



GCHA (Gravesend Churches Housing Association) – Self Assessment The Housing Ombudsman Complaint Code 2024

The Housing Ombudsman (HO) introduced the Complaints Handling Code in July 2020 which sets out good practice for landlords to deal with complaints effectively and fairly. In 2024, the HO, under new powers, updated its Complaint Code which came into effect on 1 April 2024.

Landlords including GCHA must carry out an annual assessment against the Complaint Code and publish the results.

Below is a copy of the Self-Assessment Complaint Code 2024 and GCHA's response.

This document should be considered in conjunction with GCHA's Compliments & Complaints Policy.

Section 1:	Definition of a Complaint		
Code Provision	Code Requirement	Comply Yes/No	Evidence of Compliance/Commentary/Explanation
1.2	<p>A complaint must be defined as:</p> <p><i>'An expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the landlord, its own staff, or those acting on its behalf, affecting a resident or group of residents.'</i></p>	Yes	GCHA's Compliments, Comments and Complaints policy (S2.1) meets the HO guidance on this.
1.3	<p>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.</p>	Yes	GCHA's Compliments, Comments and Complaints policy (S2.1) meets the HO guidance on this. To note that when we receive MP enquiries, these are not managed via the Formal Complaints policy process. We log and respond to MP enquiries separately. With MP complaints these are usually responded to on the same day or within 5 working days. Please refer to (S18) of the complaints policy with reference to MP Enquiries.
1.4	<p>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.</p>	Yes	GCHA Compliments & Complaints policy (S6) meets the HO guidance on this.

Section 1:	Definition of a Complaint		
Code Provision	Code Requirement	Comply Yes/No	Evidence of Compliance/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	GCHA Compliments & Complaints policy (S6) meets the HO guidance on this.
1.6	An expression of dissatisfaction with services made through a survey is not defined as a complaint, though wherever possible, the person completing the survey should be made aware of how they can pursue a complaint if they wish to. Where landlords ask for wider feedback about their services, they also must provide details of how residents can complain.	Yes	<p>GCHA Compliments & Complaints policy (S7) meets the HO guidance on this.</p> <p>In partnership with Acuity Benchmarking Group, we have included as part of the transactional customer satisfaction surveys a section providing details of how residents can make a complaint.</p>

Section 2	Exclusions		
Code Provision	Code Requirement	Comply Yes/No	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	<p>GCHA Compliments & Complaints policy (S2.1), (S9), (S19-S22) meets the HO guidance on this.</p> <p>We welcome customer feedback and promote a positive complaints culture. However, there will be times where for various reasons we will or may not accept a complaint. Our complaints policy sets our reasons why GCHA may not pursue a complaint. In line with our Equalities statement (S27) of the complaints policy all decisions will be made fairly, with empathy and with respect for the customer.</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. Acceptable exclusions include:</p> <ul style="list-style-type: none"> • The issue giving rise to the complaint occurred over twelve months ago. • Legal proceedings have started. This is defined as details of the claim, such as the Claim Form and Particulars of Claim, having been filed at court. • Matters that have previously been considered under the complaints policy. 	Yes	GCHA Compliments & Complaints policy (S2.1), (S9), (S19-S22) meets the HO guidance on this.
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	GCHA Compliments & Complaints policy (S19) meets the HO guidance on this.

Section 2	Exclusions		
Code Provision	Code Requirement	Comply Yes/No	Commentary/Explanation
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	GCHA's Compliments & Complaints policy (S19) sets out clear reasons why we may not accept a complaint.
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Yes	GCHA's Compliments & Complaints policy (S2.1), (S9) promotes a positive complaints culture with the aim to encourage resident feedback. We will consider all circumstances of each complaint.

