

Appendix A: Self-assessment form

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	Our Customer Complaint and Feedback Policy is on our website at: Contact & feedback Watford Community Housing (wcht.org.uk)	We have the exact definition in our policy at 3.2.2 4.6.1. of our policy states <i>"This is the Housing Ombudsman's definition of a complaint which generally refers to situations where we have fallen below our core Service Standards."</i>
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	Our Customer Complaint and Feedback Policy is on our website at: Contact & feedback Watford Community Housing (wcht.org.uk)	We have the exact definition in our policy at 3.2.2 4.6.1. of our policy states <i>"This is the Housing Ombudsman's definition.."</i> 4.1.4 Customers can also provide feedback through a third party such as an MP or Local Councillor who will be able to handle the complaint on behalf of the customer.
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	Yes	Our Customer Complaint and Feedback Policy is on our website at: Contact & feedback Watford Community Housing (wcht.org.uk)	We have the exact definition for Service requests in our policy at 3.2.3

	requiring action to be taken to put something right. Service requests are not complaints, but must be recorded, monitored and reviewed regularly.			We report on these annually and they are recorded by our staff teams and reported in our Insight report to customers.
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	Our Customer Complaint and Feedback Policy is on our website at: Contact & feedback Watford Community Housing (wcht.org.uk)	<p>This is defined at 4.7.1</p> <p>We have a dedicated Customer Relations team (CRT) who ensure that these items are escalated correctly.</p>
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	<p>We use CX feedback and this provides an option for a “call back” from our complaint handling team if a customer is not satisfied.</p> <p>Our Customer Complaint and Feedback Policy is on our website at: Contact & feedback Watford Community Housing (wcht.org.uk)</p>	<p>This is defined in section 4.6.2 of our policy.</p> <p>We ask customers a question about complaint knowledge on our annual Big Door Knock and in 2024/25 87.3% of customers were aware of how to make a complaint.</p> <p>We provided direct contact details for our CRT when commissioning external parties undertaking our feedback surveys. So that call handlers for TSM's could inform customers how to make complaints.</p>

Section 2: Exclusions

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
2.1	Landlords must accept a complaint unless there is a valid reason not to do so. If landlords decide not to accept a complaint they must be able to evidence their reasoning. Each complaint must be considered on its own merits	Yes	Our Customer Complaint and Feedback Policy is on our website at: Contact & feedback Watford Community Housing (wcht.org.uk)	This is defined in section 4.6.2 of our policy.
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"> • The issue giving rise to the complaint occurred over twelve months ago. • Legal proceedings have started. This is defined as details of the claim, such as the Claim Form and Particulars of Claim, having been filed at court. • Matters that have previously been considered under the complaints policy. 	Yes	Our Customer Complaint and Feedback Policy is on our website at: Contact & feedback Watford Community Housing (wcht.org.uk)	<p>This is defined in sections 4.6.2 & 3.1.6 of our policy.</p> <p>The appeal process and reasons for non-escalation of appeals is detailed in section 5.3.2 of our policy.</p> <p><i>We reserve the right not to accept an Appeal where: -</i></p> <ul style="list-style-type: none"> • <i>The appeal is not sufficiently detailed or clear;</i> • <i>No new evidence is being submitted beyond that already considered;</i> • <i>We consider that our policies, procedures or regulatory requirements have been followed in full in relation to the matter;</i>

				<ul style="list-style-type: none"> • We consider that the complaint is being progressed in order to achieve a higher award of compensation or other benefit; • We consider that the complaint is vexatious or otherwise unreasonable; or • The customer has surpassed the ten day deadline and an additional ten day extension deadline where required
2.3	Landlords must accept complaints referred to them within 12 months of the issue occurring or the resident becoming aware of the issue, unless they are excluded on other grounds. Landlords must consider whether to apply discretion to accept complaints made outside this time limit where there are good reasons to do so.	Yes	Our Customer Complaint and Feedback Policy is on our website at: Contact & feedback Watford Community Housing (wcht.org.uk)	<p>This is defined in section 4.6.2 of our policy.</p> <p><i>“Dissatisfaction with something arising more than 12 months ago – it would be at our discretion whether or not to deal with this under our Complaints Procedure</i></p>
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	Our Customer Complaint and Feedback Policy is on our website at: Contact & feedback Watford Community Housing (wcht.org.uk)	<p>This is defined in our policy at 4.6.2:</p> <p><i>“If a matter reported WCH and is not accepted as 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</i></p>

				the Ombudsman. The customer will be informed of this decision within a stage 1 – decline letter.
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Yes	Our Customer Complaint and Feedback Policy is on our website at: Contact & feedback Watford Community Housing (wcht.org.uk)	<p>This is defined in our policy at 4.2:</p> <p><i>We encourage customers making a complaint to outline what they feel would be a satisfactory resolution to the problem at the outset so that everyone's clear about expectations. We will work with the customer to understand the individual circumstances of their complaint.</i></p>

