transform housing & support

Registered office: Bradmere House, Brook Way, Leatherhead, Surrey KT22 7NA
www.transformhousing.org.uk | info@transformhousing.org.uk
Registered charity: 264133 | **Company limited by guarantee registered in England and Wales:** 01057984
Registered provider of social housing: H2452 | **Registered with Ofsted**: 2791302

Transform Board's Response to Complaints Review and Self-Assessment 2025/26

Transform introduced a comprehensive suite of policies to comply with the Housing Ombudsman Service's Code for Complaints from 1st April 2024. The introduction of the new Complaints policies and procedures was supported by a comprehensive training program for all staff. This was shaped by Transform's Client Forum and the "voice of the client" was integral to the training provided.

The new policy and procedures have resulted in a significant increase in the number of complaints. We welcome these as an opportunity to learn and continuously improve our services. We recognise complaints as an opportunity to maintain, or where necessary, rebuild trust and confidence with clients.

Transform's Client Surveys of 2024 and 2025 showed the proportion of clients who are satisfied with Transform's complaints handling increased from 48.6% in Spring 2023 to 62.5% in Autumn 2024 and was sustained at 61% in Autumn 2025.

We identified an increase in escalations to Stage 2 over the summer of 2025 and delivered values-based training and support to complaint handlers. This has shown the importance of robust procedures to ensure we are accountable to our clients and support us being a learning organisation.

We report quarterly on complaints to our Clients' Forum, as well as to our senior Executive Team and Board-level Client Experience and Impact Committee (which includes client representatives).We have updated our Compensation Policy in March 2026 to reflect the latest guidance from the Housing Ombudsman Service (HOS) and this was endorsed by our Clients' Forum.

We are pleased to confirm compliance with the HOS code and are committed to working towards continuous improvement of our reporting and learning through complaints.

Our Complaints Policy implicitly states that:

Our guiding values are Respect, Empowerment, Responsibility and Excellence. Having a clear and accessible complaints policy helps us uphold those values in these ways.

- We **respect** your views and want you to feel heard and know that we will take your concerns seriously. Being able to raise complaints helps **empower** you. Making a complaint can help you take control of a difficult situation and gives you a voice. We will take **responsibility** for what may have gone wrong and let you know in a timely manner what we can and can't do to put things right. Complaints help us learn and improve what we do and how we do it, which supports us in our aim of achieving **excellence** in our services.

- How we respond to complaints is important as it can impact on your experience of our services and how you feel about us and yourself.

- A complaint is an opportunity for us to learn and improve. It is important we listen carefully to you and understand what outcomes you would prefer through your complaint. Colleagues should take ownership of a complaint rather than think of it as a series of processes or tasks to be managed.

- Complaints do not need to be negative experiences, but can be a positive way of building, improving and maintaining positive relationships with our clients, and putting our values into action.

During 2025/26, complaint handling has been overseen by the Member Responsible for Complaints who has confirmed that this self-assessment reflects Transform's complaint handling practice.

This report and self-assessment has also been scrutinised and recommended for approval to the Board by the Client Engagement and Impact Committee on 28 April 2026. It was then approved by the full Transform Board of Trustees on 21 May 2026.

Ollie Smedley
Chair of the Board of Trustees

Katie Wadey
Chair of the Client Experience & Impact Committee, Member Responsible for Complaints

21 May 2026

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Appendix 1: Self-assessment form 2025-26

Transform Housing & Support

Self-assessment against the Housing Ombudsman Service's Complaint Handling Code 2025/26

This self-assessment form has been completed by the complaints officer and reviewed and approved by the CEIC and Board on 28 April 2026 and 21 May 2026 respectively.

We publish the self-assessment as part of the annual complaints performance and service improvement report on our website. The Board's response to the report is published alongside this.

Landlords are required to complete the self-assessment in full and support all statements with evidence, with additional commentary as necessary.

