

## Self-Assessment Report 2024

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	GSA Complaints Policy (December 2024 v10), Section 7 <a href="#">complaints-policy.pdf</a>  GSA Complaints Procedure (v8 December 2024), Section 2 <a href="#">complaints-procedure-landlord-services.pdf</a>	In April 2024 a full review of our policy and procedure was undertaken to ensure compliance with the updated code. We made further updates in December 2024 to reflect feedback from the Housing Ombudsman Service Duty to Monitor team.  Our templates and training materials have been updated to reflect the Code and our policy and procedure.
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	GSA Complaints Policy (December 2024 v10), Section 4.1 <a href="#">complaints-policy.pdf</a>  GSA Complaints Procedure (v8 December 2024), Section 9	As per previous comment.

			<a href="#">complaints-procedure-landlord-services.pdf</a>	
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>GSA Complaints Policy (December 2024 v10), Section 4.1 and 4.2</p> <p><a href="#">complaints-policy.pdf</a></p> <p>GSA Complaints Procedure (v8 December 2024), Section 3</p> <p><a href="#">complaints-procedure-landlord-services.pdf</a></p>	This is also reiterated through our bespoke training module on complaint handling.
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	<p>GSA Complaints Policy (December 2024 v10), Section 4.3</p> <p><a href="#">complaints-policy.pdf</a></p> <p>GSA Complaints Procedure (v8 December 2024), Section 3</p> <p><a href="#">complaints-procedure-landlord-services.pdf</a></p>	This is also reiterated through our bespoke training module on complaint handling.

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	GSA Complaints Policy (December 2024 v10), Section 3 <a href="#">complaints-policy.pdf</a>	

## 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	Yes	GSA Complaints Policy (December 2024 v10), Section 3 <a href="#">complaints-policy.pdf</a>	Our policy is clear that each complaint must be individually considered. In any circumstance where there is a policy exclusion, we would explain this to the customer.

	complaint must be considered on its own merits			
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"> <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	<p>GSA Complaints Policy (December 2024 v10), Section 3</p> <p><a href="#">complaints-policy.pdf</a></p>	
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	Yes	GSA Complaints Policy (December 2024 v10), Section 3	Reflected in policy and procedure wording and included in related training materials.

	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.		<a href="#">complaints-policy.pdf</a>	Examples for the basis of discretion are: <ul style="list-style-type: none"> <li>• Individual personal circumstances such as illness or bereavement</li> <li>• Vulnerabilities</li> <li>• Where the customer was not aware of the issues and could not reasonably have been expected to have made the complaint sooner</li> </ul>
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	GSA Complaints Policy (December 2024 v10), Section 3 <a href="#">complaints-policy.pdf</a>	
2.5	Landlords must not take a blanket approach to excluding complaints; they	Yes	GSA Complaints Policy (December 2024 v10), Section 3	This is clear in policy wording.

	must consider the individual circumstances of each complaint.		<a href="#">complaints-policy.pdf</a>	
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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	<p>GSA Complaints Policy (December 2024 v10), Covered in Section 2 (Introduction).Section 9 also covers our equality impact assessment</p> <p><a href="#">complaints-policy.pdf</a></p> <p>GSA Complaints Procedure (v8 December 2024), Section 4.2</p> <p><a href="#">complaints-procedure-landlord-services.pdf</a></p>	<p>The Complaints Policy is clear that we will accept a complaint through any route. This is also covered in our procedure.</p> <p>Our policy on Reasonable Adjustments also includes a section on Reasonable Adjustments in Complaint Handling.</p> <p>This is also covered in training on Reasonable Adjustments which forms part of our training on meeting the needs of customers who may have individual needs or vulnerabilities.</p>

