

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

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
1.2	A complaint must be defined as:  'an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the landlord, its own staff, or those acting on its behalf, affecting a resident or group of residents.'	Yes	Section 5.1 of the Complaints Policy	The Policy is publicly available on the Railway Housing Association website and definition of a complaint aligns with the Housing Ombudsman definition.
1.3	A resident does not have to use the word 'complaint' for it to be treated as such. Whenever a resident expresses dissatisfaction landlords must give them the choice to make complaint. A complaint that is submitted via a third party or representative must be handled in line with the landlord's complaints policy.	Yes	Section 5.2 of the Complaints Policy ('Complaint') Section 5.3 of the Complaints Policy (third party)	The Policy confirms that the word 'complaint does not need to be used and all colleagues have received MGI Training on Complaint Handling and internal awareness through an intranet post.
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	Yes	Section 5.4 and 5.6 of the Complaints Policy	The policy:      Sets out the difference     between a service request     and a complaint     Explains that service     requests are recorded,     monitored and regularly



	recorded, monitored and reviewed regularly.			reviewed, to ensure we take maximum learning.
1.5	A complaint must be raised when the resident expresses dissatisfaction with the response to their service request, even if the handling of the service request remains ongoing. Landlords must not stop their efforts to address the service request if the resident complains.	Yes	Section 5.5 of the 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	Section 5.7 of the Complaints Policy	Section 5.7 sets out our approach to dissatisfaction with services made through a survey.

#### **Section 2: Exclusions**

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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2.1	Landlords must accept a complaint unless there is a valid reason not to do so. If landlords decide not to accept a complaint they must be able to evidence their reasoning. Each complaint must be considered on its own merits	Yes	Section 6.1 of the Complaints Policy	The policy sets out that each complaint will be considered on its own merits.
	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	The issue giving rise to the complaint occurred over twelve months ago.	Yes	Sections 6.1 – 6.6 of the Complaints Policy	The policy sets out circumstances in which a
	<ul> <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>		Tolley	complaint will be refused.
	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	Yes	Section 6.1 and 6.4 of the Complaints Policy	The Policy accepts complaints referred to them within 12 months of the issue occurring or the resident making us aware, unless excluded on other grounds. The Policy also



	complaints made outside this time limit where there are good reasons to do so.			states that we may apply discretion where there are good reasons to accept a complaint over this time limit.
2.4	If a landlord decides not to accept a complaint, an explanation must be provided to the resident setting out the reasons why the matter is not suitable for the complaints process and the right to take that decision to the Ombudsman. If the Ombudsman does not agree that the exclusion has been fairly applied, the Ombudsman may tell the landlord to take on the complaint.	Yes	Section 6.6 of the Complaints Policy	The Complaints Policy sets out that an explanation will be provided and that the resident is able to challenge this with the Housing Ombudsman, who may instruct an investigation.
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Yes	Section 6.4 of the Complaints Procedure	The Complaints Policy sets out that we will apply due consideration to all matters before refusing our acceptance of a complaint.

### **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	Yes	Section 7.1 of the Complaints Policy details the channels available for residents to make a complaint.	We offer support to help complainants with specific needs to make their complaint, for example, providing an



	the Equality Act 2010 and anticipate the needs and reasonable adjustments of residents who may need to access the complaints process.		Complaints Leaflet for includes alternative languages and advice of third party organisations that can assist.	interpreter, a sign language interpreter, allowing more time than usual for information to be provided by the complainant, providing information in alternative formats such as large print or Braille, use of email or telephone rather than printed letters, use of Textaloud, use of plain English or Easy Read service, comfort or rest breaks during meetings, and dealing with an advocate or other representative.
3.2	Residents must be able to raise their complaints in any way and with any member of staff. All staff must be aware of the complaints process and be able to pass details of the complaint to the appropriate person within the landlord.	Yes	Section 7 of Complaints Policy Complaints Leaflet	The policy sets out that complaints can be received in person, telephone, letter, email, website, social media or third party. Complaints leaflet also includes a form that can be completed and returned to a freepost address.
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	Section 1 of the Complaints Policy	The Policy details how we encourage residents to provide feedback that we use to learn from complaints to drive service improvements and