Section 1: Definition of a complaint

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
1.2	A complaint must be defined as: 'an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the landlord, its own staff, or those acting on its behalf, affecting a resident or group of residents.'	Yes	Clearly stated in Complaints Policy 3.1 and on our website complaints page.	
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	Clearly stated in Transform's Complaints Policy 3.2.	We have reminded Complaints Handlers and managers of this in regular forums. We updated our complaints log and form to ensure third party complaints were clearly identified and that we secured consent from clients to share information with those their parties in a timely manner. We did not delay starting investigations prior to consent being given.
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	Yes	Clearly stated in Complaints Policy 3.3 and on our website complaints page. Local teams have close contact with clients and deal with the majority of service requests on a day-to-day basis. We log our service	We undertook a review of service requests in three services during Autumn 2024. This determined that the main areas for service requests was maintenance, and these are already recorded as repairs orders. Most other "service

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	complaints, but must be recorded, monitored and reviewed regularly.		requests for repairs on our housing management system. We identify service requests where it is clear an issue is being raised for the first time but reported by the complaints process. In order to provide an audit trail and ensure accountability, we work to the complaints timescales to respond.	requests" related to the provision of support. The exception was ASB which was formally logged in client's records. We are therefore able to identify when a client made a service request related to housing management (repairs or ASB) and can identify if any then become formal complaints. Learning from our complaints analysis identified the need to improve practice in this area. Our ASB Policy was reviewed with our Clients Forum during 2025, and this informed training for all managers in October 2025. We have also developed a Good Neighbour Policy with the Client Forum and reviewed our "House Rules for living safely and comfortably in shared accommodation" with the Client Forum. We continue to monitor ASB complaints (and service requests) to assess the impact of this work.

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
1.5	A complaint must be raised when the resident expresses dissatisfaction with the response to their service request, even if the handling of the service request remains ongoing. Landlords must not stop their efforts to address the service request if the resident complains.	Yes	Clearly stated in Complaints Policy 3.3 and Complaints procedure	We will improve and respond to service requests even where clients are not satisfied with the initial outcome. We do not wait for the conclusion of the complaint before taking action to put things right.
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	During the client satisfaction survey (CSS) individual expressions of dissatisfaction were identified and the individual was contacted, where they had provided details. The Client Survey includes information on how to make a complaint. All clients are made aware of the complaints procedure when they sign their tenancy or licence agreement. Their attention is drawn to the relevant section of the tenant handbook and properties with noticeboards have a copy attached. The procedure is also easily accessible via the website.	In 2025 we continued the inclusion of “hot alerts” so that, if a respondent consented for their details to be shared, and said they had a complaint (new or unresolved) or a repair or were very dissatisfied overall, we received notification and were able to follow up. The hot alerts were agreed with the Client Forum – who also shaped and changed some of the non-TSM questions The Client Survey in 2025 had links to Transform’s complaints form and information on how to make a complaint.

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	Clearly stated in our Complaints Policy 6.1 - Exceptions, and procedure, and on our website complaints page.	We have a long standing complaint from the neighbour of one of our clients. We work closely with the neighbour (not a tenant or client of Transform), local community safety and the police. We have not logged every update or report as a separate complaint, but continue to keep in touch and respond and acknowledge concerns as we seek a legal outcome to the concerns.
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 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.	Yes	Clearly stated in our Complaints Policy Section 6 'Things we will not consider as a complaint', and procedure, and on our website complaints page. In 2.1 we refer to how we deal with complaints about other people under other policies which support the Complaints Policy such as our Anti-Social Behaviour Policy. Any exclusions are closely monitored in the case management system to	

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
			ensure fairness and a reasonable approach	
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	Exclusions are clearly stated in our Complaints Policy 6.1 and website complaints page. Our Complaints procedure states that complaints must not be refused without a valid reason	We have considered information on concerns about support provision and advocacy from a client that dated back over a number of years. This helped the individual feel they were being heard. We were able to agree a new keyworker and approach.
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 Complaints procedure sets this out and our 'Excluded Complaint Response Template Letter' is sent to clients. This provides an explanation as well as the Housing Ombudsman's details.	
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Yes	As defined in Complaints Policy 6.1 we consider each complaint's individual circumstances.	