			GSA Reasonable Adjustments Policy, Section 8.8  <a href="#">Microsoft Word - Reasonable Adjustments Policy- Final</a>	
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	GSA Complaints Policy (December 2024 v10), Section 2 (Introduction); Section 5 (Roles and Responsibilities) and Section 10 (Training).  <a href="#">complaints-policy.pdf</a>  GSA Complaints Procedure (v8 December 2024), Section 4.2  <a href="#">complaints-procedure-landlord-services.pdf</a>	Reflected in policy and procedure wording and reinforced through training.
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	Yes	GSA Complaints Policy (December 2024 v10), Section 2 (Introduction).	We actively promote our complaints policy as an opportunity to gain customer feedback and make service improvements.



	sign that residents are unable to complain.			This tone is set through the wording of our policy and procedure.
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	<p>We have a dedicated page on our website that covers complaints.</p> <p>This includes a summary of the process with links to our policy and procedure.</p> <p><a href="#">Make a complaint - GreenSquareAccord</a></p> <p><a href="#">complaints-policy.pdf</a></p> <p><a href="#">complaints-procedure-landlord-services.pdf</a></p> <p>This includes an easy-read version:</p> <p><a href="#">GreenSquareAccord</a></p> <p>A one-page Customer Complaints Procedure document</p> <p>is sent to our customers with every Stage 1 and Stage 2</p>	<p>We have updated our website complaint page to give a summary of our process.</p> <p>In addition to our internal procedure, we have a one-page summary for customers that is issued when we acknowledge and respond to complaints.</p>

			acknowledgement and response letter	
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	GSA Complaints Policy (December 2024 v10), Section 2 and Section 7 <a href="#">complaints-policy.pdf</a>	
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	GSA Complaints Policy (December 2024 v10), <a href="#">complaints-policy.pdf</a> Section 2  GSA Complaints Procedure (v8 December 2024), Section 9 <a href="#">complaints-procedure-landlord-services.pdf</a>  GSA Reasonable Adjustments Policy, Section 8.8  <a href="#">Microsoft Word - Reasonable Adjustments Policy- Final</a>	In place and referenced within policy and procedure.

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	<p>GSA Complaints Policy (December 2024 v10), Section 2 and Appendix 1.</p> <p><a href="#">complaints-policy.pdf</a></p> <p>GSA Complaints Procedure (v8 December 2024), Section 5.5</p> <p><a href="#">complaints-procedure-landlord-services.pdf</a></p>	<p>Template response letters also include information around access to the Ombudsman service.</p> <p>Written explanation included in Stage 2 response letters to signpost to the next stage.</p> <p>The Customer Complaints Procedure document sent to residents when we acknowledge and respond to complaints provides this information.</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	Yes	<p>GSA Complaints Policy (December 2024 v10), Section 5</p> <p><a href="#">complaints-policy.pdf</a></p>	<p>We have a dedicated team who oversees complaints.</p> <p>There is a dedicated postholder who leads on liaison with the Ombudsman. This role now sits within the Quality and Compliance (Operations) Team.</p>

	as the 'complaints officer'. This role may be in addition to other duties.		GSA Complaints Procedure (v8 December 2024), Section 5 and 16  <a href="#">complaints-procedure-landlord-services.pdf</a>	
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	GSA Complaints Policy (December 2024 v10), Section 5  <a href="#">complaints-policy.pdf</a>  GSA Complaints Procedure (v8 December 2024), Section 6.1.2 refers to Complaints Handling Staff having access to specialist staff as required.  <a href="#">complaints-procedure-landlord-services.pdf</a>	Colleagues within the complaint handling teams have access to staff at all levels, including all specific roles listed in section 5.
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		GSA Complaints Policy (December 2024 v10), Section 2, 4.1 and 7  <a href="#">complaints-policy.pdf</a>	We have several ways where we learn from complaints. This includes a learning dashboard, quarterly learning logs shared with colleagues and reflective learning sessions where complaints (or housing

	a core service and must be resourced to handle complaints effectively		<p>GSA Complaints Procedure (v8 December 2024), Section 14</p> <p><a href="#">complaints-procedure-landlord-services.pdf</a></p> <p>Our commitments to learning from complaints is clear throughout our policy and procedure and reflected in our Annual Complaint and Service Improvement report.</p> <p><a href="#">gsa-annual-complaints-performance-and-service-improvement-report-2023-24.pdf</a></p>	<p>ombudsman determination) indicate serious shortfalls.</p> <p>All colleagues undertake mandatory complaints training while additional internal/HOS training is attended by our complaints handling teams.</p>
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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	Yes	<a href="#">complaints-policy.pdf</a>	There is one policy in place.