	complaint volumes are potentially a sign that residents are unable to complain.			resident satisfaction. Colleagues are trained to encourage the accurate recording of complaints through internally and externally sourced complaints handling training. Board reports on complaints performance.
3.4	Landlords must make their complaint policy available in a clear and accessible format for all residents. This will detail the two stage process, what will happen at each stage, and the timeframes for responding. The policy must also be published on the landlord's website.	Yes	Section 8 of the Complaints Policy, Complaints Procedure Complaints Leaflet for Residents	The Complaints Policy and Procedure are available on the Railway Housing Association website. The Complaints Leaflet is also available online, in our head office and in schemes and communal buildings. The Policy and leaflet set out the process and timescales for stage 1 and 2 complaints and include contact details for the Housing Ombudsman.
3.5	The policy must explain how the landlord will publicise details of the complaints policy, including information about the Ombudsman and this Code.	Yes	Section 7.5 and 7.6 of the Complaints Policy Complaints Leaflet for Residents	These sections set out how we publicise the Policy on our website alongside our complaints leaflet. Information regarding the Housing Ombudsman Service is also



				published on our website and posters are displayed in our head office, schemes and communal areas.
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	Sections 5.3 and 7.1 of Complaints Policy	The policy sets out that residents can request a third party to deal with their complaint on their behalf. Our complaints leaflet also suggests some organisations that can support and assist.
3.7	Landlords must provide residents with information on their right to access the Ombudsman service and how the individual can engage with the Ombudsman about their complaint.	Yes	Section 8.2 of Complaint Policy Complaints Leaflet for Customers Acknowledgement Letter Stage 2 Response Letter	This is included in the Policy, detailing the methods the Ombudsman can be contacted. We issue a complaint handling information leaflet with every stage 1 complaint acknowledgement letter. We publish the Complaint Handling Code online. Detail of the Housing Ombudsman service are also displayed on posters, in head office reception area, schemes and communal areas and on our website. We provide details of how to contact the Housing Ombudsman in our final



	paragraph of our stage 2
	response letter.
	If an extension of deadline is
	negotiated we provide the
	Housing Ombudsman contact
	details to the resident should
	they wish to challenge the
	timescale.

### **Section 4: Complaint Handling Staff**

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
4.1	Landlords must have a person or team assigned to take responsibility for complaint handling, including liaison with the Ombudsman and ensuring complaints are reported to the governing body (or equivalent). This Code will refer to that person or team as the 'complaints officer'. This role may be in addition to other duties.	Yes	Section 3.35 of Complaints Policy Section 2.4 of Complaints Procedure	The Complaints Policy sets out that the Chief Operating Officer is assigned to take responsibility for complaint handling, including liaison with the Housing Ombudsman and ensuring complaints are reported to Board.
4.2	The complaints officer must have access to staff at all levels to facilitate the prompt resolution of complaints. They must also	Yes	Structure	



	have the authority and autonomy to act to resolve disputes promptly and fairly.			
4.3	Landlords are expected to prioritise complaint handling and a culture of learning from complaints. All relevant staff must be suitably trained in the importance of complaint handling. It is important that complaints are seen as a core service and must be resourced to handle complaints effectively	Yes	Colleague Training Complaints Policy Statement	All colleagues have received briefings and external training session by MGI Learning, linked to the wider cultural change programme to promote the concept of invaluable feedback and how to use the MGI toolkit to effectively improve customer service, problem resolution and complaint handling.