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	Clearly stated in Complaints Policy 5.8. Our website complaints page details 'how to make a complaint' whether via the website, phone, email, letter or social media. We do not require complaints to be put in writing by the complainant as this can act as a deterrent. We also explain that complaints can be submitted by a third party on the client's behalf and that complaints may be made in a way that works best for clients. We can provide support in line with our Reasonable Adjustment and Vulnerability policies	Third parties can submit complaints on a client's behalf or assist complainants with raising complaints. We do check with the client that they consent to us sharing the findings of any investigations with the third party. We have provided information on advocacy services to support clients who wished to complain about our services.
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 reviewed in the complaints handlers forum and staff receive regular reminders of how to ensure complaints are identified and raised.	Staff have accepted complaints from clients verbally, in regular support meetings and at house meetings. The staff members have used the complaints form to assist recording. Our central complaints team have also taken phone calls from clients and recorded and responded to them appropriately.

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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	Transform welcomes feedback and complaints from clients. Our Complaints Policy Section 1 opens with an explanation of why complaints are important to us, in line with our values respect, responsibility, empowerment and excellence. Work has been undertaken, and is continuing, to make complaints information more accessible to clients and colleagues in terms of the complaints process, with information available on our website complaints page and the intranet. (see 3.2 above).	We developed our complaints policies with input from our Client Forum and included clients' voices and feedback in our training for staff on complaints. We were invited to present at a Conference in December 2025 linking our improved (and largely sustained) satisfaction rates with complaints handling to the increased number of complaints – which means clients know how to complain and feel we will act on their complaints. We have a regular complaints handlers meeting to share learning and support continuous improvement. Throughout 2025 we have presented quarterly reports on complaints received, lessons learnt and actions taken are shared with the Client Forum. These were already reported to our Trustees' Client Experience and Impact Committee, which includes client members.

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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	As stated in our Complaints Policy section 5 and clearly stated on the website complaints page. Transform operates a two-stage process. And as per 5.2.	We have a flow chart document that is accessible and have designed posters to promote the complaints procedure in shared houses.
3.5	The policy must explain how the landlord will publicise details of the complaints policy, including information about the Ombudsman and this Code.	Yes	This is explained in our Complaints Policy 5.3 and all necessary information is available on our website complaints page. The information regarding the Ombudsman is also clearly detailed in all template letters to clients. Our website and template letters were recently updated to reflect the Ombudsman's new postal address.	
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	Yes, clearly stated on our website complaints page and in the Complaints Policy 5.6	Representatives are now identified in the complaints form from the outset. This change was implemented in the autumn of 2024.
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	Yes, clearly stated on our website complaints page and in the Complaints Policy 5.5. This is also clearly detailed in all complaints template letters to clients, to ensure this is adhered to.	We have had a number of clients using the HOS route and continue to ensure clients know this is an option for them.

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	The Director of Client Services is the person with overall responsibility for complaints handling. They ensure Transform has adequate resources to monitor all complaints and ensure timescales are adhered to. This team comprises the Administrator for Client Services and is supported by the Policy & Performance Manager. The Head of Governance provides additional oversight and scrutiny for reporting to the regulator. Quarterly and annual reports are made to the Client Experience & Impact Committee (CEIC), which includes Trustees and (up to) four members of the Client Forum. The Chair of the CEIC has been the lead Trustee for Complaints on behalf of the full Board.	Director of Client Services JD includes: *The role includes responsibility for leading the organisation's complaints process and overseeing operational policy development and performance frameworks* The Client Services Team Administrator's JD includes: *Assisting with Complaints Handling to ensure we meet timescales and support the Client Services Leadership Team to disseminate learning and best practice to support the continuous improvement of our client services.* The Policy & Performance Manager's role includes: *Lead and develop a Client Services' internal service audit approach that will add to assurance across key policy areas, including complaints* *Produce regular, accurate and timely reports on our performance management information (including outcomes for clients, adherence to key procedures and practice outputs such as … complaints for the Board, Executive Team and*

