

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	<p>Complaint Resolution policy and internal complaint handling procedures.</p> <p>Section 2 of the Complaint Resolution policy.</p>	<p>The Housing Ombudsman's definition of a complaint has been integrated into Onwards Complaint Resolution Policy and is firmly embedded within our complaint handling procedures.</p> <p>The Complaint Resolution policy has been ratified by our Customer Complaints Forum.</p>
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	<p>Complaint Resolution policy and internal complaint handling procedures.</p> <p>Section 1 of the Complaint Resolution policy.</p> <p>E-learning.</p> <p>Housing Ombudsman's Complaint Handling Code E-Learning certificates.</p>	<p>Our contact handling procedures are structured to effectively triage enquiries, determining whether they are service requests or complaints.</p> <p>We have instituted an e-learning course that covers the Housing Ombudsman Service, the Code, and our responsibilities in maintaining compliant services. The training emphasises the advantages for customers, colleagues, and the wider sector.</p> <p>In addition to our in-house E-learning, all members of our Customer Resolutions Team are also required to complete the Housing Ombudsman's Complaint Handling Code E-Learning.</p>

				All complaints, regardless of how they are received, are managed consistently and in accordance with our Complaint Resolution policy.
Code provision	Code requirement	Comply: Yes/No	Evidence	Commentary/ explanation
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	<p>Complaint Resolution policy and internal complaint handling procedures.</p> <p>Sections 2 and 3 of the Complaint Resolution policy.</p> <p>Section 3 includes example scenarios which aim to provide clarity as to the difference between a service request and a complaint.</p> <p>Complaints-Policy-Plain-Guide-Jan-25.pdf</p> <p>E-learning.</p> <p>Housing Ombudsman's Complaint Handling Code E-Learning certificates</p>	<p>The Complaint Resolution policy explains the distinction between a complaint and a service request with examples. These principles are incorporated into our internal complaint handling procedures.</p> <p>Instructions on differentiating service requests from complaints have been provided to colleagues and are included in our e-learning material.</p> <p>In addition to our in-house E-learning, all members of our Customer Resolutions Team are also required to complete the Housing Ombudsman's Complaint Handling Code E-Learning.</p>
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	Yes	<p>Complaint Resolution policy and internal complaint handling procedures.</p> <p>Complaints-Policy-Plain-Guide-Jan-25.pdf</p>	We attempt to address initial enquiries and follow-ups regarding service requests promptly and effectively from the first point of contact until their resolution. Our colleagues follow the guidance as set out in the Complaint Handling Code when distinguishing

	service request if the resident complains.			<p>between a service request and a complaint, and take appropriate action based on their assessment.</p> <p>If it is determined that a complaint must be logged, the details are recorded in the housing management system accordingly.</p>
1.6	<p>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.</p> <p>Where landlords ask for wider feedback about their services, they also must provide details of how residents can complain.</p>	Yes	<p>Colleague guidance and procedures.</p> <p>Information signposting our complaints procedure is included in our surveys.</p>	<p>Our Customer Service Intervention team proactively contact residents who express dissatisfaction through our satisfaction surveys. This process involves collecting additional information, prioritising the residents' concerns, and implementing appropriate solutions whenever possible.</p> <p>Residents are informed about the complaints process from the beginning and given the opportunity to raise a complaint.</p>

Section 2: Exclusions

Code provision	Code requirement	Comply: Yes/No	Evidence	Commentary/ explanation
2.1	Landlords must accept a complaint unless there is a valid reason not to do so. If landlords decide not to accept a complaint, they must be able to evidence their reasoning.	Yes	<p>Complaint Resolution policy and internal complaint handling procedures.</p> <p>Sections 2 and 3 of the Complaint</p>	The Complaint Resolution policy provides examples of what may and may not be considered a complaint. Example scenarios are included within the policy to assist residents in

	Each complaint must be considered on its own merits.		<p>Resolution policy.</p> <p>Complaints-Policy-Plain-Guide-Jan-25.pdf</p>	<p>distinguishing between a service request and a complaint.</p> <p>Each complaint is evaluated based on its own individual merits and when a complaint is not accepted, a detailed explanation is provided to the complainant in writing, in accordance with the Complaint Resolution policy.</p> <p>All correspondence regarding complaints includes information on how residents can refer their complaint to the Housing Ombudsman Service. Complaints that are submitted but not accepted are recorded, tracked, and included in management information. The insights collected are reviewed as part of continuous learning and improvement activities.</p>
2.2	<p>A complaints policy must set out the circumstances in which a matter will not be considered as a complaint or escalated, and these circumstances must be fair and reasonable to residents.</p> <p>Acceptable exclusions include:</p> <ul style="list-style-type: none"> the issue giving rise to the complaint occurred over 12 months ago. legal proceedings have started - this is defined as details of the claim, such as the Claim Form and 	Yes	<p>Complaint Resolution policy and internal complaint handling procedures.</p> <p>Sections 3 and 13 of the Complaint Resolutions policy.</p> <p>Complaints-Policy-Plain-Guide-Jan-25.pdf</p>	<p>Exclusions are outlined in the Complaint Resolution policy and are based on factual circumstances, preventing inconsistency or subjectivity when a complaint is refused. This approach ensures fairness and consistency for residents.</p> <p>The Complaint Resolution policy is regularly reviewed to ensure clarity and ease of understanding for residents, including the section on policy exclusions. The policy specifies that all</p>