	not be treated differently if they complain.			
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	<p>This is clear in our website summary of complaints:</p> <p><a href="#">Make a complaint - GreenSquareAccord</a></p> <p>GSA Complaints Procedure (v8 December 2024), Section 1 and 5</p> <p><a href="#">complaints-procedure-landlord-services.pdf</a></p>	Our policy and procedure have two stages.
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	<p>This is clear in our website summary of complaints:</p> <p><a href="#">Make a complaint - GreenSquareAccord</a></p> <p>GSA Complaints Procedure (v8 December 2024), Section 1 and 5</p>	We operate a two-stage process.

			<a href="#">complaints-procedure-landlord-services.pdf</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. Residents must not be expected to go through two complaints processes.	Yes	GSA Complaints Procedure (v8 December 2024), Section 11 <a href="#">complaints-procedure-landlord-services.pdf</a>	This is made clear in our procedure that is now published on our website.
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Yes	GSA Complaints Procedure (v8 December 2024), Section 11 <a href="#">complaints-procedure-landlord-services.pdf</a>	This is made clear in our procedure that is now published on our website.
5.6	When a complaint is logged at Stage 1 or escalated to Stage 2, landlords must set out their understanding of the complaint and the outcomes the resident is seeking. The Code will refer to this as "the complaint definition". If any aspect of the complaint is unclear,	Yes	GSA Complaints Procedure (v8 December 2024), Section 5 <a href="#">complaints-procedure-landlord-services.pdf</a>	This is made clear in our procedure that is now published on our website.

	the resident must be asked for clarification.			
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	GSA Complaints Procedure (v8 December 2024), Section 5.4 <a href="#">complaints-procedure-landlord-services.pdf</a>	This is made clear in our procedure that is now published on our website
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 resident 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	GSA Complaints Policy (December 2024 v10), Section 6 <a href="#">complaints-policy.pdf</a>	This expectation is made clear in our policy. It forms part of the induction and training of complaint handling staff.



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>GSA Complaints Procedure (v8 December 2024), Section 6</p> <p><a href="#">complaints-procedure-landlord-services.pdf</a></p>	<p>This requirement is covered in our procedures. Complaint handlers are required to maintain records of communication with customers, including communicating updates.</p> <p>Checks are undertaken as part of our quality assurance processes.</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>GSA Complaints Policy (December 2024 v10), Section 2 (Introduction). Section 9 also covers our equality impact assessment</p> <p><a href="#">complaints-policy.pdf</a></p> <p>GSA Complaints Procedure (v8 December 2024), Section 4.2</p> <p><a href="#">complaints-procedure-landlord-services.pdf</a></p> <p>GSA Reasonable Adjustments Policy, Section 8.8</p>	<p>Our policy on Reasonable Adjustments also includes a section on Reasonable Adjustments in Complaint Handling.</p> <p>This is also covered in training on Reasonable Adjustments which forms part of our training on meeting the needs of customers who may have individual needs or vulnerabilities.</p>

