

Housing Ombudsman Complaints Handling Code

Self-Assessment Form 2025/2026

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	Complaints Policy Section 2 Complaint definition	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 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 Procedure Section 5 Step 1 Complaints Policy Policy Actions Objective 1	Our Complaints Procedure states that customers do not need to use the word complaint. Our Complaints Policy states that we will accept complaints from anyone acting on behalf of the customer with appropriate consent. Our Complaints process includes a risk assessment to help to identify residents who may be vulnerable.

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	Complaints Policy Section 2 Definitions Complaints Procedure Section 5 Procedures Step 2	There is a definition of a service request under the definitions category. Our Complaints Procedure gives additional guidance and instructs colleagues to treat issues as a complaint if in doubt.
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 Procedure Section 5 Procedures Step 2	Our procedure states If a customer expresses dissatisfaction with the handling of a service request, a complaint must be opened, even if the service request remains ongoing.
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	Yes	Text is included in surveys.	Our policy clarifies that survey feedback is not defined as a complaint. We are exploring if there is capability to introduce a follow up text for Real Time Customer Feedback

	must provide details of how residents can complain.			
--	---	--	--	--

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 Section 1 Scope	The scope of policy sets out the reasons why we may not accept a complaint and gives out commitment that we will not use exclusions to unreasonably refuse complaints.
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	Yes	Complaints Policy Section 1 Scope	The scope of policy sets out the reasons why we may not accept a complaint and gives our commitment that we will not use exclusions to unreasonably refuse complaints. We confirm that when we do refuse, we will explain why and signpost appropriately

	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.			
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 Procedure Section 5 Procedure Steps Step 6	Our complaints procedure is clear when we will not accept a complaint. Our policy advises that a 12 month time limit applies.
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	Yes	Complaints Procedure Section 5 Procedure Steps Step 6 Complaints Policy Section 1	We give our commitment and explain how we will do this under Step 6. We record all complaints and if rejected, the reason for this is recorded on our module. Most exclusions are due to issues having already exhausted the complaints process

	may tell the landlord to take on the complaint.			
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Yes	Complaints Procedure Section 5 Procedure Steps Step 6 Complaints Policy Section 1	Our complaints procedure commits to lead officers considering individual circumstances, including but not limited to vulnerability and protected characteristics.

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		We accept complaints by telephone, email and our online portal, webchat and in person. We regularly include details of how to contact us in our customer newsletters. Our complaints process includes a risk assessment.
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 Procedure Section 5 Procedure Steps Step 1	As above. All colleagues commit annually via a signed declaration that they will support the resolution of complaints.
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	Yes	<u>Make a complaint Moat</u> Complaints Policy Section 1 Context, Purpose and Scope	We regularly report on the number of complaints we receive, including our compliance at each stage. This is shared monthly on our website. We value complaints and how they contribute to service improvements.

	volumes are potentially a sign that residents are unable to complain.			
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 Section 10 Accessibility	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 either the policy or process 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.	Yes	Complaints Policy Section 10 Accessibility Objective 1	We regularly provide information on our policy in our customer communications. Our complaints policy commits to ensuring customers are consistently informed of their right to escalate complaints to the Housing Ombudsman Service. Our policy commits to publicising the Housing Ombudsman within appropriate customer communications and on our website.
3.6	Landlords must give residents the opportunity to have a representative deal with their complaint on their behalf, and to be represented or	Yes	Complaints Policy Section 6 Policy Actions	Our Objective 1 confirms that complaints may be made by a representative, advocate, family member support worker or elected official on behalf of a customer as long as they have appropriate consent.

	accompanied at any meeting with the landlord.			
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	Complaints Policy Section 1 Scope	Our complaints policy commits to ensuring customers are consistently informed of their right to escalate complaints to the Housing Ombudsman Service.

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	Graham Swanton, Director of Customer and Insight Complaints Resolution Team Insight, Service Excellence & Compliance	Our Director of Customer and Insight in our responsible person for complaints. Both the Customer Resolutions team and Insight, Service Excellence and Compliances teams sit within the same structure improving our ability to learn from complaints.

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	All of our colleagues are able to offer resolutions and encouraged to escalate issues as necessary	All colleagues are trained and empowered to offer resolutions and encouraged to escalate issues as necessary regardless of being a lead officer. We establish working groups to tackle issues which are giving rise to increased complaints. Our complaints handling system allows the input of all colleagues and delivery of commitments to be tracked using our complaint module. We report on our compliance to commitments within our monthly business health measures and on our website for customers. This was a key area of focus over the last we months and we have redesigned the module in the last quarter. Compliance has improved, particularly in Q4.
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	The majority of our complaints are handled centrally by the Customer Resolutions team. There are three specialist areas where handling is service led (Development, Sales and Marketing and New Homes Customer Care). All colleagues acting as Lead Officers must evidence completion of the Housing Ombudsman	The majority of our complaints our handled centrally by our Customer Resolutions team to ensure that investigations are impartial. There are three areas where specialist knowledge is required which sit outside of our overall centralised approach.

