#### **Appendix A: Self-assessment form – 2024/25**

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

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

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

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

### **Section 1: Definition of a complaint**

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
1.2	A complaint must be defined as:  'an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the landlord, its own staff, or those acting on its behalf, affecting a resident or group of residents.'	Yes	1.2.1 Complaints Policy – Page 4, section 3.1	We have adopted this definition of a complaint in our complaints policy which is displayed on our website.
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	1.3.1 – Complaints Policy – Page 5 – Section 5.1 1.3.2 – Page 3 – Sections 2.1 to 2.3	We have highlighted our approach to complaints in our complaints policy which is displayed on our website.  We process complaints received by third parties and this is clearly outlined in our complaints policy  We conduct complaints training to all our operational teams to ensure all staff have a clear understanding of our complaints processes

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	1.4.1 – Complaints Policy – Page 4 – Section 3.4	The difference between a service request and complaint is outlined in our complaints policy. This is also made clear in annual complaints training for all members of staff and STAR's Complaints Standards Framework
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	1.5.1 – Complaints Policy – Page 5 – Section 5.4	This is clearly outlined in our complaints policy.  We conduct complaints training to all our operational teams to ensure all staff have a clear understanding of our complaints processes.
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.	No	1.6.1 – Complaints – Page 5 – Section 5.5	We have implemented this into our complaints policy clearly outlining this.  Posters are placed in all communal areas; details of how to complain have been added to rent uplift letters; there is complaints form available on-line and used by members of staff to report complaints on

customers' behalf. However further work is required to signpost survey
respondents more effectively and this has been added to our Service Improvement Plan.

#### **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	2.1.1 – Complaints Policy – Pages 4 & 5 –Sections 4.1 to 4.2  2.1.2 – Examples of Exclusion Letters	The valid reasons are highlighted in the customer policy, and we have stated that all complaints will be considered on their own merit and provided information on how this will be assessed.
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	Yes	2.2.1 – Complaints Policy – Section 4.1	The valid reasons are highlighted in the customer policy.

	<ul> <li>and Particulars of Claim, having been filed at court.</li> <li>Matters that have previously been considered under the complaints policy.</li> </ul>			
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	2.3.1 – Complaints Policy – Page 4 – Section 4.1	Within our complaints policy we have stated this as a valid reason not to accept a complaint, however, we have also stated that all complaints will be considered on their own merit and provided information on how this will be assessed.
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	2.4.4 Exclusion letter examples	We provide detailed explanations when a complaint is not accepted and offer the right to escalate to the Ombudsman
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Yes	2.5.1 - Complaints Policy – Pages 4 & 5 –Sections 4.1 to 4.2	Within our complaints policy we have stated that all complaints will be considered on their own merit and provide

		information on how this will
		be assessed.

## **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	3.1.1 – Complaints Policy – Pages 6 & 11 – Sections 5.6 & 11.3  3.1.2 - https://www.starhousing.org.uk/have-your-say/make-a-complaint/	Within our complaints policy we provide numerous ways in which tenants can make a complaint. We also state how we aim to ensure our policies are in line with the Equality Act 2010.  We also have a section on our website which is accessible to tenants and informs them on how they can make a complaint and signposts to our complaints policy and the Housing Ombudsman service.  Posters are placed in all communal areas; details of how to complain have been added to rent uplift letters and there is a complaints form available on-line and used by members of staff to report complaints on customers' behalf.
3.2	Residents must be able to raise their complaints in any way and with any	Yes	3.2.1 – Complaints Policy – Page 6 – Section 5.6	Within our complaints policy we provide

	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.		3.2.2 - https://www.starhousing.org.uk/have-your-say/make-a-complaint/	numerous ways in which tenants can make a complaint.  We also have a section on our website which is accessible to tenants and informs them on how they can make a complaint and signposts to our complaints policy and the Housing Ombudsman service.  All members of staff undertake annual complaints training identifying where and how they can make a complaint on a customers' behalf. Ther is also a designated form available to staff via the website and handheld devices.
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	3.3.1 – Complaints Policy 3.3.2 - https://www.starhousing.org.uk/have- your-say/make-a-complaint/ 3.3.3 – Posters/Leaflets	Our complaints policy is available via our website and both the website and policy advise on how tenants can complain.  All members of staff undertake annual complaints training identifying where and how they can make a complaint on a customers' behalf.

	Ther is also a designated form available to staff via the website and handheld devices.
	Posters are placed in all communal areas; details of how to complain have been added to rent uplift letters and there is a complaints form available on-line and used by members of staff to report complaints on customers' behalf.