#### **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	Railway Housing Association only have one 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	Yes	Complaints Policy Complaints Procedure	The Complaints Policy, section 8.0, defines the two stages of our complaints handling



	(such as 'stage 0' or 'informal complaint') as this causes unnecessary confusion.			process. There are no informal/extra named 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	Complaints Policy Complaints Procedure	The Complaints Policy, section 8.0, defines the two stages of our complaints handling process
5.4	Where a landlord's complaint response is handled by a third party (e.g. a contractor or independent adjudicator) at any stage, it must form part of the two stage complaints process set out in this Code. Residents must not be expected to go through two complaints processes.	Yes	Section 8.4 of the Complaints Policy	The Complaints Policy, section 8.4 states 'We will handle complaints that are made in relation to a contractor, or other third-party delivering services on our behalf, by applying our Complaints Policy and Procedure to the complaint. We will not refer a complainant to the third-party.
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Yes	Section 8.4 of the Complaints Policy	Railway Housing Association directly handle all complaints relating to services provided by or on behalf of Railway Housing Association. If the complaint relates to work carried out by a contractor, Railway Housing Association will handle the complaint and liaise with the contractor.



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	Complaint Acknowledgement, Stage 1 Response, Stage 2 Response Letter Templates	The standard template documents for the acknowledgement, Stage 1 Response and Stage 2 Response include a section for the complaint handler to outline the complaint definition.  The investigating manager will contact the resident to discuss their complaint and the outcomes they are seeking
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	The Complaint Acknowledgement Letter Template	The Complaint Template Letter includes a section to explain what the complaint is relating to and if anything is not to be considered.
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	Yes	Section 2.1 of the Complaints Policy	The Complaints Policy aims defines we will ensure all complaints are dealt with fairly and transparently. The Procedure sets out how residents will have an opportunity to ensure they can set out their view and also receive detailed feedback on the decision. The procedure also sets out the resolutions



	d. consider all relevant information and evidence carefully.			and factors that will be considered. In addition, real-time resident satisfaction surveys are used to ensure residents are satisfied with the outcome of the complaint.
5.9	Where a response to a complaint will fall outside the timescales set out in this Code, the landlord must agree with the resident suitable intervals for keeping them informed about their complaint.	Yes	Section 8 of the Complaints Policy	The policy and procedure set out the timescales for resolution and the option to extend if the timescale cannot be achieved. The procedure sets out the aim for no longer than 10 additional working days. Additional explanations are included in the policy and procedure to agree contact points.
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	Sections 10.7 and 16.1 of the Complaints Policy Section 2.6 of the Complaints Procedure	The Policy and Procedure set out Railway's commitment to supporting residents with reasonable adjustments. Any vulnerabilities or disabilities are recorded on the Cx Housing Management system.



5.11	Landlords must not refuse to escalate a complaint through all stages of the complaints procedure unless it has valid reasons to do so. Landlords must clearly set out these reasons, and they must comply with the provisions set out in section 2 of this Code.	Yes	Section 6 of the Complaints Policy	The Complaints Policy sets out circumstances in which a complaint will be declined.
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	Complaints Spreadsheet and Folders Civica Cx System	Complaints records, correspondence and supporting documentation are held by the Resident Experience Team in a central document folder where all complaints are stored. They utilise a shared Outlook mailbox for residents to send in evidence, communications, and updates on complaints. Complaints are currently managed through a combination of a spreadsheet and individual communication with a resident through the Civica Cx system. A case management approach is being implemented for complaint handling to move all interactions and investigation



				into the Cx system. This is currently in test and will be live by August 2025
5.13	Landlords must have processes in place to ensure a complaint can be remedied at any stage of its complaints process. Landlords must ensure appropriate remedies can be provided at any stage of the complaints process without the need for escalation.	Yes	Section 8 and 9 of the Complaints Policy Section 2.10 of the Complaints Procedure	Section 8 of the Complaints Policy states that at both stages of our complaints process we will consider remedies at any point within the complaints process to resolve the complaint as early as possible. The policy and procedure set out the desire to resolve complaints as early as possible and also the resolutions that should be considered.
5.14	Landlords must have policies and procedures in place for managing unacceptable behaviour from residents and/or their representatives. Landlords must be able to evidence reasons for putting any restrictions in place and must keep restrictions under regular review.	Yes	Section 10 of the Complaints Policy	Section 10 of the Complaints Policy sets out Railway Housing Association's approach to unreasonable 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	Sections 1.5, 10.4 and 16.1 of the Complaints Policy	The Complaints Policy sets out Railway Housing Association's approach to unreasonable behaviour and consideration of



		vulnerability and alternative
		approaches.

