

## Annual Self-assessment against the Housing Ombudsman (HOS) Complaint Handling Code – Dec 2025

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: <i>'an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the landlord, its own staff, or those acting on its behalf, affecting a resident or group of residents.'</i>	Yes	See complaints policy June 24 - Section 4 (What is a complaint?) – updated Dec 25	The policy definition mirrors the wording of the Complaint Handling Code and confirms that dissatisfaction about actions, inaction, or service standards by Housing for Women or its contractors is treated as a complaint. Complaints policy and process reviewed Dec 25 to ensure reflects further reflect HOS guidance and good practice and due to go to Exec Team and People and Customer Committee PCC Feb 2026
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	See complaints policy June 24- – updated Dec 25 section 4	Residents are not required to use the word 'complaint'. Any expression of dissatisfaction is offered the option to be logged as a complaint. Complaints submitted via representatives are accepted and handled in line with policy. Complaints policy includes reference to handling petitions and complaints direct to board members and executive members. All customer enquiries are logged on Homemaster system
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	See complaints policy June 24- see staff guidance– updated Dec 25 – section 4	The policy clearly distinguishes between service requests and complaints. Service requests are recorded, monitored, and reviewed separately through Homemaster system where activities are auditable. Where a customer either disagrees or remains dissatisfied with the response to their service request a complaint will be recorded

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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	See complaints policy June 24- – updated Dec 25 see section 7.3	Where a resident is dissatisfied with the response to a service request, the issue is logged as a formal complaint. We have clarified approach to ongoing efforts to resolve issues fairly and promptly.
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	Covered in survey for tenant satisfaction measures and been incorporated as a specific point in revised complaints policy Dec 25 see s8.2	The updated complaints policy Dec 25 includes an amendment to formally reflect that any specific issues identified through survey feedback raised by a customer will be sent to the relevant service area to contact and address.

## 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	No	See complaints policy June 24- – updated Dec 25 - see7.6	The updated complaints policy Dec 25 includes an amendment to what constitutes a complaint and use of discretion. However further work needs to be done on the Homemaster system configuration to report of complaints that have not been accepted.
2.2	<p>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:</p> <ul style="list-style-type: none"> <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> <li>• Matters that have previously been considered under the complaints policy.</li> </ul>	yes	See complaints policy June 24- – updated Dec 25 see 7.3	The complaints policy sets out these exclusions. Exclusions are fair, reasonable, and consistent with the Code, including time limited issues, legal proceedings, and matters already investigated.
2.3	Landlords must accept complaints referred to them within 12 months of	Yes	See complaints policy June 24- –	The updated complaints policy Dec 25 includes an amendment to further clarify that HFW can use their

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	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.		updated Dec 25 - see 8.5	discretion on complaint management as long as done fairly and appropriately for example where there are good reasons, including vulnerability or safeguarding considerations.
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	See complaints policy June 24- – updated Dec 25 - see 7.7	If an issue is reported which is not appropriate to deal with under this policy, we will write to the person raising the issue explaining why it cannot be considered under this policy and signposting them to other sources of assistance where appropriate including the Housing Ombudsmen.
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Yes	See complaints policy June 24- – updated Dec 25 - see8.5	Each complaint is assessed on its own merits with no blanket exclusions applied. The updated complaints policy Dec 25 to clarify HFW ability to use discretion.

### 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	Completed equality impact assessment for June 24 complaints policy (Dec 25 update see s6, s8), new tenants complaint leaflet, HFW website	Equality Impact assessment update for Dec25. Complaints policy includes details of multiple routes such as customer portal, telephone or in person which are available to make a complaint. Equality Act duties are embedded, and reasonable adjustments are proactively offered.
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	Staff induction, staff training materials; Complaints Policy see s8.	All staff can receive complaints and pass them to the complaints team. All complaints are logged on HFW housing management system and allocated to specific team and individual to investigate
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	Annual complaints report , complaints and compliments monitoring We benchmark complaint numbers and customer perceptions of the complaint handling under the TSM measures	Our Corporate Place focus for 2025/26 continues our Back-to-Basics phase and ensuring we have efficient and effective processes.
3.4	Landlords must make their complaint policy available in a clear and accessible format for all	Yes	The complaints policy 2024 (update Dec25) is available from HFW	