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
				Client Services operational managers and staff. Reports should identify: • *Current performance* • *Best practice* • *Areas for Improvement* • *Learning and recommendations*
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	Clearly stated in the Complaints Policy 7.4a. The complaints team has autonomy to deal with and resolve all complaints or escalate as necessary.	We have supported and empowered complaints handlers, through the complaints handlers forum, to be confident in offering compensation to clients at an earlier stage in the complaints handling process. We have recently updated our Compensation Policy.
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	During February and March 2024 all colleagues were trained in identifying complaints and how to deal with them. They also received training on the importance of fostering a positive complaints culture. Further training was then carried out to ensure that any colleague can log a complaint for a client, regardless of how that complaint is made. Learning from complaints is reviewed with our Operational Managers and is used	The complaints policy and procedure is part of our core induction for all staff. They have access to the recorded training that was developed with clients. Our Client Services Administrator and Policy & Performance Manager support the Director of Client Services to oversee the effective

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
			to inform practice developments and priorities. Our Complaints Handlers' forum is held quarterly to support individual managers and senior managers who undertake investigations and to promote and share best practice.	implementation of the Complaints Process.

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	Transform has a single Complaints Policy available on the website complaints page.	We welcome complaints as an opportunity to improve and learn, and rebuild trust and confidence with our clients. Our Clients Forum receive quarterly reports on complaints and complaints handling and a number of services (offering shared accommodation) have posters promoting the complaints procedure.
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	Transform operates a simple procedure of Stage 1 and Stage 2 as set out in the Complaints Policy.	We agree, and even where a complaint is technically a service request (where it has not been raised before) we still acknowledge it and track to ensure clients have a response that meets their requirements.
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	As 5.2 above.	
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	Only one process is used which is monitored by the complaints team and Transform does not use third parties.	

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Yes	As 5.4 above.	
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	Clearly stated in the Complaints Policy (For stage 1, 8.2, and for stage 2, 8.8). Our template acknowledgement letter for both stages includes this information to ensure adherence, and this is monitored by the complaints team.	
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 Complaints procedure states that we will be clear what is considered as part of the complaint, and what is not. If any element of the complaint is not a service, we provide we must signpost them to the correct organisation and this is included in the complaint acknowledgement letter template to ensure adherence. This is monitored by the complaints team.	Where applicable, we will ensure clients understand where we are not responsible for elements of the service they wish to complain about. We have supported clients to raise complaints with the relevant party, raised complaints on their behalf and linked them into advocacy services.
5.8	At each stage of the complaints process, complaint handlers must: a. deal with complaints on their merits, act independently, and have an open mind; b. give the resident a fair chance to set out their position;	Yes	Clearly stated in our Complaints Policy 5.2 and 7.4 and procedure and this was incorporated in our colleague training which was delivered in February and March 2024.	Opportunities to meet the investigating officer are offered. We have discussed the importance of understanding and learning from the

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	c. take measures to address any actual or perceived conflict of interest; and d. consider all relevant information and evidence carefully.		When allocating a complaint handler, we consider potential or perceived conflicts of interest. A complaints handler from another service or outside the management structure of the service used by the complainant will be allocated to ensure impartiality.	complainant's perspective in our complaints handlers' forum.
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	Clearly stated in our Complaints Policy 8.4 stage 1, 8.10 stage 2 and is incorporated in our standard complaints extension letter templates.	We have instigated tracking of repairs where a complaint has been closed but the work scheduled but not always completed (where jobs are more complex, or have longer target response times). This enables us to update clients through their keyworker.
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	Clearly stated in our Reasonable Adjustment Policy, client disabilities and vulnerabilities are also recorded on the support section in our Pyramid record system. Clients are asked if there is any vulnerability we need to take into consideration at the outset of a complaint. We consider vulnerabilities in accordance with our Vulnerability Policy.	We updated our complaints report form to ask whether there is anything we need to consider when investigating the complaint in autumn 2024.

