

## Orwell Housing Complaints Handling Code-Self Assessment Form April 2026

### Foreword

“Following the Customer Insight Committee’s review on 6 May 2026, I confirm that all Committee Members were satisfied that the Complaints Handling Code is being fully adhered to and that Orwell continues to take constructive and proactive steps to learn from, and improve upon, its complaints processes. The completed Self-Assessment provides assurance regarding Orwell’s compliance with the Code.”

— **Tom Brown, Member Responsible for Complaints, Board Member & Customer Insight Chair**

This self-assessment form should be completed by the Complaints Officer and it must be reviewed and approved by the landlord’s governing body at least annually.

Once approved, landlords must publish the self-assessment as part of the annual complaints performance and service improvement report on their website. The governing body’s response to the report must be published alongside this.

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

We recognise that there may be a small number of circumstances where landlords are unable to meet the requirements, for example, if they do not have a website. In these circumstances, we expect landlords to deliver the intentions of the Code in an alternative way, for example by publishing information in a public area so that it is easily accessible.

## Section 1: Definition of a complaint

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
1.2	A complaint must be defined as: <i>‘an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the landlord, its own staff, or those acting on its behalf, affecting a resident or group of residents.’</i>	Yes	This is set out in our Complaints and Compliments Policy within paragraph 4.1.	Initial dissatisfaction / Service request is logged on our CRM system, if it cannot be resolved at the first point of contact a complaint will be logged
1.3	A customer does not have to use the word ‘complaint’ for it to be treated as such. Whenever a customer 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	This is set out in our Complaints and Compliments Policy within paragraphs 4.2 and 5.2.	As above, also customers will always be asked if they would like a formal complaint logged.
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 customer to the landlord requiring action to be taken to put something right. Service requests are not complaints, but must be recorded, monitored and reviewed regularly.	Yes	This is set out in our Complaints and Compliments Policy within paragraphs 4.5	Our policy distinguishes between <b>service requests</b> and <b>complaints</b> . A service request is a request from a customer requiring action to be taken to put something right and is not a complaint. All service requests will be logged on our CRM system and are recorded, monitored and reviewed regularly. We will aim to resolve service requests promptly and to the customer’s satisfaction. If a customer remains unhappy with how a service request has been handled, an expression of dissatisfaction will be

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
				<p>logged on our CRM, and the customer will be offered the option to raise a formal complaint.</p> <p>Wherever possible, expressions of dissatisfaction will be resolved at the first point of contact. We aim to resolve service requests within two working days.</p>
1.5	<p>A complaint must be raised when the customer 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 customer complains.</p>	Yes	<p>This is set out in our Complaints and Compliments Policy within paragraphs 4.6.</p>	<p>Initially, a dissatisfaction with the service will be logged, however a customer will be asked if they would like a formal complaint to be logged. We will ensure we continue to address all service requests regardless.</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. Where landlords ask for wider feedback about their services, they also must provide details of how customers can complain.</p>	Yes	<p>This is set out in our Complaints and Compliments Policy within paragraphs 15.5.</p>	<p>Orwell uses transactional surveys to monitor customer satisfaction with several services including repairs, if negative feedback is received it is escalated and followed up by our customer experience team. Information on how to complain is published online and on relevant letters sent to customers.</p>

## Section 2: Exclusions

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
2.1	Landlords must accept a complaint unless there is a valid reason not to do so. If landlords decide not to accept a complaint, they must be able to evidence their reasoning. Each complaint must be considered on its own merits	Yes	This is set out in our Complaints and Compliments Policy within paragraphs 5.1 and action.	There is no evidence of Orwell refusing any complaints.
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 customers. Acceptable exclusions include:</p> <ul style="list-style-type: none"> <li>• The issue giving rise to the complaint occurred over twelve months ago.</li> <li>• 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.</li> <li>• Matters that have previously been considered under the complaints policy.</li> </ul>	Yes	This is set out in our Complaints and Compliments Policy within paragraphs 8.1 and 8.2	As above.
2.3	Landlords must accept complaints referred to them within 12 months of the issue occurring or the customer becoming aware of the issue, unless they are excluded on other grounds. Landlords must consider whether to	Yes	We do not stipulate a time period within our Complaints Policy and Procedure and will accept a complaint where the issue is over 12 months old.	

