



Housing Ombudsman Complaints Handling Code

Self-Assessment Form 2024/2025

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: <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>	Y	Complaints Policy Moat Compliments and complaints	Our Complaints Policy and Procedure use the Housing Ombudsman's definition of a complaint
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 a complaint. A complaint that is submitted via a third party or representative must be handled in line with the landlord's complaints policy.	Y	Complaints Policy Moat Compliments and complaints	Our Complaints Policy makes it clear that customers do not have to use the word 'complaint' for it to be treated as such. (Point 1.4). Our Complaints Policy also states that we will accept complaints from anyone acting on behalf of the customer but we may need proof that they are authorised to act on behalf of the customer (Point 4.3)
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.	Y	Complaints Policy Moat Compliments and complaints	Our Complaints Policy explains service requests will not be treated as complaints unless the customer asks us to do so or is dissatisfied with our response. (Points 3.1 & 3.2)
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	Y	Complaints Policy Moat Compliments and complaints	Our Complaints Policy explains we'll continue to address any service requests after we've logged a complaint. (Point 3.1)

	the service request if the resident complains.			
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.	Y		Our normal way of operating is that an expression of dissatisfaction made through a survey is not defined as a complaint but we provide details of how customers can make a complaint if they are unhappy. We also contact those expressing dissatisfaction to try to resolve and to give the opportunity to make a complaint.

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	Y	Complaints Policy Moat Compliments and complaints	Our Complaints Policy explains there will be some issues we can't deal with as a complaint. It gives examples of the types of issue. (Point 6) Our Complaints Policy states that if we decide not to accept a complaint we will explain why and if the customer is unhappy with the decision they are able to approach the Housing Ombudsman (or Building Safety Regulator) for advice. (Point 6.2)
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: <ul style="list-style-type: none"> The issue giving rise to the complaint occurred over twelve months ago. Legal proceedings have started. This is defined as details of the claim, such as the Claim Form and Particulars of Claim, having been filed at court. Matters that have previously been considered under the complaints policy. 	Y	Complaints Policy Moat Compliments and complaints	Our Complaints Policy explains there will be some issues we can't deal with as a complaint. It gives examples of the types of issue. (Point 6)
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	Y	Complaints Policy Moat Compliments and complaints	Our Complaints Policy states issues older than 12 months may be difficult to investigate but we do not explicitly exclude them. (Point 6.1)

	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 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.	Y	Complaints Policy Moat Compliments and complaints	Our 2024/25 review demonstrates the only issues which have been rejected as complaints were duplicates and/or over 12 months after the issue had occurred.
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Y	Complaints Policy Moat Compliments and complaints	Our Complaints Policy states that we'll consider the individual circumstances of each complaint. (Point 6.2)

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.	Y	Complaints Policy Moat Compliments and complaints	<p>Our Complaints Policy explains customers can contact us by telephone, email, our online portal, web chat, in person to any employee or in writing. Customers may also contact us using social media. (Point 4.1 and 4.2)</p> <p>We frequently include details of how to contact us in customer newsletters, website articles and social media posts.</p> <p>We completed an Equality Impact Assessment when we agreed the Complaints policy.</p> <p>97% of Moat colleagues have completed annual E&D training.</p>
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	Y	Website Moat Compliments and complaints	<p>Our Complaints Policy states any Moat employee can receive a complaint. (Point 4.1)</p> <p>We do not exclude any roles from opening complaints. All staff complete online training on complaints.</p>

