

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	Cheltenham YMCA Complaints Policy	Definition included in full.
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	Cheltenham YMCA Complaints Policy	Complaints Policy encourages the process of feedback. It is not a requirement to use the word “complaint” and the organisation welcomes complaints in any format or method, including through a representative that the individual may be comfortable with.
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	Cheltenham YMCA Complaints Policy	This distinction is set out in the policy document, the organisation is part of induction training on complaints and is part of our complaints training video which provides refresher training to all staff

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	Cheltenham YMCA Complaints Policy	This is set out in the Policy document.
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	Half-yearly resident satisfaction surveys include this information.	All staff are introduced to this policy as part of their induction process in order that they feel confident in informing a person of how they can pursue a complaint if they so wish. The most recent survey is taking place in June and July 2025

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	Cheltenham YMCA Complaints Policy. Central Complaints Log	The Complaints Policy clearly highlights this, and a central organisational database is used to log, reference & progress complaints accordingly. No complaints/feedback have been refused to date.
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. • Matters that have previously been considered under the complaints policy.	YES	Cheltenham YMCA Complaints Policy	This information is included in the Policy document.
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	YES	Central Complaints Log	All complaints to date have been received/recorded within 12 months of the issue occurring

	consider whether to apply discretion to accept complaints made outside this time limit where there are good reasons to do so.			therefore this situation has not arisen.
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	Cheltenham YMCA Complaints Policy	The Complaints Policy does not allow for complaints to be refused. Our position is to listen to all feedback in order to improve our services.
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	YES	Cheltenham YMCA Complaints Policy. Central Complaints Log	Individual cases are logged & progressed and blanket exclusions has never been applicable. To date all complaints have been accepted and never refused.

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	Cheltenham YMCA Complaints Policy Website	We seek to address all barriers to progressing matters of dissatisfaction. And will make reasonable adjustments where appropriate We have updated our policy to fully reflect this commitment.
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	Cheltenham YMCA Complaints Policy Website Central Complaints Log Policy TEAMS Channel	The Complaints Policy highlights that making a complaint can be done in a variety of ways to any member of staff. This can be seen on the central recording database. All staff are inducted into the business, and viewing/understanding the policy is part of the Probation period, so processes can be implemented as and when required. If future reference is needed, then all staff have access to the Microsoft TEAMS channel where policies are located for viewing.

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.	YES	Cheltenham YMCA Complaints Policy Website Central Complaints Log Policy TEAMS Channel	Policy states that complaints received are viewed as an opportunity to listen, learn, develop and improve. Openness to receiving complaints and progressing them. Volumes are consistent (complaints never refused) with peaks & troughs during a financial year.
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	Cheltenham YMCA Complaints Policy	Policy is available as required and has been amended to a 2-stage process to properly reflect the Code.
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	Cheltenham YMCA Complaints Policy	The policy is available on the website and includes information about the Ombudsman and the Code
3.6	Landlords must give residents the opportunity to have a representative deal with their complaint on their behalf, and to be represented or accompanied at any meeting with the landlord.	YES	Cheltenham YMCA Complaints Policy	This information is included in the Policy document.
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	Cheltenham YMCA Complaints Policy	This information is included in the Policy document.

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	Cheltenham YMCA Complaints Policy	Head of Housing, Policy & Performance
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	Organisational structure	Head of Housing, Policy & Performance is a member of the SLT and so has the required authority.
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	Cheltenham YMCA Complaints Policy	The policy states that complaints will be taken seriously so we can learn, develop and improve. Online training has been rolled out to existing staff and all new staff (customer care, how to handle complaints)

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	Cheltenham YMCA Complaints Policy	A single Policy is in place. This ensures consistency for all complainants and that everyone should be treated the same when a complaint is received & progressed.
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	Cheltenham YMCA Complaints Policy	Policy is a 2-stage process.
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	Cheltenham YMCA Complaints Policy	Policy is a 2-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.	N/A	N/A	3 rd parties are not used to handle complaints.
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	N/A	N/A	3 rd parties are not used to handle complaints.

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	Cheltenham YMCA Complaints Policy	Policy sets out the complaint as reflected in the code
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	Central Complaints Log	YMCA Cheltenham always accepts responsibility for the remediation or correction of the matter that resulted in the complaint being made.
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	Cheltenham YMCA Complaints Policy	Wording reflects the requirement of the Code.
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	Cheltenham YMCA Complaints Policy & Central Complaints Log	Policy reflects the Code

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	Central Complaints Log	YMCA Cheltenham adopts the Equality Act 2010 in entirety in all areas of service provision. There have been no reasonable adjustments requested this year. Staff are available to support residents with communication barriers & where necessary utilise language line to assist.
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	Central Complaints Log	There have been no refusals.
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	Central Complaints Log	Full records are maintained as required.
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	Cheltenham YMCA Complaints Policy	Within current Complaints Policy reference made to resolving and providing feedback at any stage of the process.

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	YMCA Cheltenham License Agreement YMCA Cheltenham House Rules InForm Housing Management System	Licence agreement and House Policy Rules stipulate expectations of residents and how unacceptable behaviour will be managed. Housing Management system enables staff to record any action that is taken, and upload evidence/files where required.
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	YMCA Cheltenham Policy Suite	YMCA Cheltenham adopts the Equality Act 2010 in entirety in all areas of service provision.