	<p>Particulars of Claim, having been filed at court.</p> <ul style="list-style-type: none"> • matters that have previously been considered under the complaints policy. • 			complaints received will be evaluated based on their individual merits.
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	Complaint Resolution policy and internal complaint handling procedures. Section 13 of the Complaint Resolution policy.	Our Complaint Resolution policy states that in exceptional circumstances, we may accept a complaint outside of the 12- month timescale.
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	Complaint Resolution policy and internal complaint handling procedures. Section 13 of the Complaint Resolution policy.	<p>A comprehensive explanation detailing the reasons for the rejection of a complaint is always provided to the complainant. This explanation is formally issued in writing, adhering to our Complaint Resolution policy.</p> <p>All correspondence related to complaints includes information on how residents can escalate their complaint to the Housing Ombudsman Service.</p>
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Yes	Complaint Resolution policy and internal complaint handling procedures.	The Complaint Resolution policy states that each complaint will be assessed individually based on its merits.

			Section 3 of the Complaint Resolution policy.	
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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	Compliments, complaints and feedback Onward Complaint Resolution policy and internal complaint handling procedures. Complaints-Policy-Plain-Guide-Jan-25.pdf Alternative Requirements policy.	<p>Our website contains a dedicated compliments and complaints homepage which details the channels through which complaints may be submitted. Details are also included within the Complaint Resolution policy.</p> <p>Our Alternative Requirements policy is designed to ensure compliance with the Equality Act, providing services that accommodate the needs of all customers, including those who may have vulnerabilities or require reasonable adjustments. The policy also clarifies procedures for colleagues on how to effectively assist such customers.</p>
3.2	Residents must be able to raise	Yes	Complaint Resolution policy and	The Complaint Resolution policy sets

	<p>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.</p>		<p>internal complaint handling procedures.</p> <p>Section 4 of the Complaint Resolution policy.</p> <p>Complaints-Policy-Plain-Guide-Jan-25.pdf</p> <p>E-Learning.</p> <p>Onward+ training programme.</p>	<p>out the various ways in which a complaint may be submitted.</p> <p>We have implemented complaints training to ensure colleagues are able to identify and understand complaints and are aware of how to raise a complaint via our internal processes.</p> <p>In 2024 we invested in an ongoing companywide training programme (Onward+) attended by all colleagues. The training focussed upon delivering exceptional customer care and understanding complaints. The next phase of the training (Onward+ The Evolution) will commence in May 2025.</p>
3.3	<p>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.</p>	Yes	<p>Complaint Resolution policy and internal complaint handling procedures.</p> <p>E-Learning.</p> <p>Annual Complaints Performance & Service Improvement report</p> <p>Our complaints service is actively promoted: customer-newsletter-spring-25-DIGITAL.pdf</p>	<p>In the interest of enhancing the customer experience, our approach is to minimise the number of customer complaints and resolve enquiries at the first point of contact.</p> <p>We have a well embedded complaint handling culture which recognises how receiving complaints can benefit our learning and improvement activities.</p> <p>We record and monitor all complaints that we receive and use this information to consider and identify improvements that can be made to our services and we publish our performance in our Annual Complaints Performance and</p>

				<p>Service Improvement report.</p> <p>Through a variety of channels, we regularly promote our complaint handling services, and the services of the Housing Ombudsman.</p>
3.4	Landlords must make their complaint policy available in a clear and accessible format for all residents. This will detail the 2-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	<p>Complaint Resolution policy and internal complaint handling procedures.</p> <p>Sections 5, 6, 7 and 8 of the Complaint Resolution policy.</p> <p>Complaints-Policy-Plain-Guide-Jan-25.pdf</p> <p>Recite technology embedded within the Onward website.</p> <p>Translation services are available.</p>	<p>The Complaint Resolution policy is available on our website under the 'policies' and 'contact us' sections. It can also be accessed through the dedicated compliments and complaints homepage.</p> <p>The policy outlines the process in a clear and concise manner.</p> <p>To enhance accessibility to our complaint handling services, we have published a 'plain guide'. This version simplifies the policy to provide residents with information in a format that may be easier to read and understand.</p> <p>The policy includes instructions in multiple languages, detailing how residents can request a copy of the policy in another language.</p> <p>Recite technology is integrated into our website, and translation services are available.</p>
3.5	The policy must explain how the landlord will publicise details of the complaints policy, including	Yes	Complaint Resolution policy and internal complaint handling procedures.	The Customer Resolution policy confirms our approach to publicising the complaint handling service.

