

#### **Background**

We welcome all feedback from residents and other service users, as it provides us with an opportunity to continually improve what we do and how we do it. Comments, compliments and complaints received are managed through our Complaints, Comments or Compliments Policy.

This policy and process was reviewed and updated in 2023 to reflect the Housing Ombudsman's Complaint Handling Code. As per the 'Code' the policy reflects a two stage complaints process, ensuring all complaints are investigated thoroughly and, if required, the findings reviewed. After this point, should a complainant remain dissatisfied with the outcome, the policy supports people to escalate their complaint further to the independent Housing Ombudsman.

Last summer, the Government's new Social Housing (Regulation) Act came into force, designed to deliver the aims of the 2021 Social Housing White Paper around strengthening consumer standards, improve resident involvement and tackling poor performing landlords.

The Act further strengthen the powers of the Regulator for Social Housing and the Housing Ombudsman; to provide more support to residents and ensure housing providers were managing feedback effectively.

This report provides a summary of the number and types of complaints received in the financial year 2024/25, as well as an overview of the service improvement made as a result. It also provides the latest version of the recent self-assessment against the Code which was presented to the Board.

#### **Oversight of Complaints**

All complaints, comments and compliments received are administered by our Finance Officer. This ensures a strong level of administrative oversight and control, helping us to ensure case are logged correctly, targets are met and deliver a high-quality service. The Housing Services Manager or Finance Manager respond to stage one complaints, while the Chief Executive investigates stage two complaints. Should a complaint be made against the Chief Executive then a designated board member will investigate and respond.

Complaints information is shared and reviewed at the quarterly board meetings, providing a comprehensive picture of what feedback is coming into the organisation. Performance against the complaints is also reported.



#### Summary of complaints received in 2024/2025

Complaint type	Stage one	Stage two	Ombudsman	Complaint Upheld
Housing Management	4	3	0	1
Repairs & Maintenance	6	1	1	3
Damp and Mould	1	1	1	1
Anti-Social Behaviour	0	0	0	0

#### **Analysis of Complaints**

In 2024/25, 100% of the complaints we received were responded to within the target timescale of 10 working days for a stage one response and 20 working days for a stage two response. This represents the same level as last year.

45% of the complaints investigated found the complaint to be justified. This is an increase from 33% last year.

Where complaints were upheld, we have sought to learn from these experiences. As a consequence, policy/process amendments have been made to ensure that service levels improve for the future. For example, one complaint concerned unacceptable language used by a contractor. As a result of this complaint, we have spoken to all of our contractors and reminded them as to the professional standards required.

The Tenant Satisfaction Measures survey (TSM), undertaken in 2023, highlighted some concerns in the area of complaint handling. In the survey, residents were asked how satisfied they were 'with the landlord's approach to handling complaints. Only 33% of respondents said that they were either satisfied or very satisfied. I'm pleased to report that during the 2025 TSM survey satisfaction in respect to handling complaints has increased to 47%.

There is likely to continue to be some confusion for residents between what is identified as a service failure and a complaint – we had more residents say that had made a complaint than listed on our records.

This result however shows that the measures we have put in place are having a positive effect on complaint handling satisfaction.

#### **Engagement with the Housing Ombudsman**



In November 2024, the Housing Ombudsman released its Annual Complaints Review. It showed that they made 21,740 interventions to put things right for residents, ranging from doing repairs to paying compensation and improving practices – a 329% increase on the previous year.

It has also published 271 landlord performance reports and written to 126 landlords where failings were found in 75% or more of its decisions – compared to just 25 landlords last year. Tables of those landlords are published in 5 size groups, ranging from landlords with fewer than 100 homes to more than 50,000.

#### Other key findings include: -

- 73% of decisions resulted in maladministration because the landlord did not follow its legal requirements, policy or process
- 4 percentage point rise in severe maladministration to 856 findings, or 7% of all decisions, with the no fault rate falling from 25% to 15%
- 73% of property condition findings upheld, 84% for the handling of the complaint,
   68% for antisocial behaviour and 62% for health and safety, including building safety
   every complaint category has seen an increase
- the area with the highest proportion of findings upheld was London at 77% compared to the lowest of 62% in the North East and Yorkshire, with every region witnessing an increase
- 9 landlords received more than 5 failure orders for non-compliance with the Complaint Handling Code or cooperating with investigations

The Housing Ombudsman will normally investigate a complaint once it has been through our own internal two stage complaints process. In the year 2024/25, we have received 2 Housing Ombudsman investigations. The results of these investigations are yet to be known by WHA.

#### Service Improvements in 2024/2025

During 2024/25 we have developed our services in the following ways: -

- Complaints training for all staff, specifically related to the Housing Ombudsman Complaint Handling code and recommended good practice.
- Complaints have been given more prominence on our new website. The policy advises of the differences between a request for service and a complaint.
- Improved communication through our twice-yearly resident newsletter which always advises how to make a complaint and provides the Housing Ombudsman details.



