

Grosvenor Hart Homes: Housing Ombudsman Self- Assessment Form

Please find the Grosvenor Hart Homes (GHH) self-assessment against the Housing Ombudsman Complaint Handling Code 2024 as of September 2026.

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	We adopt the Housing Ombudsman’s definition of complaints- in GHH policy under ‘What is a complaint?’: <i>‘We regard a complaint as an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the organisation, its own staff, or those acting on its behalf, affecting an individual tenant, group of tenants, prospective tenants, other customers, contractors or members of the public.’</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	Yes	This is set out in our policy under ‘What is a complaint?’: <i>“We acknowledge that a customer may not explicitly use the word ‘complaint’ when expressing dissatisfaction but it will be made clear to the</i>	

	handled in line with the landlord's complaints policy.		<i>customer that they have the choice to register their dissatisfaction as a formal complaint."</i> And in the section 'Who can make a complaint?' <i>"Any complaints that are submitted via a third party or representative will be handled in line with our standard GHH complaints policy and procedures."</i>	
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	This distinction is set out the GHH policy under 'What is a service request?': <i>'Occasionally a customer may require action from GHH to put something right but have no interest in engaging in a formal complaint investigation or may not require us to respond to their concerns in writing.</i> <i>On these occasions we will treat the report as a service request. A service request is a request from a customer requiring action to be taken by GHH to</i>	.

			<i>put something right. This could include reporting a repair or maintenance issue or taking action to resolve a neighbourhood issue ... Our housing management system enables us to record, track and initiate the required action to deal with these, allowing us to establish an audit trail and learn from customer feedback.'</i> "	
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	This is detailed in the GHH policy under 'What is a service request?': <u>'Where a customer is unhappy with how we have dealt with an issue, the service we have provided or our response to a service request, they can make a formal complaint. When a service request becomes a complaint, we will continue our efforts to address the service request.'</u>	

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	This is detailed in the GHH policy under 'How complaints can be made': <i>“Survey feedback may not necessarily need to be treated as a complaint, though, where possible, the person completing the survey should be made aware of how they can pursue their dissatisfaction as a complaint if they wish to. Whenever we request feedback from our customers, we will provide information on how customers can make a complaint if they wish to.”</i>	
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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	This is detailed in the GHH policy under 'Exclusion grounds' <i>"We will consider all complaints on an individual, case-by-case basis and accept all complaints referred to us within 12 months of the issue having occurred or the customer becoming aware of the issue unless there is a valid reason not to do so.... If we do not accept a complaint, we will explain the reason for our decision (and how we propose to address the customer's concerns) and where the customer is a GHH Limited tenant, inform the customer that they have the right to take that decision to the Housing Ombudsman."</i>	GHH has two entities- Grosvenor Hart Homes Limited (GHH Limited), which sits within our Registered Provider (RP) entity and manages our social housing, and GHH Properties North West Limited (GHH PNW Limited), which manages our market housing. GHH only has one complaints policy and any differences in approach between our social and market properties is specified within the policy. As the Housing Ombudsman service is only accessible to GHH Limited social housing customers as part of our RP entity, it is specified in our policy that only GHH Limited customers can take decisions

				to the Housing Ombudsman.
2.2	A complaints policy must set out the circumstances in which a matter will not be considered as a complaint or escalated, and these circumstances must be fair and reasonable to	Yes	This is detailed in the GHH policy under 'Exclusion grounds' :	

	residents. Acceptable exclusions include: • The issue giving rise to the complaint occurred over twelve months ago. • Legal proceedings have started. This is defined as details of the claim, such as the Claim Form and Particulars of Claim, having been filed at court. • Matters that have previously been considered under the complaints policy.		<i>“We may not consider an expression of dissatisfaction under this policy if the issue:</i> • <i>occurred more than 12 months ago</i> • <i>has already been considered under this policy</i> • <i>is feedback about another tenant’s behaviour</i> • <i>circumstances out of our control</i> • <i>is subject to legal action</i> • <i>relates to an insurance claim.”</i> This is also explained on the GHH website.	
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	This is set out in the GHH policy under ‘Exclusion grounds’: <i>“We will consider all complaints on an individual, case-by-case basis and accept all complaints referred to us within 12 months of the issue having occurred or the customer becoming aware of the issue unless there is a valid reason not to do so. In some cases, we may apply discretion</i>	