			<a href="#">Microsoft Word - Reasonable Adjustments Policy- Final</a>	
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	GSA Complaints Procedure (v8 December 2024), Section 5.1  <a href="#">complaints-procedure-landlord-services.pdf</a>	This expectation is made clear in our procedure.
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	GSA Complaints Policy (December 2024 v10), Section 2  <a href="#">complaints-policy.pdf</a>  GSA Complaints Procedure (v8 December 2024), Section 5.7  <a href="#">complaints-procedure-landlord-services.pdf</a>	We have a dedicated internal SharePoint site, accessed by complaint handling staff, where all complaint records are held.  Investigation training for complaint handling staff includes recording requirements.
5.13	Landlords must have processes in place to ensure a complaint can be remedied at any stage of its complaints process. Landlords must	Yes	GSA Complaints Procedure (v8 December 2024), Section 5.6	Included in our procedure.

	ensure appropriate remedies can be provided at any stage of the complaints process without the need for escalation.		<a href="#">complaints-procedure-landlord-services.pdf</a>	
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	<p>GSA Complaints Policy (December 2024 v10), Section 6</p> <p><a href="#">complaints-policy.pdf</a></p> <p>Unacceptable Behaviour Policy (October 2023), Section 4.2.2</p> <p><a href="#">Microsoft Word - Unacceptable Behaviour Policy</a></p>	.
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>Unacceptable Behaviour Policy (October 2023), Section 4</p> <p>GSA Complaints Procedure (v8 December 2024), Section 12</p> <p><a href="#">complaints-procedure-landlord-services.pdf</a></p>	

## Section 6: Complaints Stages

### Stage 1

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
6.1	Landlords must have processes in place to consider which complaints can be responded to as early as possible, and which require further investigation. Landlords must consider factors such as the complexity of the complaint and whether the resident is vulnerable or at risk. Most stage 1 complaints can be resolved promptly, and an explanation, apology or resolution provided to the resident.	Yes	GSA Complaints Procedure (v8 December 2024), Section 6 and Appendix 1 and 2  <a href="#">complaints-procedure-landlord-services.pdf</a>	Our procedure has a process in place for differentiating between complaints that may be resolved by our Early Resolution Team in the Contact Centre and those more complex cases that need investigation by the Customer Care team.
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	Included in the summary of the complaints process on our website:  <a href="#">Make a complaint - GreenSquareAccord</a>  GSA Complaints Procedure (v8 December 2024), Section 6	Code requirement reflected within our procedure.

			<a href="#">complaints-procedure-landlord-services.pdf</a>	
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	<p>Included in the summary of the complaints process on our website: <a href="#">Make a complaint - GreenSquareAccord</a></p> <p>GSA Complaints Procedure (v8 December 2024), Section 6</p> <p><a href="#">complaints-procedure-landlord-services.pdf</a></p>	Code requirement reflected within our procedure.
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>Included in the summary of the complaints process on our website: <a href="#">Make a complaint - GreenSquareAccord</a></p> <p>GSA Complaints Procedure (v8 December 2024), Section 6</p> <p><a href="#">complaints-procedure-landlord-services.pdf</a></p>	<p>Code requirement reflected within our procedure.</p> <p>Our Customer Care team are aware of the requirement to maintain a full record of any extensions being communicated to customers.</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	GSA Complaints Procedure (v8 December 2024), Section 6 <a href="#">complaints-procedure-landlord-services.pdf</a>	Code requirement reflected within our procedure and included within template letters.
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	GSA Complaints Procedure (v8 December 2024), Section 6 <a href="#">complaints-procedure-landlord-services.pdf</a>	Code requirement reflected within our procedure.
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	GSA Complaints Procedure (v8 December 2024), Section 6 <a href="#">complaints-procedure-landlord-services.pdf</a>	Code requirement reflected within our procedure and complaint investigation training provided to relevant colleagues.
6.8	Where residents raise additional complaints during the investigation, these must be incorporated into the stage 1 response if they are related	Yes	GSA Complaints Procedure (v8 December 2024), Section 6.2	Code requirement reflected within our procedure.