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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	Clearly stated in our Complaints Policy 8.7 and set out in all complaint letters sent to clients.	
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	All correspondence, documentation and details of outcomes are contained in the complaints case management system.	Where clients express a preference for phone or in person contact only, the complaint handler will record a note of the conversation and discussions, and any outcome agreed
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	Transform strives to resolve complaints as early as possible with a fair and reasonable outcome (5.2 of the Complaints Policy). We also highlight this in the procedure and standard wording in Complaint letter templates.	We have worked with the complaints handlers' forum to empower complaints handlers to offer compensation at an early stage wherever appropriate. We have updated the compensation policy to reflect the latest HOS guidance and will be seeking sign-off from our Client Forum in April 2026 before planned promotion through the Complaints Handlers' Forum
5.14	Landlords must have policies and procedures in place for managing unacceptable behaviour from residents and/or their representatives. Landlords	Yes	Our Unacceptable Behaviour Policy sets out the way we will deal with unacceptable behaviour which involves a staged approach (Section	We have explained to a complainant that raising multiple separate complaints about a specific situation can

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	must be able to evidence reasons for putting any restrictions in place and must keep restrictions under regular review.		5) and we have arrangements to review any limits we put in place (Section 7).	detrimentally impact upon the timely investigation and resolution of their concerns. This has been recorded so there is a clear audit trail.
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	We have provisions in our Unacceptable Behaviour Policy which highlights exceptions to the policy (Section 6) which states that will not use any actions or limits which would discriminate against anybody.	

Section 6: Complaint 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	Clearly stated in our Complaints Policy 5.2d. All complaints go through an immediate investigation at acknowledgment stage to identify if an immediate resolution can be delivered or whether escalation to an investigating officer is required if more complex.	We have worked with the complaints handlers' forum to empower complaints handlers to offer resolutions including compensation at an early stage wherever appropriate.
6.2	Complaints must be acknowledged, defined and logged at stage 1 of the complaints procedure **within five working days of the complaint being received**.	Yes	Clearly stated in our Complaints Policy 8.2. Our procedure requires that the Stage 1 acknowledgement letter template is used. The case management system is used to monitor any pending deadlines.	We have achieved this
6.3	Landlords must issue a full response to stage 1 complaints **within 10 working days** of the complaint being acknowledged.	Yes	Clearly stated in our Complaints Policy 8.5. Our procedure requires that the Stage 1 response letter template is used. The case management system is used to monitor any pending deadlines.	We monitor our performance in this area. Where necessary, we issue extension letters. Where we have not met targets, we have factored this into our offered resolution, including compensation for any additional distress.
6.4	Landlords must decide whether an extension to this timescale is needed when	Yes	Clearly stated in our Complaints Policy 8.4. Our procedure requires	

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	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.		that the Stage 1 extension letter template is used. This includes an explanation for the extension period and the deadline for the full response. Our case management system is used to monitor any pending deadlines.	
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	Our procedure requires that the Stage 1 extension letter template is used. This includes the contact details of 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	Clearly stated in our Complaints Policy 8.5, we send a full response within 10 days of acknowledgement including details of what we have done and anything we still need to do and when we aim to do it by. The complaints team track outstanding actions and keep the complainant up to date.	We have instigated tracking of complaints that have been responded and within timescales, but where actions (usually repairs or improvement works) have not been completed. This ensure we can keep clients – and their keyworkers – updated.
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	Clearly stated in our Complaints Policy 8.5 that a full response will be provided including the reasons for any decisions we have made. Guidance is provided in the Stage1 Complaint outcome letter template.	We do this. There are occasions where we will summarise very long and detailed letters of complaint, particularly where inappropriate language may have been used or issues are repeated, or where listing specific points may be triggering and retraumatising. We ensure