			<i>to accept complaints issued beyond this time limit where there are good reasons to do so.”</i>	
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	This is detailed in the GHH policy under ‘Exclusion Grounds’: <i>“If we do not accept a complaint, we will explain the reason for our decision (and how we propose to address the customer’s concerns) and where the customer is a GHH Limited tenant inform the customer that they have the right to take that decision to the Housing Ombudsman. We will comply with any subsequent Ombudsman decision which directs us to accept a complaint where the Ombudsman does not feel the exclusion has been fairly applied.”</i>	As per 2.1 of this self-assessment, as the Housing Ombudsman service is only accessible to GHH Limited social housing customers as part of our RP entity, it is specified in our policy that only GHH Limited customers can take decisions to the Housing Ombudsman.
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Yes	This is indicated in the GHH policy under ‘Exclusion grounds’ <i>“We will consider all complaints on an individual, case-by-case basis”</i>	

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	The various ways complaints can be made is set out in the GHH policy e.g. in the 'Introduction' and on the GHH website: <i>"You can make a complaint or provide feedback to GHH in any of the following ways:</i> <i>• by telephone on 01244 563777 (core office hours: Monday-Friday, 9am-5pm)</i> <i>• in person at any of our offices</i> <i>• via our online complaints form on our website</i> <i>• through the GHH My Home Portal</i> <i>• in writing to any of our offices</i> <i>• by email to feedback@grosvenorhart.com"</i> We also explain in the section 'Equality, diversity and inclusion' how we will take steps to make	

			reasonable adjustments to support those who may need to access the complaints process e.g. : • <i>‘Adapt our approach considering the needs of our customers and make reasonable adjustments to ensure a tenant can raise and address their complaint with us....</i> • <i>Where a customer has a vulnerability or characteristic that may make it harder for them to access the policy, e.g. due to age, disability, care experience, mental health, religion/faith, pregnancy/maternity, race or language, we will look at how we can give reasonable support so the customer can fully access the policy. This may be through exploring translation services, producing large print versions of our documentation or providing assistance via the GHH Support Service.</i> • <i>Identify and understand any barriers customers may have to reporting a complaint which may relate to a protected</i>	
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			<i>characteristic.'</i>	
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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	This is detailed in the GHH policy under 'How complaints will be handled' <i>"Customers can raise a complaint with any member of GHH staff. Staff will be trained in handling and responding to complaints appropriately and will be empowered to deal with complaints as and when they arise including escalating the complaint to the appropriate person within the organisation There are designated staff who are designated to deal with complaints at Stage 1 and 2.."</i>	
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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	This is stipulated in the GHH policy under 'How complaints can be made': <i>"In our endeavour to ensure our complaints process is accessible to our customers, we may reflect on a low volume of complaints as a sign that our customers are unable to complain and look at how we can address this. Conversely, we do not necessarily see a high complaints volume as negative, but rather as a sign that customers are aware of our procedures and that our complaints process is accessible."</i>	
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	The GHH Complaints Policy is available and signposted on our website: All tenants are issued with a tenant handbook on move in with a summary of the complaints process. In 2025-6, we worked with our tenants to produce an easy-read document explaining our complaints process. This is available on our website and displayed across our sites.	

			As stated in the Policy, customers are also able to request a physical copy of the policy and we will work with customers where there is an accessibility issue to ensure we can meet their needs.	
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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	The GHH policy states where the policy can be accessed online and also has a section dedicated to the role of 'The Housing Ombudsman Service'. This information is also on the GHH website' https://www.grosvenor.com/hart-tenant-complaints Our Policy also has a section on 'Promoting awareness of our approach to complaints': <i>'We will ensure that our complaints policy and process, the Housing Ombudsman's Complaint Handling Code and the Housing Ombudsman scheme (including contact information) is promoted in different ways e.g. on our website, visible on posters across our sites and in bulletins and correspondence as appropriate'."</i>	
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	This is detailed in the GHH policy under 'Who can make a complaint' and referred to as an advocate: <i>"Complainants may make a complaint via an advocate. An</i>	