	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.		<a href="#">complaints-procedure-landlord-services.pdf</a>	
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"> <li>a. the complaint stage;</li> <li>b. the complaint definition;</li> <li>c. the decision on the complaint;</li> <li>d. the reasons for any decisions made;</li> <li>e. the details of any remedy offered to put things right;</li> <li>f. details of any outstanding actions; and</li> </ul>		<p>GSA Complaints Procedure (v8 December 2024), Section 6</p> <p><a href="#">complaints-procedure-landlord-services.pdf</a></p>	Code requirement reflected within our procedure and Stage 1 template letters.

	g. details of how to escalate the matter to stage 2 if the individual is not satisfied with the response.			
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### Stage 2

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
6.10	If all or part of the complaint is not resolved to the resident's satisfaction at stage 1, it must be progressed to stage 2 of the landlord's procedure. Stage 2 is the landlord's final response.	Yes	GSA Complaints Procedure (v8 December 2024), Section 6  <a href="#">complaints-procedure-landlord-services.pdf</a>	Code requirement reflected within our procedure and template letters.  Customer Complaints Procedure (April 2024) issued to all customers with complaint responses.
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	Included in the summary of the complaints process on our website: <a href="#">Make a complaint - GreenSquareAccord</a>  GSA Complaints Procedure (v8 December 2024), Section 6  <a href="#">complaints-procedure-landlord-services.pdf</a>	Code requirement reflected within our procedure and template letters



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	GSA Complaints Procedure (v8 December 2024), Section 6.2 <a href="#">complaints-procedure-landlord-services.pdf</a>	This is made clear in our procedure and the mandatory training module that supports it.
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Yes	GSA Complaints Procedure (v8 December 2024), Section 6.2 <a href="#">complaints-procedure-landlord-services.pdf</a>	This is made clear in our procedure and designated postholders are currently responsible for Stage 2 responses.  We have completed further structural changes to ensure a split between our Stage 1 and Stage 2 teams.
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	GSA Complaints Procedure (v8 December 2024), Section 6 <a href="#">complaints-procedure-landlord-services.pdf</a>	Code requirement reflected within our procedure and template letters.  Customer Complaints Procedure (April 2024) issued to all customers with complaint responses.

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	GSA Complaints Procedure (v8 December 2024), Section 6 <a href="#">complaints-procedure-landlord-services.pdf</a>	Code requirement reflected within our procedure.  Our Customer Care team are aware of the requirement to maintain a full record of any extensions being communicated to customers.
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	GSA Complaints Procedure (v8 December 2024), Section 5.3 <a href="#">complaints-procedure-landlord-services.pdf</a>	Code requirement reflected within our procedure and included within template letters.
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	GSA Complaints Procedure (v8 December 2024), Section 5.5 <a href="#">complaints-procedure-landlord-services.pdf</a>	Code requirement reflected within our procedure.

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	GSA Complaints Procedure (v8 December 2024), Section 5.5 <a href="#">complaints-procedure-landlord-services.pdf</a>	Code requirement reflected within our procedure and complaint investigation training provided to relevant colleagues
6.19	Landlords must confirm the following in writing to the resident at the completion of stage 2 in clear, plain language: <ul style="list-style-type: none"> <li>a. the complaint stage;</li> <li>b. the complaint definition;</li> <li>c. the decision on the complaint;</li> <li>d. the reasons for any decisions made;</li> <li>e. the details of any remedy offered to put things right;</li> <li>f. details of any outstanding actions; and</li> </ul>	Yes	GSA Complaints Procedure (v8 December 2024), Section 5.5 <a href="#">complaints-procedure-landlord-services.pdf</a>	Code requirement reflected within our procedure and template letters.

	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.	Yes	GSA Complaints Procedure (v8 December 2024), Section 5.1 <a href="#">complaints-procedure-landlord-services.pdf</a>	In place

## Section 7: Putting things right

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
7.1	Where something has gone wrong a landlord must acknowledge this and set out the actions it has already taken, or intends to take, to put things right. These can include: <ul style="list-style-type: none"> <li>Apologising;</li> </ul>	Yes	GSA Complaints Policy (December 2024 v10), Section 2 and 6 <a href="#">complaints-policy.pdf</a>	This is included in our policy, procedure and templates.  These principles are covered in our training programmes and adherence monitored through quality assurance mechanisms.