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	apply discretion to accept complaints made outside this time limit where there are good reasons to do so.			
2.4	If a landlord decides not to accept a complaint, an explanation must be provided to the customer setting out the reasons why the matter is not suitable for the complaints process and the right to take that decision to the Ombudsman. If the Ombudsman does not agree that the exclusion has been fairly applied, the Ombudsman may tell the landlord to take on the complaint.	Yes	This is set out in our Complaints and Compliments Policy within paragraphs 8.2	
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Yes	This is set out in our Complaints and Compliments Policy within paragraphs 8.1 and 8.2	

### Section 3: Accessibility and Awareness

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
3.1	Landlords must make it easy for customers 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 customers who may need to access the complaints process.	Yes	This is set out in our Complaints, Compliments and Compensation Policy within paragraph 6.1. and 14.	Customers can complain <a href="#">online</a> , face to face, by telephone, via the online app or portal, social media and in writing (letter or email).
3.2	Customers must be able to raise their complaints in any way and with any member of staff. All staff must be aware of the complaints process and be able to pass details of the complaint to the appropriate person within the landlord.	Yes	This is set out in our Complaints, Compliments and Compensation Policy within paragraph 6.1.	All front-line staff have mandatory complaints training as part of their e-learning and all leaders have complaints handling training. Every year complaints training is refreshed; the Customer resolution team all have access to Housing Ombudsman Learning Centre.
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 customers are unable to complain.	Yes	Orwell report our annual complaints on our website. Complaints are reported through our customer insight committee that meet quarterly and are reported to board. Monthly reports of complaints are made available to all leaders.	The performance report for the previous 12 months is logged <a href="#">online</a> and will be updated annually.
3.4	Landlords must make their complaint policy available in a clear and accessible format for all customers. This will detail the two-stage process, what will happen at each stage, and the timeframes for responding. The	Yes	Our Complaints and Compliments Policy is available on our website. Customers can also request a paper copy, an easy read option if required, and the read	The Policy and Procedure is available <a href="#">online</a> .

<b>Code provision</b>	<b>Code requirement</b>	<b>Comply: Yes / No</b>	<b>Evidence</b>	<b>Commentary / explanation</b>
	policy must also be published on the landlord's website.		aloud function can be used online. Our policy details the stages of our procedure, what happens at each stage, and the timelines for responses in Section 7 (paragraphs 7.1-7.8)	
3.5	The policy must explain how the landlord will publicise details of the complaints policy, including information about the Ombudsman and this Code.	Yes	This is set out in our Complaints, Compliments Policy within paragraph 18.1.	The complaints policy and process are available online, as is the Ombudsman's Complaint Handling Code and our self-assessment of compliance with it and information about the Housing Ombudsman. <a href="#">Orwell's Website</a>
3.6	Landlords must give customers the opportunity to have a representative deal with their complaint on their behalf, and to be represented or accompanied at any meeting with the landlord.	Yes	This is set out in our Complaints, Compliments and Compensation Policy within paragraph 13.1 and 13.2.	
3.7	Landlords must provide customers with information on their right to access the Ombudsman service and how the individual can engage with the Ombudsman about their complaint.	Yes	This is included in stage one and two response letters. It is also covered when writing to acknowledge a delay in responding. This is set out in our Complaints and Compliments Policy within paragraph 10.1.	

## 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	We have dedicated Customer Resolution Officers. This is set out in our Complaints and Compliments Policy within paragraph 6.1.	
4.2	The complaints officer must have access to staff at all levels to facilitate the prompt resolution of complaints. They must also have the authority and autonomy to act to resolve disputes promptly and fairly.	Yes	The Customer resolution officer and senior can award compensation of up to £300 as per our standing orders. In addition, the Customer Experience Manager can sign off up to £750 with Head of Customer Experience and Housing with a limit of £1000. The Customer resolution team has autonomy to resolve complaints and access any level of staff.	It has recently been agreed that the Senior Customer Resolution Officer will have her limit reviewed to be increased from £300 to £500 to allow a more efficient response for the customer.
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	All front-line staff and leaders have mandatory complaints training as part of their e-learning. We have a Customer Resolution Team Officer who are responsible for dealing with all complaints across the business. Leaders have access to our monthly complaint report. Quarterly	Information about complaints, including lessons learned, is included in our Annual Report as well as published on <a href="#">Orwell's Website</a>