	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.		<p>website. There is a dedicated complaints page on HFW's web site linked to the 'Contact us' section which can also be found via the search function. This publicises the Complaint Policy, the two stage process and associated timescales, Complaint Handling Code and the role of the HOS with links to the HOS's web site.</p> <p><a href="https://hfw.org.uk/contact-us/complaints-compliments/">https://hfw.org.uk/contact-us/complaints-compliments/</a></p>	The Dec 2025 revised complaints policy will be shared on our website and summarised in our Connect newsletter once approved and includes a new complaints leaflet for residents.
3.5	The policy must explain how the landlord will publicise details of the complaints policy, including information about the Ombudsman and this Code.	Yes	This is reflected in the complaints policy. The HOS Scheme, this is also added as link to all our complaint response letters we send see complaints policy s15.4, 14.2, 14.6	The Dec 25 complaints policy update includes further information about how we will communicate performance and learning from complaints and service requests.
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	See complaints policy June 24- – updated Dec 25 -see3.1,s4, s5.1.s8.1	Residents may be represented or accompanied at any stage. Complaint letters and the policy include details regarding signposting for other local and national support agencies
3.7	Landlords must provide residents with information on their right to access the Ombudsman service and how the individual can engage	Yes	See complaints policy June 24- – updated Dec 25 see s12. Complaint	Clear information on the right to access the Ombudsman is provided at all stages. Signposting to Housing Ombudsmen on response letters and on HFW website.

	with the Ombudsman about their complaint.		response templates; new tenants complaint leaflet	
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## 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.	Partially	Governance structure; role descriptions. All complaints are logged through the customer services team, and the complaints process flow includes which staff are responsible for each stage of the procedure See Complaints policy s4.6	There have been several staff changes that resulted in some roles being removed from the structure including the 'complaint officer'. These changes created resource gaps and some unacceptable slippage in our responses to both complaints and HOS enquiries. This is being addressed by the newly appointed Head of Operations and, Director of Operations. This will ensure a designated team oversees complaint handling and HOS case liaison rather than being reliant on a single officer.
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	Governance arrangements. The customer service team who log, assign, and track complaints via our CRM system in home master.	Recent staff turnover has caused some gaps in overseeing the prompt progress of actions to complaints and management of HOS enquiries. This has resulted in several complaint failure notices being served against HFW. Although resources are reassigned to create capacity, there is a backlog of complaint cases and HOS enquires that need to be addressed. Changes will ensure the complaints function has access to senior staff and authority to resolve disputes expediently.
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	Yes	See complaints policy June 24- – updated Dec 25. See s14 Training records; staff handbook	Working with the IT team to ensure that service request and complaint reports reflect the changes in staff. Weekly meeting set up to identify priorities against outstanding process. Targeting of most overdue cases. Staff have taken part on workshops to review content of letters to ensure customer friendly, they have received training on the process and customer care training.

	a core service and must be resourced to handle complaints effectively			Complaint handling is recognised as a core service with ongoing training and learning.
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## 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	See complaints policy June 24- – updated Dec 25	The complaints policy is the only policy which is applied to all customers and complaints
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	See complaints policy June 24- – updated Dec 25 - see 4.5	There are only 2 stages in the complaints process. Early resolution is encouraged without introducing informal stages.
5.3	A process with more than two stages is not acceptable under any circumstances as this will make the complaint process unduly long and delay access to the Ombudsman.	Yes	See complaints policy June 24- – updated Dec 25 - see s9	Our complaints process consists of 2 stages – stage 1, and stage 2.
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	See complaints policy June 24- – updated Dec 25 - see s9	Our complaints process consists of 2 stages – stage 1, and stage 2. Although we may liaise with third parties during an investigation these third parties do not respond to complaints on our behalf.

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Partially	See complaints policy June 24- – updated Dec 25 Contract management arrangements – see s9	Housing for Women retains responsibility for compliance. Our complaints process consists of 2 stages – stage 1, and stage 2. Although we may liaise with third parties during an investigation these third parties do not respond to complaints on our behalf. We have identified this as an area for improvement in 2026/27
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	See complaints policy June 24- – updated Dec 25 see s9 Acknowledgement templates. Our acknowledgement letter was updated to include wording on our understanding of the complaint (the complaint definition) Prior to sending this letter the Complaints Resolution Officer will contact the customer to fully understand the details of the complaint, any reasonable adjustments required, and the	Complaints are clearly defined and outcomes sought are recorded. In 2026 we will explore how intelligence gathered through the tenancy sustainment visits can be used to tailor our approach to service delivery