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
				the points raised are covered and addressed in full.
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 clearly stated in our Complaints Procedure. If new issues are raised during the life of the complaint these should be added to the complaint definition and investigated within the same timescales if they are related to the existing complaint and the response has not been issued. If the response has been sent, the new issues are unrelated, or it would unnecessarily delay the response to include them at this stage, the new issues must be logged as a new complaint case via the Complaint Team.	
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;	Yes	Our Complaints Policy 8.5 details how we respond and sets out required content for the response in line with these requirements. We use standard complaint letter templates for all complaints and these are available to all colleagues on the intranet.	

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	f. details of any outstanding actions; and g. details of how to escalate the matter to stage 2 if the individual is not satisfied with the response.			

Stage 2

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
6.10	If all or part of the complaint is not resolved to the resident's satisfaction at stage 1, it must be progressed to stage 2 of the landlord's procedure. Stage 2 is the landlord's final response.	Yes	Our Complaints Policy 8.6 highlights that if a client is not satisfied with the response to stage 1 then the complaint is escalated to stage 2 and it details what this involves (8.6 to 8.8). Our stage 2 response provides details of how to escalate to the Housing Ombudsman if the client is not satisfied with our response (8.11).	We track Stage 2 escalations and in the summer of 2025 identified an increase in these for an area of operations. We provided additional training for complaints handlers, and this has resulted in a greater proportion being resolved to the client's satisfaction at stage 1.
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.		Our Complaints Policy 8.8 requires acknowledgement within 5 working days of receipt. Our Complaints procedure requires this information to be logged in the Complaints Case Management system. Our stage 1 acknowledgement template includes the complaint definition.	This has been achieved

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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 Complaints Policy 8.7 does not require an explanation, although we do ask what aspects of our stage 1 response the client is not happy with so we can focus on the right aspects during our stage 2 investigation. The stage 2 investigating officer will contact the client for full understanding.	
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Yes	Our Complaints Policy 8.8 states that the stage 2 investigating officer will usually be a more senior member of staff than the individual investigating Stage 1.	
6.14	Landlords must issue a final response to the stage 2 **within 20 working days** of the complaint being acknowledged.	Yes	Clearly stated in the Complaints Policy 8.11. This is monitored in the Case Management system	
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	As per Complaints Policy 8.10 and monitored in the Case Management system.	
6.16	When an organisation informs a resident about an extension to these	Yes	Our Stage 2 extension letter template includes this information.	

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	timescales, they must be provided with the contact details of the 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	Clearly stated in our Complaints Policy 8.11 we send a full response within 20 days of acknowledgement with details of what we have done, anything we still need to do and when we aim to do it by. The complaints team track outstanding actions and keep the complainant up to date.	We provide information about what actions will be taken, and include timescales, for example for repairs to be complete. We have commenced tracking actions that may be outstanding – to keep clients updated – and have escalated where necessary.
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	Clearly stated in our Complaints Policy 8.11 that a full response will be provided including the reasons for any decisions we have made. Guidance is provided in the Stage 2 Complaint outcome letter template.	
6.19	Landlords must confirm the following in writing to the resident at the completion of stage 2 in clear, plain language: a. the complaint stage; b. the complaint definition; c. the decision on the complaint; c. the reasons for any decisions made; d. the details of any remedy offered to put things right; e. details of any outstanding actions; and	Yes	As per the Complaints Policy 8.11. All this information is included in Stage 2 Complaint response letter template used for all complaints and available to all colleagues on the intranet.	