	information about the Ombudsman and this Code.		<p>Section 4 of the Complaint Resolution policy.</p> <p>Our complaints service and the services of the Ombudsman are actively promoted: customer-newsletter-spring-25-DIGITAL.pdf</p>	<p>Information about our complaints service is routinely disseminated through various channels such as customer newsletters, annual reports, and other relevant communications. Additionally, details regarding the Housing Ombudsman service are included in all our complaint correspondence.</p>
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	<p>Complaint Resolution policy and internal complaint handling procedures.</p> <p>Complaints-Policy-Plain-Guide-Jan-25.pdf</p> <p>Mp-enquiries@onward.co.uk</p>	<p>Residents are permitted to appoint a representative to handle their complaints, and this is outlined in the Customer Resolution policy.</p> <p>We have established a dedicated mailbox, mp-enquiries@onward.co.uk, which Members of Parliament and Councillors can use to submit enquiries and complaints on behalf of their constituents.</p> <p>All complaints received will be managed in accordance with the Complaint Resolution Policy.</p>
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.		<p>Compliments, complaints and feedback Onward</p> <p>Complaint Resolution policy and internal complaint handling procedures.</p>	<p>Information regarding a resident's right to lodge complaints with the Ombudsman is disseminated through various channels, including the Complaint Resolution policy, Customer Newsletters and complaint correspondence. We also provide</p>

			<p>Section 10 of the Complaint Resolution policy.</p> <p>Our complaints service and the services of the Ombudsman are actively promoted: Customer-news-summer-24-digital.pdf</p> <p>The Housing Ombudsman Service and contact details are detailed in all complaint correspondence.</p>	<p>information about the Housing Ombudsman Service with every stage 1 and stage 2 acknowledgment, in addition to stage 1 and stage 2 responses.</p> <p>Details about the Housing Ombudsman's Service, how they can help, and the relevant contact details are also detailed via these publications.</p>
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Section 4: Complaint handling staff

Code provision	Code requirement	Comply: Yes/No	Evidence	Commentary/ explanation
4.1	Landlords must have a person or team assigned to take responsibility for complaint handling, including liaison with the Ombudsman and ensuring complaints are reported to the governing body (or equivalent). This Code will refer to that person or team as the 'complaints officer'. This role may be in addition to other duties.	Yes	<p>The Customer Resolutions team is our specialised and centralised team dedicated to managing complaints.</p> <p>Performance, insight, and learning from complaints are regularly reported to the Customer Committee, Complaint Forum, and Board.</p>	<p>The Customer Resolution team is responsible for handling complaints, under the leadership of the Customer Resolutions Manager.</p> <p>The Customer Resolutions Manager serves as the designated "complaints officer" and acts as the main point of liaison with the Ombudsman.</p>
4.2	The complaints officer must have access to staff at all levels	Yes	Complaint Resolution policy and internal complaint handling	The Complaint Resolution Manager oversees a dedicated team of

	to facilitate the prompt resolution of complaints. They must also have the authority and autonomy to act to resolve disputes promptly and fairly.		procedures.	<p>Resolution Specialists. Acting as the customer advocate, the Customer Resolution team collaborates with other teams while also working independently to achieve customer-focused outcomes in response to complaints.</p> <p>The team manages relationships with complainants, coordinates complaint investigations, and oversees complaints through to resolution.</p> <p>The team is responsible for making the final determination on whether complaints should be upheld and has the authority to agree on appropriate resolutions and actions, including financial remedies.</p>
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	<p>Complaint Resolution policy and internal complaint handling procedures.</p> <p>Our learning and improvement framework comprises of various colleague-led and customer-facing groups which support us with learning from complaints.</p> <p>E-Learning and enhanced training programmes.</p>	<p>We have a well-established learning and improvement framework and a positive complaint handling culture that recognises the value of complaints in enhancing customer care and the satisfaction of our residents.</p> <p>Colleagues undertake mandatory training to learn how to identify and address complaints effectively. Those who are directly involved in the investigation and resolution of complaints receive advanced levels of training and possess expertise in our complaint handling procedures and systems.</p>

				Each business area has clearly defined roles and responsibilities related to complaint management and is adequately resourced to ensure efficient and timely delivery of our complaint handling services.
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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	Complaint Resolution policy and internal complaint handling procedures. Complaints-Policy-Plain-Guide-Jan-25.pdf Complaint compensation guidance Onward	<p>The Complaint Resolution policy is the sole framework for addressing complaints. This policy is supported by a 'plain read' guide and additional guidance on Remedies and Financial Redress.</p> <p>We have established a robust complaint handling culture that recognises the value of feedback in enhancing our learning and improvement efforts. Complaints are always received with a positive and constructive mindset.</p>
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	Yes	Complaint Resolution policy and internal complaint handling procedures. Sections 5, 6, 7 and 8 of the	<p>We always attempt to resolve a resident's concerns at the first point of contact.</p> <p>Colleagues take great care to ensure</p>

	0' or 'informal complaint') as this causes unnecessary confusion.		Complaint Resolution policy.	that residents are aware of their right to have their concerns investigated as a complaint at any point. Our complaint resolution process consists of two stages, with no additional formal or informal steps.
5.3	A process with more than 2 stages is not acceptable under any circumstances as this will make the complaint process unduly long and delay access to the Ombudsman.	Yes	Complaint Resolution policy and internal complaint handling procedures.	Our complaint resolution process consists of two stages, with no additional formal or informal steps.
5.4	Where a landlord's complaint response is handled by a third party (such as a contractor or independent adjudicator) at any stage, it must form part of the 2-stage complaints process set out in this Code. Residents must not be expected to go through 2 complaints processes.	Yes	Complaint Resolution policy and internal complaint handling procedures. Sections 5, 6, 7 and 8 of the Complaint Resolution policy.	Complaints are handled by our Customer Resolution team and not by third parties. Our complaint resolution process consists of two stages, with no additional formal or informal steps.
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Yes	Complaint Resolution policy and internal complaint handling procedures.	Complaints are handled by our Customer Resolution team and not by third parties.
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	Yes	Complaint Resolution policy and internal complaint handling procedures. Sections 5, 6, 7 and 8 of the Complaint Resolution policy.	When a complaint is received, case handlers contact the complainant to acknowledge receipt, formally introduce themselves, establish a relationship, and explain their role.