			<i>advocate could be a friend, relative, support worker or an advocacy service such as the Citizens Advice Bureau. This may be in cases where a customer requires support due to physical disability, mental health or language barriers, or in cases where a customer has requested a representative act on their behalf....An advocate can accompany or represent the customer throughout the complaints process including at meetings with GHH."</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	This is detailed in the GHH policy in a section on 'The Housing Ombudsman Service' which provides information on the role of the Housing Ombudsman and the contact details. Information about how to contact the Ombudsman service, including the contact details, is available in the tenant handbook and on the GHH website and will be made clear to customers at each stage of the process.	

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	As indicated in the GHH policy, our Deputy Chief Executive and Chief Operating Officer is the GHH appointed Complaints Officer. We have also appointed a Lead Member Responsible for Complaints on our Board.	Due to its size, GHH does not have a dedicated complaints team, but GHH has dedicated staff to deal with complaints at Stage 1 and 2. GHH has an established process to ensure the procedure is consistently followed and that complaints data and learning is shared with senior leadership and Board.
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	As above, this officer is our Deputy Chief Executive and Chief Operating Officer, with access to all staff and Board and authority to appropriately act on complaints.	As above, the Complaints Officer is supported by dedicated complaints officers and the Quality and Compliance team.
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	Yes	Our approach to learning from complaints is set out in the GHH Policy under 'Learning from complaints'.	There is a strong culture of learning from complaints, with dedicated lessons learnt sessions and actions

	important that complaints are seen as a core service and must be resourced to handle complaints effectively		<i>‘Effective complaint handling is a key priority for us and we are committed to learning from complaints so that we can continuously improve the services we deliver to our tenants and other customers. This is part of our aim to establish a positive complaint handling culture so we can effectively resolve disputes... We will proactively consider lessons learnt from each complaint and assign tangible actions to each lesson learnt to ensure they lead to genuine improvement in our services. We will ensure this learning is shared across the GHH team and that our Management Board considers insights from individual complaints, themes and trends to make positive changes to service delivery (including any trends that relate to equality, diversity and inclusion). Our learning will be informed by both the case findings and also feedback from customers who have been through the GHH complaints process.</i>	assigned to each and seen through by our Quality and Compliance team. The learning will be regularly communicated across the GHH team, both to operational staff and senior management. There is also a detailed guidance document and procedure that step through the complaint handling process, with template letters drafted to ensure our communication on complaints reflects our policy. We also consult customers including those who have been through the process to inform how we can do better. We are reviewing our training programme in the round to ensure compliance with the RSH Competence and Conduct Standard and developing a new Learning and Development Polic. As part of this a more robust programme for delivering
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			.	training, including around complaint handling, is being developed. This will be rolled out before the end of 2026.
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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	We have a single complaints policy for all customers.	
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	This is detailed in the GHH policy under 'Aims & key objectives' <i>'Resolving matters locally and as quickly as possible by being open, transparent, accountable and outcome focused'</i> <i>Resolving any queries or issues reported efficiently and at the first point of contact wherever possible.'</i> Our complaints process has two stages: stage 1 and stage 2 as detailed in the section 'How complaints will be handled' As indicated, we also deal with service requests outside of our formal complaints process. We provide	

			information on this in our Complaints Policy under 'What is a Service Request': <i>'A service request is a request from a customer requiring action to be taken by GHH to put something right. This could include reporting a repair or maintenance issue or taking action to resolve a neighbourhood issue.'</i>	
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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	This is outlined in the GHH policy under 'How complaints will be handled': <i>"We have a two-stage complaints process."</i>	
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.	N/A	All GHH complaints are handled by GHH staff according to one GHH complaints process.	
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	N/A	All GHH complaints are handled by GHH staff in line with the Code.	
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,	Yes	This approach is outlined in the GHH policy under 'How complaints will be handled' <i>"When we acknowledge a complaint...we will set out our understanding of the complaint"</i>	This is also communicated in the guidance note for staff dealing with complaints and template letters ensure the complaints officer covers all points required in addressing a complaint.