Section 3:	Accessibility and Awareness		
Code Provision	Code Requirement	Comply Yes/No	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	GCHA's Compliments & Complaints policy (S11), (S27) meets the HO guidance on this.
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	GCHA's Compliments & Complaints policy (S11), (S27) meets the HO guidance on this.
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	GCHA's Compliments & Complaints policy (S9) meets the HO guidance on this. We promote a positive complaints culture and provide various channels in which a resident can raise a complaint.
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	GCHA's Compliments & Complaints policy is available on our website and easily accessible. In line with the HO guidance, we apply a 'two stage' complaints process setting out what happens at each stage. (S12.1-12.4)

Section 3:	Accessibility and Awareness		
Code Provision	Code Requirement	Comply Yes/No	Commentary/Explanation
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	GCHA's Compliments & Complaints policy (S14) meets the HO guidance on this.
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	GCHA's Compliments & Complaints policy (S11) meets the HO guidance on this.
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	GCHA's Compliments & Complaints policy (S12.1-12.4) meets the HO guidance on this.

Section 4:	Complaint Handling Staff		
Code Provision	Code Requirement	Comply Yes/No	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	We are a small Housing Landlord under 1000 properties, where our staff take on more than one role/responsibilities. The overall lead on complaints is the Executive Assistant, who takes full responsibility for complaints management with the support from the wider organisation and the Senior Management Team. All complaints are discussed at Senior Management meetings, monthly staff meetings, and reported to GCHA's board on a quarterly basis.
4.2	The complaints officer must have access to staff at all levels to facilitate the prompt resolution of complaints. They must also have the authority and autonomy to act to resolve disputes promptly and fairly.	Yes	The Executive Assistant (Complaints Lead) has access to staff at all levels to facilitate the prompt resolution of complaints including lessons learnt. The Executive Assistant including 'all Staff' are empowered to resolve disputes promptly and fairly. Complaints are discussed weekly with complaint leads and at staff monthly meetings, along with any lessons learnt.
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	Complaints and lessons learnt are discussed at monthly staff meetings, and EMT (Executive Management Team) meetings. A refresher staff training on complaints to be completed in August 2024.

Section 5:	The Complaint Handling Process		
Code Provision	Code Requirement	Comply Yes/No	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	GCHA operates one complaints policy which is written in line with the HO Complaints Code 2020 and reviewed under the HO Complaint Code 2024 in March 2024.
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	There is no 'Stage 0' process in place. Where there is an area of dissatisfaction, or service request, we will as recommend by the HO, log the request. Our initial aim is to resolve at the first point of contact and outside of the formal complaints process where the resident is happy to do so. We adhere to a two stage complaint policy process.
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	GCHA's Compliment & Complaints policy is written in line with the HO Complaints Code 2020 and revised under the HO Complaints Code 2024. We operate a two stage complaint process.
5.4	Where a landlord's complaint response is handled by a third party (e.g. a contractor or independent adjudicator) at any stage, it must form part of the two stage complaints process set out in this Code. Residents must not be expected to go through two complaints processes.	Yes	<p>Gas complaints are dealt with directly via our Gas & Heating contractor. All other third party complaints are managed via GCHA's Compliment & Complaints policy. MP queries are recorded as 'MP enquiries,' logged and responded to within 0-5 days of receipt. Refer to (S18).</p> <p>We contacted our Gas & Heating contractor via email to check that their complaints policy aligns with the HO recommendations. The contractor confirmed by email 27/06/2024 that their approach to complaints aligns with the HO Complaint Code and they operate a 2 stage complaints process.</p>

Section 5: The Complaint Handling Process			
Code Provision	Code Requirement	Comply Yes/No	Commentary/Explanation
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Yes	<p>In line with the HO requirements, we manage all complaints in line with the revised complaint code, excluding MP enquiries and Gas complaints which currently are dealt with via the Gas & Heating contractor. MP enquires are managed separately to formal complaints and recorded separately.</p> <p>We contacted our Gas Contractor who confirmed by email on 27/06/2024, that they manage their complaints in line with the HO Complaint Code.</p>
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	GCHA's Compliments & Complaints policy (S12.1-12.3) meets the HO guidance on this.
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.		GCHA's Compliments & Complaints policy (S12.1-12.3) meets the HO guidance on this.
5.8	<p>At each stage of the complaints process, complaint handlers must:</p> <p>(A) deal with complaints on their merits, act independently, and have an open mind</p> <p>(B) give the resident a fair chance to set out their position</p> <p>(C) take measures to address any actual or perceived conflict of interest</p> <p>(D) consider all relevant information and evidence carefully.</p>	Yes	GCHA's Compliment & Complaints policy sets out a positive complaints culture, welcoming customer feedback, and creates every opportunity to respond to all complaints in a fair, objective way taking into account all points (A-D). Refer to (S9) and (S12.1-S12.3)