- Updating contractor advice due to learning from a complaint.
- New Housing Management IT system, which allows for better logging of complaints in the first instance.

#### The future

We are hoping that the addition of a new housing management IT system will ensure more accurate recording of complaints when these are first reported to us.

We will continue staff training and focus on enhancing the skills that are important for providing an effecting complaint handling service. This includes improving our communication and listening skills and showing empathy and understanding throughout the process.

Due to the advanced capabilities of our new Housing Management IT system, we are looking to launch further transactional surveys, which may highlight areas of dissatisfaction. This may provide us with the option to divert cases through the complaints process, whereby a full investigation can be carried out.

#### Board's response

We were pleased to see further development in this area and in particular the improvement in resident satisfaction to our complaint handling.

We review WHA's complaint handling self-assessment and scrutinise/challenge complaint handling performance as part of our quarterly board meetings. We welcome hearing of service improvements that are introduced as a result of a complaint, comment or compliment.

Furthermore, as we continue to improve our infrastructure, such as our housing management system, we believe this will play an important part in developing our services in this area.

Finally, we believe that we are on track to continue improving in this area, with the aim of providing high quality services to our residents.



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	Complaints policy	
1.3	A resident does not have to use the word 'complaint' for it to be treated as such. Whenever a resident expresses dissatisfaction landlords must give them the choice to make complaint. A complaint that is submitted via a third party or representative must be handled in line with the landlord's complaints policy.	Yes	Complaints policy	
1.4	Landlords must recognise the difference between a service request and a complaint. This must be set out in their complaints policy. A service request is a request from a resident to the landlord requiring action to be taken to put something right. Service requests are not complaints, but must be recorded, monitored and reviewed regularly.	Yes	Complaints policy	



1.5	A complaint must be raised when the resident expresses dissatisfaction with the response to their service request, even if the handling of the service request remains ongoing. Landlords must not stop their efforts to address the service request if the resident complains.	Yes	Complaints policy	
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	Complaints policy and staff training	



#### **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	Complaints policy	
	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:			
2.2	<ul> <li>The issue giving rise to the complaint occurred over twelve months ago.</li> <li>Legal proceedings have started. This is defined as details of the claim, such as the Claim Form and Particulars of Claim, having been filed at court.</li> </ul>	Yes	Complaints policy	



	Matters that have previously been considered under the complaints policy.			
2.3	Landlords must accept complaints referred to them within 12 months of the issue occurring or the resident becoming aware of the issue, unless they are excluded on other grounds. Landlords must consider whether to apply discretion to accept complaints made outside this time limit where there are good reasons to do so.	Yes	Complaints policy	
2.4	If a landlord decides not to accept a complaint, an explanation must be provided to the resident setting out the reasons why the matter is not suitable for the complaints process and the right to take that decision to the Ombudsman. If the Ombudsman does not agree that the exclusion has been fairly applied, the Ombudsman may tell the landlord to take on the complaint.	Yes	Complaints policy	
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Yes	Complaints policy	



#### **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	Complaints policy and published contact methods.	Complaint section standard in tenant newsletter
3.2	Residents must be able to raise their complaints in any way and with any member of staff. All staff must be aware of the complaints process and be able to pass details of the complaint to the appropriate person within the landlord.	Yes	Complaints policy	
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	Yes	Complaints policy and complaints review	Complaint numbers increasing



	complaint volumes are potentially a sign that residents are unable to complain.		
3.4	Landlords must make their complaint policy available in a clear and accessible format for all residents. This will detail the two stage process, what will happen at each stage, and the timeframes for responding. The policy must also be published on the landlord's website.	Yes	Complaints policy available via the website at any time
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	Complaints policy
3.6	Landlords must give residents the opportunity to have a representative deal with their complaint on their behalf, and to be represented or accompanied at any meeting with the landlord.	Yes	Complaints policy
3.7	Landlords must provide residents with information on their right to access the Ombudsman service and how the individual can engage with the Ombudsman about their complaint.	Yes	Complaints policy, website and tenant newsletter



#### **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	Finance Officer is responsible for complaint handling	
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	Included in the role of the Finance Officer	
4.3	Landlords are expected to prioritise complaint handling and a culture of learning from complaints. All relevant staff	Yes	Specific complaint handling / response completed in late 2024	Training was design around the complaint handling code



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		

#### **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	Complaints policy	
5.2	The early and local resolution of issues between landlords and residents is key to effective complaint handling. It is not appropriate to have extra named stages (such as 'stage 0' or 'informal complaint') as this causes unnecessary confusion.	Yes	Complaints policy	Complaints policy is a two stage process
5.3	A process with more than two stages is not acceptable under any circumstances as this will make the complaint process unduly long and delay access to the Ombudsman.	Yes	Complaints policy	Complaints policy is a two stage 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	Complaints policy	
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Yes	Complaints policy	
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	Complaints policy and complaint responses	Template response letters
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	Complaints policy	