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
			<p>outcome the customer is seeking. When it is not possible to speak with the customer within 5 working days of the complaint being submitted the info available is used to define the complaint definition.</p>	
5.7	<p>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.</p>	Partially	<p>Complaint responses Our complaints management has been set up in CRM / Homemaster which follows the process and timescales outlined in the HfW policy. Our template letters include guidance for staff which includes ensuring we fully understand the complaint and the resolution sought by the resident.</p>	<p>Responses do not always consistently explain which issues HfW is responsible for. Due to capacity issues customer resolution staff have not always contacted customers to try and discuss verbally with tenants to clarify issues on their complaint and confirm this back in the acknowledgement letter. This is being addressed as part of the 2026/27 complaints action plan activities on quality assurance.</p>

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
5.8	<p>At each stage of the complaints process, complaint handlers must:</p> <ul style="list-style-type: none"> <li>a. deal with complaints on their merits, act independently, and have an open mind;</li> <li>b. give the resident a fair chance to set out their position;</li> <li>c. take measures to address any actual or perceived conflict of interest; and</li> <li>d. consider all relevant information and evidence carefully.</li> </ul>	Partially	<p>Our complaints policy and process reflects that all complaints must be managed under this criteria.</p>	<p>Complaints are handled impartially with conflicts of interest managed. To address any conflict of interest a person who is the subject of the complaint, or line manager of the subject will not be assigned the complaint to investigate at Stage 1. Our approach is to attempt to contact the customer as part of logging the complaint, and the investigation stage to ensure an opportunity for them or their advocate to set out their position. An in-person visit may also be arranged</p>
5.9	<p>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.</p>	Partially	<p>See complaints policy June 24- – updated Dec 25 see s9.7 Our policy, process and response template letters state that the investigating manager must contact the resident to agree an extension if they think they will need longer than the agreed time to investigate and respond to the complaint.</p>	<p>We have identified that we have not always kept to these timelines or consistently explained to tenants why we are seeking an extension. This is identified as an area for improvement in 2026/27 action plan. This is to ensure all extensions are agreed by a senior staff member and with residents and timely updates provided.</p>

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
5.10	Landlords must make reasonable adjustments for residents where appropriate under the Equality Act 2010. Landlords must keep a record of any reasonable adjustments agreed, as well as a record of any disabilities a resident has disclosed. Any agreed reasonable adjustments must be kept under active review.	Yes	EIA assessment completed for June 24 Complaints policy and updated in Dec25, complaint records	We have reviewed EIA dec 25. During 2026 we will explore how we can use data gathered through tenancy sustainment visit to tailor approach to complaints service. We have proposed a new quality assurance process for 2026 to ensure Adjustments are recorded and reviewed.
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	See complaints policy June 24- – updated Dec 25 see s7.6	Any exclusions are detailed in our complaints policy. Escalation is not refused without valid reasons.
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.	Partially	Our complaints management has been set up in CRM / HomeMaster which follows the process and timescales outlined in the HfW policy to ensure all actions are auditable. There is a document archive for each case where all relevant	Management information on complaints handling and quarterly performance reporting to the people and customer committee is used to demonstrate assurance with the process. We have identified not all available fields in the system are being updated consistently. This will be addressed as part of the 2026/27 Action plan. This is to ensure full records are maintained.

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
			<p>letters and documents are uploaded. Complaints policy ses s14.2</p>	
5.13	<p>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.</p>	Yes	<p>See complaints process, complaint outcomes.</p>	<p>HFW have a range of remedies which can be applied at any point of the complaints process without requiring escalation.</p>
5.14	<p>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.</p>	Yes	<p>See Unreasonable Behaviour Policy</p>	<p>The unreasonable behaviour policy which adopts the HOS guidelines. Restrictions are evidence based and reviewed.</p>
5.15	<p>Any restrictions placed on contact due to unacceptable behaviour must be proportionate and demonstrate regard for the provisions of the Equality Act 2010.</p>	Yes	<p>Complaints policy s11 Equality Impact Assessment. We have an unacceptable customer behaviour policy which is used to assess on a case by case basis</p>	<p>Restrictions consider Equality Act duties.</p>