#### **Section 6: Complaints Stages**

#### Stage 1

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
6.1	Landlords must have processes in place to consider which complaints can be responded to as early as possible, and which require further investigation. Landlords must consider factors such as the complexity of the complaint and whether the resident is vulnerable or at risk. Most stage 1 complaints can be resolved promptly, and an explanation, apology or resolution provided to the resident.	Yes	Section 3.11 of the Complaints Procedure	Section 3.11 of the Complaints Procedure details that the investigating manager will contact the customer to understand the complexity and vulnerabilities or risks of the case to reach a prompt resolution. In instances where a resident's safety is at risk due to a necessary repair, upon receiving the complaint, repair jobs are prioritised and completed according to the Repairs Policy. All complaints are logged and triaged by the Resident Experience Team to ensure the timely investigation and resolution specific to a resident's individual needs.



				The procedure sets out that colleagues are able to resolve things quickly for minor issues. All colleagues have received training from MGI about effective handling of dissatisfaction and tools to resolve quickly and effectively.
6.2	Complaints must be acknowledged, defined and logged at stage 1 of the complaints procedure within five working days of the complaint being received.	Yes	Section 8 of the Complaints Policy	We aim to acknowledge all complaints within 5 working days.
6.3	Landlords must issue a full response to stage 1 complaints <u>within 10 working</u> <u>days</u> of the complaint being acknowledged.	Yes	Section 8 of the Complaints Policy	We aim to respond to all Stage 1 complaints within 10 working days from date of acknowledgement letter.
6.4	Landlords must decide whether an extension to this timescale is needed when considering the complexity of the complaint and then inform the resident of the expected timescale for response. Any extension must be no more than 10 working days without good reason, and the reason(s) must be clearly explained to the resident.	Yes	Section 8 of the Complaints Procedure	The policy and procedure set out how the timescales can be extended and the procedure confirms this should be not longer than a further 10 working days.
6.5	When an organisation informs a resident about an extension to these timescales,	Yes	Section 8 of the Complaints Policy	The Complaints Procedure sets out that the Housing



	they must be provided with the contact details of the Ombudsman.		Section 3.14 of the Complaints Procedure	Ombudsman details will be provided when we inform residents of an 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	Section 8.3 of the Complaints Policy Section 3.16 of the Complaints Procedure	The Complaints Policy states a complaint response must be sent as soon as we know the answer. Where there are outstanding actions these are tracked and appropriate updates provided to the resident through to full resolution.
6.7	Landlords must address all points raised in the complaint definition and provide clear reasons for any decisions, referencing the relevant policy, law and good practice where appropriate.	Yes	Section 3.17 of the Complaints Procedure	The Complaints Procedure states we will provide a full written response which will address all points raised. The complaint definition and provide clear reasons for any decisions, referencing the relevant policy, law and good practice where appropriate. The Resident Experience Manager quality checks every response to ensure all required information is included and issues are addressed. A new Complaints



				Scrutiny Group has been formed with residents to give additional resident scrutiny of the quality of complaint 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	Section 3.15 of the Complaints Procedure	The Procedure sets out our approach to additional complaints and how to respond.
6.9	Landlords must confirm the following in writing to the resident at the completion of stage 1 in clear, plain language:  a. the complaint stage; b. the complaint definition; c. the decision on the complaint; d. the reasons for any decisions made; e. the details of any remedy offered to put things right; f. details of any outstanding actions; and	Yes	Section 3.17 of the Complaints Procedure	The Procedure sets out the requirements of the responses to ensure that all points are reviewed and escalation options. The Resident Experience Manager quality checks every response to ensure all required information is included and issues are addressed.