	the resident must be asked for clarification.		<i>and the outcomes the customer is seeking i.e. the 'complaint definition'. We will seek clarification of the customer's views where this is necessary and if any part of the complaint is unclear."</i>	
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	This is stated in the GHH policy under 'How complaints will be handled' <i>"We will also make clear which aspects of the complaint we are and are not responsible for and clarify any areas where this is not clear."</i>	This is also communicated in the guidance note for staff dealing with complaints and template letters ensure the complaints officer covers all points required in addressing a complaint.
5.8	At each stage of the complaints process, complaint handlers must: - deal with complaints on their merits, act independently, and have an open mind; - give the resident a fair chance to set out their position; - take measures to address any actual or perceived conflict of interest; and - consider all relevant information and evidence carefully.	Yes	This is set out in the Complaint Investigation Principles section of the GHH policy: <i>"To ensure that a complaint investigation is fair, at each stage of the complaints process we will:</i> <i>• Deal with each case on its merits</i> <i>• Act independently and have an open mind</i> <i>• Give the customer a fair chance to set out their position</i>	This approach is reflected in the GHH guidance note on responding to complaints.

			• <i>Take measures to address any actual or perceived conflict of interest</i> • <i>Consider all relevant information and evidence carefully</i>	
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	This is detailed in the GHH policy in the section 'How complaints will be handled' with the same approach at both stages 1 and 2 in line with the timescales set out in the Ombudsman Code e.g. <i>"There will be times when we are unable to provide a comprehensive response in the timeframes set out. On these occasions, we may extend a response deadline by up to a maximum of 10 working days but only with the prior agreement of the complainant. On these occasions, complainants will be kept up to date and will receive an explanation for any delays. We will provide customers with the contact information for the person handling the complaint and also the contact details of the Housing Ombudsman for GHH Limited tenants where they are not happy with our</i>	This approach is reflected in the GHH guidance note on responding to complaints.

			<i>proposed response timescale.”</i> This is also set out on the GHH website.	
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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	This is detailed in the GHH policy under 'Equality, diversity and inclusion' <i>"We will...Keep a record of any reasonable adjustments agreed with customers as well as recording any disabilities customers have disclosed and keep the reasonable adjustments under active review."</i>	This is supported by our housing case 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	This is detailed in the GHH policy under 'How complaints will be handled': <i>"Once Stage 1 has been completed, if all or part of the complaint is not resolved to the customer's satisfaction it will be progressed to Stage 2, unless an exclusion ground applies. In cases where we cannot accept a complaint because exclusion grounds apply, we will explain the reason to the customer."</i>	This approach is reflected in the GHH guidance note on responding to complaints.

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	This is detailed in the GHH policy under ‘Recording complaints’ <i>“In all cases, we will keep a full record of each complaint and the outcomes at each stage using our case management system.”</i> Our case management system also ensures an audit trail of complaints actions and correspondence is logged for each case.	Outcomes and lessons learnt from complaints are also logged and tracked by our Quality and Compliance team..
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	This is detailed in the GHH policy in the section ‘Putting things right’ <i>“Remedies can be put in place at any stage of the complaints process as appropriate and in agreement with the Complaints Officer where appropriate.”</i>	
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	We set out our approach to this in the GHH policy under Restrictions: <i>“We may place restrictions on a customer’s contact with us where their behaviour becomes unacceptable, impacts upon our ability to consider their complaint</i>	

			<i>or to serve other customers or they engage in abusive or threatening behaviour.</i> <i>In these instances, we will explain the reason for our decision and how we propose to engage with the customer to address their concerns. We will keep any restrictions we place under regular review."</i> This is detailed further in the GHH Acceptable Behaviour Policy which is available on our website.	
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	This is detailed in the GHH policy under 'Restrictions': <i>"We will ensure our decision (to place restrictions) is proportionate and takes account of the customer's needs and demonstrates regard for the provisions of the Equality Act 2010."</i> <i>This is also detailed further in the GHH Acceptable Behaviour Policy.</i>	

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	This is detailed in the GHH policy under 'How complaints will be handled' <i>"In the interest of seeking quick and early resolutions to complaints where possible, our initial triage process will consider the complexity of each complaint and whether the tenant is vulnerable or at risk and determine an appropriate course of action to resolve the case promptly at stage 1, providing an explanation, apology or other resolution without delay where possible."</i>	This approach is also suggested in our responding to complaints guidance note.
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	This is detailed in the GHH policy under 'How complaints will be handled' <i>"When a complaint is made, it will be acknowledged, defined</i>	This is made clear in our responding to complaints guidance note. Our case management system is set up to reflect this timescale.