## 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	See Complaints Policy see S2, s4.5, s5.2, s6, s7,s9,11,12,13,16.3 Complaints Procedure, case file audits, EIA. There are a range of remedies that exist which can be applied at any stage of the process.	Housing for Women considers at the earliest point whether a complaint can be resolved promptly or requires further investigation. Complexity, risk and/or safeguarding concerns and vulnerability are considered when deciding the handling approach. Simple complaints are often resolved at Stage 1 with an explanation, apology or practical action. During 2026 we will explore how we can further use data gathered from the tenancy sustainment visits to apply an enhanced risk-based approach to prioritising resolutions. Staff are empowered to implement resolutions to issues.
6.2	Complaints must be acknowledged, defined and logged at stage 1 of the complaints procedure <b><u>within five working days of the complaint being received.</u></b>	Yes	Acknowledgement templates; complaints case management system. Our complaints management has been set up in CRM / Homemaster which follows the process and timescales outlined in the HFW policy s9	All Stage 1 complaints are acknowledged and logged within five working days. The acknowledgement confirms receipt; summarises the issues raised and identifies the officer responsible. Staff and managers have access to real time reporting so can see if any reported complaints have not been addressed within the policy timescales
6.3	Landlords must issue a full response to stage 1 complaints <b><u>within 10 working days</u></b> of the complaint being acknowledged.	Yes	Performance reports; complaint records; HOS Complaints management has been set up in CRM / Homemaster which follows the process and timescales outlined in the HFW	Stage 1 responses are issued within 10 working days of acknowledgement. Housing for Women has been issued with a number of Complaint Handling Failure Notices by the HOS, primarily linked to delays and weaknesses in oversight during a period of

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
			policy. Staff and managers have access to real time reporting so can see if any reported complaints have not been addressed within the policy timescales ses policy s9	senior leadership and management turnover. This learning reflects sector-wide maladministration findings. Permanent senior staff are now in post, processes and templates have been reviewed, and performance against timescales will be monitored closely and reported quarterly to senior management and the governing body. This is reflected as an area for improvement in the 2026/27 Action plan.
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.	No	Complaint correspondence; case notes. Complaints management has been set up in CRM / Homemaster which follows the process and timescales outlined in the HFW policy s9	It has become apparent that customers have not always been consistently advised of the reason for any delay outside of the agreed timescales, Extended response times will form part of an enhanced approach to managing service performance and productivity. Where an extension is required due to complexity, third-party involvement or staff absence, this is agreed with the resident and limited to a maximum of 10 working days, with clear reasons provided. This is included in the 2026/27 Complaints Action plan.
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	See complaints policy and process. Extension notification templates	All template letters include the contact details for the HOS in line with the Code.
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	Yes	See complaints process, Complaint responses; action tracking logs see policy s9	Responses are issued once the complaint outcome is known, even where actions remain outstanding. The complaints policy update Dec25 amended to clarify that the complaint will remain open until all activities

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	completed. Outstanding actions must still be tracked and actioned promptly with appropriate updates provided to the resident.			within the remedies have been fully implemented including keeping residents informed. This will help maintain trust and we do what we say we are going to. Will be included as part of the 2026/27 Complaints action plan.
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.	Partially	See complaints policy June 24- – updated Dec 25 s9. Staff have attended training and workshops including review of letter templates and writing. Quality assurance checks; response templates	During 2026 we will set staff targets to attend the HOS on line seminars and training events to ensure they stay UpToDate with any emerging positive practice. We have a number of staff completing the IOH qualification as part of response to improve professionalisation of staff. A new quality assurance process is included within the 2026/27 Complaints action plan. This to ensure Responses address each point of the complaint definition and provide reasons for decisions with reference to policy, law and good practice where appropriate.
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	See complaints policy June 24- – updated Dec 25 s9, case records, complaints process	Related issues raised before a response is issued are incorporated into the existing complaint. Unrelated issues are logged as new complaints where appropriate. Our complaints policy and way of working reflects this approach.

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
6.9	Landlords must confirm the following in writing to the resident at the completion of stage 1 in clear, plain language: <ul style="list-style-type: none"> <li>a. the complaint stage;</li> <li>b. the complaint definition;</li> <li>c. the decision on the complaint;</li> <li>d. the reasons for any decisions made;</li> <li>e. the details of any remedy offered to put things right;</li> <li>f. details of any outstanding actions; and</li> <li>g. details of how to escalate the matter to stage 2 if the individual is not satisfied with the response.</li> </ul>	Yes	See complaints policy and process and associated Stage 1 response templates	Stage 1 responses clearly confirm the complaint stage, definition, decision, reasons, remedies, outstanding actions and escalation rights. Our complaints policy and way of working reflects this approach. Staff have attended workshops to review the content and style of all complaint letter templates to ensure they reflect the HOS code of practice and positive practice.