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	<p>Our Customer Complaint and Feedback Policy is on our website at: Contact & feedback Watford Community Housing (wcht.org.uk)</p> <p>Customers can request for reasonable adjustments when providing feedback to us. WCH will accommodate all requests so far as possible in accordance with the Equality Act 2010 and our Translation & Interpretation Policy. We want to ensure that all customers receive equitable outcomes .</p> <p>Where customers are considered vulnerable, they will be treated in accordance with our Vulnerable Customers Policy.</p>	<p>Section 4.1.1. states: <i>Customers can give us feedback in a number of ways:</i></p> <table><tr><td>In person:</td><td><i>To any member of our staff</i></td></tr><tr><td>Digital Service:</td><td><i>Register at www.wcht.org.uk/</i></td></tr><tr><td>By telephone:</td><td><i>0800 218 2247</i></td></tr><tr><td>Online:</td><td><i>Via our website: www.wcht.org.uk/contact-feedback; or through our social media platforms, Facebook and Instagram</i></td></tr><tr><td>By email:</td><td><i>feedback@wcht.org.uk</i></td></tr><tr><td>In writing to:</td><td><i>Gateway House 59 Clarendon Road Watford Hertfordshire WD17 1LA</i></td></tr></table>	In person:	<i>To any member of our staff</i>	Digital Service:	<i>Register at www.wcht.org.uk/</i>	By telephone:	<i>0800 218 2247</i>	Online:	<i>Via our website: www.wcht.org.uk/contact-feedback; or through our social media platforms, Facebook and Instagram</i>	By email:	<i>feedback@wcht.org.uk</i>	In writing to:	<i>Gateway House 59 Clarendon Road Watford Hertfordshire WD17 1LA</i>
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Online:	<i>Via our website: www.wcht.org.uk/contact-feedback; or through our social media platforms, Facebook and Instagram</i>															
By email:	<i>feedback@wcht.org.uk</i>															
In writing to:	<i>Gateway House 59 Clarendon Road Watford Hertfordshire WD17 1LA</i>															

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	<p>We provide regular training to our staff and completed this most recently with Managers in May 2024 and in March 2025 with our front-line customer service teams.</p> <p>Within our Corporate Objective for 2025/26: Complaint handling responsibilities for all employees:</p> <ul style="list-style-type: none"> • To ensure you are collaborative and co-operative in your approach towards any complaints or dissatisfaction. <p>Working with relevant colleagues to create a resolution in line with the Housing Ombudsman principles: Be Fair, Put things right and Learn from outcomes.</p> <ul style="list-style-type: none"> • Ensure that the customer affected is contacted in the first instance. Respond fully to all areas that require investigation, using data from our systems. • Meet our Stage 1 and Stage 2 deadlines. To ensure that any complaints or dissatisfaction mentioned is logged, collated, and sent to Customer Relations to ensure good record keeping. • Where there may have been any shortfalls identified through complaints, ensure that ownership is taken, and that 	<p>We have section of our intranet for staff on feedback and our policy is available online with additional guidance notes for managers handling complaints.</p> <p>We promote staff to undertake additional learning on the HOS Centre for Learning.</p>
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			learnings and actions are made to improve the service and increase customer satisfaction	
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	We provide weekly updates to all managers and the Senior Leadership team on complaint volumes. We have seen our volumes increase this year and the amount of overall feedback logged has also increased.	We openly share and promote this data in our annual report and customer insights report. We also report this to our Gateway Membership Team and Customer Experience Committee each quarter.
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	Our Customer Complaint and Feedback Policy is on our website at: Contact & feedback Watford Community Housing (wcht.org.uk)	<p>We have ensured that the search of the website is also optimised to bring up the correct pages if the customer types the word "complaint" into the search function.</p> <p>You can also select different languages on our website.</p> <p>We have recently surveyed our customers with visual impairment to ensure we have captured their communication preferences so that letters and policies can be requested in large font or braille.</p>
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	Our Customer Complaint and Feedback Policy is on our website at: Contact & feedback Watford Community Housing (wcht.org.uk)	This is set out in Section 8 of this policy which references reporting to committees, our Member Responsible for Complaints and our Gateway Membership Team.
3.6	Landlords must give residents the opportunity to have a representative deal with their complaint on their behalf, and to be represented or	Yes	Our Customer Complaint and Feedback Policy is on our website at: Contact & feedback	This is set out in section 4.1.4 <i>"Customers can also provide feedback through a third party such as an MP or Local Councillor who will be able to</i>