			<i>and logged at Stage 1 within five working days of receipt.”</i> This information is also on the GHH website.	
6.3	Landlords must issue a full response to stage 1 complaints <u>within 10 working days</u> of the complaint being acknowledged.	Yes	This is detailed in the GHH policy under ‘How complaints will be handled’ <i>“We will provide a full response to the complaint within 10 working days of the complaint being acknowledged.”</i> This information is also on the GHH website.	This is made clear in our responding to complaints guidance note. Our case management system is set up to reflect this timescale.
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	This is detailed in the GHH policy under ‘How complaints will be handled’ <i>“Where there is a good reason why we cannot provide a response within the timescales set out above, we may extend the response deadline by up to 10 working days, seeking the complainant’s agreement to the extension. agreement of the complainant. On these occasions, complainants will be kept up to date and will receive an</i>	This approach is also detailed in our responding to complaints guidance note and our template letters ensure this is clearly communicated to the customer.

			<i>explanation for any delays.”</i> This is also detailed on the GHH website.	
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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 detailed in the GHH policy under 'How complaints will be handled' <i>"We will provide customers with...the contact details of the Housing Ombudsman for GHH Limited tenants where they are not happy with our proposed response timescale."</i>	This is also detailed in our responding to complaints guidance note and our template complaints letter set out this information. As per 2.1 of this self-assessment, as the Housing Ombudsman service is only accessible to GHH Limited social housing customers as part of our RP entity, it is specified in our policy that only GHH Limited customers can take decisions to the Housing Ombudsman.

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	This is detailed in the GHH policy under 'How complaints will be handled' <i>"We will respond when the answer to the complaint is known, not when any outstanding actions required to address the issue have been completed. However, where possible we will provide guidance on when the actions will be completed Thereafter, we will continue to progress and complete any outstanding actions as promptly as possible and issue regular updates to the customer where actions are taking place over a longer time</i>	This approach is also detailed in our responding to complaints guidance note. Our case management system allows us to track and progress actions. Outstanding actions are monitored by our Quality and Compliance team. t
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			<i>period. Customers can also contact their GHH case officer at any time for an update”</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	This is detailed in the GHH policy under ‘How complaints will be handled’: <i>“Our response will address all the points raised in the complaint definition and refer to the relevant policy, law and good practice, where appropriate, to explain the reasons for any decisions.”</i>	This approach is also detailed in our responding to complaints guidance note and our template letters prompt this detail to be provided.
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	This is detailed in the GHH policy under ‘How complaints will be handled’ <i>“If, during the course of the Stage 1 investigation, further complaints are made by the customer, we will incorporate these into our response if the issues are related and we have not yet issued the Stage 1 response. In cases where we have already issued the Stage 1 response, where the new issues are deemed unrelated to the original issue under investigation</i>	This approach is also detailed in our responding to complaints guidance note.

			<i>or where incorporating the new issue would unreasonably delay the response, the new issue would be dealt with as a new complaint.”</i>	
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 g. details of how to escalate the matter to stage 2 if the individual is not satisfied with the response.	Yes	This is detailed in the GHH policy under ‘How complaints will be handled’ <i>“Our response will be in writing in clear, plain language and include:</i> • <i>the complaint stage</i> • <i>the complaint definition</i> • <i>our decision on the complaint</i> • <i>the reasons for any decisions made (referencing policy, law and good practice where appropriate)</i> • <i>the details of any remedy offered to put things right</i> • <i>details of any outstanding actions</i> • <i>details of how to escalate the matter to Stage 2 if the customer is not satisfied with the answer.”</i>	This approach is also detailed in our responding to complaints guidance note and our template letters prompt this detail to be provided.