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	3.4.1 – Complaints Policy – Pages 7 to 9 – Section 7.  3.4.2 - https://www.starhousing.org.uk/have-your-say/make-a-complaint/	Our complaints policy is accessible via our website and this can also be posted or emailed to tenants if requested.  The policy clearly identifies a two stage process and details what this includes.
3.5	The policy must explain how the landlord will publicise details of the complaints policy, including	Yes	Para 12.1 Complaint Handling Policy	The policy states that "The complaints policy and details of the Housing Ombudsman Services will be published on Shropshire Town and Rural's website. We will publish regular reminders about how to make a complaint, where to find the complaints policy and relevant Housing Ombudsman scheme information in our newsletters for customers."

	information about the Ombudsman and this Code.		3.5.2 – Posters/Leaflets	
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	3.6.1 – Complaints Policy – Page 4, section 2.2	Our complaints policy states that a tenant can give a representative permission to act on their behalf.
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	3.7.1 – Complaints Policy – Page 9, Section 7.2  3.7.2 - Make a Complaint (starhousing.org.uk)  3.7.3 – Example of a complaint acknowledgement  3.7.4 – Example of a Stage 2 Response (see evidence 6.10.1 -the HOS address has been updated for all current responses due)	Our complaints policy and website clearly identify how tenants can access the Ombudsman service.  We also include the Ombudsman details on all acknowledgments and Stage 1 & 2 responses.  Details on how to contact the Housing Ombudsman are also on posters in communal areas.

# **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	4.1.1 – Complaints Policy – Page 4, Section 3.4 4.1.2 – Contact details updated with HOS	There is a Complaints & disrepair Manager in place who effectively manages the complaints process and liaises with the Ombudsman.
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	4.2.1 – STAR Board Minutes 4.2.2 – SMT Minutes 4.2.3 – AAB Minutes 4.2.4 – Letter example wrote by Assistant Director	The complaints manager has full access to all staff levels to facilitate resolution across the organisation. All responses are investigated and responded to by the relevant manager and stage 2 responses by Senior Managers/Directors.  All complaints data is reported into various boards to ensure open and transparent discussions take place.
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	PYes	N/A	All except 8 members of staff have received complaint handling training.  All members of staff must now undertake annual complaints training to

ensure all staff have a cle understanding
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and how we implement lessons learnt.
lessons learnt.
The Complaints & Disrepair
Managers meets monthly
with Senior Managers to
review root cause analysis
of complaints and identify
and agree learnings.
The Complaints & Disrepai
Manager meets with
Service Managers monthly
to agree Service
Improvements and include
them on individual
departmental plans for
future development and
learning from complaints.

## **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	5.1.1 – Complaints Policy	We have one single complaints policy which is accessible to all customers and is in line with the Equality Act 2010
5.2	The early and local resolution of issues between landlords and residents is key to effective complaint handling. It is not	Yes	5.2.1 – Complaints Policy – Pages 7 & 8 – Section 7	Our complaints policy clearly defines a Stage one and Stage two process to resolving all complaints.

	appropriate to have extra named stages (such as 'stage 0' or 'informal complaint') as this causes unnecessary confusion.			All members of staff undertake annual complaints training to ensure all staff have a clear understanding of this.
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	5.2.1 – Complaints Policy – Pages 7 & 8 – Section 7	Our complaints policy clearly defines a Stage one and Stage two process to resolving all complaints.  All members of staff undertake annual complaints training to ensure all staff have a clear understanding of this.
5.4	Where a landlord's complaint response is handled by a third party	Yes	5.4.1 – Complaints Policy – Pages 6 & 7 – Sections 6 & 7	Our complaints policy clearly defines a Stage one and Stage two

	(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.			process to resolving all complaints.  All members of staff undertake annual complaints training to ensure all staff have a clear understanding of this.
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Yes	5.5.1 – Complaints Policy – Page 5, Section 4.1  5.5.2 - <a href="https://www.shropshire.gov.uk/feedback/complaints-comments-and-compliments/">https://www.shropshire.gov.uk/feedback/complaints-comments-and-compliments/</a>	Our complaints process clearly states that all complaints are dealt with internally, however where a complaint is raised in relation to an area we are not responsible for Shropshire Council will respond and we will ensure we monitor this in line with policy and procedure.
5.6	When a complaint is logged at Stage 1 or escalated to Stage 2,	Yes	5.6.1 – Complaints Form 5.6.2 – Acknowledgment	Our complaints form prompts that we ask for a preferred solution