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	Central Complaints Log	Complaint responses demonstrate the outcomes/apologies given and the varying time frames. The organisation's central database for logging complaints demonstrates the spread & speed at which complaints are progressed, resolved and closed although this will be updated as per adjacent explanation/commentary.
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	Cheltenham YMCA Complaints Policy	Policy meets regulatory expectation.
6.3	Landlords must issue a full response to stage 1 complaints <u>within 10 working days</u> of the complaint being acknowledged.	YES	Cheltenham YMCA Complaints Policy	Policy meets regulatory expectation.
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,	YES	Central Complaints Log	Some complaints have needed longer periods of time to progress & resolve. Where this has happened mutual agreement between parties has been agreed.

	and the reason(s) must be clearly explained to the resident.			Policy has been updated to reflect the ten working day window.
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	Cheltenham YMCA Complaints Policy	Policy reflects the Code.
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	Central Complaints Log	Responses meet requirements of the Code.
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	Central Complaints Log	Best practice standard is now established and will be followed going forward.
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	Cheltenham YMCA Complaints Policy	Wording reflects the requirement of the Code.

6.9	Landlords must confirm the following in writing to the resident at the completion of stage 1 in clear, plain language: a. the complaint stage; b. the complaint definition; c. the decision on the complaint; d. the reasons for any decisions made; e. the details of any remedy offered to put things right; f. details of any outstanding actions; and g. details of how to escalate the matter to stage 2 if the individual is not satisfied with the response.	YES	Central Complaints Log	Best practice standard now established and will be followed going forward.
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STAGE 2

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary/explanation
6.10	If all or part of the complaint is not resolved to the resident's satisfaction at stage 1, it must be progressed to stage 2 of the landlord's procedure. Stage 2 is the landlord's final response.	YES	Cheltenham YMCA Complaints Policy	Policy reflects the Code.
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	Cheltenham YMCA Complaints Policy	Policy reflects the Code.
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	Cheltenham YMCA Complaints Policy	Our current policy framework does not require explanations in order to escalate, and all complaints have been treated this way thus far.
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	YES	Cheltenham YMCA Complaints Policy	Policy reflects the code.
6.14	Landlords must issue a final response to the stage 2 within 20 working days of the complaint being acknowledged.	YES	Cheltenham YMCA Complaints Policy	Policy reflects the code.
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,	YES	Cheltenham YMCA Complaints Policy	Policy reflects the Code.

	and the reason(s) must be clearly explained to the resident.			
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	Cheltenham YMCA Complaints Policy	Policy reflects the Code.
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	Central Complaints Log	The required information is given as a matter of routine.
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	Central Complaints Log	Best practice standard is now established and will be followed going forward.
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; e. the details of any remedy offered to put things right; f. details of any outstanding actions; and	YES	Cheltenham YMCA Complaints Policy	Policy reflects the Code.

	g. details of how to escalate them 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	Trustee Statement & Action Plan	CEO now reviews the complaint with the lead investigating officer at Stage 2

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	Cheltenham YMCA Complaints Policy	Policy reflects the Code.
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	YES	Cheltenham YMCA Complaints Policy	Policy reflects the Code.

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	Trustee Statement & Action Plan	Although remedies have resulted following the conclusion of complaints, this is not defined within the Policy. The policy has been updated to reflect the Code.
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	YES	Trustee Statement & Action Plan	The policy has been updated to properly reflect the Code.

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	Website	Report is updated and has been placed on the website Data collection and reporting systems are used to ensure compliance with the Code.
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	YES	Cheltenham YMCA Website	Information is available as required.

	relating to complaints. The governing body's response to the report must be published alongside this.			
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8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	YES	Cheltenham YMCA Complaints Policy	no restructure has taken place
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	YES	No request made.	
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	Cheltenham YMCA Complaints Policy	Policy meets regulatory expectation.

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	Management and Team Meeting records	Audit Management meetings to reflect on complaints & outcomes in order to exercise learning.
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	Cheltenham YMCA Complaints Policy. Central Complaints Log	Complaints are openly received, logged and used as a source of information to make positive changes where applicable. Our complaints central database makes reference to this when needed.
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	Cheltenham YMCA Complaints Policy. Central Complaints Log	A complaints central database ensures transparency and the desire to progress complaints . Virtual training for staff embeds a positive culture around complaint handling.
9.4	Landlords must appoint a suitably senior lead person as accountable for their complaint handling. This person must assess any themes or	YES	Cheltenham YMCA	Head of Housing, Policy and Performance Review

	trends to identify potential systemic issues, serious risks, or policies and procedures that require revision.		Complaints Policy.	
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	Policy & Governance Committee Records.	Policy & Governance Committee is the MRC. This committee will be responsible for this regulatory area.
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	Policy & Governance Committee Records.	This committee is responsible for this regulatory area.
9.7	As a minimum, the MRC and the governing body (or equivalent) must receive: a. regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance; b. regular reviews of issues and trends arising from complaint handling; c. regular updates on the outcomes of the Ombudsman's investigations and progress made in complying with orders related to severe maladministration findings; and d. annual complaints performance and service improvement report.	YES	Policy & Governance Committee Records.	This committee is responsible for this regulatory area.

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	Cheltenham YMCA Complaints Policy.	Noted within our Complaints Policy, which highlights a culture of openness and resolving complaints as and when they arise. Staff team meetings and new employee inductions highlight the need/requirement to understand the standards set within the policy doc and how we implement them on a day-to-day basis.
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