	<ul style="list-style-type: none"> <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>		<p>GSA Complaints Procedure (v8 December 2024), Section 5.6</p> <p><a href="#">complaints-procedure-landlord-services.pdf</a></p>	
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Yes	<p>GSA Complaints Procedure (v8 December 2024), Section 5.6</p> <p><a href="#">complaints-procedure-landlord-services.pdf</a></p>	<p>This is reflected in our response letters and any offers of financial redress.</p> <p>Our compensation policy and procedure have been fully updated to reflect the Ombudsman Remedies guidance.</p>

			<p>GSA Remedies and Compensation Policy (v5 October 2024) Section 2</p> <p><a href="#">remedies-and-compensation-policy.pdf</a></p>	<p>For relevant staff, an e-learning module on compensation is available.</p>
7.3	<p>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.</p>	Yes	<p>GSA Complaints Procedure (v8 December 2024), Section 5.6</p> <p><a href="#">complaints-procedure-landlord-services.pdf</a></p> <p>GSA Remedies and Compensation Policy (v5 October 2024) Section 2</p> <p><a href="#">remedies-and-compensation-policy.pdf</a></p>	<p>We have dashboards in place so business areas can track actions arising from complaints,</p> <p>The letter identifies the compensation process and expected timescale for compensation payment (up to 15 working days from receipt of bank details).</p> <p>We have a compensation tracker in place to track payments.</p>
7.4	<p>Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.</p>	Yes	<p>GSA Complaints Procedure (v8 December 2024), Section 5.6</p> <p><a href="#">complaints-procedure-landlord-services.pdf</a></p>	<p>Our compensation policy and procedure have been fully reviewed in line with the Ombudsman Remedies guidance.</p> <p>For relevant staff, an e-learning module on compensation is available.</p>

			GSA Remedies and Compensation Policy (v5 October 2024) Section 2  <a href="#">remedies-and-compensation-policy.pdf</a>	
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## Section 8: Self-assessment

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> <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</p>		<p>GSA Complaints Policy (December 2024 v10), Section 7 <a href="#">complaints-policy.pdf</a></p> <p>GSA Complaints Procedure (v8 December 2024), Section 14 <a href="#">complaints-procedure-landlord-services.pdf</a></p> <p><a href="#">gsa-annual-complaints-performance-and-service-improvement-report-2023-24.pdf</a></p>	<p>The content of the annual report has been aligned to Code requirements and includes both quantitative and qualitative data.</p> <p>It also includes the Ombudsman's 2022-23 report on GSA and provides an overview of determinations made by the Ombudsman in 2023-24.</p> <p>The report includes details of service improvements undertaken in 2023-24.</p>

	<p>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; and</p> <p>f. any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord.</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 body's response to the report must be published alongside this.</p>	Yes	<p>GSA Complaints Policy (December 2024 v10), Section 7</p> <p><a href="#">complaints-policy.pdf</a></p> <p>GSA Complaints Procedure (v8 December 2024), Section 14</p>	<p>The report was reviewed by the governing body.</p> <p>The report was published ahead of the deadline of 30/6/2024.</p>



			<a href="#">complaints-procedure-landlord-services.pdf</a>  <a href="#">gsa-annual-complaints-performance-and-service-improvement-report-2023-24.pdf</a>	
8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	Yes	This updated self-assessment reflects changes made to our policies and procedures following feedback from the Housing Ombudsman Service Duty to Monitor team.	
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	Yes	We will comply in full with any request to review our self-assessment.	
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	Yes	We are aware of this requirement and will inform the Ombudsman should this be required.	