## 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	See complaints policy June 24- – updated Dec 25 s9, escalation records	Where a resident remains dissatisfied, the complaint is progressed to Stage 2 as the final response. This is reflected in our complaints policy and process
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	Stage 2 acknowledgement templates; system logs See complaints policy. Homemaster is configured to automatically reflect timeline in HOS code of practice, complaints process	This is reflected in our complaints policy and process. Stage 2 requests are acknowledged and logged within five working days. Stage 2 responses are issued within 20 working days of acknowledgement. Housing for Women has been issued with a number of Complaint

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
				<p>Handling Failure Notices by the HOS, primarily linked to delays and weaknesses in oversight during a period of senior leadership and management turnover. This learning reflects sector-wide maladministration findings. Permanent senior staff are now in post, processes and templates have been reviewed, and performance against timescales will be monitored closely and reported quarterly to senior management and the governing body. This is reflected as an area for improvement in the 2026/27 Action plan.</p>
6.12	<p>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.</p>	Yes	<p>See complaints policy and process June 24-see s9 – updated Dec 25, staff guidance and training</p>	<p>This is reflected in our complaints policy and process</p>
6.13	<p>The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.</p>	Yes	<p>Governance arrangements; case allocation records. See complaints policy and process June 24- – updated Dec 25 see s9</p>	<p>Stage 2 reviews are conducted by a senior manager or director who was not involved at Stage 1.</p>
6.14	<p>Landlords must issue a final response to the stage 2 <b><u>within 20 working days</u></b> of the complaint being acknowledged.</p>	Partially	<p>Performance monitoring reports. See complaints policy. S9 Homemaster is configured to automatically reflect timeline in HOS code of practice</p>	<p>Staff and managers have access to real time reporting so can see if any reported complaints have not been addressed within the policy timescales. Housing for Women has been issued with a number of Complaint Handling Failure Notices by the HOS, primarily linked to delays and weaknesses in oversight during a period of senior leadership and management</p>

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
				turnover. This learning reflects sector-wide maladministration findings. Permanent senior staff are now in post, processes and templates have been reviewed, and performance against timescales will be monitored closely and reported quarterly to senior management and the governing body. This is reflected as an area for improvement in the 2026/27. This will help ensure final responses are consistently issued within 20 working days of acknowledgement.
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.	Partially	Correspondence records Complaints management has been set up in CRM / Homemaster which follows the process and timescales outlined in the HFW complaint policy s9	It has become apparent that customers have not always been consistently advised of the reason for any delay outside of the agreed timescales, Extended response times will form part of an enhanced approach to managing service performance and productivity. Where an extension is required due to complexity, third-party involvement or staff absence, this is agreed with the resident and limited to a maximum of 20 working days, with clear reasons provided to the customer and approval by a senior manager. This is included in the 2026/27 Complaints Action plan.
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	Stage 2 extension letters. See complaints policy and process June 24- – updated Dec 25 -s9	All template letters include the contact details for the HOS
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	Yes	Stage 2 responses; action logs. See complaints policy and process June 24- – updated Dec 25 -s9	Final responses are issued when the decision is known, with follow-up actions tracked separately. The complaints policy update Dec25 amended to clarify that the

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	the issue are completed. Outstanding actions must still be tracked and actioned promptly with appropriate updates provided to the resident.			complaint will remain open until all activities within the remedies have been fully implemented.
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.	Partially	QA reviews; response templates. See complaints policy and process June 24- – updated Dec 25 -s9,s17	Staff have attended training and workshops including review of letter templates and writing. During 2026 we will set staff targets to attend the HOS on line seminars and training events to ensure they stay UpToDate with any emerging positive practice. We have a number of staff completing the IOH qualification as part of response to improve professionalisation of staff. A new quality assurance process is included within the 2026/27 Complaints action plan. This to ensure Responses address each point of the complaint definition and provide reasons for decisions with reference to policy, law and good practice where appropriate
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	Partially	Final response templates. See complaints policy s9 and process and associated standard letter template	Final responses confirm complaint stage, decision, remedies, outstanding actions and the right to approach the Ombudsman. Our complaints policy and way of working reflects this approach. Staff have attended workshops to review the content and style of all complaint letter templates to ensure they reflect the HOS code of practice and positive practice. The QA approach in the complaints action plan 2026/27 will ensure this is embedded.