Section 5: The Complaint Handling Process			
Code Provision	Code Requirement	Comply Yes/No	Commentary/Explanation
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	GCHA's Compliment & Complaints policy sets this out in (S12.1-S12.3)
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	GCHA's Compliment & Complaints policy (S9), (S27) sets out our approach to 'reasonable adjustments' for residents and consideration given under the 'Equality Act 2010'.
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	GCHA's Compliment & Complaints policy (S12.1-S12.3), (S19-S22) sets out reasons where we will decline to escalate a complaint and reasons why we will not escalate a complaint.
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 26 any relevant supporting documentation such as reports or surveys.	Yes	<p>GCHA keeps complaint records on their (shared drive GCHA all staff – documents). Effective from 1 April 2024, all live complaints are now recorded and tracked via CRM and Excel subject to a review of CRM's end to end online workflow which requires adapting to align with the revised complaints process.</p> <p>Action: CRM workflow to be reviewed to comply with the revised HO Code and improve reporting. (Target Date for Completion: March 2025). Risk: low as complaints currently recorded on CRM and Excel.</p>

Section 5:	The Complaint Handling Process		
Code Provision	Code Requirement	Comply Yes/No	Commentary/Explanation
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	GCHA's Compliment & Complaints policy is written on the basis that where we can resolve at first point of contact we will. Reference: (S2.1), (12.1-12.3)
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	GCHA's Compliment & Complaints policy sets out how we will address or respond to unacceptable behaviour (S21). As recommended by the HO, there is a separate unacceptable behaviour policy in place which was approved by the Policy and Review committee in April 2024. This is saved on GCHA's shared drive under policies and procedures.
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	<p>GCHA's Compliment & Complaints policy (S27.0) sets out provisions of the Equality Act but also where unacceptable behaviour is in place, any restriction will be proportionate to the type of behaviour demonstrated. Refer to (S21).</p> <p>As stated above (5.14) of the Code, there is a new 'Unacceptable Behaviour' policy in place which was approved by the Policy and Review committee in April 2024.</p>

Section 6:	Complaint Stages – Stage One		
Code Provision	Code Requirement	Comply Yes/No	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	GCHA's Compliment & Complaints policy (S9) is where we promote a positive complaints culture and welcome all feedback Refer to (S2.1), S12.1-12.3) our approach to considering all complaints where we will make it our priority to resolve complaints at first time fix and or early as possible, taking into account any vulnerabilities and or at risk situations.
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	GCHA's Compliments & Complaints policy (S12.1) sets out the HO guidance on this.
6.3	Landlords must issue a full response to stage 1 complaints within 10 working days of the complaint being acknowledged.	Yes	GCHA's Compliments & Complaints policy (S12.1) sets out the HO guidance on this.
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	GCHA's Compliment & Complaints policy (S12.1) sets out the HO guidance on this.
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	GCHA's Compliment & Complaints policy (S12.1) sets out the HO guidance on this.

Section 6:	Complaint Stages – Stage One		
Code Provision	Code Requirement	Comply Yes/No	Commentary/Explanation
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	GCHA's Compliment & Complaints policy (S12.1) sets out the HO guidance on this.
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	GCHA's Compliment & Complaints policy (S12.1) sets out the HO guidance on this.
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	GCHA's Compliment & Complaints policy (S12.1) sets out the HO guidance on this.

Section 6:	Complaint Stages – Stage One – Stage Two from (6.10-6.20)		
Code Provision	Code Requirement	Comply Yes/No	Commentary/Explanation
6.9	<p>Landlords must confirm the following in writing to the resident at the completion of stage 1 in clear, plain language:</p> <p>(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 stage 2 if the individual is not satisfied with the response.</p>	Yes	GCHA's Compliment & Complaints policy (S12.1) sets out the HO guidance on this.
6.10.	<p>Stage Two Complaint Process (6.10-6.20) 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.</p>	Yes	GCHA's Compliment & Complaints policy (S12.1-S12.3) sets out the HO guidance on this.
6.11	Requests for stage 2 must be acknowledged, defined, and logged at stage 2 of the complaints procedure within five working days of the escalation request being received.	Yes	GCHA's Compliment & Complaints policy (S12.3) sets out the HO guidance on this.
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	GCHA's Compliment & Complaints policy (S12.3) sets out the HO guidance on this.
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Yes	GCHA's Compliment & Complaints policy (S12.3) sets out the HO guidance on this.