	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.		5.6.3 – Formal Response	to complaints which is recorded and used as part of the formal response.  Our acknowledgments and formal responses also highlight the understanding of the complaint and the tenants desired outcome.
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	5.7.1 – Complaints Policy – Page 4 & 5, section 4.1 5.7.2 – Exclusion letter templates	Our complaints policy sets out clearly which elements of complaints will not be addressed as part of a formal complaint.
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	Yes	<ul> <li>5.8.1 – Investigation Report</li> <li>5.8.2 – Email highlighting meeting with tenant to discuss complaint</li> <li>5.8.3 – Formal Response</li> </ul>	Investigating managers will use an investigation report to capture all information and findings in relation to complaints.  The investigating manager and/or our Complaints & Disrepair Manager communicate with tenants in relation

	perceived conflict of interest; and d. consider all relevant information and evidence carefully.			to their complaint to ensure we have a clear understanding of their concerns. All information is considered and a formal response is issued.
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	N/A	Yes extensions are agreed with customers when they are needed.  This is identified within stage 1 and stage 2 responses and subsequent actions from complaints are recorded on our Complaints Action Log and reminder are regularly sent to service managers to review and complete.

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	5.10.1 – Example of Vulnerability indicator	Tenant disabilities are recorded on our systems to ensure we are aware of any reasonable adjustments required.  Where a tenant requests reasonable adjustments or makes us aware of a disability during the complaint process these will be taken into consideration.
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	5.11.1 – Complaints Policy – Pages 4 & 5, Section 4.1	Our complaints policy clearly defines the only reasons we would refuse to escalate a complaint through all stages

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	5.12.1 – Complaints file for complaints 5.12.2 – Complaint action tracker	We currently have a complaints file for each complaint which encompasses the original complaint and all acknowledgments, outcomes and the investigation report.  All follow on actions are logged and monitored.
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	5.13.1 – Complaints information - https://www.starhousing.org.uk/have-your- say/make-a-complaint/  5.12.2 – Acknowledgment  5.12.3 – Formal Outcome	Our policy and website clearly provide accessible information for all tenants to contact our complaints team at any time. Contact details and processes are also provided within our acknowledgement and formal responses.

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.	Partially	5.14.1 – Unreasonable Persistent Complainants Policy	We are in the process of updating our Complaint Handling Policy which includes a section for managing unacceptable behaviour.
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	5.15.1 – Unreasonable Persistent Complainants Policy (See evidence 5.14.1)	We are in the process of updating our Complaint Handling Policy which includes a section for managing unacceptable behaviour. This will demonstrate provisions of the Equality Act 2010.

### **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	6.1.1 – Investigation Report 6.1.2 – Formal Response	All investigating managers have undertaken in-house complaints training and specialist training from HQN which highlights the need to identify those customers who may be vulnerable or at risk.  Senior Managers and the Complaints & disrepair Manager review all complaint responses to ensure they are resolved promptly where possible and any vulnerabilities are taken into consideration.
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	6.2.1 – Complaints Tracker 6.2.2 – Complaint acknowledgment	Complaints are logged and recorded which calculates response times in acknowledging complaints within timescales/five working days.
				This is outlined in our complaints policy.

6.3	Landlords must issue a full response to stage 1 complaints within 10 working days of the complaint being acknowledged.	Partially	6.3.1 – Complaints Tracker 6.3.2 – Formal Response (see evidence 6.1.2)	Complaints are logged and recorded which calculates response times in responding to stage 1 complaints within timescales/ten working days.
				This is reported monthly to Senior Managers and in KPIs. This is outlined in our complaints policy. We aim to respond to all complaints within 10 working days and where this is not possible, we communicate and agree extensions with tenants.

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	6.4.1 – Complaints Tracker	All extensions are recorded on our complaints tracker and we aim for no longer than 10 working days.
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	N/A	Residents are provided contact details of the Ombudsman when notified of any extension.
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	6.6.1 – Formal Response (see evidence 5.8.3) 6.6.2 – Action Tracker	We aim to send all formal responses within 10 working days and where actions are required these are highlighted within the letter.  The complaint will then be closed unless escalated and all actions are logged and tracked to completion.
6.7	Landlords must address all points raised in the complaint definition and provide clear reasons for any	Yes	6.7.1 – Formal Response (see evidence 6.1.2) 6.7.2 – Investigation Report	A member of our Senior Management Team and our Complaints & Disrepair Manager separately review each complaint response to ensure all points raised are responded to with clear reasons for any decisions are included.