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
			<p>reports are presented to Customer Insight Committee and board members are presented with the annual report and assessment for sign off. Complaints themes are captured alongside other customer insight and used to create 'insight into action' priorities which are tracked and monitored by our Customer Insight Committee biannually and Board.</p>	

## 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. Customers must not be treated differently if they complain.	Yes	Orwell has one Complaints and Compliments Policy. This is published on <a href="#">Orwell's Website</a>	
5.2	The early and local resolution of issues between landlords and customers 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	Orwell logs any failures or expressions of dissatisfaction as 'initial dissatisfaction' however this is purely to allow us to monitor this and to learn, it is not a part of our complaints process. Customers will always be asked if they wish to make a formal complaint. Our complaints process only has two stages. This is evidenced within our Complaints and Compliments Policy and Procedure.	
5.3	A process with more than two stages is not acceptable under any circumstances as this will make the complaint process unduly long and delay access to the Ombudsman.	Yes	Our complaints process only has two stages. This is evidenced within our Complaints and Compliments Policy. This is published on <a href="#">Orwell's Website</a>	
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. Customers must not be	Yes	This is set out in our Complaints and Compliments Policy within paragraph 7.7.	

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	expected to go through two complaints processes.			
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Yes	This is set out in our Complaints and Compliments Policy within paragraph 7.7.	
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 customer is seeking. The Code will refer to this as “the complaint definition”. If any aspect of the complaint is unclear, the customer must be asked for clarification.	Yes	This is set out in our Complaints and Compliments Policy within paragraph 7.6.	
5.7	When a complaint is acknowledged at either stage, landlords must be clear which aspects of the complaint they are, and are not, responsible for and clarify any areas where this is not clear.	Yes	This is set out in our Complaints and Compliments Policy within paragraph 7.6.	
5.8	At each stage of the complaints process, complaint handlers must: <ul style="list-style-type: none"> <li>a. deal with complaints on their merits, act independently, and have an open mind;</li> <li>b. give the customer a fair chance to set out their position;</li> <li>c. take measures to address any actual or perceived conflict of interest; and</li> <li>d. consider all relevant information and evidence carefully.</li> </ul>	Yes	This is set out in our Complaints and Compliments Policy within paragraph 3.3	Complaints training is provided annually to Customer Resolution Officers. (LearnSpace under SCRO and SCO)

<b>Code provision</b>	<b>Code requirement</b>	<b>Comply: Yes / No</b>	<b>Evidence</b>	<b>Commentary / explanation</b>
5.9	Where a response to a complaint will fall outside the timescales set out in this Code, the landlord must agree with the customer suitable intervals for keeping them informed about their complaint.	Yes	This is set out in our Complaints and Compliments Policy within paragraph 7.5.	
5.10	Landlords must make reasonable adjustments for customers 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 customer has disclosed. Any agreed reasonable adjustments must be kept under active review.	Yes	This is set out in our Complaints and Compliments Policy within paragraph 14.4	Dynamics 365 (CRM system) is kept up to date with such requests, and these are reviewed at the point of a service request or formal complaint being made.
5.11	Landlords must not refuse to escalate a complaint through all stages of the complaints procedure unless it has valid reasons to do so. Landlords must clearly set out these reasons, and they must comply with the provisions set out in section 2 of this Code.	Yes	This is set out in our Complaints and Compliments Policy within paragraph 7.3	
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 customer, correspondence with other parties, and any relevant supporting documentation such as reports or surveys.	Yes	Orwell uses a CRM (Microsoft Dynamics) system to record all documentation which relates to complaints, all dates and correspondence is recorded. Repairs reports and details are logged on our 'Connect' system	

Code provision	Code requirement	Comply: Yes / No	Evidence	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	Colleagues are encouraged to resolve matters from the first point of contact and have the autonomy to resolve matters at any point in the process. This is covered off within staff training. It is also set out within our Complaints and Compliments Policy, paragraph 3.3.	
5.14	Landlords must have policies and procedures in place for managing unacceptable behaviour from customers 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	This is set out in our Complaints and Compliments Policy within paragraph 12.1. Orwell has an unreasonable behaviour and demands policy and procedure which covers this.  Any agreements and restrictions would be recorded on dynamics and kept under review by the customer resolution team.	
5.15	Any restrictions placed on contact due to unacceptable behaviour must be proportionate and demonstrate regard for the provisions of the Equality Act 2010.	Yes	This is covered within our unreasonable behaviour and demands policy and procedure	