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	f. details of how to escalate the matter to the Ombudsman Service if the individual remains dissatisfied.			
6.20	Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.	Yes	Our Complaints Policy has only two stages as stated in 1.4 and detailed in section 8.11 and the flowchart at Appendix 1 shows that following Stage 2 clients may escalate their complaint to the Housing Ombudsman if not satisfied.	We have convened multi-directorate meetings to review complaints that had a number of elements to ensure we were able to provide an appropriate and comprehensive solution and response

Section 7: Putting things right

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
7.1	Where something has gone wrong a landlord must acknowledge this and set out the actions it has already taken, or intends to take, to put things right. These can include: • Apologising; • Acknowledging where things have gone wrong; • Providing an explanation, assistance or reasons; • Taking action if there has been delay; • Reconsidering or changing a decision; • Amending a record or adding a correction or addendum; • Providing a financial remedy; • Changing policies, procedures or practices.	Yes	This is included in our Complaints Policy section 10 and in Complaint letter templates used by all colleagues and available on the intranet. We have also made the Housing Ombudsman's document 'Apologies Guidance for Landlords' available.	Our template letters and guidance support complaints handlers to address all these requirements. We report on complaints to the Transform Clients Forum on a quarterly basis and identify lessons learnt and changes made. The Client Forum has been actively involved in reviewing and agreeing changes to policy and practice. This includes our revised ASB and the development of a "Good Neighbour" Policy. They have also flagged opportunities to improve our annual service charge/ rent increase letters and this has been scheduled for discussion at the Client Forum in April 2026.
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Yes	Our Compensation Policy 7.3 states that we will consider each case based on what has happened and the impact it has had on the client. Compensation is based on the level of impact, whether mild, moderate	We have updated the Compensation Policy to reflect HOS's latest guidance. This is going to the Client Forum and CEIC in April 2026.

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
			or severe (Section 8). Other remedies are explained in Section 6. Complaints Policy.	
7.3	The remedy offer must clearly set out what will happen and by when, in agreement with the resident where appropriate. Any remedy proposed must be followed through to completion.	Yes	Our Complaints Policy section 10 sets out how we acknowledge responsibility and put things right. The Compensation Policy section 7 includes timeframes for deciding compensation and how we inform clients and section 9 provides the timeframe for making payment. Our template letters for Stage 1 and 2 sent to the client also detail this information. The complaints team monitor outstanding actions to ensure that these are delivered.	Our Client Services Team Administrator tracks compensation payments and only closes a complaint when the compensation request form has been completed.
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes	We approved a new Compensation Policy in February 2024 which was implemented on 1 April 2024. This reflects the Housing Ombudsman's guidance on remedies (Section 8).	We updated the Compensation Policy in March 2026 and it is going to the Client Forum for sign off in April 2026 (although we have applied it ahead of this where relevant). This reflects the latest HOS on calculating 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	The Annual complaints report and self-assessment, which includes all the areas stated in 8.1 was scrutinised by Executive on 16 April, Customer Experience & Impact Committee on 29 April and Board on 22 May 2025. It is then published on the website. In addition, we shared learning from our complaints and reported this to our Client Forum.	This report is presented to the Client Experience & Impact Committee (which includes client representatives) prior to going to Board for approval.
8.2	The annual complaints performance and service improvement report must be reported to the landlord's governing	Yes	Following the meeting on 21 May 2026, the Board's response to the Annual Complaints Performance	

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	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.		and Service Improvement report can be found here.	
8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	Yes	This self-assessment reflects the new complaints and associated policies and procedures we developed in 2023/24 and implemented from 1 April 2024, together with the updates required by (1) Ofsted; (2) The HOS updated guidance on compensation; (3) regulatory changes such as STAIRS and OFWAT/ Heat Networks.	We have policies for: Complaints Compensation Reasonable Adjustments Unacceptable Behaviour Vulnerability
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	Yes	Not applicable this year.	
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	Not applicable this year.	