	decisions, referencing the relevant policy, law and good practice where appropriate.		(see evidence 6.1.1)	Where a tenant adds additional concerns these will also be logged and addressed whilst the complaint is open.
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	6.8.1 – Complaints policy – Page 7, Section 7	Within our complaints policy we clearly set this out to ensure all parties are aware of how additional issues will be responded to.
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;	Yes	6.9.1 – Formal Response (see evidence 6.1.2)	Our formal responses clearly highlight the stage of the complaint, our understanding of the complaint, the decision of the complaint, our reasoning, any follow up actions which are then logged and tracked, the remedies, how to escalate

f. details of any outstanding	to stage 2 with contact
actions; and	details and also the HOS
g. details of how to escalate the	contact details.
matter to stage 2 if the individual is	
not satisfied with the response.	

### Stage 2

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
6.10	If all or part of the complaint is not resolved to the resident's satisfaction at stage 1, it must be progressed to stage 2 of the landlord's procedure. Stage 2 is the landlord's final response.	Yes	6.10.1 – Stage 1 Formal Response 6.10.1 – Complaints Policy – Page 9, Sections 7.2	Our complaints policy defines our process at Stage 2 and clearly states that Stage 1 complaints can be progressed to Stage 2 at the customers discretion.
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	6.11.1 – Complaints Tracker 6.11.2 – Acknowledgment of Stage 2 Escalation	All escalations to stage 2 are logged on our complaints tracker and acknowledgments are sent within five working days
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	6.12.1 – Stage 2 response example (see evidence 6.10.1)	We provide a clear process to escalating a complaint and we accept that no reason need be given.
6.13	The person considering the complaint at stage 2 must not be the same	Yes	6.13.1 – Stage 2 Formal response (see evidence 6.10.1)	Stage 1 and Stage 2 complaints are not
	person that considered the complaint at stage 1.		6.13.2 – Stage 1 Formal Response	responded to or investigated by the same person. Stage 2 will be responded to by an appropriate member of the Senior Management Team.

6.14	Landlords must issue a final response to the stage 2 within 20 working days of the complaint being acknowledged.	Yes	6.14.1 – Complaints Tracker	We aim to respond to all stage 2 complaints within 20 working days. We track all complaints on our complaints tracker to monitor timescales and report on this monthly as a KPI.
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	6.15.1 – Complaints Tracker	All extensions are recorded on our complaints tracker and are no longer than 20 working days. These are reported monthly as a KPI.
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	6.16.1 – Extension template example	HOS details are provided within the extension email/letter
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	Yes	6.17.1 – Formal Response (see evidence 6.10.1) 6.17.2 – Action Tracker	We aim to send all Stage 2 formal responses within 20 working days and where actions are required these are highlighted within the letter. These are recorded on an Action Tracker until completed.
	tracked and actioned promptly with appropriate updates provided to the resident.			

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	6.18.1 – 2 <sup>nd</sup> Stage Response (see evidence 6.10.1) 6.18.2 – Investigation Report (see evidence 6.1.1)	Our complaints team will review the original complaint and ensure that this is broken down with our investigation report to ensure each point is outlined in the formal response.  Where a tenant adds additional concerns these will also be logged and addressed whilst the complaint is open.
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	Yes	6.19.1 – 2 <sup>nd</sup> Stage Response (see evidence 6.10.1)	Our formal responses clearly highlight the stage of the complaint, our understanding of the complaint, the decision of the complaint, our reasoning, any follow up actions which are then logged and tracked, the remedies, how to escalate to stage 2 with contact details and also the HOS contact details.
	g. details of 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	6.20.1 – Complaints Policy – Pages 9 & 10, Section 7	Our policy clearly defines that stage two responses will be responded by a member of the Senior Management Team.

## **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:	Yes	7.1.1 – Formal Response Example (see evidence 6.1.2) 7.1.2 – Compensation Policy	Within our responses where applicable we will acknowledge issues, apologise, take the relevant actions and provide the appropriate redress.  The Complaints & Disrepair Managers meets monthly with Senior Managers to review root cause analysis of complaints and identify and agree learnings. The Complaints & Disrepair Manager meets with Service Managers monthly to agree Service Improvements and include them on individual departmental plans for future development and learning from complaints.
	<ul> <li>Amending a record or adding a correction or addendum;</li> <li>Providing a financial remedy;</li> <li>Changing policies, procedures or practices.</li> </ul>			
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Yes	7.2.1 – Formal Response example – Redress  7.2.2 – Compensation Policy	Appropriate remedies are set out within our formal responses and we use our compensation policy for guidance.

