

Our Self-Assessment against Complaints Handling Code May 2025



Section 1: Definition of a complaint				
Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
1.2	A complaint must be defined as: 'an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the landlord, its own staff, or those acting on its behalf, affecting a resident or group of residents.'	Yes	Section 1 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' replaced with 'organisation' and 'individuals' as Waythrough delivers services other than 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 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. on behalf of a service user, a representative of another organisation or a member of the public. Section 4.4.3 states: Complaints from third parties acting on behalf of complainants will be accepted with the consent of the complainant, or where the service user cannot complain unaided and cannot give consent because they lack capacity within the meaning of the Mental Capacity Act 2005.	

Section 1: Definition of a complaint				
Code provision	Code requirement	Comply: 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 and 4.4.1 explain the difference. It also confirms that all are recorded internally to allow monitoring for trends and issues that require further action.	Waythrough refers to 'service requests' as 'concerns' however service requests for housing complaints is 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 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 states: Information about how to provide feedback and make complaints will be promoted to people who use our services, and other stakeholders via service user handbooks/welcome packs, posters/leaflets in reception areas, service newsletters, social media, surveys.	

Section 2: Exclusions				
Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
2.1	Landlords must accept a complaint unless there is a valid reason not to do so. If landlords decide not to accept a complaint, they must be able to evidence their reasoning. Each complaint must be considered on its own merits	Yes	Section 4.4.2 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 gives examples of where complaints will not be accepted and comply with the acceptable exclusions in the Code.	

Section 2: Exclusions

Code provision	Code requirement	Comply: 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 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.	
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 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.	
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Yes	This is explained in sections 4.4.1 and 4.4.2.	

Section 3: Accessibility and Awareness				
Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
3.1	Landlords must make it easy for residents to complain by providing different channels through which they can make a complaint. Landlords must consider their duties under the Equality Act 2010 and anticipate the needs and reasonable adjustments of residents who may need to access the complaints process.	Yes	Section 4.2 gives examples of how feedback can be provided including through another person such as a family member, friend, advocate, solicitor or other professional they are working with. Section 4.4.3 explains what support and assistance can be made available including reasonable adjustments. Our Hub recording system has a free-format text field to capture the reasonable adjustments needed.	
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	Section 3 details roles and responsibilities of staff around identifying feedback and recording or passing this on appropriately. Managers ensure complaints handling is promoted within services, staff training is completed and learning from feedback is circulated and embedded.	All staff are aware of the process.
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 4.1.1 and Section 4.9.	Volume of complaints are monitored and trends analysed and shared within governance meetings.

Section 3: Accessibility and Awareness				
Code provision	Code requirement	Comply: 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 states that the policy is published on Waythrough's website and can be made available in other formats. An overview of the process is also available on the website. Section 4.5 details what will happen and timescales of each stage.	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 this to improve 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 explains how the policy will be promoted including via service user handbooks/welcome packs, posters/leaflets in reception areas, service newsletters, social media, surveys. It also states that complainants will be informed about relevant Ombudsman schemes that are available to them. Section 4.1.3 references compliance with the Housing Ombudsman's Complaint Handling Code 2024.	Contact details for the Housing Ombudsman are also 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 4.4.3 details the arrangements for support and assistance to complain including being represented or accompanied by a suitable person at any meeting.	

Section 3: Accessibility and Awareness				
Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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 4.4.3 explains that information will be provided about how to raise concerns outside the organisation for example to the Ombudsman.	Contact details for the Housing Ombudsman are also included in template letters for correspondence relating to complaints. Right to make a complaint is included in occupancy agreements and resident welcome packs.