	complaint to the appropriate person within the landlord.			Our gas partner, Sureserve, can also take a complaint. It will be handled in accordance with Moat's policy and procedure and escalations to stage two are handled by Moat.
3.3	High volumes of complaints must not be seen as a negative, as they can be indicative of a well-publicised and accessible complaints process. Low complaint volumes are potentially a sign that residents are unable to complain.	Y	Website Complaints Procedure Moat Compliments and complaints	We regularly report on the number of complaints we receive, including our compliance at each stage. This is now shared quarterly on our website.
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.	Y	Website Moat Compliments and complaints Complaints Policy Moat Compliments and complaints	Our complaints policy and our approach are available on our website. We regularly provide information on our policy in our customer focussed publications. If a customer needs the policy in another language or format we will work with our partners to provide it as requested.
3.5	The policy must explain how the landlord will publicise details of the complaints policy, including information about the Ombudsman and this Code.	Y	Complaints Policy Moat Compliments and complaints	The complaints section on our website gives much of the relevant information from the policy. We regularly provide information on our policy in our customer communications. Our policy shares our commitment that we will regularly publicise details of how to make a complaint and the Housing Ombudsman Service
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.	Y	Complaints Policy Moat Compliments and complaints	Our Complaints Policy states we'll accept complaints from someone acting on the customer's behalf and they can represent or accompany a customer to meetings. (Point 4.3).
3.7	Landlords must provide residents with information on their right to access the Ombudsman service and how the	Y	Website Moat Compliments and complaints Complaints Policy	We promote the Housing Ombudsman Service in our Complaints Policy, website, complaints communication, newsletters and social media channels.

	individual can engage with the Ombudsman about their complaint.		<u>Moat Compliments and complaints</u>	
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Section 4: Complaint Handling Staff

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
4.1	Landlords must have a person or team assigned to take responsibility for complaint handling, including liaison with the Ombudsman and ensuring complaints are reported to the governing body (or equivalent). This Code will refer to that person or team as the 'complaints officer'. This role may be in addition to other duties.	Y		<p>We have a Customer Resolution team which directly deals with most of our complaints. The team also provide support to trained colleagues elsewhere in the business.</p> <p>The Customer Resolutions team provides regular reporting to the Executive team, Customer & Communities Committee and Board.</p> <p>The Board considered the capacity in the Customer Resolution team and permanently increased the number of posts during 2024 to respond to the increased number of complaints.</p>
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.	Y		<p>All colleagues are trained and empowered to offer resolutions and encouraged to escalate issues as necessary whether they are a Lead Officer or not.</p> <p>We establish working groups to tackle issues which are giving rise to increased complaints.</p> <p>Our complaints handling system allows the input of all colleagues and the delivery of commitments to be tracked using our complaints module. We report on our compliance to commitments within our monthly business health measures and on our website for customers. This will be a key area of focus for improvement during 2025/26.</p>
4.3	Landlords are expected to prioritise complaint handling and a culture of learning from complaints. All relevant staff must be suitably trained in the importance of complaint handling. It is important that complaints are seen as a core service and must be resourced to handle complaints effectively	Y		<p>We have both a service led and centralised approach to complaint handling depending on the nature of the complaint.</p> <p>We have comprehensive online training package for Lead Officers on SkillGate, which includes guidance on application of policy, approach and the use of our complaint module on CRM. The training is being refreshed in 2025/26.</p>

				<p>We have comprehensive training on stage two complaints giving more guidance.</p> <p>All Lead Officers must complete and evidence training on the Housing Ombudsman Complaint Handling Code.</p> <p>Our Board has considered the capacity in the Customer Resolution Team and increased the number of permanent posts during 2024 to respond to the increased number of complaints.</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 not be treated differently if they complain.	Y	Complaints Policy Moat Compliments and complaints	We have a single Complaints Policy and a single procedure. They set out how we deal with complaints on their merit, and our support to help customers to 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.	Y	Complaints Policy Moat Compliments and complaints	We operate a two stage complaints process. We remain focussed on early resolution.
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.	Y	Complaints Policy Moat Compliments and complaints	We operate a two stage complaints process and our formal complaints communication provides contact details for the Housing Ombudsman.
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.	Y		Only our gas complaints are handled by our contractor at stage one and this is overseen by Moat colleagues in our Gas and Asbestos team. Our contractor (SCS) adhere to our policy / two stage process with the second stage being completed by Moat colleagues.
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Y		We check that our gas contractors have completed the Housing Ombudsman Complaint Handling Code training.
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	Y		Our Complaints Procedure ensures we capture <ul style="list-style-type: none"> • A description of the issue • The resolution the customer would like • The impact this is having on the customer or any members of their household