## Section 6: Complaints Stages

Stage 1				
Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
6.1	Landlords must have processes in place to consider which complaints can be responded to as early as possible, and which require further investigation. Landlords must consider factors such as the complexity of the complaint and whether the customer is vulnerable or at risk. Most stage 1 complaints can be resolved promptly, and an explanation, apology or resolution provided to the customer.	Yes	All complaints are dealt with on an individual basis and colleagues are encouraged and given the autonomy to remedy complaints as soon as possible. The customer resolutions officer will consider the complexity of the complaint and any vulnerabilities will be considered and recorded within Dynamics CRM system. This is covered off within staff training. It is also set out within our Complaints and Compliments Policy, paragraph 3.3.	Orwell has a CHAT (Complaints Handling Assessment Team, made up of our customers, who review 10% of all complaints responded to within the last quarter. They are ensuring that we resolved complaints promptly, within our policy and procedure and that we showed empathy. The results of this can be found on our <a href="#">CHAT webpage</a> .
6.2	Complaints must be acknowledged, defined and logged at stage 1 of the complaints procedure <b><u>within five working days of the complaint being received</u></b> .	Yes	This is set out in our Complaints and Compliments Policy within paragraph 7.1.	This is recorded within our Dynamics CRM system for monitoring purposes
6.3	Landlords must issue a full response to stage 1 complaints <b><u>within 10 working days</u></b> of the complaint being acknowledged.	Yes	This is set out in our Complaints and Compliments Policy within paragraph 7.2.	
6.4	Landlords must decide whether an extension to this timescale is needed when considering the complexity of the complaint and then inform the	Yes	This is set out in our Complaints and Compliments Policy within paragraph 7.5.	All extensions will be agreed with our customer and contact will be agreed via the Customer Resolution Officer.

<b>Stage 1</b>				
<b>Code provision</b>	<b>Code requirement</b>	<b>Comply: Yes / No</b>	<b>Evidence</b>	<b>Commentary / explanation</b>
	customer 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 customer.			
6.5	When an organisation informs a customer about an extension to these timescales, they must be provided with the contact details of the Ombudsman.	Yes	This is set out in our Complaints and Compliments Policy within paragraph 7.5.	
6.6	A complaint response must be provided to the customer 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 customer.	Yes	This is set out in our Complaints and Compliments Policy within paragraph 9.1 to 9.4.	Outstanding actions are recorded within Dynamics CRM and tracked by our resolutions team. Complaints are closed out once all actions are complete.
6.7	Landlords must address all points raised in the complaint definition and provide clear reasons for any decisions, referencing the relevant policy, law and good practice where appropriate.	Yes	This is set out in our Complaints and Compliments Policy within paragraph 9.3 & 9.4	
6.8	Where customers 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	Yes	This is set out in our Complaints and Compliments Policy within 7.4.	

Stage 1				
Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	already being investigated or it would unreasonably delay the response, the new issues must be logged as a new complaint.			
6.9	Landlords must confirm the following in writing to the customer at the completion of stage 1 in clear, plain language: a. the complaint stage; b. the complaint definition; c. the decision on the complaint; d. the reasons for any decisions made; e. the details of any remedy offered to put things right; f. details of any outstanding actions; and details of how to escalate the matter to stage 2 if the individual is not satisfied with the response.	Yes	This is set out in our Complaints and Compliments Policy within paragraph 9.2.	An audit was undertaken in March 2026 which confirmed compliancy. The overall assessment was marked as Substantial Assurance which states there is a robust system of internal controls operating effectively to ensure that risks are managed and process objectives achieved.

Stage 2				
Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
6.10	If all or part of the complaint is not resolved to the customer's satisfaction at stage 1, it must be progressed to stage 2 of the landlord's procedure. Stage 2 is the landlord's final response.	Yes	This is set out in our Complaints and Compliments Policy within paragraph 7.2 and 7.3.	
6.11	Requests for stage 2 must be acknowledged, defined and logged at stage 2 of the complaints procedure within five working days of the escalation request being received.	Yes	This is set out in our Complaints and Compliments Policy within paragraph 7.2	
6.12	Customers 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 customer remains unhappy as part of its stage 2 response.	Yes	This is set out in our Complaints and Compliments Policy within paragraph 7.2 and 7.3.	
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Yes	This is set out in our Complaints and Compliments Policy within 7.3.	
6.14	Landlords must issue a final response to the stage 2 <b><u>within 20 working days</u></b> of the complaint being acknowledged.	Yes	This is set out in our Complaints and Compliments Policy within 7.3.	
6.15	Landlords must decide whether an extension to this timescale is needed when considering the complexity of the complaint and then inform the customer of the expected timescale for response. Any extension must be no more than 20 working days without	Yes	This is set out in our Complaints and Compliments Policy within 7.5	