	to this as “the complaint definition”. If any aspect of the complaint is unclear, the resident must be asked for clarification.			During this initial phase, the case handler aims to clarify the “complaint definition”, gather any additional information needed for the investigation, and seek to understand the desired outcome with the complainant.
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	Complaint Resolution policy and internal complaint handling procedures. Sections 6, 7 and 8 of the Complaint Resolution policy.	During the initial acknowledgment process, we inform complainants about which aspects of their complaint fall within our responsibility and which do not. This includes providing written confirmation.
5.8	At each stage of the complaints process, complaint handlers must: <ul style="list-style-type: none"> • 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 • consider all relevant information and evidence carefully 	Yes	Complaint Resolution policy and internal complaint handling procedures. Sections 6, 7 and 8 of the Complaint Resolution policy.	Working as the customer advocate, the Customer Resolution team works independently and impartially and are tasked with delivering customer focussed resolutions to complaints. The introductory acknowledgement and internal investigation procedures allow all parties to present their position and submit evidence. The Customer Resolution team operates independently from other teams to maintain impartiality and avoid conflicts of interest. Using their knowledge, experience, established procedures and system controls, our complaint handlers gather the information and evidence required to resolve complaints in a structured and methodical manner, ensuring a

				balanced and consistent approach to case investigations and resolutions.
5.9	Where a response to a complaint will fall outside the timescales set out in this Code, the landlord must agree with the resident suitable intervals for keeping them informed about their complaint.	Yes	<p>Complaint Resolution policy and internal complaint handling procedures.</p> <p>Sections 6 and 8 of the Complaint Resolution policy.</p>	<p>Our primary objective is to address complaints promptly and comprehensively, considering the unique circumstances of each case. Consequently, we prioritise the quality of our investigation and resolution process over merely adhering to strict timelines.</p> <p>If it is determined that a complaint may not be resolved within the timelines specified in the Code, our case handlers will notify the resident as soon as they become aware of any potential delay and establish a regular communication plan until the complaint is resolved.</p>
5.10	Landlords must make reasonable adjustments for residents where appropriate under the Equality Act 2010. Landlords must keep a record of any reasonable adjustments agreed, as well as a record of any disabilities a resident has disclosed. Any agreed reasonable adjustments must be kept under active review.	Yes	<p>Internal complaint handling procedures.</p> <p>Additional requirements policy.</p> <p>Equality-Diversity-and-Inclusion-Policy-Statement-Oct-2022.pdf</p>	<p>Our Equality, Diversity, and Inclusion policy, along with our alternative requirements policy, ensures that our services comply with the Equality Act.</p> <p>We have implemented a 'special circumstances' review into our complaint acknowledgment process. This entails our case handlers verifying whether the complainant has any vulnerabilities that should be considered during the complaint investigation and determining if any reasonable adjustments are necessary.</p>

				Reasonable adjustments are recorded in the housing management system and monitored regularly.
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	Complaint Resolution policy and internal complaint handling procedures. Sections 6.7 and 8 of the Complaint Resolution policy.	<p>We typically do not refuse to escalate a complaint unless it falls under the exclusions outlined in the Complaint Resolution policy.</p> <p>If a decision is made not to escalate a complaint to the next stage, the rationale for this decision will be communicated to the complainant in writing, following our established complaint handling procedures.</p> <p>Complainants are made aware of their right to escalate to the Ombudsman and the Ombudsman service contact details are provided.</p>
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	Internal complaint handling procedures.	All information, correspondence, and evidence related to complaints are securely stored within our housing management system in the complaint handling case management functionality.
5.13	Landlords must have processes in place to ensure a complaint can be remedied at any stage of	Yes	Complaint Resolution policy and internal complaint handling procedures.	We aim to address residents' concerns promptly. Our Customer Resolutions team have the authority to resolve

	its complaints process. Landlords must ensure appropriate remedies can be provided at any stage of the complaints process without the need for escalation.			complaints and determine appropriate remedies without escalation.
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	Complaint Resolution policy and internal complaint handling procedures. Section 13 of the Complaint Resolution policy. Unacceptable behaviour policy. Violence and aggression policy.	The Complaint Resolution policy outlines our approach to unacceptable behaviour. Onward also has dedicated Unreasonable Behaviour and Violence and Aggression policies.
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	Complaint Resolution policy and internal complaint handling procedures. Unacceptable behaviour policy. Violence and aggression policy.	Our approach to managing unacceptable behaviour will vary according to its nature and severity. Initially, we will provide the customer with an opportunity to amend their behaviour. Should the behaviour persist, we will evaluate the need to limit their interactions with us. The policies in place for tackling unreasonable behaviour and violence and aggression ensure proportionality and compliance with the Equality Act 2010.

