Appendix A: Self-assessment form

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: 'an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the landlord, its own staff, or those acting on its behalf, affecting a resident or group of residents.'	Yes	Complaints policy	The policy includes the following We define a complaint as an expression of dissatisfaction, however made, about the standard of service, actions, or lack of action with any service delivered by any member of THA or those acting on its behalf, affecting a customer or a group of customers.
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	Complaints policy	The policy includes the following A customer does not have to use the word "complaint" for it to be treated as such. We'll consider our customers' dissatisfaction and will investigate and put it right. We'll raise a service request or log a complaint. This policy also applies to contractors and third parties providing services on behalf of THA
1.4	Landlords must recognise the difference between a service request and a complaint. This must be set out in	Yes	Complaints policy	The policy includes the following A service request is a request from

	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.			a customer requiring action to be taken to put something right. We do not consider a service request a complaint, but will record, monitor and review them regularly.
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	Complaints policy	The policy includes the following A service request will become a complaint if the customer expresses a dissatisfaction with the response to the service request
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	Complaints policy	The policy includes the following If a customer expresses a dissatisfaction with services made through a survey we won't define it as a complaint, though we will make the customer aware of how they can pursue a complaint if they wish to

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	Complaints policy	Detail is contained in the policy for what will and won't be accepted as a complaint
2.2	A complaints policy must set out the circumstances in which a matter will not be considered as a complaint or escalated, and these circumstances must be fair and reasonable to residents. Acceptable exclusions include: • The issue giving rise to the complaint occurred over twelve months ago. • Legal proceedings have started. This is defined as details of the claim, such as the Claim Form and Particulars of Claim, having been filed at court.	Yes	Complaints policy	The policy includes the following Some matters are not considered to be a complaint or an escalation and will be excluded from our complaints policy. These circumstances are: A complaint where there is an alternative appropriate process in place (e.g. ASB), unless there was a service failure. Issues over 12 months old. Services outside of THA's control or where there is another appeal route available. A matter already exhausted through the complaint process, the court, or another legal proceedings have started is defined as details of the claim, such as the claim form and particulars of claim, having been filed at the court.

	Matters that have previously been considered under the complaints policy.			
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	Complaints policy	See 2.2 above
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	Complaints policy	See 2.2 above
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Yes	Complaints policy	The policy advises we may deal with a complaint differently where individual circumstances merit it.

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	Complaints policy Website	Customers or their representatives may make a complaint and how they would like it resolved in any of the following ways: Email to complaintsandcompliments@teachershousing.org.uk By phone on 0207 440 9440 Writing to us at: Teachers Housing Association, Rugby Chambers, 2 Rugby Street, London WC1N 3QU. At any of our schemes, by reporting it to a local staff member
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	Complaints policy	Annual training takes place which was recorded and will form part of induction training for any new staff within THA who are the managing agents. Training taken place in May 2024 & 2025
3.3	High volumes of complaints must not be seen as a negative, as they can be	Yes	No target for number of complaints Training taken place	Staff training stressed that complaints are viewed as an opportunity to learn, and to be seen as a positive opportunity to put things right.

	indicative of a well- publicised and accessible complaints process. Low complaint volumes are potentially a sign that residents are unable to complain.		Information on complaints on website Information on site noticeboard	
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	Complaints policy	Information includes two stages and timescales A simplified version is to be produced to be available on our website
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	Complaints policy	The policy includes the following We will make our customers aware of this Policy at sign up, through our website, and newsletters throughout the year.
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	Yes	Complaints policy	The policy includes the following Customers may have a third party or a representative deal with their complaint on their behalf and be represented or accompanied at any meeting with THA.

	at any meeting with the landlord.			
3.7 rt	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	Complaints policy Information contained within standard complaint response templates	Details are included in our complaints policy. Response templates include information on the ombudsman including as an escalation option after stage 2. Correspondence to complaints at earlier stages advises they can contact the ombudsman, however the ombudsman may not investigate until it has exhausted our internal process.

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	Complaints policy	The complaints officer is the Director of Operations for Teacher Housing Association who are the managing agents
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	Job description for Director of Operations Organisational structure chart Complaints policy	The Director of Operations is part of the executive management team for teachers and have direct contact with the Board of Trustees.
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	Staff training for staff at THA Board meetings	Staff training for THA has taken place which included information of what we have learnt from complaints and the changes we have implemented as a result.