	to this as “the complaint definition”. If any aspect of the complaint is unclear, the resident must be asked for clarification.			Any adjustments to support our customer through the complaints process. This is recorded under the customer impactation assessment in the complaints module
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.	Y	Complaints procedure can be provided on request	We have updated our Complaints Procedure in 2025 to make this requirement clear at both stages.
5.8	At each stage of the complaints process, complaint handlers must: <ul style="list-style-type: none"> 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 d. consider all relevant information and evidence carefully. 	Y	Complaints Policy Moat Compliments and complaints	<p>Our Complaints Procedure reflects the requirements of the Complaint Handling Code (available on request).</p> <p>Our Lead Officers can act independently to find appropriate remedies.</p>
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.	Y	Complaints Policy Moat Compliments and complaints	<p>Our Complaints Policy states that where we need to extend the timescales we will provide an explanation, communication schedule and details for the Housing Ombudsman (Point 5.6). Extensions are still expected to be within the extension timescales prescribed in the Code.</p> <p>Extensions are recorded within the complaint module in CRM. We monitor extensions and there is a limited pool of colleagues who are permitted to authorise</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	Y	Complaints Policy Moat Compliments and complaints	Our Complaints Policy states we'll make reasonable adjustments to accommodate individual needs and comply with the Equality Act 2010. We'll provide an interpreter or British Sign Language interpreter if needed.

	resident has disclosed. Any agreed reasonable adjustments must be kept under active review.			We completed an Equality Impact Assessment when we reviewed our Complaints Policy.
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.	Y	Complaints Policy Moat Compliments and complaints	Our Complaints Policy states we will escalate a complaint to stage two as long as stage one is completed.
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.	Y		<p>All colleagues complete CRM training as part of their induction to ensure that our records are maintained and accurate regardless of the issue or interaction.</p> <p>We keep full records of our complaints and communication within our complaints module on CRM and have the functionality to track/tag using the complaint reference number and upload any documentation as well as communicate directly through CRM using tasks and emails.</p> <p>We capture how the issue is affecting the customer and/or other members of their household at three points during the complaint journey.</p>
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.	Y	Complaints Policy Moat Compliments and complaints	<p>Our Complaints Policy states our aim is to fully resolve complaints at stage one. (Point 5.4).</p> <p>We added “Putting things right” to our Complaints Procedure in 2025 which directly reflects the same section of the Housing Ombudsman Code.</p>
5.14	Landlords must have policies and procedures in place for managing unacceptable behaviour from	Y	Unreasonable Behaviour Policy Moat Reports, documents and policies	Our Complaints Policy references our Unreasonable Behaviour Policy within the related policies and procedures.

	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.			Our Complaints Procedure acknowledges that customers can become frustrated but if the Lead Officer feels they are being unreasonable, they should refer to the Unreasonable Behaviour Policy which explains the action we will take when a customer demonstrates unacceptable behaviour.
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.	Y	Unreasonable Behaviour Policy Moat Reports, documents and policies	Our Complaints procedure signposts Lead Officers to our Unreasonable Behaviour Policy. The Policy explains the action we will take if a customer demonstrates unacceptable behaviour and that we will consider a customer's individual circumstances. Approval must be given by an Executive Director to apply any restrictions.