	accompanied at any meeting with the landlord.		 Watford Community Housing (wcht.org.uk)	<i>handle the complaint on behalf of the customer. In these cases, the customer must provide their express permission through our permission to speak process. Customers may be accompanied to any meeting with the landlord"</i>
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	<p>Every letter sets this out to our customer at each stage of the process.</p> <p>Our Customer Complaint and Feedback Policy is on our website at: Contact & feedback Watford Community Housing (wcht.org.uk)</p>	<p>Each letter states:</p> <p><i>"If you remain unhappy with our decision you can pass your complaint to the Housing Ombudsman whose contact details are as follows..."</i></p> <p>Section 6 of our policy: External Complaints Procedure.</p>

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	<p>This person is Our Customer Experience Manager.</p> <p>We also have a Member Responsible for Complaints appointed from our Board who is the Chair of our Customer Experience Committee.</p>	<p>Duties are clearly set out in the job description for this role.</p> <p>This person manages the Customer Relations Team who manage all customer feedback.</p>
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	The Customer Experience Manager is managed by the Assistant Director of Customers and Communities and in turn the Group Director of Operations.	The Customer Experience Manager has the autonomy to escalate issues as requires and reports to all leaders in the business on the performance of their service areas in handling complaints.
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	We were Audited by TIAA in January 2024 on our complaints handling and complaint handling process.	An audit outcome of "substantial assurance" was achieved as a result of this audit.

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	Our Customer Complaint and Feedback Policy is on our website at: Contact & feedback Watford Community Housing (wcht.org.uk)	Section 1.2. of this policy states: <i>“Residents will never be treated differently for bringing forward complaints”</i>
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	We do not have extra named stages in our policy.	Our timelines for resolution (internally) monitored are also tighter than those imposed by the HOS Code for Stage 2 complaints to ensure overall compliance and quicker resolution.
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	Our Customer Complaint and Feedback Policy is on our website at: Contact & feedback Watford Community Housing (wcht.org.uk)	The two stage process is set out at section 5.0 of our complaints procedure.
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	Our Customer Complaint and Feedback Policy is on our website at: Contact & feedback Watford Community Housing (wcht.org.uk)	The two stage process is set out at section 5.0 of our complaints procedure. We do not use third parties to settle our complaints at this time.

5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Yes	Our Customer Complaint and Feedback Policy is on our website at: Contact & feedback Watford Community Housing (wcht.org.uk)	We do not use third parties to settle our complaints at this time.
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	Our Customer Complaint and Feedback Policy is on our website at: Contact & feedback Watford Community Housing (wcht.org.uk)	<p>This is in section 4.2: <i>“We encourage customers making a complaint to outline what they feel would be a satisfactory resolution to the problem at the outset so that everyone’s clear about expectations. We will work with the customer to understand the individual circumstances of their complaint”.</i></p> <p><i>Within our template acknowledgement letters at stage 1 or stage 2 we will set out our outstanding of the complaint.</i></p>
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	Our template letters make clear each area raised as per the complaint definition that there is a clear explanation and response.	Template letters break down each section of the complaint definition into different areas with a bold title in our responses.
5.8	At each stage of the complaints process, complaint handlers must:	Yes	All staff and Customer Resolutions Officers (CRO) have access to: Creating a positive complaints handling culture guide.	A TIAA audit of the process received the outcome of “substantial assurance”.