Section 6:	Complaint Stages – Stage One – Stage Two from (6.10-6.20)		
Code Provision	Code Requirement	Comply Yes/No	Commentary/Explanation
6.14	Landlords must issue a final response to the stage 2 within 20 working days of the complaint being acknowledged.	Yes	GCHA's Compliment & Complaints policy (S12.3) sets out the HO guidance on this.
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	GCHA's Compliment & Complaints policy (S12.3) sets out the HO guidance on this.
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	GCHA's Compliment & Complaints policy (S12.3) sets out the HO guidance on this.
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	GCHA's Compliment & Complaints policy (S12.3)) sets out the HO guidance on this.
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	GCHA's Compliment & Complaints policy (S12.3)) sets out the HO guidance on this.

Section 6:	Complaint Stages – Stage One – Stage Two from (6.10-6.20)		
Code Provision	Code Requirement	Comply Yes/No	Commentary/Explanation
6.19	<p>Landlords must confirm the following in writing to the resident at the completion of stage 2 in clear, plain language:</p> <p>(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>	Yes	GCHA's Compliment & Complaints policy (S12.3)) sets out the HO guidance on this.
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	GCHA's Compliment & Complaints policy (S12.3) sets out the HO guidance on this.

Section 7:	Putting Things Right		
Code Provision	Code Requirement	Comply Yes/No	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	GCHA's Compliment & Complaints policy (S9.0), (S2.1), (S12.1-S12.3) sets out the HO guidance on this.
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Yes	GCHA's Compliment & Complaints policy (S15) sets out the HO guidance on this.
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	Any remedy offered to resolve, settle a complaint, is set out clearly in our complaint responses and responses are recorded on GCHA's shared drive and CRM. As part of any response, we include what will happen and by when, in agreement with the resident. Refer to (S15) compensation for service failure.
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes	GCHA's Compliment & Complaints policy was written in line with HO guidance and revised under the Self-Assessment Code 2024. Any outcomes, remedies offered will reflect the HO guidance in terms of what is reasonable and appropriate.

Section 8:	Self-Assessing, Reporting and Compliance		
Code Provision	Code Requirement	Comply Yes/No	Commentary/Explanation
8.1	<p>Landlords must produce an annual complaints performance and service improvement report for scrutiny and challenge, which must include:</p> <p>(A) the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements.</p> <p>(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;</p> <p>(C) any findings of non -compliance with this Code by the Ombudsman;</p> <p>(D) the service improvements made as a result of the learning from complaints;</p> <p>(E) any annual report about the landlord's performance from the Ombudsman;</p> <p>(F) any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord.</p>	Yes	<p>GCHA has completed its self-assessment against this code and will publish the results on GCHA's website by end of June 2024.</p> <p>In April 2024, we provided GCHA's Board with an annual summary of complaints for the last 12 months.</p> <p>The annual complaints performance and areas for improvement report will be published on GCHA's website including the Boards response to the report by end of June 2024.</p> <p>Action: GCHA's self-assessment is to be published on GCHA's website by end of June 2024 including the Board's response to the self-assessment code and complaint report.</p>

Section 8:	Self-Assessing, Reporting and Compliance		
Code Provision	Code Requirement	Comply Yes/No	Commentary/Explanation
8.2	The annual complaints performance and service improvement report must be reported to the landlord's governing body (or equivalent) and published on the section of its website relating to complaints. The governing body's response to the report must be published alongside this.	Yes	The annual complaints performance was reported to the Board in April 2024. The results are represented in the annual complaints performance and service improvement plan report, which will be published end of June 2024 on GCHA's website.
8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	N/A	This is not currently applicable to GCHA. However, we will consider (8.3) should GCHA undergo a major restructure, merger and/or change in procedures.
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	Yes	GCHA welcomes the opportunity to review and update its self-assessment following an HO investigation.
8.5	If a landlord is unable to comply with the Code due to exceptional circumstances, such as a cyber incident, they must inform the Ombudsman, provide information to residents who may be affected, and publish this on their website Landlords must provide a timescale for returning to compliance with the Code.	Yes	In the case of exceptional circumstances, such as a cyber incident, we will inform the HO and in line with transparency, apply (8.5) of the code where appropriate.