Section 4: Complaint Handling Staff				
Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
4.1	Landlords must have a person or team assigned to take responsibility for complaint handling, including liaison with the Ombudsman and ensuring complaints are reported to the governing body (or equivalent). This Code will refer to that person or team as the 'complaints officer.' This role may be in addition to other duties.	Yes	Section 1 provides the definition of a Complaint Handler and sections 3 and 4.5.1.3 explain their responsibilities to investigate the complaint, communicate with the Complainant, and take action to resolve the issues identified (where applicable). Section 3 explains the responsibilities of the Quality and Performance Team for complaints reports within governance meeting, undertaking service inspections and liaising with the Housing Ombudsman to ensure compliance with the Code.	
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	Sections 3 and 4.5.1.3 explain that the Complaint Handler will have access to staff at all levels to facilitate the quick resolution of complaints. Complaints are only allocated to managers who have completed Waythrough's e-learning and has sufficient authority to put any issues right.	

Section 4: Complaint Handling Staff				
Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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 4.5.1.3 explains training requirements. Section 4.1 of the internal Complaints Guidance explains how Complaint Handlers are allocated, complaints prioritised with protected time and delays are avoided. Planned annual leave is considered and the complaint could be reassigned if the Complaint Handler is unexpectedly away from work.	

Section 5: The Complaint Handling Process				
Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
5.1	Landlords must have a single policy in place for dealing with complaints covered by this Code. Residents must not be treated differently if they complain.	Yes	Section 2 Scope states: The policy relates to all activities of Waythrough unless agreed partnership or contractual arrangements specify an alternative procedure. Section 4.1.1 states: Waythrough view complaints positively, as an opportunity to put things right if they go wrong and improve our services. 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.	

Section 5: The Complaint Handling Process				
Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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 4.5 explains there are two stages within Waythrough's process.	Service requests are monitored to ensure that they are not used to prevent issues progressing to complaints.
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 4.5 explains there are two stages within Waythrough's process.	
5.4	Where a landlord's complaint response is handled by a third party (e.g. a contractor or independent adjudicator) at any stage, it must form part of the two stage complaints process set out in this Code. Residents must not be expected to go through two complaints processes.	Yes	Section 4.1.3 explains the arrangements around partnership, sub-contracting and commissioners and that a local written procedure will be put in place to Ensure that individuals are not required to go through two complaints processes.	Complaint Handlers for housing complaints would seek input from the third party and this will be included in the investigation as part of our two stage complaints process.
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Yes	As above the appropriate process will be followed in such cases.	
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	Sections 4.5.1.4 explains the approach taken to establish the complaint definition, in line with the Code.	

Section 5: The Complaint Handling Process				
Code provision	Code requirement	Comply: 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 explains the approach taken for complaints involving multiple organisations and clarifying with the complainant, which of the key points Waythrough is responsible for investigating. Support can be provided to raise other concerns with the relevant organisation.	
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	Section 4.5.1.3 sets out the approach taken around these areas by complaint handlers.	
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 includes arrangements of how and when we will keep the complainant updated.	The Hub recording system has a text box to capture any agree extension and contact arrangements.
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 4.4.3 details the arrangements around support and assistance to complain. It states We will record reasonable adjustments on the complaint record and keep these under review to ensure they continue to meet the person's needs.	The Hub recording system has a text box to capture any agree extension and contact arrangements.

Section 5: The Complaint Handling Process				
Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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 4.1.2 states: Complaints will not be refused unless there are valid reasons for doing so. Each complaint will be considered on its merits and reasons for not accepting these will be clearly communicated and documented. Section 4.6 relating specifically to Stage 2 Appeals states: We will always accept an appeal request, unless there is a valid reason not to do so which will be communicated to the complainant and recorded on the complaint record on the relevant recording system.	
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 1 explains the management information systems used for recording complaints and other feedback. This is referenced throughout the policy and is used for all records and correspondence as well as the outcomes of each point of a complaint. A quality assurance approach is taken of these records by members of the Quality and Performance Team who are automatically added to a complaint when one is recorded for oversight and support.	
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 states: 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. This can be arranged at any stage of the process and not when the complaint has been closed.	

Section 5: The Complaint Handling Process				
Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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': 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. They will be recorded on theHub and kept under review. A question on theHub states: Is there a need to set any limits or restrictions to manage unacceptable behaviour from the Complainant and/or their representatives? This may include requiring that all contact about the complaint take place with a named person, restricting telephone calls to specified days and times. Any limits or restrictions need to be proportionate, trauma informed and with regard to neurodiversity and Equality Act.	
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	As above.	