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	Learning is collated and reviewed from an individual, local and organisational perspective, any issues arising are then disseminated to the appropriate colleagues and teams for actioning. We continue to develop our arrangements for learning from our complaints: from case review, to internal scrutiny through frontline reflection, manager and team meetings and our Complaint Handlers' Forum to external Scrutiny, including the TSM Perception Survey, our Client Forum and ultimately Executive Overview by the Executive Team, Client Experience and Impact Committee through to our Board. We also closely monitor current Housing Ombudsman publications including press releases about recent cases, the decision archive and Spotlight Reports.	The Client Services Business Plan includes actions where learning has arisen from our analysis of complaints. This included improving our ASB management and developing new policies with clients, and reviewing our Arrears Policy to strengthen the focus on prevention and early intervention, again, discussed with and endorsed by our Client Forum.
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	Yes	We have included learning from complaints in reports to the Client Forum, Client Experience and Impact Committee and Operational Managers Meetings. They are	From Autumn 2024, we have presented quarterly complaints data and learning/ insights to our Clients Forum. Their additional insights have been used to shape learning.

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	introduce positive changes in service delivery.		helping inform practice developments and priorities.	We completed a review of our ASB policy and delivered new training for managers as a response to reviewing complaints and issues. Clients also proposed and helped develop a Good Neighbour Policy.
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	Wider learning is shared as set out in 9.1 above.	
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 Director of Client Services supervises the Complaints team who monitor any trends occurring and identify and risks to individuals, locality or the organisation.	Initial themes have been included in CEIC reports and at our Operational Managers Meeting, as well as discussed with the Client Forum. This has informed revision of the policy and practice areas identified in this self-assessment. We delivered targeted values-based complaints handling training for colleagues in

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
				October 2025 after identifying an increase in stage 2 escalations over the summer. This has increased the proportion of complaints being resolved satisfactorily at stage 1.
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	The Board has appointed the Chair of our Client Experience & Impact Committee as our Member Responsible for Complaints. She is responsible for ensuring the Board receive regular complaints information. She will have access to colleagues and information to be able to report on their findings in complaints. Her details are available on our website complaints page.	
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	The MRC as Chair of Client Experience & Impact Committee reports back to the Board at each meeting on the outcome of the Committee's review of complaints.	
9.7	As a minimum, the MRC and the governing body (or equivalent) must receive:	Yes	We have quarterly reporting on complaints to our Client Experience & Impact Committee. The annual complaints and service improvement report was considered	The Client Forum also receives quarterly reports on operational matters including complaints.

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	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.		by the Client Experience & Impact Committee on 28 April and Board on 21 May 2026.	
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	The Director of Client Services' *role includes responsibility for leading the organisation's complaints process and overseeing operational policy development and performance frameworks* All staff are bound by our code of conduct which includes requirements to work professionally and treat others well. It also refers to our values of respect, empowerment, responsibility and excellence, which underpin our approach to complaints handling. During 2025, the Clients' Forum reviewed the Contractors Code of Conduct which also refers to our complaints policy.	We actively promote a learning culture, focused on continuous improvement, and our Ways of Working are based upon the principles of person-centred, relationship-based, strengths-focused and trauma-informed approaches. Empowering clients is central to our objectives and purpose and enabling them to complain, raise concerns and feel heard is core to our approaches. Our annual client survey provides a regular overview of satisfaction with complaints handling and we introduced real time" feedback on closing complaints during the year.

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
			The Client Services Leadership Team reviews complaints on a weekly basis to identify any issues that may need further support and intervention. All colleagues received training on delivering a positive complaint handling culture during February and March 2024. This is available on our intranet and we offer bespoke training in complaints handling for new managers. The training includes the voice of the client. This sets clear expectations for how complaints should be handled collaboratively across teams/ directorates. We review complaints regularly and where clients are not satisfied or wish to escalate to stage 2, we review and identify learning for the individual complaints handler, to support improvement through reflection. The Complaints Handlers Forum is chaired by the Director of Client Services and used to share learning and improve communication and joint working across directorates to	Our regular monitoring enabled us to identify an increase in stage 2 escalations and we identified additional values-based complaints training for a group of colleagues. This resulted in an increase in complaints being resolved satisfactorily at stage 1.

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
			resolve complaints and improve complaints handling.	