Section 6: Complaint stages

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	Internal complaint handling procedures.	<p>We always attempt to resolve a complainant concern at the earliest opportunity. Our Customer Resolutions team are empowered to resolve complaints and determine the appropriate remedy. Using their knowledge, experience and established procedures, our Customer Resolutions team gather the information and evidence required to resolve complaints in a structured and methodical manner, ensuring a prompt, balanced and consistent approach to complaint handling.</p> <p>The Customer Resolution Manager performs regular quality checks using the quality management framework. These checks involve analysing both open and closed complaints to identify and act upon opportunities for learning and improvement.</p>
6.2	Complaints must be acknowledged, defined and logged at stage 1 of the complaints procedure within 5 working days of the complaint being received.	Yes	<p>Complaint Resolution policy and internal complaint handling procedures.</p> <p>Sections 5 and 6 of the Complaint Resolution policy.</p>	Our complaint response timescales are detailed in the Complaint Resolution policy. The policy also explains what action we will take in the event that the timescale may not be achieved.

6.3	Landlords must issue a full response to stage 1 complaints within 10 working days of the complaint being acknowledged.	Yes	<p>Complaint Resolution policy and internal complaint handling procedures.</p> <p>Sections 5 and 6 of the Complaint Resolution policy.</p> <p>Annual Complaints Performance & Service Improvement report</p>	<p>Our complaint response timescales are detailed in the Complaint Resolution policy. The policy also explains what action we will take if the timescale may not be achieved.</p> <p>Onward's performance against this timescale is detailed in the Annual Complaints Performance and Service Improvement Report and our Tenant Satisfaction Measures results which are published on our website.</p>
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	<p>Complaint Resolution policy and internal complaint handling procedures.</p> <p>Sections 5 and 6 of the Complaint Resolution policy.</p>	<p>Our complaint response timescales are detailed in the Complaint Resolution policy. The policy also explains what action we will take if the timescale may not be achieved.</p>
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	<p>Complaint Resolution policy and internal complaint handling procedures.</p> <p>Internal correspondence templates.</p>	<p>Our complaint response timescales are detailed in the Complaint Resolution policy. The policy also explains what action we will take in the event that the timescale may not be achieved.</p> <p>All complaint correspondence includes details of how complainants can refer their complaint to the Housing</p>

				Ombudsman Service.
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	<p>Complaint Resolution policy and internal complaint handling procedures.</p> <p>Section 6 of the Complaint Resolution policy.</p>	<p>Resolutions are determined and responses issued when the complaint is resolved. Before responding, case handlers contact the complainant to discuss their findings, communicate the outcome, and agree on any action or remedy. They also confirm that the complainant is satisfied with the result and the handling of the complaint before issuing the response.</p> <p>The case remains open until all actions are completed and, if possible, a pre-closure call has occurred.</p>
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	<p>Complaint Resolution policy and internal complaint handling procedures.</p> <p>Sections 6 and 8 of the Complaint Resolution policy.</p> <p>Quality management framework.</p>	<p>Our Customer Resolutions team employs their expertise, experience, and established procedures to systematically collect information and evidence necessary for resolving complaints. This ensures that complaint handling is carried out promptly, equitably, and consistently.</p> <p>Case handlers use a repository of template email and letter responses to ensure all relevant information about a complaint is addressed, and written correspondence is structured consistently and, in a customer-friendly way.</p> <p>A selection of resolved complaints is</p>

				checked against our quality management framework to ensure that they meet the required quality standard.
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	Complaint Resolution policy and internal complaint handling procedures.	<p>New or supplementary information or evidence may be submitted at any stage of the complaints process.</p> <p>The implementation of a robust case management procedure and system ensures that any new information can be efficiently shared, reviewed, and taken into consideration as part of an ongoing complaint.</p> <p>If a new complaint must be recorded, the complainant is duly informed, and the acknowledgement process stipulated for Stage 1 is promptly initiated.</p>
6.9	<p>Landlords must confirm the following in writing to the resident at the completion of stage 1 in clear, plain language:</p> <ul style="list-style-type: none"> a) the complaint stage b) the complaint definition c) the decision on the complaint d) the reasons for any decisions made e) the details of any remedy offered to put 	Yes	<p>Complaint Resolution policy and internal complaint handling procedures.</p> <p>Quality management framework.</p> <p>Internal correspondence templates.</p> <p>Colleague training.</p>	<p>Our correspondence templates have been updated based on guidance from the Housing Ombudsman and the Complaint Handling Code. These updates have also been incorporated into our colleague training.</p> <p>The Customer Resolution team are trained and competent in the delivery of these principles.</p> <p>Our quality management framework ensures that the principles are applied accurately and consistently.</p>