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.	Y		<p>Our Complaints Procedure states a formal response should be provided at the earliest possible opportunity and no later than 10 working days from when we acknowledged the complaint.</p> <p>Our Complaints Procedure sets clear expectations that the customer impact section must be complete and any risk to safety or wellbeing should be referred to the Customer Services or Customer Resolution management team and they will expedite appropriately.</p>
6.2	Complaints must be acknowledged, defined and logged at stage 1 of the complaints procedure <u>within five working days of the complaint being received.</u>	Yes-policy No - practice	<p>Complaints Policy Moat Compliments and complaints</p> <p>Annual complaints performance and service improvement report</p>	<p>Our Complaints Policy is compliant, however our performance compliance varied as detailed in our annual report.</p> <p>During 2024/25 we acknowledged 89.7% of stage 1 complaints within five working days.</p>
6.3	Landlords must issue a full response to stage 1 complaints <u>within 10 working days</u> of the complaint being acknowledged.	Yes-policy No - practice	<p>Complaints Policy Moat Compliments and complaints</p> <p>Annual complaints performance and service improvement report</p>	<p>Our Complaints Policy is compliant, however our performance compliance varied as detailed in our annual report.</p> <p>During 2024/25 we issued a full response to 87.5% of stage 1 complaints within 10 working days.</p>
6.4	Landlords must decide whether an extension to this timescale is needed when considering the complexity of the complaint and then inform the resident of the expected timescale for response. Any extension must be no more than 10 working days without good reason, and the reason(s) must be clearly explained to the resident.	Y	<p>Complaints Policy Moat Compliments and complaints</p> <p>Annual complaints performance and service improvement report</p>	<p>Our Complaints Policy states that where we need to extend the timescales, we will provide an explanation (Point 5.6)</p> <p>During 2024/25 we extended the response timescale in <4% of stage 1 cases</p> <p>If we fail to communicate extensions and our responses are late or outside of the time they may have given, we compensate customers for the</p>

				complaint handling failure considering the potential impact the delay had on the customer and resolution.
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.	Y		Our Complaints Procedure includes the need to inform the customer of the contact details for 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.	Y		Our Complaints Procedure explains we may not be able to deliver the outcome at the time of the complaint response. When this is the case, we create a "commitment" to deliver a resolution at a future date. Commitments are recorded on the CRM complaints module and monitored on the complaint Lead Officer's dashboard.
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.	Y		Our Complaints Procedure states that we will provide clear reasons for decisions referencing policy, law and good practice (Point 6.7).
6.8	Where residents raise additional complaints during the investigation, these must be incorporated into the stage 1 response if they are related and the stage 1 response has not been issued. Where the stage 1 response has been issued, the new issues are unrelated to the issues already being investigated or it would unreasonably delay the response, the new issues must be logged as a new complaint.	Y	Complaints Policy Moat Compliments and complaints	Our Complaints Policy states that additional issues will be considered if a response has not been issued (Point 5.7).
6.9	Landlords must confirm the following in writing to the resident at the completion of stage 1 in clear, plain language: <ol style="list-style-type: none"> the complaint stage; the complaint definition; 	Y		Our Complaints Procedure and template for responses states a response should include the reasons for any decisions the Lead Officer has made and be compliant with the guidance set out within the Complaints Handling Code.

	<p>c. the decision on the complaint;</p> <p>d. the reasons for any decisions made;</p> <p>e. the details of any remedy offered to put things right;</p> <p>f. details of any outstanding actions; and</p> <p>g. details of how to escalate the matter to stage 2 if the individual is not satisfied with the response.</p>			
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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.	Y	<p>Complaints Policy</p> <p>Moat Compliments and complaints</p>	<p>We operate a two stage complaints process.</p> <p>Our Complaints Policy states we will escalate a complaint to stage two if the customer asks us to (Point 5.5).</p>
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- policy No - practice	<p>Complaints Policy</p> <p>Moat Compliments and complaints</p> <p>Annual complaints performance and service improvement report</p>	<p>Our Complaints Policy is compliant, however our performance compliance varied as detailed in our annual report.</p> <p>During 2024/25 we acknowledged 90.9% of stage 2 complaints within five working days.</p>
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.	Y	<p>Complaints Policy</p> <p>Moat Compliments and complaints</p>	<p>Our Complaints Procedure explains the customer does not need to give a reason for escalation but it's helpful to know if there is a particular area that they are not happy with and confirmation of the resolution they are seeking.</p>
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Y	<p>Complaints Policy</p> <p>Moat Compliments and complaints</p>	<p>Our Complaint Policy explains a complaint review will be conducted by a senior colleague.</p>