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	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	See complaints policy and process June 24- – updated Dec 25 -s9	Stage 2 complaints are investigated by Senior colleagues with access to all colleagues across the business.

### Section 7: Putting things right

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
7.1	<p>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:</p> <ul style="list-style-type: none"> <li>• Apologising;</li> <li>• Acknowledging where things have gone wrong;</li> <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> </ul>	Yes	See Complaints policy – see s9,s10 and compensation policy and procedure	Where service failure is identified, Housing for Women acknowledges this and sets out actions taken or planned, including apologies, explanations, practical remedies and compensation. This is set out within our complaint response template letters. Staff have received training on our the complaints and compensation policy, process and standard letter templates

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	<ul style="list-style-type: none"> <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	See Complaint responses, Compensation assessments, compensation policy. Our compensation policy sets out the criteria for giving compensation and levels of compensation that can be offered dependent on the service failure. Complaints policy s10	Remedies are proportionate to the impact on the resident, including distress, inconvenience and time and trouble. Staff empowered to apply solution from a range of options including financial compensation,
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.	Partially	Action plans; case tracking. This is set out in our compensation policy, complaints policy s10	It is not always evident that we have consistently monitored if we have delivered against all of the proposed remedies. This will form part of the complaints 2026/27 action plan. This will help ensure remedies clearly set out what will happen and by when, and completion is monitored.
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes	Our menu of remedies is reflective of HOS positive practice, staff guidance . complaints policy s10, appendix 1 complaints process	Ombudsman guidance is taken into account when determining remedies.



Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	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.		assessment completed Dec25 and will be presented to People Customer Committee Published on our website in Qtr1 25/26 Referenced in our Annual Report 24/25	response. In 2026/27 we will explore how we can engage some tenants on an assessment of our approach to sharing complaints information with customers as part of the Customer strategy.
8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	Yes	Governance procedures. Self assessment against complaint code. Complaints cation plan 2026/27	Following some further changes in staffing structure a sense check was undertaken of the complaints policy and procedure, and associated commentary is included within the self-assessment document
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	Yes	HOS Complaint Handling Failure Notices; internal action plans; governance reports, Housing ombudsmen determinations. A review of approach to HFW complaints took place in 2024 following a sever maladministration order. Further review has taken place following a number of staffing changes within the operations senior management team a further review has taken place in response to Housing Ombudsmen feedback on the HFW complaints policy in Aug 25.	Housing for Women reviews its self-assessment, policies and procedures following HOS investigations and Complaint Handling Failure Notices. Failure notices issued to the organisation have been used as a catalyst for improvement, including reviewing complaint handling arrangements, strengthening audit trails, revising correspondence, and embedding equality and trauma-informed practice. As a consequences of a period of staffing instability and some emerging issues with regards ownership of managing HOS requests for data, speed of managing complaints against agreed timeline and the issue a a number of complaint handling failure orders we have revisited the complaint policy and procedures to ensure that if any future changes at a senior management level can be managed and reduce the impact of the complaints service

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
				delivery. Progress against actions is monitored through governance structures.
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	Business continuity plans, tenant communication plan. HFW senior executives have kept the housing regulator informed of staffing issues and impact on service delivery. A meeting is being arrange for Q1 of 25/26 to discuss the impact of staffing issues on complaints management and to share a back to basics/stabilising plan with the HOS.	Procedures are in place to notify residents and the Ombudsman if exceptional circumstances affect compliance. Revised complaints policy and procedure to reflect HOS code of practice and emerging guidance for landlords

## 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.	No	Learning logs; service improvement actions; HOS correspondence System and process exists for capturing lessons learnt from complaints Complaints policy s14	Housing for Women have not consistently and robustly carried out analyses of themes and trends beyond individual complaints, including learning from HOS determinations and Complaint Handling Failure Notices. However recent turnover issues with the senior operation management team has created some capacity and service monitoring and learning gaps. New staff are now in place to help provide some stability to the service and have triggered an overview of leadership approach, complaint handling processes, equality impact assessments, staff guidance and response templates, demonstrating organisational learning and alignment with Housing Consumer Standards. Changes in staffing have impacted on capacity and limited scope to identify and apply lessons learnt. The complaints action plan 2026/27 will include actions to ensure learning is robustly applied from future complaints management. We will re launch changes introduced from the 2024 severe maladministration case include you said we did to evidence link between customer feedback and service improvement.
9.2	A positive complaint handling culture is integral to the effectiveness with	Partially	Staff training; leadership messaging. Recent changes to	Complaints are promoted as a source of learning rather than blame. Recent staffing