				All members of staff investigating complaints have undertaken specialist complaints training to identify impacts on residents.
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	7.2.1 – Formal Response example – Redress 7.2.2 – Compensation Policy 7.2.3 – Action Tracker	Appropriate remedies are set out within our formal responses and we use our compensation policy for guidance. Any actions in relation to remedies are logged and tracked via our action tracker.
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes	7.2.2 – Compensation Policy	Our compensation policy clearly states that we consider the HOS guidance when considering appropriate compensation. All members of staff investigating complaints have undertaken specialist complaints training to identify impacts on residents.

## 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	Yes	8.1.1 – Annual Complaints Performance Report	This will be scrutinised at STAR Board, Customer Satisfaction Committee,

	improvement report for scrutiny and challenge, which must include: a. the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements. b. a qualitative and quantitative analysis of the landlord's complaint handling performance. This must also include a summary of the types of complaints the landlord has refused to accept; c. any findings of non-compliance with this Code by the Ombudsman; d. the service improvements made as a result of the learning from complaints; e. any annual report about the landlord's performance from the Ombudsman; and f. any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord.			Asset Assurance Board and by MRC for both STAR housing and Shropshire Council
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	Yes	8.1.1 – Annual Complaints Performance Report	This will be scrutinised at STAR Board, Customer Satisfaction Committee, Asset Assurance Board and by MRC for both STAR housing and Shropshire Council
	response to the report must be published alongside this.			

8.3	Landlords must also carry out a self- assessment following a significant restructure, merger and/or change in procedures.	Yes	N/A	This has been noted and if this occurs a self-assessment will be completed
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	Yes	N/A	This has been noted and we will comply if this is requested.
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	N/A	This has been noted and if this occurs, we will comply with the instructions.

# 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		The Complaints & Disrepair Managers meets monthly with Senior Managers to review root cause analysis of complaints and identify and agree learnings. The Complaints & Disrepair Manager meets with Service Managers monthly to agree Service Improvements and include them on individual departmental plans for future development and learning from complaints.
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.	Partially	9.2.1 – Complaints Policy Complaints Standards Framework	We have a complaints policy in place which provides guidance on complaint handling and a centralised complaints team who manages complaints effectively.  All members of staff investigating complaints have undertaken specialist complaints training to identify impacts on residents.  We have also introduced a Complaints Standards Framework which clearly sets out the expectations we have of how complaints

				should be viewed.
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	No	Complaints Standards Framework CSS Voice of the Customer reporting	Complaints levels and learnings are shared with the Customer Services Subcommittee and Board in line with the Complaints Standards Framework. As is the annual self assessment, improvement plan and annual report.
	stakeholders, such as residents' panels, staff and relevant committees.			before the end of September 2025
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	9.4.1 – Operations Director	The Operations Director is responsible for the complaints team and is accountable for complaint handling.

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	9.5.1 –Portfolio Holder - Housing and Assets 9.5.2 –Member of STAR board	Two MRC's have been appointed one from the perspective of STAR Housing (ALMO) and one from Shropshire Council – Landlord.  Both have been briefed on expectations and have received a copy of relevant reports.
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	9.6.1 – STAR Board Meetings 9.6.2 – Asset Assurance Board 9.6.3 – 1:1 Meetings	Complaints are discussed with MRCs in 1:1 meetings following customer services committee, at STAR board meetings and at Asset Assurance Board ensuring the MRCs receive regular information.
9.7	As a minimum, the MRC and the governing body (or equivalent) must receive:	Yes	9.7.1 – STAR board report  9.7.2 – AAB report	Complaints are discussed with MRC's in 1:1 meetings following customer services

	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.			committee, at STAR board meetings and at Asset Assurance Board ensuring the MRC's receive regular information.
9.8	Landlords must have a standard objective in relation to complaint handling for all relevant employees or third parties that reflects the need to:  a. have a collaborative and cooperative approach towards resolving complaints, working with colleagues across teams and departments;  b. take collective responsibility for any shortfalls identified through complaints, rather than blaming others; and  c. act within the professional standards for engaging with complaints as set by any relevant professional body.	Yes	9.8.1 – Complaints policy	We have a complaints policy in place which provides guidance on complaint handling and a centralised complaints team who manages complaints effectively.  All members of staff investigating complaints have undertaken specialist complaints training to identify impacts on residents.