6.14	Landlords must issue a final response to the stage 2 <u>within 20 working days</u> of the complaint being acknowledged.	Yes - policy No - practice	Complaints Policy Moat Compliments and complaints Annual complaints performance and service improvement report	Our Complaints Policy is compliant, however our performance compliance varied as detailed in our annual report. During 2024/25 we issued a full response to 79.9% of stage 2 complaints within 20 working days. Delays were generally as a result of staff changes
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.	Y	Complaints Policy Moat Compliments and complaints	Our Complaints Policy states that where we need to extend the timescales, we will provide an explanation and seek agreement (Point 18). During 2024/25 we extended the response timescale in 10% of stage 2 cases.
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.	Y	Complaints Policy Moat Compliments and complaints	Our Complaints Policy includes the need to inform the customer of the contact details for the Ombudsman (Point 5.6)
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.	Y	Complaints Policy Moat Compliments and complaints	Our Complaints Procedure explains we may not be able to deliver the outcome at the time of the complaint response. When this is the case, we create a "commitment" to deliver a resolution at a future date. Commitments are recorded on the CRM complaints module on and monitored on the complaint Lead Officer's dashboard.
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.	Y		Our Complaints Procedure states that we will provide clear reasons for decisions referencing policy, law and good practice (Point 6.14 and 6.16).
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;	Y		Our Complaints Procedure says a response should include the reasons for any decisions the Lead Officer has made and be compliant with the guidance set out within the Complaints Handling Code.

	<p>b. the complaint definition;</p> <p>c. the decision on the complaint;</p> <p>d. the reasons for any decisions made;</p> <p>e. the details of any remedy offered to put things right;</p> <p>f. details of any outstanding actions; and</p> <p>g. details of how to escalate the matter to the Ombudsman Service if the individual remains dissatisfied.</p>			
6.20	Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.	Y		The need to involve all relevant staff members in finalising a stage two response is made clear in our Complaints Procedure

Section 7: Putting things right

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
7.1	<p>Where something has gone wrong a landlord must acknowledge this and set out the actions it has already taken, or intends to take, to put things right. These can include:</p> <ul style="list-style-type: none"> • Apologising; • Acknowledging where things have gone wrong; • Providing an explanation, assistance or reasons; • Taking action if there has been delay; • Reconsidering or changing a decision; • Amending a record or adding a correction or addendum; • Providing a financial remedy; • Changing policies, procedures or practices. 	Y		<p>Our approach to resolving complaints ensures all potential remedies are considered. We ask customers how they would like their complaint resolved.</p> <p>Our Complaints Procedure includes a section on putting things right and reflects the Housing Ombudsman guidance from the Complaint Handling Code.</p>
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Y	<p>Compensation Policy Moat Reports, documents and policies</p>	<p>Our Compensation Policy provides guidance on the reasons for paying compensation and the levels of compensation in different circumstances. Policy changes to align with the Housing Ombudsman Remedies Guidance were approved in May 2025.</p> <p>We also review the Housing Ombudsman Case library for comparisons routinely</p>
7.3	The remedy offer must clearly set out what will happen and by when, in agreement with the resident where appropriate. Any remedy proposed must be followed through to completion.	Y		<p>Our Complaints Procedure explains we will create a “commitment” to deliver a remedy at a future date after closing a complaint. Commitments are recorded on the CRM complaints module and monitored via dashboards.</p>

7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Y		<p>Our Compensation Policy provides guidance on the reasons for paying compensation and the levels of compensation in different circumstances.</p> <p>The Compensation Policy was updated in May 2025.</p> <p>We also review the Housing Ombudsman Case library for comparisons routinely.</p>
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Section 8: Self-assessment, reporting and compliance