Stage 2				
Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	good reason, and the reason(s) must be clearly explained to the customer.			
6.16	When an organisation informs a customer about an extension to these timescales, they must be provided with the contact details of the Ombudsman.	Yes	This is set out in our Complaints and Compliments Policy within 7.5	
6.17	A complaint response must be provided to the customer 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 customer.	Yes	This is set out in our Complaints and Compliments Policy within paragraph 9.1 to 9.4.	
6.18	Landlords must address all points raised in the complaint definition and provide clear reasons for any decisions, referencing the relevant policy, law and good practice where appropriate.	Yes	This is set out in our Complaints and Compliments Policy within paragraph 9.1 to 9.5.	
6.19	Landlords must confirm the following in writing to the customer at the completion of stage 2 in clear, plain language: a. the complaint stage; b. the complaint definition; c. the decision on the complaint; d. the reasons for any decisions made; e. the details of any remedy offered to put things right;		This is set out in our Complaints and Compliments Policy within paragraph 9.2.	

Stage 2				
Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	f. details of any outstanding actions; and g. details of how to escalate the matter to the Ombudsman Service if the individual remains dissatisfied.			
6.20	Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.		Orwell do not have any additional stages, and all suitable colleagues will be involved when issuing responses. This is set out in our Complaints and Compliments Policy within paragraph 10.1.	

## 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"> <li>• Apologising;</li> <li>• Acknowledging where things have gone wrong;</li> <li>• Providing an explanation, assistance or reasons;</li> <li>• Taking action if there has been delay;</li> <li>• Reconsidering or changing a decision;</li> <li>• Amending a record or adding a correction or addendum;</li> <li>• Providing a financial remedy;</li> <li>• Changing policies, procedures or practices.</li> </ul>	Yes	This is set out in our Complaints and Compliments Policy within paragraph 9.4.	Orwell has a compensation policy and procedure which can be found <a href="#">online</a> has been written in line with the Housing Ombudsman guidance.
7.2	Any remedy offered must reflect the impact on the customer as a result of any fault identified.		This is set out in our Complaints and Compliments Policy within paragraph 9.1 to 9.5.	
7.3	The remedy offer must clearly set out what will happen and by when, in agreement with the customer where appropriate. Any remedy proposed must be followed through to completion.		This is set out in our Complaints and Compliments Policy within paragraph 9.1 to 9.5.	
7.4	Landlords must take account of the guidance issued by the Ombudsman		This is set out in our Complaints and Compliments Policy within paragraph 9.1 to 9.5.	Orwell has a compensation policy and procedure which has been written in line with the Housing Ombudsman guidance

<b>Code provision</b>	<b>Code requirement</b>	<b>Comply: Yes / No</b>	<b>Evidence</b>	<b>Commentary / explanation</b>
	when deciding on appropriate remedies.			which is being reviewed and aligned with new guidance issued from 1st April 2026 This will be finalised by the end of May 2026

## 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"> <li>a. the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements.</li> <li>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;</li> <li>c. any findings of non-compliance with this Code by the Ombudsman;</li> <li>d. the service improvements made as a result of the learning from complaints;</li> <li>e. any annual report about the landlord's performance from the Ombudsman; and</li> <li>f. any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord.</li> </ul>		<p>We publish our themes from learning to colleagues and customers in our annual complaints and service improvement report.</p> <p>The Complaint Handling Assessment Team scrutinise complaint handling on a quarterly basis. We also have a Customer Insight Committee who review Complaint Reports on a quarterly basis including learning. An annual report taken to our Board sets out information on complaints received that year, with a focus on key themes and areas for improvement.</p> <p>The following links provide evidence. <a href="#">CHAT webpage</a> and <a href="#">Complaints webpage</a></p>	<p>Between April 2025-March 2026 Orwell received 244 complaints, 75.5% were resolved at stage one, of the 244 complaints, 20% were escalated to stage two, 2 were escalated to the Housing Ombudsman. Our findings will be included in the report which is updated annually on our website. <a href="#">Complaints webpage</a></p>
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</p>		<p>The following links provide evidence. <a href="#">CHAT webpage</a> and <a href="#">Complaints webpage</a></p>	<p><i>To be approved by the Chair of Orwell's Customer Insight Committee on 6/5/26- the response will be added to the top of this self-assessment. (Separate section on website to</i></p>