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	Sections 3.17 and 3.25 of the Complaints Procedure	The Complaints Procedure states that if the resident is unhappy with their stage 1 response, they may appeal and we will escalate complaint to stage 2.
6.11	Requests for stage 2 must be acknowledged, defined and logged at stage 2 of the complaints procedure within five working days of the escalation request being received.	Yes	Section 8.2 of the Complaints Policy Sections 3.25 and 3.29 of Complaints Procedure	We aim to acknowledge stage 2 complaints within five 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	3.26 of the Complaints Procedure	The Procedure states we will not ask the complainant to explain their reasons for a requesting to escalate their complaint to stage 2.
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Yes	Section 3.28 of the Complaints Procedure	The procedure sets out that the Stage 2 investigator must



				not be the same person as Stage 1
6.14	Landlords must issue a final response to the stage 2 <u>within 20 working days</u> of the complaint being acknowledged.	Yes	Section 8.1 of the Complaints Policy Section 3.29 of the Complaints Procedure	We aim to respond to stage 2 complaint 20 working days from the date 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.	Yes	Section 3.30 of the Complaints Procedure	The procedure sets out that an extension at Stage 2 should be no more than 20 working days.
6.16	When an organisation informs a resident about an extension to these timescales, they must be provided with the contact details of the Ombudsman.	Yes	Section 3.32 of the Complaints Procedure	
6.17	A complaint response must be provided to the resident when the answer to the complaint is known, not when the outstanding actions required to address the issue are completed. Outstanding actions must still be tracked and actioned promptly with appropriate updates provided to the resident.	Yes	Section 8.3 of Complaints Policy and section 3.33 of Complaints Procedure	The Complaints Policy and Procedure states that we will provide resident with a response as soon as know the answer. Where there are any outstanding actions, these aretracked and appropriate updates provided to resident through to resolution.



6.18	Landlords must address all points raised in the complaint definition and provide clear reasons for any decisions, referencing the relevant policy, law and good practice where appropriate.	Yes	Section 3.34 of the Complaints Procedure	The Procedure sets out the requirements of responses to ensure that all issues raised are addressed. The Resident Experience Manager quality checks all responses before being sent to resident.
6.19	Landlords must confirm the following in writing to the resident at the completion of stage 2 in clear, plain language: a. the complaint stage; b. the complaint definition; c. the decision on the complaint; d. the reasons for any decisions made; e. the details of any remedy offered to put things right; f. details of any outstanding actions; and g. details of how to escalate the matter to the Ombudsman Service if the individual remains dissatisfied.	Yes	Section 3.34 of the Complaints Procedure	The procedure sets out the requirements of the responses to ensure that all points are reviewed and escalation options. The Resident Experience Manager quality checks all responses before being sent to resident.
6.20	Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.	Yes	Section 8.1 of Complaints Policy and Section 3.27 and 3.35 of Complaints Procedure	All Stage 2 complaint investigators are Executive Team members and therefore have appropriate access to all



		colleagues required to be
		involved.

### **Section 7: Putting things right**

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
7.1	Where something has gone wrong a landlord must acknowledge this and set out the actions it has already taken, or intends to take, to put things right. These can include:  • Apologising;  • Acknowledging where things have gone wrong;  • Providing an explanation, assistance or reasons;  • Taking action if there has been delay;  • Reconsidering or changing a decision;  • Amending a record or adding a correction or addendum;  • Providing a financial remedy;  • Changing policies, procedures or practices.	Yes	Sections 3.17 and 3.34 of the Complaints Procedure	The Procedure set out the requirements of the responses to ensure that all points are reviewed and escalation options. The Resident Experience Manager quality checks all responses before being sent to resident.