	publish this on their website Landlords must provide a timescale for returning to compliance with the Code.			
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### 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	GSA Complaints Procedure (v8 December 2024), Section 13 <a href="#">complaints-procedure-landlord-services.pdf</a>	<p>We have processes in place to review complaints and look at trends and root-cause learning.</p> <p>This may be through a deep dive review of an individual case (known as an Evergreen session) or through wider analysis.</p> <p>We have developed a learning dashboard and use this to identify trends and themes.</p> <p>We now completed quarterly learning logs on learning from complaints. This includes both learning from GSA and learning from the wider sector.</p>
9.2	A positive complaint handling culture is integral to the effectiveness with which landlords resolve disputes. Landlords	Yes	GSA Complaints Procedure (v8 December 2024), Section 13	As above.

	must use complaints as a source of intelligence to identify issues and introduce positive changes in service delivery.		<a href="#">complaints-procedure-landlord-services.pdf</a>	The importance of having a clear learning culture is one that we are reinforcing across the business.
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>GSA Complaints Policy (December 2024 v10), Section 2, 4.1 and 7 <a href="#">complaints-policy.pdf</a></p> <p>GSA Complaints Procedure (v8 December 2024), Section 14 <a href="#">complaints-procedure-landlord-services.pdf</a></p> <p>Our commitments to learning from complaints is clear throughout our policy and procedure and reflected in our Annual Complaint and Service Improvement report.</p>	<p>Since April 2024 we have delivered dedicated sessions on learning to our Customer Panel and are committed to further work with the Customer Panel sub-group on complaints to make further improvements to both our complaint handling and wider customer offer.</p> <p>We have conducted colleague webinars to communicate learning from complaints and Housing Ombudsman Investigations. This has included attendance from the Housing Ombudsman</p> <p>Our quarterly learning logs are shared through the company intranet and cascaded through meeting structures.</p> <p>Individual team accountabilities are reinforced through the learning dashboard.</p>

			<a href="#">gsa-annual-complaints-performance-and-service-improvement-report-2023-24.pdf</a>	
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	GSA Complaints Policy (December 2024 v10), Section 5 <a href="#">complaints-policy.pdf</a>	<p>This role is held by the Director of Quality and Compliance.</p> <p>A quarterly report is provided to the governing body detailing themes, trends and learning.</p> <p>The Director of Quality and Compliance is also responsible for the quarterly learning log shared with colleagues, and responsible for liaison with the Customer Panel in relation to learning from complaints.</p>
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	<p>GSA Complaints Policy (December 2024 v10), Section 5 <a href="#">complaints-policy.pdf</a></p> <p>GSA Complaints Procedure (v8 December 2024), Section 14 <a href="#">complaints-procedure-landlord-services.pdf</a></p>	<p>The Chair of Operations Committee (and member of the GSA Board) is the designated MRC.</p> <p>The MRC and The Director of Quality and Compliance are in regular contact.</p>

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	GSA Complaints Procedure (v8 December 2024), Section 14 <a href="#">complaints-procedure-landlord-services.pdf</a>	The MRC receives quarterly updates at the Operations Committee and provides detail of this to the Board.  The MRC has access to relevant colleagues and information to perform this role.
9.7	As a minimum, the MRC and the governing body (or equivalent) must receive:  a. regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance;  b. regular reviews of issues and trends arising from complaint handling;  c. regular updates on the outcomes of the Ombudsman's investigations and progress made in complying with orders related to	Yes	The details of the quarterly report are fully aligned to Code requirements.	

	severe maladministration findings; and  d. annual complaints performance and service improvement report.			
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; and</p> <p>c. act within the professional standards for engaging with complaints as set by any relevant professional body.</p>	Yes	This expectation is made clear through our procedure and corporate expectations.	<p>Our approach to embedding a clear learning framework includes:</p> <ul style="list-style-type: none"> <li>• Our policy and procedure</li> <li>• Training (include use of HOS centre for learning)</li> <li>• Systems in place to embed learning and service improvement.</li> </ul>