	<ul style="list-style-type: none"> a. deal with complaints on their merits, act independently, and have an open mind; b. give the resident a fair chance to set out their position; c. take measures to address any actual or perceived conflict of interest; and d. consider all relevant information and evidence carefully. 		<p>All CROs and Manager in Customer Experience have completed the relevant modules in the HOS Centre for Learning.</p> <p>All staff members complete and annual declaration of interest to prevent any conflicts of interest.</p>	This audit looked at a sample of responses of complaints to customers.
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	<p>We met all timescales in 2024/25</p> <p>We have a report which enables the team to track the status of open cases</p>	<p>Section 5.3.4 of our policy states:</p> <p><i>If the issue is such that we cannot conclude the Appeal within this timescale we will apologise, explain why this is the case and confirm a new expected response date.</i></p>
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	These are logged in our MRI Housing system and recorded as part of the complaint reporting process	<p>Section 4.1.2 states:</p> <p><i>“Customers can request for reasonable adjustments when providing feedback to us. WCH will accommodate all requests so far as possible in accordance with the Equality Act 2010 and our Translation & Interpretation Policy. We want to ensure that all customers receive equitable outcomes . Where customers are considered vulnerable, they will be treated in accordance</i></p>

				<i>with our Vulnerable Customers Policy”</i>
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	Our Customer Complaint and Feedback Policy is on our website at: Contact & feedback Watford Community Housing (wcht.org.uk)	This is set out in section 5.3.2 of this policy: <i>“We will not refuse to escalate a complaint through all stages of the procedure unless there is a valid reason to do so. We reserve the right not to accept an Appeal under section 2 of the Complaint handling Code or where: ...”</i>
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	We use MRI and our Customer feedback module to log the relevant details of each case.	A TIAA audit of the process received the outcome of “substantial assurance” of this process. This audit looked at a sample of responses of complaints to customers.
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	We have a Goodwill Gesture policy which allows us to provide additional remedies to support us with resolution.	Section 4.2 encourages managers to understand what would be “ <i>satisfactory resolution to the problem at the outset</i> ” so that the complaint can be remedied at the earliest stage.
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	Yes	Persistent & Unreasonable Behaviour Policy – June 2022	Section 7.2 states: “ <i>The Housing Ombudsman has its own guidance on what constitutes unacceptable</i>

	putting any restrictions in place and must keep restrictions under regular review.			<i>behaviour which we follow, and which is reflected in our Persistent & Unreasonable Behaviour Policy at Appendix 1</i>
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	Persistent & Unreasonable Behaviour Policy – June 2022	Section 8.1 of our policy makes provisions under the act and states: “Accordingly, any restrictions imposed on a customer’s contact following section 6 above should recognise and be appropriate to their individual circumstances”

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	Our Customer Complaint and Feedback Policy is on our website at: Contact & feedback Watford Community Housing (wcht.org.uk)	Section 4.2 encourages managers to understand what would be “ <i>satisfactory resolution to the problem at the outset</i> ” so that the complaint can be remedied at the earliest stage.
6.2	Complaints must be acknowledged, defined and logged at stage 1 of the complaints procedure <u>within five working days of the complaint being received</u> .	Yes	Our Customer Complaint and Feedback Policy is on our website at: Contact & feedback Watford Community Housing (wcht.org.uk)	Section 5.2.1 states timescales for receipt and resolution of complaints. We do however try to record these earlier where possible.
6.3	Landlords must issue a full response to stage 1 complaints <u>within 10 working days</u> of the complaint being acknowledged.	Yes	Our Customer Complaint and Feedback Policy is on our website at: Contact & feedback Watford Community Housing (wcht.org.uk)	Section 5.2.2. states: “ <i>we would look to resolve the issue within a maximum of ten working days, starting from the date the complaint was first logged</i> ”
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	Yes	Our Customer Complaint and Feedback Policy is on our website at: Contact & feedback Watford Community Housing (wcht.org.uk)	Section 5.2.3 states: “ <i>In some rare circumstances, we may need to extend a Stage 1 Complaint for a further ten days. This allows for the</i>