7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Yes	Section 9.0 of the Complaints Policy	The Complaints Policy sets out we will consider a level of financial compensation by way of redress. The Complaints Policy will be considered alongside the Compensation Policy when determining what the appropriate redress is. Consideration will include the length of time, frequency, severity, individual circumstances and any vulnerabilities when considering a resolution.
7.3	The remedy offer must clearly set out what will happen and by when, in agreement with the resident where appropriate. Any remedy proposed must be followed through to completion.	Yes	Sections 3.17 and 3.34 of the Complaints Procedure	The Procedure sets out the requirements of responses to ensure we include the details of any remedy offered to put things right, including the offer of compensation if appropriate
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes		We have regard for the Housing Ombudsman's Remedies Guidance in making assessments about appropriate remedies offers, including compensation payments.



### 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;  d. the service improvements made as a result of the learning from complaints;  e. any annual report about the landlord's performance from the Ombudsman; and	Yes	Sections 12 and 13 of the Complaints Policy Annual Newsletter to Residents	



	f. any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord.			
8.2	The annual complaints performance and service improvement report must be reported to the landlord's governing body (or equivalent) and published on the on the section of its website relating to complaints. The governing body's response to the report must be published alongside this.	Yes	The annual complaints performance and service improvement report can be found on our website here annual-complaints-report-june-2024-365.pdf	
8.3	Landlords must also carry out a self- assessment following a significant restructure, merger and/or change in procedures.	Yes	Section 11.4 of the Complaint policy.	Railway Housing Association carried out this self-assessment in December 2024, following a significant restructure
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	Yes		Railway Housing Association will comply with any request from the Housing Ombudsman. To date, there have been no requests.
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	Yes	As required. We have a disaster recovery plan in place	



residents who may be affected, and		
publish this on their website Landlords		
must provide a timescale for returning to		
compliance with the Code.		

### Section 9: Scrutiny & oversight: continuous learning and improvement

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
9.1	Landlords must look beyond the circumstances of the individual complaint and consider whether service improvements can be made as a result of any learning from the complaint.	Yes	Section 13 of the Complaints Policy Management Team Agenda	Complaint trends and service improvements are discussed monthly at Leadership Team meetings. A learning log has been created to capture learnings and track the implementation of changes for 2024/25. When investigating a complaint, Investigating Managers are required to determine the root cause analysis of the complaint, to understand why it occurred. and how it can be prevented from reoccurring in the future. Railway Housing Association have scheduled quarterly 'Learning from Complaints Meetings', attended by the MRC, Executive Team, and Operations Managers, to



				review the previous quarter's complaints received to discuss and identify any learning/ service improvement opportunities.
9.2	A positive complaint handling culture is integral to the effectiveness with which landlords resolve disputes. Landlords must use complaints as a source of intelligence to identify issues and introduce positive changes in service delivery.	Yes	Section 13 of the Complaints Policy Management Team Agenda	Complaint trends and service improvements are discussed monthly at Leadership Team meetings. A learning log has been created to capture learnings and to track the implementation of changes for 2024/25.
9.3	Accountability and transparency are also integral to a positive complaint handling culture. Landlords must report back on wider learning and improvements from complaints to stakeholders, such as residents' panels, staff and relevant committees.	Yes	Section 12 of the Complaints Policy	Complaint handling is reported to our Resident Committee once and externally published on a quarterly basis.
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	Structure Section 3 of the Complaints Policy	The policy sets out The Chief Operating Officer is responsible 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	Section 12.3 of the Complaints Policy	The policy sets out that the Member Responsible for Complaints is the Chair of the Board.
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	Board Minutes	Complaint performance is reported to the Board on a quarterly basis. This also is also presented to the Resident Committee in advance of Board.
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	Yes	Board Minutes	Information on performance of complaint handling is reported quarterly and the annual selfassessment and report are presented to the Resident Committee Board.



	d. annual complaints performance and service improvement report.		
9.8	Landlords must have a standard objective in relation to complaint handling for all relevant employees or third parties that reflects the need to:  a. have a collaborative and 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	The policy statement confirms the Association's commitment to complaint handling and learning.