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	This is detailed in the GHH policy under 'How complaints will be handled' <i>"Once Stage 1 has been completed, if all or part of the complaint is not resolved to the customer's satisfaction it will be progressed to Stage 2, unless an exclusion ground applies... Stage 2 is the final stage in our complaints process and signals our final response to the issue as the landlord."</i> This is also detailed on the GHH website.	This approach is also detailed in our responding to complaints guidance note.
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	This is detailed in the GHH policy under 'How complaints will be handled': <i>"A request to escalate a complaint to Stage 2 will be acknowledged, defined and logged within five working days of the escalation request being received."</i>	This is made clear in our responding to complaints guidance note. Our case management system is set up to reflect this timescale.

			This is also detailed on the GHH website.	
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	This is stated in the GHH policy under 'How complaints will be handled' <i>"Customers do not have to explain their reasons for escalation to Stage 2 and we will seek to understand why the customer remains unhappy."</i> This is also detailed on the GHH website.	This approach is also detailed in our responding to complaints guidance note.
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Yes	This is stated in the GHH policy under 'How complaints will be handled' <i>"a Stage 2 complaint will be considered by a senior manager who has not considered the complaint at Stage 1."</i>	This approach is also detailed in our responding to complaints guidance note.
6.14	Landlords must issue a final response to the stage 2 <u>within 20 working days</u> of the complaint being acknowledged.	Yes	This is detailed in the GHH policy on page 5: <i>"We will provide a final response to the complaint within 20</i>	This is made clear in our responding to complaints guidance note. Our case management system

			<i>working days of the complaint being acknowledged."</i> This is also detailed on the GHH website.	is set up to reflect this timescale.
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	This is detailed in the GHH policy under 'How complaints will be handled' <i>"In exceptional circumstances where we are unable to respond within this timeframe, due to the complexity of the complaint, the timeframe may be extended. We will provide an explanation to the customer and confirm a clear timeframe for when the response will be received. This extension should not exceed 20 working days without good reason."</i> This is also detailed on the GHH website.	This approach is also detailed in our responding to complaints guidance note and our template letters ensure this is clearly communicated to the customer.
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 detailed in the GHH policy under 'How complaints will be handled' <i>" We will continue to keep the customer up to date with the</i>	This is also detailed in our responding to complaints guidance note and our template complaints letter set out this information.

			<i>progress of their complaint and provide GHH Limited customers with the details of the Housing Ombudsman if they are not satisfied with the timeliness of our response.”</i>	As per 2.1 of this self-assessment, as the Housing Ombudsman service is only accessible to GHH Limited social housing customers as part of our RP entity, it is specified in our policy that only GHH Limited customers can take decisions to the Housing Ombudsman.
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	This is detailed in the GHH policy under ‘How complaints will be handled’ <i>“We will respond when the answer to the complaint is known, not when any outstanding actions required to address the issue have been completed. However, where possible we will provide guidance on when the actions will be completed. Thereafter, we will continue to progress and complete any outstanding actions as promptly as possible and issue regular updates to the customer where actions are taking place over a longer time period. Customers can also contact their GHH case officer at</i>	This approach is also detailed in our responding to complaints guidance note. Our case management system allows us to track and progress actions. Outstanding actions monitored by our Quality and Compliance team.

			<i>any time for an update</i>	
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	This is detailed in the GHH policy under 'How complaints will be handled' <i>"Our response will address all the points raised in the complaint"</i>	This approach is also detailed in our responding to complaints guidance note and our template letters prompt this detail to be provided.

			<i>definition and refer to the relevant policy, law and good practice, where appropriate, to explain the reasons for any decisions.”</i>	
6.19	Landlords must confirm the following in writing to the resident at the completion of stage 2 in clear, plain language: - the complaint stage; - the complaint definition; - the decision on the complaint; - the reasons for any decisions made; - the details of any remedy offered to put things right; - details of any outstanding actions; and - details of how to escalate the matter to the Ombudsman Service if the individual remains dissatisfied.	Yes	This is detailed in the GHH policy under ‘How complaints will be handled’: <i>“ Our response will be in writing in clear, plain language and include:</i> <i>• the complaint stage</i> <i>• the complaint definition</i> <i>• our decision on the complaint</i> <i>• the reasons for any decisions made</i> <i>• the details of any remedy offered to put things right</i> <i>• details of any outstanding actions</i> <i>• for GHH Limited social housing customers, details of how to escalate the matter to the Housing Ombudsman service if the customer remains dissatisfied.”</i> <i>.”</i>	This approach is also detailed in our responding to complaints guidance note and our template letters prompt this detail to be provided. As per 2.1 of this self-assessment, as the Housing Ombudsman service is only accessible to GHH Limited social housing customers as part of our RP entity, it is specified in our policy that only GHH Limited customers can take decisions to the Housing Ombudsman.