	extension must be no more than 10 working days without good reason, and the reason(s) must be clearly explained to the resident.			<i>relevant manager to conclude their investigation into the complaint and issue a final response."</i>
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	This is included in all feedback letters.	Each letter states: <i>"... you can pass your complaint to the Housing Ombudsman whose contact details are as follows:.."</i>
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	Our Customer Complaint and Feedback Policy is on our website at: <u>Contact & feedback Watford Community Housing (wcht.org.uk)</u>	Section 5.2.2. states: <i>"If the problem has been resolved within this timescale, we will agree with you that the complaint can be closed but if there are things outstanding e.g. repair work, we will continue to monitor the situation closely to ensure it is completed within a reasonable timescale."</i>
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	All staff and Customer Resolutions Officers (CRO) have access to: Creating a positive complaints handling culture guide. All CROs and Manager in Customer Experience have completed the relevant modules in the HOS Centre for Learning.	A TIAA audit of the process received the outcome of "substantial assurance". This audit looked at a sample of responses of complaints to customers.
6.8	Where residents raise additional complaints during the investigation, these	Yes	Our Customer Complaint and Feedback Policy is on our website	Section 5.2.2 states:

	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.		at: Contact & feedback Watford Community Housing (wcht.org.uk)	<i>"...if new issues are raised by the customer after the Stage 1 has been issued, they may be raised as a new complaint so they do not cause unreasonable delays."</i>
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"> a. the complaint stage; b. the complaint definition; c. the decision on the complaint; d. the reasons for any decisions made; e. the details of any remedy offered to put things right; f. details of any outstanding actions; and g. details of how to escalate the matter to stage 2 if the individual is not satisfied with the response. 	Yes	<p>All of this is included in our system and templated letters for complaint handling at all stages.</p> <p>All staff and Customer Resolutions Officers (CRO) have access to: Creating a positive complaints handling culture guide.</p> <p>All CROs and Manager in Customer Experience have completed the relevant modules in the HOS Centre for Learning.</p>	<p>A TIAA audit of the process received the outcome of "substantial assurance".</p> <p>This audit looked at a sample of responses of complaints to customers.</p>

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	Our Customer Complaint and Feedback Policy is on our website at: Contact & feedback Watford Community Housing (wcht.org.uk)	Section 5.3.7 states: <i>The conclusion of an Appeal represents the exhaustion of our internal complaints handling procedure.</i>

			Section 5.0 focusses on the appeal stage of the Landlord procedure.	<i>Complainants who remain dissatisfied can pursue their complaint externally, the Procedure of which is detailed further below at section 6.</i>
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	Our Customer Complaint and Feedback Policy is on our website at: <u>Contact & feedback Watford Community Housing (wcht.org.uk)</u>	Section 5.3.1 states: <i>“These will be acknowledged within five working days of the escalation being received.”</i>
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	Our Customer Complaint and Feedback Policy is on our website at: <u>Contact & feedback Watford Community Housing (wcht.org.uk)</u>	Section 5.3.3 states the reasons why a resident may wish to escalate and how we will try to understand the further reasons for them escalating the complaint.
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Yes	We escalate the level of manager being used at each stage. Our Customer Complaint and Feedback Policy is on our website at: <u>Contact & feedback Watford Community Housing (wcht.org.uk)</u>	Section 5.3.4 states: <i>A Stage 2 Appeal would be carried out by a WCH manager at Assistant Director Level or above (at WCH’s discretion) together with a Tenant Panel Customer Representative. The WCH manager involved at Stage 2 must be above the investigating manager at Stage 1</i>
6.14	Landlords must issue a final response to the stage 2 <u>within 20 working days</u> of the complaint being acknowledged.	Yes	Our Customer Complaint and Feedback Policy is on our website at: <u>Contact & feedback Watford Community Housing (wcht.org.uk)</u>	Section 5.3.4 states: <i>“It should take no more than fifteen working days from the date WCH are clear of the reasons for escalating the complaint, and in exceptional</i>

				<i>circumstances, no more than 20 days."</i>
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	Our Customer Complaint and Feedback Policy is on our website at: Contact & feedback Watford Community Housing (wcht.org.uk)	Section 5.3.4 states: <i>"If the issue is such that we cannot conclude the Appeal within this timescale we will apologise, explain why this is the case and confirm a new expected response date."</i>
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	This is included in all feedback letters.	Each letter states: <i>"... you can pass your complaint to the Housing Ombudsman whose contact details are as follows:..."</i>
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	Our Customer Complaint and Feedback Policy is on our website at: Contact & feedback Watford Community Housing (wcht.org.uk)	Section 5.2.2 states: <i>"If the problem has been resolved within this timescale, we will agree with you that the complaint can be closed but if there are things outstanding e.g. repair work, we will continue to monitor the situation closely to ensure it is completed within a reasonable timescale."</i>
6.18	Landlords must address all points raised in the complaint definition and provide clear reasons for any decisions, referencing the	Yes	All staff and Customer Resolutions Officers (CRO) have access to: Creating a positive complaints handling culture guide.	ATIAA audit of the process received the outcome of "substantial assurance".