	<p>things right</p> <p>f) details of any outstanding actions</p> <p>g) details of how to escalate the matter to stage 2 if the individual is not satisfied with the response</p>			The right of complainants to escalate their complaint is included in all related correspondence.
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	<p>Complaint Resolution policy and internal complaint handling procedures.</p> <p>Section 8 of the Complaint Resolution policy.</p> <p>Internal correspondence templates.</p>	<p>Before resolving a complaint, the complaint case handlers perform a "pre-closure call" with the complainant to ensure that they are content with the way the complaint has been addressed and that they are satisfied with the outcome.</p> <p>The Complaint Resolution policy and our Stage 1 response correspondence inform complainants of their right to escalate their complaint and detail the escalation procedure.</p> <p>All complaint correspondence contains details about the Housing Ombudsman Service, including their contact information.</p>
6.11	Requests for stage 2 must be acknowledged, defined and logged at stage 2 of the complaints procedure within 5 working days of the escalation request being received.	Yes	<p>Complaint Resolution policy and internal complaint handling procedures.</p> <p>Section 8 of the Complaint Resolution policy.</p>	Our complaint response timescales are detailed in the Complaint Resolution policy. The policy also explains what action we will take if the timescale may not be achieved.

6.12	Residents must not be required to explain their reasons for requesting 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	Complaint Resolution policy and internal complaint handling procedures.	While every effort will be made to understand the complainant's request to escalate their complaint, a personalised acknowledgement procedure is essential for the resolution process. This procedure ensures an ongoing and open dialogue during the resolution process and that all aspects of the complaint are properly understood, including the complainant's desired outcome.
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Yes	Complaint Resolution policy and internal complaint handling procedures. Section 8 of the Complaint Resolution policy. Complaints-Policy-Plain-Guide-Jan-25.pdf	The Complaint Resolution policy states that Stage 2 complaints are investigated by a director, or delegated individual who has not considered the complaint at Stage 1.
6.14	Landlords must issue a final response to the stage 2 within 20 working days of the complaint being acknowledged.	Yes	Complaint Resolution policy and internal complaint handling procedures. Section 8 of the Complaint Resolution policy. Complaints-Policy-Plain-Guide-Jan-25.pdf	Our complaint response timescales are detailed in the Complaint Resolution policy. The policy also explains what action we will take if the timescale may not be achieved. Onward's performance against this timescale is detailed in the Annual Complaints Performance and Service Improvement Report and our Tenant Satisfaction Measures results which are

			Annual Complaints Performance & Service Improvement report TPS-results-July-24-IGD.pdf	published on our website.
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	Complaint Resolution policy and internal complaint handling procedures. Section 8 of the Complaint Resolution policy. Complaints-Policy-Plain-Guide-Jan-25.pdf	Our complaint response timescales are detailed in the Complaint Resolution policy. The policy also explains what action we will take in the event that the timescale may not be achieved.
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	Complaint Resolution policy and internal complaint handling procedures. Internal correspondence templates.	Our complaint response timescales are detailed in the Complaint Resolution policy. The policy also explains what action we will take in the event that the timescale may not be achieved. All complaint correspondence includes details of how complainants can refer their complaint to the Housing Ombudsman Service. We have integrated system capabilities for recording extensions, allowing us to track our compliance rates.
6.17	A complaint response must be provided to the resident	Yes	Complaint Resolution policy and internal complaint handling	Resolutions are determined and responses issued when the complaint is

	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.		procedures. Section 8 of the Complaint Resolution policy.	resolved. Before responding, case handlers contact the complainant to discuss findings, communicate the outcome, and agree on any action or remedy. They also confirm that the complainant is satisfied with the result and the handling of the complaint before issuing the response. The case remains open until all actions are completed and, if possible, a pre-closure call has occurred.
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	Complaint Resolution policy and internal complaint handling procedures. Section 8 of the Complaint Resolution policy. Internal correspondence templates. Quality management framework.	Colleagues responsible for resolving Stage 2 complaints employ their expertise, experience, and established procedures to systematically collect information and evidence necessary for resolving complaints. This ensures that complaint handling is carried out promptly, equitably, and consistently. A repository of template email and letter responses are used to ensure all relevant information about a complaint is addressed, and written correspondence is structured consistently and, in a customer-friendly way. A selection of resolved complaints are checked against our quality management framework to ensure that they meet the required quality standard.
6.19	Landlords must confirm the	Yes	Complaint Resolution policy and	Colleagues responsible for resolving

	<p>following in writing to the resident at the completion of stage 2 in clear, plain language:</p> <ul style="list-style-type: none"> a) the complaint stage b) the complaint definition c) the decision on the complaint d) the reasons for any decisions made e) the details of any remedy offered to put things right f) details of any outstanding actions g) details of how to escalate the matter to the Ombudsman Service if the individual remains dissatisfied 		<p>internal complaint handling procedures.</p> <p>Quality management framework.</p> <p>Internal correspondence templates.</p>	<p>Stage 2 complaints are trained and competent in the delivery of these principles.</p> <p>Our quality management framework ensures that the principles are applied accurately and consistently.</p> <p>The right of complainants to escalate their complaint is included in all related correspondence.</p>
6.20	<p>Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.</p>	Yes	<p>Complaint Resolution policy and internal complaint handling procedures.</p>	<p>Onward operates a two-stage complaints process. Stage 2 complaints are investigated by a director, or delegated individual who has not considered the complaint at Stage 1.</p>