Section 5: The Complaint Handling Process

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
5.1	Landlords must have a single policy in place for dealing with complaints covered by this Code. Residents must not be treated differently if they complain.	Yes	Complaints policy	We have adopted THA policy
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	Complaints Policy	We do not have a stage 0
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	Complaints policy	We have a two stage 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	Complaints policy	The policy includes the following This policy also applies to contractors and third parties providing services on behalf of THA. Although this has not arisen as yet, we will adhere to this requirement of the code

5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Yes	Complaints policy Contractor instructions	Although this has not arisen as yet, we will adhere to this requirement of the code
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	Standard guidance letter templates Training	Training has highlighted the requirement for staff to clarify the complaint and what outcome is being sought. This information is included in standard guidance letter template responses
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	Complaints policy Response letters	This will be detailed as applicable in responses
5.8	At each stage of the complaints process, complaint handlers must: a. deal with complaints on their merits, act independently, and have an open mind; b. give the resident a fair chance to set out their position; c. take measures to address any actual or perceived conflict of interest; and	Yes	Complaints policy Staff training Complaint responses	Complaint responses are reviewed

	d. consider all relevant information and evidence carefully.			
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	Complaints policy Staff training	Staff training in May 2025 got THA stressed the requirement to maintain contact as agreed with the complainant
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	Complaints policy Reasonable adjustments policy IT systems	
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	Complaints policy Complaint tracker	The complaint policy details examples of valid reasons for not escalating a complaint. The complaint tracker identifies complaint escalations.
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,	Yes	Complaint tracker and folders Staff training	Individual complaint folders in place. Staff are aware of the requirement to save all correspondence in the complaint folder.

	correspondence with other parties, and any relevant supporting documentation such as reports or surveys.			
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	Staff training	Complaints training emphasised the benefits of early resolution and problem solving on the part of the person receiving the complaint. They are encouraged to act with autonomy to resolve matters
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	Unacceptable behaviour policy	THA are the management agents, and have various policies in place
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	The complaints policy references our unacceptable behaviour policy	The unacceptable behaviour policy references the Equality Act 2010

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	Complaints policy Complaints tracker Standard guidance letter templates	the complaints tracker captures any vulnerabilities and trackers response timescales. Our policy details Where we are able to provide a quicker resolution or response we will always attempt to do so,
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	Complaints policy Complaints tracker	This is monitored and dates tracked
6.3	Landlords must issue a full response to stage 1 complaints within 10 working days of the complaint being acknowledged.	Yes	Complaints policy Complaints tracker	This is monitored and dates tracked. This is reported at SMT performance meetings and staff have diarised calendar reminders.
6.4	Landlords must decide whether an extension to this timescale is needed when considering the complexity of the	Yes	Complaints policy Staff training Letter template	Examples for individual cases where an extension has been requested.

	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.			
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	Complaints policy Letter template	Letter template includes details of how to contact the ombudsman
6.6	A complaint response must be provided to the resident when the answer to the complaint is known, not when the outstanding actions required to address the issue are completed. Outstanding actions must still be tracked and actioned promptly with appropriate updates provided to the resident.	Yes	Complaint tracker	Actions which remain open are tracked, but complaint closed
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	Complaint responses	The standard letter template provides prompts on areas considered e.g. policies and procedures.
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	Yes	Complaints policy Staff training	This is was included in staff training and is referenced in the complaints policy Where a customer raises additional complaints during the investigation, these will be added to the stage 1 response if they are related, and the

invest delay	ated to the issues already being tigated or it would unreasonably the response, the new issues be logged as a new complaint.			stage 1 response has not been issued. Where the stage 1 response has been issued, and the new issues are unrelated to the issues already being investigated or it would be unreasonably delaying the response, the new issues will
writing of star a. a. b. c. d. 6.9 ma e. to f. ac. g. ma	ords must confirm the following in g to the resident at the completion ge 1 in clear, plain language: the complaint stage; the complaint definition; the decision on the complaint; the reasons for any decisions ade; the details of any remedy offered put things right; details of any outstanding tions; and details of how to escalate the atter to stage 2 if the individual is at satisfied with the response.	Yes	Standard template responses	The standard template response for stage 1 complaints includes these requirements

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	Yes	Complaint records Complaint tracker	The policy details ability to progress to stage 2 for final

	stage 1, it must be progressed to stage 2 of the landlord's procedure. Stage 2 is the landlord's final response.		Complaints policy Standard response templates	outcome. Letters detail this is our final response.
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	Complaints policy Complaints tracker	the policy details this timescale, and acknowledgement timescales are monitored.
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	Complaints policy	the policy does not specify any requirement to explain reasons If a complaint is not resolved to the customer's satisfaction at stage 1, they can request for their complaint to be escalated to stage 2
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Yes	Complaints policy Complaints tracker	Policy states Stage 2 complaints will be reviewed by a SMT member Complaints tracker details officer responding
6.14	Landlords must issue a final response to the stage 2 within 20 working days of the complaint being acknowledged.	Yes	Complaints policy	Detailed as a requirement in the policy and complaints tracker details timescales. This is reported on at SMT performance meetings within THA
6.15	Landlords must decide whether an extension to this timescale is needed when considering the complexity of the	Yes	Complaints policy Standard letter template	Complaints policy details this