			Complaint Handling Code training before complaints are allocated.	
--	--	--	---	--

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	We only have one complaints policy	The overall policy is based on fairness, transparency and a commitment to putting things right
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 Section 6 Policy Actions	Objective 2 in our policy actions commits to improving our timeliness and sets out both stages of our complaint handling which is in compliance with the HOS Complaint Handling Code.
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 Section 6 Policy Actions	Our policy has two stages. Objective 2 in our policy actions commits to improving our timeliness.

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		Our contractors do not respond to complaints on our behalf. Our gas servicing contract with Sureserve routes calls direct to the gas contractor but they are returned to Moat if a complaint is requested.
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Yes		Third parties provide information for Moat to respond.
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	Complaints Procedure Section 5 Procedure Steps	This guidance is detailed under Section 5 / Step 1 – Receiving and Recording a complaint.
5.7	When a complaint is acknowledged at either stage, landlords must be clear which aspects of the complaint they	Yes	Complaints Procedure Section 5 Procedure Steps	This is confirmed under stage one and stage two steps for complaint investigations.

	are, and are not, responsible for and clarify any areas where this is not clear.			
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 d. consider all relevant information and evidence carefully.	Yes	Complaints Procedure Section 5 Procedure Steps	Our complaints procedure reflects the requirements of the Complaint Handling Code. Our lead officers can act independently to find appropriate remedies.
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 Procedure Section 5 Procedure Steps Step 4	We aim to achieve the timescales set out in the Complaints Handling Code at both stages and to reduce the use of extensions within the more centralised operating model by working closely with the areas we are partnered with.
5.10	Landlords must make reasonable adjustments for residents where appropriate	Yes	Complaints Procedure Section 5 Procedure Steps	A risk assessment form is completed on our system for every complaint to support the

	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.		Step 1	identification of vulnerable customers and those who may need reasonable adjustments.
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 Procedure Section 5 Procedure Steps Step 4 Complaints Policy Section 6 Policy Actions Objective 1	We will always escalate a complaint to stage two as long as stage one has been completed within 12 months.
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	Complaints Procedure Section 5 Procedure Steps Step 1 Receiving and recording a complaint	The complaints procedures clearly communicates the expectation that information will be recorded on CRM in several areas. We also commit to this in our procedure principles

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	Complaints Policy Policy Actions Objective 6	We do not restrict the remedies which can be offered by stage. Customers may request compensation without having to open a complaint.
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	Unreasonable Behaviour Policy	The Unreasonable Behaviour Policy is listed under related policies in complaints policy and complaints procedure. It is available on the website.
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	Unreasonable Behaviour Policy Customer Alert Policy Our policies Moat	We have an Unreasonable Behaviour Policy which is shared on our web page. The policy explains the action we will take if a customer demonstrates unacceptable behaviour and that we will consider individual circumstances.

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	Complaint Procedure Section 5 Risk Assessment	Risk assessments take place at stage one and stage two. Any case identified as high risk is offered an in person visit and can be escalated to Complex Case Review Panel for consideration.
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	Complaints Policy Section 6 Policy Actions Objective 2 Complaint Procedure Section 5 Step 3	We were 97% compliant for stage one acknowledgments
6.3	Landlords must issue a full response to stage 1 complaints <u>within 10 working days</u> of the	Yes	Complaints Policy Section 6 Policy Actions	97% of stage one complaints were answered within target (NB: this may include the use of extensions)

	complaint being acknowledged.		Objective 2 Complaint Procedure Section 5 Step 3	
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	Complaints Policy Section 6 Policy Actions Objective 2 Complaint Procedure Section 5 Step 3	We aim to achieve the timescales set out in the Complaints Handling Code at both stages and to reduce the use of extensions within the more centralised operating model by working closely with the areas we are partnered with.
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 Section 6 Policy Actions Objective 2 Complaint Procedure Section 5 Step 3	This is checked by lead officers line managers during quality assurance audits.
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	Yes	Complaints Policy Section 6 Policy Actions Objective 5 Complaint Procedure Section 5	76.4% of commitments were managed within agreed timescales.

	must still be tracked and actioned promptly with appropriate updates provided to the resident.		Step 7	
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	Complaints Policy Section 6 Policy Actions Objective 3 Complaint Procedure Section 5 Step 3	This is considered by lead officers line managers during quality assurance audits and if complaints are escalated to stage two to understand the help understand the reason for the escalation.
6.8	Where residents raise additional complaints during the investigation, these must be incorporated into the stage 1 response if they are related and the stage 1 response has not been issued. Where the stage 1 response has been issued, the new issues are unrelated to the issues already being investigated or it would unreasonably delay the response, the new issues must be logged as a new complaint.	Yes	Complaint Procedure Section 5 Step 3	If we have not issued our response, we can include as long it does not cause an unreasonable delay. Issues which have not been through stage one, cannot be added to stage two complaints.
6.9	Landlords must confirm the following in writing to the resident at the completion of stage 1 in clear, plain language:	Yes	Complaint Procedure Section 5 Step 3	Our template for responses states responses should include all of the points listed. Adherence is assessed during quality assurance audits.

	a. the complaint stage; b. the complaint definition; c. the decision on the complaint; d. the reasons for any decisions made; e. the details of any remedy offered to put things right; f. details of any outstanding actions; and g. details of how to escalate the matter to stage 2 if the individual is not satisfied with the response.			
--	--	--	--	--

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		We operate a two stage complaints process. The stage two template states that the complaint will be closed and should be referred to the Housing Ombudsman or equivalent if the customer remains unhappy.
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 Section 6 Policy Actions Objective 2 Complaint Procedure Section 5	We acknowledged 91% of stages two requests on time.