	relevant policy, law and good practice where appropriate.		All CROs and Manager in Customer Experience have completed the relevant modules in the HOS Centre for Learning.	<p>This audit looked at a sample of responses of complaints to customers.</p> <p>All letters include a section on lessons learned and these are captured in our complaints Insight report.</p>
6.19	<p>Landlords must confirm the following in writing to the resident at the completion of stage 2 in clear, plain language:</p> <ul style="list-style-type: none"> 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. <p>“”</p>	Yes	<p>All of this is included in our system and templated letters for complaint handling at all stages.</p> <p>All staff and Customer Resolutions Officers (CRO) have access to: Creating a positive complaints handling culture guide.</p> <p>All CROs and Manager in Customer Experience have completed the relevant modules in the HOS Centre for Learning.</p>	<p>A TIAA audit of the process received the outcome of “substantial assurance”.</p> <p>This audit looked at a sample of responses of complaints to customers.</p>
6.20	Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.	Yes	<p>We escalate the level of manager being used at each stage.</p> <p>Our Customer Complaint and Feedback Policy is on our website at: Contact & feedback Watford Community Housing (wcht.org.uk)</p>	<p>Section 5.3.4 states: <i>“A Stage 2 Appeal would be carried out by a WCH manager at Assistant Director Level or above (at WCH's discretion) together with a Tenant Panel Customer Representative. The WCH manager involved at Stage 2</i> </p>

				<i>must be above the investigating manager at Stage 1”</i>
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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"> • 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	<p>All of this is included in our system and templated letters for complaint handling at all stages.</p> <p>All staff and Customer Resolutions Officers (CRO) have access to: Creating a positive complaints handling culture guide.</p> <p>All CROs and Manager in Customer Experience have completed the relevant modules in the HOS Centre for Learning.</p> <p>Our intranet also provides guidance on Housing Ombudsman – remedies guidance.</p>	<p>A TIAA audit of the process received the outcome of “substantial assurance”.</p> <p>This audit looked at a sample of responses of complaints to customers.</p>
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Yes	<p>Our Customer Complaint and Feedback Policy is on our website at: Contact & feedback Watford Community Housing (wcht.org.uk)</p> <p>Goodwill gestures policy</p>	We utilise the limits set out in the HOS Remedies Guide as a basis for issuing remedies and offering compensation.

			Our intranet also provides guidance on Housing Ombudsman – remedies guidance.	
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	<p>All of this is included in our system and templated letters for complaint handling at all stages.</p> <p>All staff and Customer Resolutions Officers (CRO) have access to: Creating a positive complaints handling culture guide.</p> <p>All CROs and Manager in Customer Experience have completed the relevant modules in the HOS Centre for Learning.</p>	<p>A TIAA audit of the process received the outcome of “substantial assurance”.</p> <p>This audit looked at a sample of responses of complaints to customers.</p>
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes	<p>Our Customer Complaint and Feedback Policy is on our website at: Contact & feedback Watford Community Housing (wcht.org.uk)</p> <p>Goodwill gestures policy</p> <p>Our intranet also provides guidance on Housing Ombudsman – remedies guidance.</p>	We utilise the limits set out in the HOS Remedies Guide as a basis for issuing remedies and offering compensation.

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 f. any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord.	Yes	<p>This is included in our Customer Insights Report 2024/25. This report was scrutinised by our Gateway Committee and also our Customer Experience Committee.</p> <p>A report which outlined changes to the Complaint Policy, our annual self-assessment document and compliance with the Code went to both Committees and Group Board in June / July 2025.</p>	<p>This will be published on our website by 30th June 2025 at: How we're performing Watford Community Housing (wcht.org.uk)</p>
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.	Yes	<p>A report which outlined changes to the Complaint Policy, our annual self-assessment document and compliance with the Code went to</p>	<p>This will be published on our website by 31 July 2025 at: How we're performing Watford Community Housing (wcht.org.uk)</p>