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	Complaints policy and training	Recent complaint training aligned to complaint handling code
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	Complaints policy	
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	Yes	Complaints policy	



	a record of any disabilities a resident has disclosed. Any agreed reasonable adjustments must be kept under active review.		
5.11	Landlords must not refuse to escalate a complaint through all stages of the complaints procedure unless it has valid reasons to do so. Landlords must clearly set out these reasons, and they must comply with the provisions set out in section 2 of this Code.	Yes	Complaints policy
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	Specific complaints folder and spreadsheet
5.13	Landlords must have processes in place to ensure a complaint can be remedied at any stage of its complaints process. Landlords must ensure appropriate remedies can be provided at any stage of the complaints process without the need for escalation.	Yes	Complaints policy



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	Behaviour policy	
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	Behaviour policy	

#### **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	Yes	Complaints policy	



	promptly, and an explanation, apology or resolution provided to the resident.			
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	Complaints policy	
6.3	Landlords must issue a full response to stage 1 complaints within 10 working days of the complaint being acknowledged.	Yes	Complaints policy / Complaints monitoring	All complaints and timescales regularly tracked and monitored. Complaint report advises of performance
6.4	Landlords must decide whether an extension to this timescale is needed when considering the complexity of the complaint and then inform the resident of the expected timescale for response. Any extension must be no more than 10 working days without good reason, and the reason(s) must be clearly explained to the resident.	Yes	Complaints policy	
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	Complaints policy / response templates	
6.6	A complaint response must be provided to the resident when the answer to the	Yes	Complaints policy	



	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.		
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	Complaints policy and template responses
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	Complaints policy
6.9	Landlords must confirm the following in writing to the resident at the completion of stage 1 in clear, plain language:  complaint stage;	Yes	Complaint policy and template letters



comp	laint definition;		
e decisi	on on the complaint;		
e reaso	ns 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.		

#### 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	Complaint policy	
6.11	Requests for stage 2 must be acknowledged, defined and logged at stage 2 of the complaints procedure within five	Yes	Complaint policy / complaint monitoring	



	working days of the escalation request being received.		
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	Complaint policy
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Yes	Complaint policy
6.14	Landlords must issue a final response to the stage 2 within 20 working days of the complaint being acknowledged.	Yes	Complaint policy / complaint monitoring
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	Complaint policy
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	Complaint policy / template responses



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	Complaint policy	
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	Complaint policy	
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;	Yes	Complaint policy / template responses	



	f. details of any outstanding actions; and			
	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	Complaints policy	

#### **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;	Yes	Complaints policy / template responses	



	<ul> <li>Providing an explanation, assistance or reasons;</li> <li>Taking action if there has been delay;</li> <li>Reconsidering or changing a decision;</li> <li>Amending a record or adding a correction or addendum;</li> <li>Providing a financial remedy;</li> <li>Changing policies, procedures or practices.</li> </ul>			
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Yes	Complaints policy	
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	Complaints policy	
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes	Complaints policy	Guidance regularly reviewed and adopted



#### 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 findings of non-compliance with this Code by the Ombudsman;	Yes	Report finalised and approved at board meeting September 2025	



	<ul> <li>d. the service improvements made as a result of the learning from complaints;</li> <li>e. any annual report about the landlord's performance from the</li> </ul>			
	Ombudsman; and			
	<ul> <li>f. any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord.</li> </ul>			
8.2	The annual complaints performance and service improvement report must be reported to the landlord's governing body (or equivalent) and published on the on the section of its website relating to complaints. The governing body's response to the report must be published alongside this.	Yes	Board meeting minutes – September 2025	
8.3	Landlords must also carry out a self- assessment following a significant restructure, merger and/or change in procedures.	Yes		



8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	Yes		
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	Complaints policy	

#### 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	Complaints policy / complaints monitoring	Lesson learnt captured
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	Complaints policy / staff training	Training used to make staff aware of this code requirement



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	Tenant newsletter / annual complaint review
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	Barry Rees, Housing Services Manager
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	Neil Pascoe – Board Member
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	Yes	Board reports



	staff to perform this role and report on their findings.			
9.7	As a minimum, the MRC and the governing body (or equivalent) must receive:  a. regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance;  b. regular reviews of issues and trends arising from complaint handling;  c. regular updates on the outcomes of the Ombudsman's investigations and progress made in complying with orders related to severe maladministration findings; and  d. annual complaints performance and service improvement report.	Yes	Board reports and complaint reviews	
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	Yes	Complaints policy / staff training	



	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.			