Section 6: Complaints Stages

Stage 1

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
6.1	Landlords must have processes in place to consider which complaints can be responded to as early as possible, and which require further investigation. Landlords must consider factors such as the complexity of the complaint and whether the resident is vulnerable or at risk. Most stage 1 complaints can be resolved promptly, and an explanation, apology or resolution provided to the resident.	Yes	Section 4.5.1.2 states: 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 <u>within five working days of the complaint being received</u> .	Yes	Section 4.5.1.1 states: 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 Performance Report
6.3	Landlords must issue a full response to stage 1 complaints <u>within 10 working days</u> of the complaint being acknowledged.	Yes	Section 4.5.1.2 states: We aim to resolve complaints within the following timescales: Complaints received from Waythrough residents – 10 working days.	The timescales within the Code have been used for our analysis within the Annual Complaints Performance Report
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 and an extension to the policy timescale may need to be agreed. Any extension should not exceed 10 working days and should not delay actions to put things right.	

Section 6: Complaints Stages

Stage 1

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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 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 7.0 states: 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. This can be arranged at any stage of the process and does not need to wait until the complaint has been closed. It goes on to state: Any further actions that need to be completed after the person has been informed of the outcome will continue to be tracked, actioned promptly and updates provided to the person.	
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 4.5.1.8 details the approach taken by Complaint Handlers when communicating their findings and decisions.	Template letters are used in line with the Code's requirements.

Section 6: Complaints Stages

Stage 1

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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	Section 4.5.1.4 describes the process taken where additional complaints are raised dependant on whether the outcome of the investigation has been issued or potential delays caused by any further investigation required.	
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 details the approach taken by Complaint Handlers when communicating their findings and decisions in line with the Code.	Template letters are used in line with the Code's requirements.

Section 6: Complaints Stages

Stage 2

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
6.10	If all or part of the complaint is not resolved to the resident's satisfaction at stage 1, it must be progressed to stage 2 of the landlord's procedure. Stage 2 is the landlord's final response.	Yes	Section 4.6 states: If the complainant is unhappy with all or part of the response to their complaint, we will progress their complaint to the Appeal Stage. Complaints can only be appealed once; this is the final stage of our Complaint Process before the complaint is closed.	
6.11	Requests for stage 2 must be acknowledged, defined and logged at stage 2 of the complaints procedure within five working days of the escalation request being received.	Yes	Section 4.6.1 states: All appeal requests 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 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.	Yes	Section 4.6 states: The person does not need to give a reason for appealing the outcome, but Appeal Handlers are expected to make reasonable efforts to understand why the person remains unhappy with the initial outcome.	
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 states: 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.	
6.14	Landlords must issue a final response to the stage 2 <u>within 20 working days</u> of the complaint being acknowledged.	Yes	Section 4.6.1 states: The appeals process, 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.

Section 6: Complaints Stages

Stage 2

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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 states 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.	The timescales within the Code have been used for our analysis within the Annual Complaints Performance Report.
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 4.6.1 states contact details are to 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 around redress states: 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. This can be arranged at any stage of the process and not when the complaint has been closed.	
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 4.6.3 details this approach and template letters are used to populate this information.	

Section 6: Complaints Stages

Stage 2

Code provision	Code requirement	Comply: 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 made; e) the details of any remedy offered to put things right; f) details of any outstanding actions; and g) details of how to escalate the matter to the Ombudsman Service if the individual remains dissatisfied.	Yes	Section 4.6.3 details this approach and template letters are used to populate this information.	
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 confirms this to be the case.	

Section 7: Putting things right

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
7.1	Where something has gone wrong a landlord must acknowledge this and set out the actions it has already taken, or intends to take, to put things right. These can include: • Apologising; • Acknowledging where things have gone wrong; • Providing an explanation, assistance or reasons; • Taking action if there has been delay; • Reconsidering or changing a decision; • Amending a record or adding a correction or addendum; • Providing a financial remedy; • Changing policies, procedures or practices.	Yes	Sections 4.7 and 47.1 details this approach and this structure is set out in template letters.	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	Sections 4.7 and 4.7.1 details this approach.	
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	Sections 47 and 47.1 details this approach and this is set out within the template letters.	