	The governing body's response to the report must be published alongside this.		<p>both Committees and Group Board in June 2024.</p> <p>Our report for 2025/26 will be presented to the Committees (GMT & CEC) on 18 & 19 June 2025 and Group Board 21 July 2025.</p> <p>Their responses will be published on our website by end of July 2025.</p>	Our 2024 response is currently published.
8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	Yes	There have been no significant changes of this type.	There have been no significant changes of this type.
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	Yes	We have not been requested to review this by HOS in 2024/25.	There have been no requests of this type.
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	There have been no significant issues as outlined.	N/A

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	Weekly reports go to service managers and weekly meetings are held with teams such as Repairs and Housing to identify ways that the services can be improved and complaints proactively prevented.	Quarterly reports which detail trends in learning are shared with the Executive Management Team and Board Committees and our Gateway Membership team. These are also used to hold scrutiny events with our customers twice a year.
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	All of this is included in our system and templated letters for complaint handling at all stages. All staff and Customer Resolutions Officers (CRO) have access to: Creating a positive complaints handling culture guide. All CROs and Manager in Customer Experience have completed the relevant modules in the HOS Centre for Learning. In May 2024 a complaints lunch and learn was hosted by our Customer Experience Manager	A recent TIAA audit of the process received the outcome of "substantial assurance". This audit looked at a sample of responses of complaints to customers.
9.3	Accountability and transparency are also integral to a positive complaint handling culture. Landlords must report back on	Yes	Weekly reports go to service managers and weekly meetings are held with teams such as Repairs	Quarterly reports which detail trends in learning are shared with the Executive

	wider learning and improvements from complaints to stakeholders, such as residents' panels, staff and relevant committees.		and Housing to identify ways that the services can be improved and complaints proactively prevented.	Management Team and Board Committees and our Gateway Membership team. These are also used to hold scrutiny events with our customers twice a year.
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	The Assistant Director of Customers and Communities is responsible for this role	Quarterly reports which detail trends in learning are shared with the Executive Management Team and Board Committees and our Gateway Membership team. These are also used to hold scrutiny events with our customers twice a year.
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	Clare Norton has been appointed as our Responsible Member for Complaints. She meets quarterly with the Customer Experience Manager and Assistance Director of Customers and Communities.	Clare Norton is Chair of our Customer Experience Committee and a Group Board Member. She is an experienced Housing professional.
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	Clare Norton has been appointed as our Responsible Member for Complaints. She meets quarterly with the Customer Experience Manager and Assistance Director of Customers and Communities.	Clare Norton is Chair of our Customer Experience Committee and a Group Board Member. She is an experienced Housing professional.

9.7	<p>As a minimum, the MRC and the governing body (or equivalent) must receive:</p> <ul style="list-style-type: none"> a. regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance; b. regular reviews of issues and trends arising from complaint handling; c. regular updates on the outcomes of the Ombudsman's investigations and progress made in complying with orders related to severe maladministration findings; and d. annual complaints performance and service improvement report. 	Yes	<p>Clare Norton has been appointed as our Responsible Member for Complaints.</p> <p>She meets quarterly with the Customer Experience Manager a</p>	<p>Clare sits on the Customer Experience Committee which receives reports which detail the elements listed in 9.7a)-d)</p>
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> <ul style="list-style-type: none"> a. have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments; b. take collective responsibility for any shortfalls identified through complaints, rather than blaming others; and c. act within the professional standards for engaging with complaints as set by any relevant professional body. 	Yes	<p>This was refreshed in 2025 and is in the corporate objectives for every member of our teams.</p>	<p>The objective states:</p> <ul style="list-style-type: none"> • <i>To ensure you are collaborative and co-operative in your approach towards any complaints or dissatisfaction. Working with relevant colleagues to create a resolution in line with the Housing Ombudsman principles: Be Fair, Put things right and Learn from outcomes.</i> • <i>Ensure that the customer affected is contacted in the first instance. Respond fully to all areas that require investigation, using data from our systems.</i>

				<ul style="list-style-type: none">• <i>Meet our Stage 1 and Stage 2 deadlines. To ensure that any complaints or dissatisfaction mentioned is logged, collated, and sent to Customer Relations to ensure good record keeping.</i>• <i>Where there may have been any shortfalls identified through complaints, ensure that ownership is taken, and that learnings and actions are made to improve the service and increase customer satisfaction</i>
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