6.20	Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.	Yes	This is detailed in the GHH policy under 'How complaints will be handled' <i>Stage 2 is the final stage in our complaints process and signals our final response to the issue as the landlord. It will involve suitable staff members needed to issue such a response. As such, a Stage 2 complaint will be considered by a senior manager who has not considered the complaint at Stage 1.'</i> This is detailed on the GHH website.	
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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;	Yes	This is detailed in the GHH policy under 'Putting things right' <i>"Where something has gone wrong, we will acknowledge this and take actions to put things right."</i> <i>The actions we may take following a complaint may include:</i> • <i>Apologising</i>	

	- Reconsidering or changing a decision; - Amending a record or adding a correction or addendum; - Providing a financial remedy; - Changing policies, procedures or practices.		<i>Acknowledging where things have gone wrong</i> <i>Providing an explanation, assistance or reasons why an approach has been taken</i> <i>Taking a specific action</i> <i>Reconsidering or changing a decision</i> <i>Amending a record or adding a correction or addendum</i> <i>Providing financial compensation</i> <i>Changing policies, procedures or practices."</i>	
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Yes	This is detailed in the GHH policy under 'Putting things right' <i>"Any remedy offered will consider and reflect the impact on the customer of any fault identified."</i>	
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	This is detailed in the GHH policy under 'Putting things right' <i>"When a remedy is offered, we will clearly set out what will happen and by when, in agreement with the customer, where appropriate. We will follow</i>	Our Quality and Compliance team monitor complaints actions to ensure they are seen through to completion.

			<i>through all remedies to completion.”</i>	
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes	This is detailed in the GHH policy under ‘Putting things right’ <i>“We will also consult Ombudsman guidance when determining appropriate remedies.”</i>	This approach is detailed in the guidance note on responding to complaints.

Section 8: Putting things right

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	GHH produce an Annual Complaints Performance and Service Improvement report every year. This report is available on our website and records of archived reports from previous years is available on our website. This report provides detail on complaints we have received in the annual reporting year and provides information on learning and service improvements we have made as a result of individual complaints and operational experience. In cases where GHH had had contact with the Ombudsman during the reporting year, this would also be noted in the report. We also repeat a self-assessment against the Code every year and the latest version of this assessment is available on our website.	As a relatively new RP with a small housing portfolio, GHH has a relatively low number of complaints but we undertake detailed learning exercises on the basis of all complaints. Although only one of our constituent entities, GHH Limited, which manages our social housing, is a member of the Housing Ombudsman Scheme, the report may also reflect learning and service improvement resulting from complaints from our market rent tenants within GHH PNW Limited. This is because we generally follow the same procedure and policy across all our housing stock so learning applies across our portfolio.

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 is reported to the GHH Board every year for review and comment prior to submission to the Ombudsman and publication. The Board as our governing body provide a response to the report and self-assessment which is also published on our website.	
8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	Yes	In cases where there is a significant restructure, merger and/or change in procedures, we carry out an additional self-assessment. For example, this occurred in 2025 after, a number of GHH properties were transferred into our RP entity, GHH Limited, in 2025.	