Section 9:	Scrutiny and Oversight: Continuous Learning and Improvement		
Code Provision	Code Requirement	Comply Yes/No	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	<p>GCHA takes every opportunity to review customer feedback either via the complaints handling process or other avenues with the aim to make service improvements. Example: Customer feedback 'Keeping residents updated throughout the duration of their complaint.' Service Improvement: This is now in place as part of the weekly complaints review meetings.</p> <p>All service improvements are discussed taking into consideration a few factors, including cost of service improvements. We will always be open with the resident and honest as to what can be delivered and when.</p>
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	GCHA's Compliment & Complaints policy reinforces a positive complaint handling culture (S9.0). We reinforce this through our values, by holding weekly complaint meetings, and discussions at monthly staff meetings. This will be reinforced as part of the next 'complaints handling' training to be delivered in August 2024.
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	GCHA works in partnership with its newly formed Resident's Scrutiny panel where their first project in 2024 will be to review GCHA's complaints policy and processes including our responses to help GCHA improve on service delivery. Staff are already involved in weekly complaint review meetings and training. Regular complaint updates are also provided to GCHA board on a quarterly basis. (S9) of the Compliments and Complaints policy sets out our positive complaints culture where we welcome all feedback.
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 Operations is the appointed senior lead accountable to GCHA for oversight of all complaints. This is supported by the role of the Executive Assistant who leads on the day to day complaint handling/management process.

Section 9:	Scrutiny and Oversight: Continuous Learning and Improvement		
Code Provision	Code Requirement	Comply Yes/No	Commentary/Explanation
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	Eileen Jordan is the nominated Board Member to support GCHA operation staff on complaint handling to ensure that we operate a positive complaints culture. The nominated lead (Eileen Jordan) will be referred to as (The member responsible for complaints).
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	<p>The (MRC) Eileen Jordan will be responsible for ensuring the Board receives regular information on complaints that provides insight on GCHA's complaint handling performance.</p> <p>The Senior Lead for complaints will meet with the MRC member before Board meetings including the (Executive Assistant) to review complaints before they go to the board.</p>
9.7	<p>As a minimum, the MRC, and the governing body (or equivalent) must receive:</p> <p>(A) regular updates on the volume, categories, and outcomes of complaints, alongside complaint handling performance;</p> <p>(B) regular reviews of issues and trends arising from complaint handling;</p> <p>(C) Regular updates on the outcomes of the Ombudsman's investigations and progress made in complying with orders related to severe maladministration findings;</p> <p>(D) annual complaints performance and service improvement report.</p>	Yes	Quarterly complaint updates are reported to the Board. We will work closely with the nominated MRC to ensure compliance with (9.7). An annual complaints performance report was reported to the Board in April 2024. We have since completed a published version of the annual Complaints Performance report including a Service Improvement Plan to address areas for improvement. This will be published on GCHA website end of June 2024.

Section 9:	Scrutiny and Oversight: Continuous Learning and Improvement		
Code Provision	Code Requirement	Comply Yes/No	Commentary/Explanation
9.8	<p>Landlords must have a standard objective in relation to complaint handling for all relevant employees or third parties that reflects the need to:</p> <p>(A) have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments;</p> <p>(B) take collective responsibility for any shortfalls identified through complaints, rather than blaming others;</p> <p>(C) act within the professional standards for engaging with complaints as set by any relevant professional body.</p>	Yes	(9.8) is reflected in GCHA values, annual KPI's and staff performance objectives which are reviewed in regular one to one meetings and as part of GCHA's annual appraisal process.