Section 7: Putting things right

Code provision	Code requirement	Comply: Yes/No	Evidence	Commentary/ explanation
7.1	<p>Where something has gone wrong a landlord must acknowledge this and set out the actions it has already taken, or intends to take, to put things right. These can include:</p> <ul style="list-style-type: none"> • apologising • acknowledging where things have gone wrong • providing an explanation, assistance, or reasons • taking action if there has been delay • reconsidering or changing a decision • amending a record or adding a correction or addendum • providing a financial remedy • changing policies, procedures, or practices 	Yes	<p>Complaint Resolution policy and internal complaint handling procedures.</p> <p>Section 12 of the Complaint Resolution policy.</p> <p>Complaint compensation guidance Onward</p>	<p>Resolution outcomes are agreed upon with complainants prior to the resolution of a complaint case. Our written responses provide a comprehensive explanation detailing the issues that have occurred and the actions taken to rectify them.</p> <p>Learning outcomes specific to the complaint are included in our response and utilised to inform our continuous improvement and learning activities.</p> <p>Colleagues utilise a variety of tools and guidance to determine the appropriate remedy and our internal controls ensure that remedies are applied in a fair and consistent manner.</p>
7.2	Any remedy offered must reflect the impact on the	Yes	Complaint Resolution policy and internal complaint handling	Our approach to remedies and financial redress is detailed in our guidance and

	resident as a result of any fault identified.		<p>procedures.</p> <p>Section 12 of the Complaint Resolution policy.</p> <p>Complaint compensation guidance Onward</p>	<p>can be located on our website.</p> <p>Colleagues utilise a variety of tools and guidance to determine the appropriate remedy and our internal controls ensure that remedies are applied in a fair and consistent manner.</p>
7.3	The remedy offer must clearly set out what will happen and by when, in agreement with the resident where appropriate. Any remedy proposed must be followed through to completion.	Yes	<p>Complaint Resolution policy and internal complaint handling procedures.</p> <p>Section 12 of the Complaint Resolution policy.</p> <p>Complaint compensation guidance Onward</p>	<p>Resolution outcomes are agreed upon with complainants prior to the resolution of a complaint case. Our written responses provide a comprehensive explanation detailing the issues that have occurred and the actions taken to rectify them.</p> <p>Learning outcomes specific to the complaint are included in our response and utilised to inform our continuous improvement and learning activities.</p> <p>Colleagues utilise a variety of tools and guidance to determine the appropriate remedy and our internal controls ensure that remedies are applied in a fair and consistent manner.</p>
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes	<p>Complaint Resolution policy and internal complaint handling procedures.</p> <p>Section 12 of the Complaint Resolution policy.</p> <p>Complaint compensation guidance</p>	<p>Our approach to remedies and financial redress aligns with the guidance issued by the Ombudsman and is detailed in our Remedies and Financial Redress Guidance.</p>

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Section 8: Self-assessment, reporting and compliance

Code provision	Code requirement	Comply: Yes/No	Evidence	Commentary/ explanation
8.1	<p>Landlords must produce an Annual Complaints Performance and Service Improvement report for scrutiny and challenge, which must include:</p> <ul style="list-style-type: none"> the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements 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 any findings of non-compliance with this 	Yes	Annual Complaints Performance & Service Improvement report	<p>The Annual Complaints Performance and Service Improvement Report are published on our website.</p> <p>The Annual Complaints Performance and Service Improvement Report are ratified by our Board and Customer Complaints Forum.</p>

	<p>Code by the Ombudsman</p> <ul style="list-style-type: none"> the service improvements made as a result of the learning from complaints any annual report about the landlord's performance from the Ombudsman any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord 			
8.2	<p>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.</p>	Yes	Governing Body's response to the performance report	<p>The governing body's response to the Annual Complaints Performance and Service Improvement Report is published on our website.</p> <p>Quarterly and annual reports are reported to the governing body.</p>
8.3	<p>Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.</p>	Yes	<p>Self-Assessment against the Housing Ombudsman's Complaint Handling Code.</p>	<p>We regularly evaluate our compliance with the Complaint Handling Code through self-assessments conducted in accordance with the Code.</p> <p>Our audit and risk framework includes</p>

				the annual self-assessment against the Code.
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	Yes	Onward has consistently achieved 100% compliance with all Orders issued by the Ombudsman. Housing Ombudsman Annual Landlord Performance Report.	We maintain full compliance with the Code and will promptly and positively respond to any order issued by the Ombudsman.
8.5	If a landlord is unable to comply with the Code due to exceptional circumstances, such as a cyber incident, they must inform the Ombudsman, provide information to residents who may be affected, and publish this on their website. Landlords must provide a timescale for returning to compliance with the Code.	Yes	Business continuity plans and procedures.	Prompt and effective communication with customers and all key stakeholders forms part of our business continuity plans.