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
8.1	<p>Landlords must produce an annual complaints performance and service improvement report for scrutiny and challenge, which must include:</p> <p>a. the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements.</p> <p>b. a qualitative and quantitative analysis of the landlord's complaint handling performance. This must also include a summary of the types of complaints the landlord has refused to accept;</p> <p>c. any findings of non-compliance with this Code by the Ombudsman;</p> <p>d. the service improvements made as a result of the learning from complaints;</p> <p>e. any annual report about the landlord's performance from the Ombudsman; and</p> <p>f. any other relevant reports or publications produced by the</p>	Y Y Y Y Y Y	www.moat.co.uk	<p>Our annual report contains all the required elements.</p> <p>The annual report is accessible on our website, and we provide links to access our performance data in our customer newsletters.</p>

	Ombudsman in relation to the work of the landlord.			
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.	Y	www.moat.co.uk	<p>Our annual report was approved by the Board and a response included.</p> <p>The annual report is easily accessible on our website and we provide links to access our performance data in our customer newsletters</p> <p>We regularly report to Board with specific complaints reports or as part of an Operations Update.</p> <p>We regularly report to the Customer and Communities Committee that includes Board Members and customers.</p>
8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	NA		Moat Homes Ltd has not completed any restructure or merger that would trigger a new self-assessment. If a significant change occurs, we commit to completing a new self-assessment within 12 weeks.
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	NA		Moat Homes Ltd has not been the subject of an Ombudsman investigation.
8.5	If a landlord is unable to comply with the Code due to exceptional circumstances, such as a cyber incident, they must inform the Ombudsman, provide information to residents who may be affected, and publish this on their website Landlords must provide a timescale for returning to compliance with the Code.	Y		We will inform the Ombudsman if we are unable to comply with the Code due to exceptional circumstances.

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	Y	Complaints Policy Moat Compliments and complaints	Our Complaints Policy confirms our commitment to learning from complaints and improving the services we offer our customers. We'll look beyond the

	service improvements can be made as a result of any learning from the complaint.		<u>Annual complaints performance and service improvement report</u>	circumstances of individual complaints to identify issues and introduce positive changes (Point 7). Our annual performance report and customer newsletters explain some of the changes made as a result of learning from complaints.
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.	Y	Complaints Policy <u>Moat Compliments and complaints</u> <u>Annual complaints performance and service improvement report</u>	Our Complaints Policy confirms our commitment to learning from complaints and improving the services we offer our customers. We'll look beyond the circumstances of individual complaints to identify issues and introduce positive changes (Point 7). The lessons learned page in the complaints section of our website gives examples of improvements as a result of complaints.
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.	Y		We regularly report to Board with specific complaints reports or as part of an Operations Update. We provide quarterly reporting to our Customer and Communities Committee. Our customer-led Repairs Forum discusses complaints trends and performance. Sharing outcomes with our wider customer base is an area we have identified for improvement in the next year.
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.	Y		The Senior Officer accountable for complaints handling is Marek Witko, Executive Director: Housing and Customer Experience.
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	Y		The Member Responsible for Complaints is Caroline Ross, Chair of the Customer and Communities Committee.

	culture. This person is referred to as the Member Responsible for Complaints ('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.	Y		Our Board's response to the annual performance report and our self-assessment is included in our annual complaints performance and service assessment report
9.7	As a minimum, the MRC and the governing body (or equivalent) must receive: <ol style="list-style-type: none"> regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance; regular reviews of issues and trends arising from complaint handling; regular updates on the outcomes of the Ombudsman's investigations and progress made in complying with orders related to severe maladministration findings; and annual complaints performance and service improvement report. 	Y		We regularly report to Board with specific complaints reports or as part of an Operations Update. We will ensure these reports meet the Ombudsman's requirements.
9.8	Landlords must have a standard objective in relation to complaint handling for all relevant employees or third parties that reflects the need to: <ol style="list-style-type: none"> have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments; take collective responsibility for any shortfalls identified through 	Y		All roles that have been identified as having Lead Officer responsibility have it reflected in job descriptions. In addition, all staff are asked to commit to adhering to the Housing Ombudsman Complaint Handling Code in their annual declarations.

<p>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>			
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