			Step 4	
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 Section 6 Policy Actions Objective 1 Complaint Procedure Section 5 Step 4	Customers do not need to explain why they are escalating their complaint, but we will try to understand what the stage one failed to resolved and the resolutions being sought as part of initial communications at stage two.
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Yes	Complaint Procedure Section 5 Step 4	Complaints are always allocated to different colleagues between stages.
6.14	Landlords must issue a final response to the stage 2 <u>within 20 working days</u> of the complaint being acknowledged.	Yes		96% of stage two complaints were responded to in target
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	Complaints Policy Section 6 Policy Actions Objective 2 Complaint Procedure Section 5 Step 3	We encourage our lead officers to consider this as early as possible in the complaint resolution to help manage customers' expectations.
6.16	When an organisation informs a resident about an extension to	Yes	Complaints Policy Section 6	We monitor compliance as part of line management and quality assurance

	these timescales, they must be provided with the contact details of the Ombudsman.		Policy Actions Objective 2 Complaint Procedure Section 5 Step 3	
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	Complaints Policy Section 6 Policy Actions Objective 5 Complaint Procedure Section 5 Step 7	We issue responses at the earliest opportunity and manage and monitor agreed actions via the “commitments” on our complaints module.
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	Complaints Policy Section 6 Policy Actions Objective 3 Complaint Procedure Section 5 Step 3	This is considered by lead officers line managers during quality assurance audits and if complaints are escalated to stage two to understand the help understand the reason for the escalation.
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;	Yes	Complaint Procedure Section 5 Step 3	Our template for responses states responses should include all of the points listed. Adherence is assessed during quality assurance audits.

	c. the decision on the complaint; d. the reasons for any decisions made; e. the details of any remedy offered to put things right; f. details of any outstanding actions; and 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 Procedure Section 5 Step 3	Our template refers to stage two being our final response and provides escalation details to the Housing Ombudsman Service (if appropriate).

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; • Amending a record or adding a correction or addendum; • Providing a financial remedy; • Changing policies, procedures or practices.	Yes	Complaint Policy Section 1 Context Purpose and Scope Section 4 Policy Principles Section 6 Policy Actions Objective 3 and 6	We are committed to resolving issues and how we will do so is within our Policy Actions.
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Yes	Complaint Policy Section 6 Policy Actions Objective 3	We have reviewed our Compensation Policy to reflect the Housing Ombudsman Guidance issued in February 2026.

			Complaint Procedure Section 5 Step 7	
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	Complaint Procedure Section 5 Step 7	If a remedy is not delivered at the point of responding to the complaint, we use our commitment module to ensure we record and monitor the promises we have made to our customers.
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes	Complaint Procedure Section 5 Step 3	We have reviewed our Compensation Policy to reflect the Housing Ombudsman Guidance issued in February 2026.

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	Yes	www.moat.co.uk	Our 2026 report is on schedule to be published and includes the required information.

	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.			
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		This is scheduled to be presented for approval in July
8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.		Not applicable	We have not had a significant merger. We reviewed our revised policy against self-assessment criteria.

8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.		Not applicable	
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.		Not applicable	

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		Lessons learnt are reported to Customer Assurance Panel, ET, SLT, Committee Board.
9.2	A positive complaint handling culture is integral to the effectiveness with which landlords resolve disputes. Landlords must use complaints	Yes	www.moat.co.uk	We reviewed our complaints delivery model and moved to a business partnering model to better support working collaboratively across the business to identify themes and opportunities to

	as a source of intelligence to identify issues and introduce positive changes in service delivery.			improve our service and better customer outcomes. We produce insight information which feed into local governance and operational meetings. We held two Customer workshops in 2025/26 to work with our customers and understand the areas we needed to prioritise for improvement for our complaint handling.
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		Our business partnering model supports working collaboratively with areas of the business to identify themes and opportunities to improve our services.
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	Graham Swanton Director of Customer and Insight	
9.5	In addition to this a member of the governing body (or equivalent) must be appointed to	Yes	Caroline Ross Board Member	Information received via Committee and Board reports.

	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').			
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		
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	Yes		

	related to severe maladministration findings; and d. annual complaints performance and service improvement report.			
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: a. have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments; b. take collective responsibility for any shortfalls identified through complaints, rather than blaming others; and c. act within the professional standards for engaging with complaints as set by any relevant professional body.	Yes	All colleagues have this as part of their annual declaration.	