8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	Yes	GHH commits to reviewing and updating the self-assessment following an Ombudsman investigation.	
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	In exceptional circumstances where we were unable to comply with the Code, we would inform the Ombudsman and our residents and publish on our website a timeline 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	Our approach is detailed in the GHH policy under 'Learning from complaints' <i>"We will proactively consider lessons learnt from each complaint and assign tangible actions to each lesson learnt to ensure they lead to genuine improvement in our services. We will ensure this learning is shared across the GHH team and that our Management Board considers insights from individual complaints, themes and trends to make positive changes to service delivery (including any trends that relate to equality, diversity and inclusion)."</i>	We have regular lessons learnt sessions to reflect on learning from complaints and whether any changes in our processes and procedures or other actions are required. Lessons learnt are recorded and agreed actions are taken with oversight from our Quality and Compliance team to ensure we make genuine service improvements. Lessons learnt are shared regularly with the GHH operational team and Management Board and are fed back to the GHH Board.

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	Our approach is detailed in the GHH policy under ‘Learning from complaints’ <i>“Effective complaint handling is a key priority for us and we are committed to learning from complaints so that we can continuously improve the services we deliver to our tenants and other customers. This is part of our aim to establish a positive complaint handling culture so we can effectively resolve disputes... We will proactively consider lessons learnt from each complaint and assign tangible actions to each lesson learnt to ensure they lead to genuine improvement in our services. We will ensure this learning is shared across the GHH team and that our Management Board considers insights from individual complaints, themes and trends to make positive changes to service delivery (including any trends that relate to equality, diversity and inclusion).”</i>	As detailed above, we have an established lessons learnt process, with oversight from the Quality and Compliance team, which ensures learning feeds into operations and leads to genuine service improvement. As we grow, we will have more data to support us to identify trends and themes supporting continuous improvement.
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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	This intention is set out in the GHH policy under 'Learning from complaints' <i>"In line with our commitment to be accountable and transparent, we will also report on our performance and learning and service improvements which have resulted from complaints to our customers, including through our regular tenant bulletins, on our website, at regular neighbourhood forums and through our annual report."</i>	
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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	As set out in our policy under 'learning from complaints', our Housing Director and DCEO is accountable for complaint handling: <i>"Our Deputy Chief Executive and Chief Operating Officer is our appointed complaints officer, who is responsible for complaints handling and will take the lead on assessing themes and trends, risks and where policies and procedures need to be revised."</i>	
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	As set out in the GHH policy , we have appointed a Lead Board Member for complaints (MRC) (Terrie Alafat): <i>"We have an appointed Lead Member Responsible for Complaints (MRC) on our Board."</i>	
9.6	The MRC will be responsible for ensuring the governing body receives regular information on complaints that	Yes	This is outlined in the GHH policy under 'Learning from Complaints'	As above, the Board receive an update on complaints

	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.		<i>"The MRC is responsible for ensuring that the Board receives regular information on complaints to enable it to understand our complaints handling performance."</i>	through a monthly dashboard and more detail on complaints received through a quarterly operational update. As GHH grows our portfolio and the number of tenants increases, we will be able to submit more detailed information on complaints to the MRC, including any trends based on themes of complaints and demographics of customers submitting complaints.
9.7	As a minimum, the MRC and the governing body (or equivalent) must receive: a. regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance; b. regular reviews of issues and trends arising from complaint handling; c. regular updates on the outcomes of the Ombudsman's investigations and progress made in complying with orders related to severe maladministration findings; and d. annual complaints performance and service improvement report.	Yes	This is detailed in the GHH policy under 'Learning from complaints' <i>"We will ensure that the MRC and the rest of the Board receive regular updates on complaints including on volume, categories and outcomes, complaint handling performance, reviews of issues and trends and updates on the outcomes of any Ombudsman investigations and progress in addressing any findings, as well as the annual complaints performance and service improvement report."</i>	As above, the Board receive an update on complaints through a monthly dashboard and more detail on complaints received through a quarterly operational update. The Board also receives and responds to our 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 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	This approach is outlined in our policy under ‘Complaint Investigation Principles’: <i>“In our handling of complaints, our approach for all employees and any third parties we work with will seek to:</i> • <i>Take an empathetic collaborative and co-operative approach towards resolving complaints, working with colleagues across organisations and departments as appropriate.</i> • <i>Take collective responsibility for any shortfalls identified, rather than blaming others</i> • <i>Act within the professional standards for engaging with complaints as set by relevant professional bodies</i> • <i>Be proactive, clear and transparent to try and find a solution swiftly and efficiently.”</i>	
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