<b>Code provision</b>	<b>Code requirement</b>	<b>Comply: Yes / No</b>	<b>Evidence</b>	<b>Commentary / explanation</b>
	body's response to the report must be published alongside this.			<i>ensure Foreword is clearly visible following feedback from ombudsman suggested it wasn't).</i>
8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.		The self-assessment is updated annually and following any Housing Ombudsman updates and relevant changes	
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.		We were asked to ensure the Foreword from the governing body was visible on the website as current position at start of this document did not satisfy the ombudsman this year.	This will be rectified for this year's submission.
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 customers who may be affected, and publish this on their website Landlords must provide a timescale for returning to compliance with the Code.		Orwell have a Business Continuity Plan for such circumstances which has been updated to include this.	

## Section 9: Scrutiny & oversight: continuous learning and improvement

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
9.1	Landlords must look beyond the circumstances of the individual complaint and consider whether service improvements can be made as a result of any learning from the complaint.	Yes	This is set out in our Complaints and Compliments Policy within paragraph 9.6.	Themes from complaints are captured and fed into 'insight into action' plans for the year, any identified improvements are then tracked and reported to the Orwell Residents' Group (ORG) and Customer Insight Committee.
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.		We collect feedback from complaints through TSM's, transactional surveys, the complaints feedback itself and through CHAT. We publish our themes from learning to colleagues and customers in our annual report. We have a customer Complaint Handling Assessment Team to scrutinise complaint handling on a quarterly basis. We also have a Customer Insight Committee who review Complaint Reports on a quarterly basis including learning. An annual report taken to our Board sets out information on complaints received that year, with a focus on key themes and areas for improvement. The following links provide evidence. <a href="#">CHAT webpage</a> and <a href="#">Complaints webpage</a> .	

<b>Code provision</b>	<b>Code requirement</b>	<b>Comply: Yes / No</b>	<b>Evidence</b>	<b>Commentary / explanation</b>
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 customers' panels, staff and relevant committees.		As above.	
9.4	Landlords must appoint a suitably senior lead person as accountable for their complaint handling. This person must assess any themes or trends to identify potential systemic issues, serious risks, or policies and procedures that require revision.		This is the Director of Customers and Communities, Tony Long.	
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').		This is the Chair of our Customer Insight Committee and Board Member- Tom Brown.	
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.		A role profile has been set out for the MRC and is on the Customer Insight Committee. They have access through the Customer resolution team to any information requested and receive monthly and annual complaints reports as part of the board performance report and quarterly complaints reports. Training was delivered to the	Our current MRC will step down in 2026, and their replacement will receive training on complaints to meet this requirement.

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
			MRC in April 2025 by the complaints team	
9.7	<p>As a minimum, the MRC and the governing body (or equivalent) must receive:</p> <ul style="list-style-type: none"> <li>a. regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance;</li> <li>b. regular reviews of issues and trends arising from complaint handling;</li> <li>c. regular updates on the outcomes of the Ombudsman’s investigations and progress made in complying with orders related to severe maladministration findings; and</li> <li>d. annual complaints performance and service improvement report.</li> </ul>		As above	
9.8	<p>Landlords must have a standard objective in relation to complaint handling for all relevant employees or third parties that reflects the need to:</p> <ul style="list-style-type: none"> <li>a. have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments;</li> <li>b. take collective responsibility for any shortfalls identified through complaints, rather than blaming others; and</li> <li>c. act within the professional standards for engaging with</li> </ul>		<p>One of Orwell’s organisational values is ‘collaborative.’ As such, our culture and practice is to work co-operatively across teams and departments to resolve complaints. This requirement is also included in our code of conduct which every employee and board member signs annually.</p>	

<b>Code provision</b>	<b>Code requirement</b>	<b>Comply: Yes / No</b>	<b>Evidence</b>	<b>Commentary / explanation</b>
	complaints as set by any relevant professional body.			