Section 7: Putting things right				
Code provision	Code requirement	Comply: 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 47.1 states that we will have regard to our Compensation Policy. This Policy uses Housing Ombudsman's structure and has guidance attached which refers to the Remedies Guidance. Section 8.2 of the Complaints Guidance sets out 'What Makes a Good Apology' and refers to the Ombudsman's Apologies Guidance.	

Section 8: Self-assessment, reporting and compliance				
Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
8.1	Landlords must produce an annual complaints performance and service improvement report for scrutiny and challenge, which must include: a) the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements. b) a qualitative and quantitative analysis of the landlord's complaint handling performance. This must also include a summary of the types of complaints the landlord has refused to accept; c) any finding 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; and	Yes	Section 4.9.3 states: Waythrough's Quality and Performance Team will produce an annual report and self-assessment against the Housing Ombudsman's Code. 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 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 requirement	Comply: Yes / No	Evidence	Commentary / explanation
	f) any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord.			
8.2	The annual complaints performance and service improvement report must be reported to the landlord's governing body (or equivalent) and published on the on the section of its website relating to complaints. The governing body's response to the report must be published alongside this.	Yes	Section 4.9.3 states that we will produce and publish an annual Complaints Performance and Service Improvement Report. 11.1.1 of our internal Complaints Guidance confirms this will be published on the website and will include the governing body's response to the report.	The 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 11.1.1 of the internal Complaints Guidance states: The self-assessment will be reviewed following any significant restructure, merger or significant changes to procedures.	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.
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	Yes	Section 11.1.1 of the internal Complaints Guidance states: 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	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 requirement	Comply: Yes / No	Evidence	Commentary / explanation
9.1	Landlords must look beyond the circumstances of the individual complaint and consider whether service improvements can be made as a result of any learning from the complaint.	Yes	Section 4.9.3 focuses on governance, monitoring and review. All feedback is monitored and reviewed through Waythrough's Quality and Performance Committee meeting and reporting structures. The Quality and Performance Team provides quarterly reports on the number and type of complaints, outcomes, and trends and prepare 'Learning Loops' to promote identified learning from complaints and changes to practice that are needed. The Quality Assurance Oversight Meeting reviews quarterly complaints reports which include a summary of complaint volumes and key learning points. These insights inform decisions about actions to be communicated across services and the wider organisation. The findings are then shared with both the Integrated Governance Group and the Quality and Performance Committee.	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: The Quality and Performance Team provides quarterly reports on the number and type of complaints, outcomes, and trends and prepare 'Learning Loops' to promote identified learning from complaints and changes to practice that are needed.	

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Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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 9.3 states: Waythrough will provide service commissioners and regulatory bodies with appropriate information in relation to complaints received, in line with the requirements of that body. An overview of complaints and outcomes is also provided within annual reports for residents. Learning Loops are circulated to staff and discussed in team meetings.	
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 sets out the responsibilities including those of Quality, Performance and Compliance for providing reports.	Senior member of the Quality and Performance 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 confirms the role and responsibilities of the MRC.	
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 explains that the 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.	

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Code provision	Code requirement	Comply: 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 covers Governance, Monitoring and Review. Quarterly reports to governance meetings and reporting structures provide a summary of complaints which include any learning and improvements.	If there were any Ombudsman investigations these would be included in the quarterly report.
9.8	Landlords must have a standard objective in relation to complaint handling for all relevant employees or third parties that reflects the need to: a) have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments; b) take collective responsibility for any shortfalls identified through complaints, rather than blaming others; and c) act within the professional standards for engaging with complaints as set by any relevant professional body.	Yes	Section 4.1.1 Our positive approach to complaints and other feedback confirm these expectations of all staff, volunteers and others acting on the organisation's behalf.	