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	which landlords resolve disputes. Landlords must use complaints as a source of intelligence to identify issues and introduce positive changes in service delivery.		the customer service team including increasing staffing time of phone lines and feeing up capacity of the customer service team to improve administration of complaints are reflective of issues raised by tenants in complaints	changes across operations have created uncertainties in terms of clarity around roles and responsibilities. Although performance monitoring of complaints takes place staffing issues has reduced how customer feedback is being used to positively influence change across the whole service. These will be addressed through the complaints action plan 2026/27 and back to basics objective within the HFW Corporate plan.
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.	Partially	Tenant reports; newsletters. The people and customer committee received quarterly information on complaints handling and headline performance data on complaints included in the quarterly tenants newsletter, and the HFW executive team	Although feedback exists its scope is limited due to issues highlighted in 9.2. During 2026 we will relaunch you said we did as part of the learning from complaints. We will relaunch tenant involvement activities which have stalled due to staffing changes and associated capacity issues,
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.	Partially	Governance structure. See Complaints and compensation policy and procedure Staff structure	A senior lead is accountable for complaint handling and trend analysis. The newly appointed Director of operations will take overall responsibility for the complaints. As part of recognition of issues over the last few months complaints and customer communication will be a key priority as part back to basic agenda in the corporate plan
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	Partially	Board and committee role descriptions. The Chair of the People & Communication Committee as responsibility for complaints on the governing body Governance structure	A Board member is identified as the MRC. The People & Communication Committee is a subcommittee of the HfW Board

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	Responsible for Complaints ('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.	Partially	<p>Quarterly complaints performance reports are scrutinised at this committee before being reviewed by full board. The MRC receives the annual complaints report, any updates on policy and reports following any ombudsmen decision.</p> <p>Committee forward plan. Complaints policy – s14,s17</p>	The people and communication committee and the full Board receive quarterly complaints performance reports. During Q of 26 the MRC will be given an action plan with a focus of addressing some of the outstanding complaints cases and approach to bring stability to team and improved approach to customer contact. The actions identified in the complaints actions plan 20206/27 will provide assurance that the MRC The MRC has access to data and staff to fulfil the role.
9.7	<p>As a minimum, the MRC and the governing body (or equivalent) must receive:</p> <ul style="list-style-type: none"> <li>a. regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance;</li> <li>b. regular reviews of issues and trends arising from complaint handling;</li> <li>c. regular updates on the outcomes of the Ombudsman's investigations and progress made in complying with orders related to severe maladministration findings; and</li> <li>d. annual complaints performance and service improvement report.</li> </ul>	Partially	<p>People and Communication committee (P&amp;CC) forward plan, P&amp;CC agenda, report and minutes to meetings</p>	<p>The governing body receives regular information on complaints performance. However the scope and quality of data on trends, outcomes, HOS determinations, and any Complaint Handling Failure Notices issued to Housing for Women, learning and customer impact could be improved. This ensures transparency, senior accountability, and oversight of learning and improvement actions. This will be addressed as part of the 2026/27 complaints action plan.</p>

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
9.8	<p>Landlords must have a standard objective in relation to complaint handling for all relevant employees or third parties that reflects the need to:</p> <p>a. have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments;</p> <p>b. take collective responsibility for any shortfalls identified through complaints, rather than blaming others; and</p> <p>c. act within the professional standards for engaging with complaints as set by any relevant professional body.</p>	Partially	<p>Corporate plan 2022/27, customer First strategy, Inclusion in staff members jobs description, Weekly complaints reporting and management, a number of staff completing IOH qualifications, staff attending workshop and training on complaint handling and customer care, range of internal training courses on diversity, customer care, Performance frameworks; contracts</p>	<p>In 2026 staff performance objectives will include attendance at housing ombudsmen training events, improved use of internal housing management and CRM system to ensure clear audit trail of all customer interactions. Complaint handling expectations are embedded in staff objectives and third-party arrangements.</p>