	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.			Standard letter template in place
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	Standard letter template Complaints policy	Letter template includes details of how to contact the ombudsman
6.17	A complaint response must be provided to the resident when the answer to the complaint is known, not when the outstanding actions required to address the issue are completed. Outstanding actions must still be tracked and actioned promptly with appropriate updates provided to the resident.	Yes	Standard letter template Complaints policy Complaints tracker	Actions which remain open are tracked, but complaint closed
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	Standard letter template Staff training	The standard letter template provides prompts on areas considered e.g. policies and procedures.
6.19	Landlords must confirm the following in writing to the resident at the completion of stage 2 in clear, plain language: a. the complaint stage; b. the complaint definition; c. the decision on the complaint; d. the reasons for any decisions made;	Yes	Standard letter template	The standard template response for stage 2 complaints includes these requirements

	 e. the details of any remedy offered to put things right; 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.	Yes	Complaint folders	Details of staff involved will be include in complaint folders.

Section 7: Putting things right

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
7.1	 Where something has gone wrong a landlord must acknowledge this and set out the actions it has already taken, or intends to take, to put things right. These can include: Apologising; Acknowledging where things have gone wrong; Providing an explanation, assistance or reasons; Taking action if there has been delay; Reconsidering or changing a decision; 	Yes	Complaint responses Standard letters Compensation payments Lessons learned reports	The standard letter template provides guidance on areas to consider This was included in staff training Complaint responses will detail if a decision has changed The complaint tracker details compensation payments and lessons learned

	 Amending a record or adding a correction or addendum; Providing a financial remedy; Changing policies, procedures or practices. 			
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Yes	See 7.1 above	See 7.1 above
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	See 7.1 above And complaint tracker	See 7.1 above Complaint tracker details outstanding actions and is monitored to ensure completion
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes	Complaint responses	Spotlight and maladministration reports reviewed and key points shared Will further be considered as part of complaints policy review.

Section 8: Self-assessment, reporting and compliance

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
8.1	Landlords must produce an annual complaints performance and service improvement report for scrutiny and challenge, which must include: a. the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements. b. a qualitative and quantitative analysis of the landlord's complaint handling performance. This must also include a summary of the types of complaints the landlord has refused to accept; c. any findings of non-compliance with this Code by the Ombudsman; d. the service improvements made as a result of the learning from complaints; e. any annual report about the landlord's performance from the Ombudsman; and f. any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord.	Yes	Completed in 2024, and 2025 submission	

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 on the section of its website relating to complaints. The governing body's response to the report must be published alongside this.	Yes	Thrale performance report and trustees statement Board agenda and papers	
8.3	Landlords must also carry out a self- assessment following a significant restructure, merger and/or change in procedures.	Yes		We will complete this should the need arise
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	Yes		We will comply with any such request
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		We will comply should this situation arise.

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	Complaint responses Annual report to the Board on performance	
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	Staff training Compliant policy Reports to board SMT meetings	Staff training highlighted positive aspect to complaints and lessons learned from complaints, including what we had implemented as a result.
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	Trustee Meetings Tenant Influence Panel (THA)	Learning from complaints has been shared with staff. THA have a newly formed tenant influence panel who will scrutinise complaint performance and lessons learned. Information will be shared with the Trustees should complaints arise.
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,	Yes	Operations Director for THA	The Operations Director is a member of the Executive Management team.

	serious risks, or policies and procedures that require revision.			
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	Member of the Board is MRC	THA have a MRC and Thrale Almshouses have a Trustee who is the MRC
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	Trustee meeting minutes	Updates provided to Trustees as part of standard agenda
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	Yes	Trustees minutes Annual self assessment and complaint report	Standard agenda item as part of performance at Trustee meetings.

and service improve	ndings; and laints performance ement report.		
operative approach complaints, working across teams and d	to complaint vant employees or ects the need to: corative and co- towards resolving with colleagues epartments; e responsibility for fied through nan blaming others; professional ing with complaints	THA Staff objectives Complaints officer objective	Objective includes ensure complaint handling is carried out in accordance with the Ombudsman's Code. To collect and share complaint information as required by both the Code and our Board.