Section 9: Scrutiny and 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	Yes	Learning into Action Framework. Learning and improvement action	Learning outcomes are incorporated within all complaint responses and are used to inform our learning and

	consider whether service improvements can be made as a result of any learning from the complaint.		trackers. Customer Scrutiny groups, Customer Complaints Forum, Customer Committee.	continuous improvement activities. Learning from complaints, including Housing Ombudsman determinations, have resulted in change of processes, policies and systems. Monthly reports on thematic issues and trends are provided for the business, including recommendations for improvement.
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	Learning into Action framework. Cross-functional learning and improvement groups. Customer Scrutiny groups, Customer Complaints Forum, Customer Committee. Learning and improvement action trackers.	Our Learning into Action framework aims to foster a culture of learning and reflection, using insights from complaints and other feedback mechanisms to drive continuous improvement in our services. The framework is guided by the following principles: <ul style="list-style-type: none"> • Fairness and transparency: All complaints and feedback are handled fairly and transparently, in accordance with the Housing Ombudsman's Complaint Handling Code and the Onward Complaint Resolution policy. • Learning and improvement: We actively seek to learn from complaints and feedback, identifying areas for

				<p>improvement and implementing effective solutions.</p> <ul style="list-style-type: none"> • Proportionality and timeliness: Complaints and feedback are dealt with proportionately and in a timely manner. • Accountability: We are accountable for our performance and take responsibility for addressing issues raised in complaints and feedback.
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	<p>Customer Sentiment Report.</p> <p>Onward-CUSTOMER-AR-2024-ONLINE-copy.pdf</p> <p>Annual Complaints Performance & Service Improvement report</p> <p>Governing Body's response</p>	<p>We regularly share our complaints performance, trends, and learning outputs with colleagues and customers.</p> <p>Ad-hoc updates featuring information such as sector wide news and information relating to the Housing Ombudsman are also shared with colleagues.</p> <p>Various methods are employed to share complaints information with residents, including the Annual Report, Newsletters, Scrutiny panels, and the Customer Complaint Forum.</p>
9.4	Landlords must appoint a suitably senior lead person as accountable for their	Yes	<p>Learning into Action framework.</p> <p>Cross-functional learning and</p>	Director of Customer Experience is accountable.

	complaint handling. This person must assess any themes or trends to identify potential systemic issues, serious risks, or policies and procedures that require revision.		improvement groups. Customer Complaints Forum. Learning and improvement actions trackers.	Complaint themes are systematically monitored and reviewed with senior stakeholders on a weekly basis. The data, insights, and intelligence obtained from complaints are integrated into our learning and improvement activities.
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 (MRC).	Yes	Governing Body's response	A Non-Executive Director holds the position of Member Responsible for Complaints. This role is tasked with overseeing enhancements in customer resolution efforts to ensure that the culture, systems, and processes are functioning effectively and continuously improving. We ensure that the Customer Voice is integrated into our governance structure through various mechanisms, including the Customer Committee, which functions as a formal committee of the Board.
9.6	The MRC will be responsible for ensuring the governing body receives regular information on complaints that provides insight on the landlord's complaint handling performance. This person must have access to suitable information and staff to perform this role and report on their findings.	Yes	Onward-CUSTOMER-AR-2024-ONLINE-copy.pdf Annual Complaints Performance & Service Improvement report Governing Body's response Customer Committee Reports.	Quarterly and annual reports are provided to the governing body. These reports include details of the volume of complaints at each stage, our performance, learning outcomes and trend analysis. Additionally, all Housing Ombudsman determinations, case detail and orders are also reported.

			Customer Sentiment Report.	
9.7	<p>As a minimum, the MRC and the governing body (or equivalent) must receive:</p> <ul style="list-style-type: none"> a) regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance b) regular reviews of issues and trends arising from complaint handling c) regular updates on the outcomes of the Ombudsman's investigations and progress made in complying with orders related to severe maladministration finding d) annual Complaints Performance and Service Improvement report. 	Yes	<p>Onward-CUSTOMER-AR-2024-ONLINE-copy.pdf</p> <p>Annual Complaints Performance & Service Improvement report</p> <p>Governing Body's response</p> <p>Customer Committee Reports.</p> <p>Customer Sentiment Report.</p>	<p>Quarterly and annual reports are submitted to the governing body. These reports encompass comprehensive details regarding the volume of complaints at each stage, our performance metrics, learning outcomes, and trend analysis. Furthermore, all determinations made by the Housing Ombudsman, including case details and orders, are also documented in these reports.</p> <p>In instances of severe maladministration, closer examination occurs, and specific management actions are identified and monitored.</p>
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:	Yes	<p>Members of our Customer Resolution team have a standard objective which complies with this requirement.</p> <p>Performance against objectives is</p>	<p>All relevant colleagues have a standard objective in relation to complaint handling.</p> <p>Our complaint handling procedures, along with our learning and</p>

	<ul style="list-style-type: none">a) have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departmentsb) take collective responsibility for any shortfalls identified through complaints, rather than blaming othersc) act within the professional standards for engaging with complaints as set by any relevant professional body	<p>monitored regularly as part of our performance and quality management frameworks.</p> <p>Learning into Action framework.</p> <p>Learning and improvement actions trackers.</p>	<p>improvement frameworks, are structured to foster a positive and collaborative culture across all aspects of complaint management, learning, and continuous improvement.</p> <p>Our strategy for enhancing complaint resolutions and elevating the overall customer experience involves collaboration between various teams across the business. These groups work together to ensure that we adopt a professional, cohesive, and consistent approach.</p>
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