



HOS Complaint Handling Code Self-assessment – April 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 updated November 2025 SettleParadigm-Complaints-Policy.pdf settleparadigm-complaints-policy.pdf	The definition is included in our Complaints Policy.
1.3	A resident does not have to use the word 'complaint' for it to be treated as such. Whenever a resident expresses dissatisfaction landlords must give them the choice to make complaint. A complaint that is submitted via a third party or representative must be handled in line with the landlord's complaints policy.	Yes	Complaints Policy updated November 2025 SettleParadigm-Complaints-Policy.pdf settleparadigm-complaints-policy.pdf A report is used to identify instances where the word 'complaint' appears in customer interactions and cross checked on a weekly basis against logged complaints, ensuring all expressions of dissatisfaction are correctly recorded and investigated as	We have adopted this definition in our policy and procedure as well as on our website and within colleague training. As per the definition, when resident's raise dissatisfaction or when service requests are ongoing, staff are trained to offer our complaints process and pass the relevant details to the Customer Resolutions Team. Our Complaints Policy and supporting information on our website confirm complaints can be raised via a resident's representative or advocate. In the event a MP raises a complaint on behalf of a resident, we will contact the resident to advise it has been received. If

			complaints.	the resident has not already accessed our complaints process this offer will be made and consent will be sought to share the response with the MP.
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 updated November 2025 SettleParadigm-Complaints-Policy.pdf settleparadigm-complaints-policy.pdf	We have adopted this definition in our policy as well as on our website and within colleague training. Service requests are monitored and reviewed via our standard business performance reporting. The checking detailed in section 1.3 ensures all complaints are identified and logged.
1.5	A complaint must be raised when the resident expresses dissatisfaction with the response to their service request, even if the handling of the service request remains ongoing. Landlords must not stop their efforts to address the service request if the resident complains.	Yes	Complaints Policy updated November 2025 SettleParadigm-Complaints-Policy.pdf settleparadigm-complaints-policy.pdf	We will continue actioning the service request while the complaint is being investigated independently by the Customer Resolutions Team.
1.6	An expression of dissatisfaction with services made through a survey is not defined as a complaint, though wherever possible, the person completing the survey should be made aware of how they can pursue a complaint if they wish to. Where landlords ask for wider feedback about their services, they also must provide details of how residents can complain.	Yes	Complaints Policy updated November 2025 SettleParadigm-Complaints-Policy.pdf settleparadigm-complaints-policy.pdf Where technically possible, residents who respond to digital interaction surveys and express dissatisfaction, will receive an auto response signposting them to our complaints	Any expression of dissatisfaction with our service made through surveys will not be defined as a complaint however the third party appointed to undertake our ongoing perception surveys will inform residents of our complaints process if dissatisfaction is expressed and they will make us aware of it to follow up. Colleagues reviewing feedback via automated interaction surveys follow up with residents where dissatisfaction is expressed and make the resident aware of our complaints process.

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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	Complaint Policy updated November 2025 SettleParadigm-Complaints-Policy.pdf settleparadigm-complaints-policy.pdf	All complaints will be accepted unless there is a valid and clearly evidenced reason not to do so. We will always consider the individual circumstances of each case before deciding whether a complaint should be excluded. Any decision to exclude a complaint will be reviewed and approved by a member of the SettleParadigm leadership team. We will communicate any such decision to the resident in writing.
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. 	Yes	Complaint Policy updated November 2025 SettleParadigm-Complaints-Policy.pdf settleparadigm-complaints-policy.pdf Our quarterly complaint report issued to the Executive Board, Resident Experience Committee and Group Common Board will detail any complaints that have been refused.	Exclusions are detailed in our complaints policy.
2.3	Landlords must accept complaints referred	Yes	Complaint Policy	All complaints will be accepted unless

	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.		updated November 2025 SettleParadigm-Complaints-Policy.pdf settleparadigm-complaints-policy.pdf	where the issue occurred over 12 months ago, unless there is a justified reason for the delay i.e. ill health, health & safety issues, safeguarding issues or where a resident was unaware of a service failure until it had a detrimental impact. Discretion will be applied when necessary to ensure residents are not unfairly excluded from our complaint process.
2.4	If a landlord decides not to accept a complaint, an explanation must be provided to the resident setting out the reasons why the matter is not suitable for the complaints process and the right to take that decision to the Ombudsman. If the Ombudsman does not agree that the exclusion has been fairly applied, the Ombudsman may tell the landlord to take on the complaint.	Yes	Complaints Policy updated November 2025 SettleParadigm-Complaints-Policy.pdf settleparadigm-complaints-policy.pdf	No complaint will be unreasonably refused to be escalated through all stages of our complaints process. Where the Customer Resolutions Team, in liaison with a senior manager, decides it is not appropriate to escalate a complaint, a full explanation will be given to the resident. At this point, it will be made clear that the response is a full and final response, and the resident will be provided with information on accessing the Housing Ombudsman Service.
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Yes	Complaints Policy updated November 2025 SettleParadigm-Complaints-Policy.pdf settleparadigm-complaints-policy.pdf	Our complaint process will be objective in its approach including understanding the resident's individual circumstances and identifying timely and appropriate resolutions to the issues raised. Residents and/or their representative will be given the opportunity to outline the reasons for their complaint, the impact it has and the outcome they are seeking to

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Section 3: Accessibility and Awareness

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
3.1	Landlords must make it easy for residents to complain by providing different channels through which they can make a complaint. Landlords must consider their duties under the Equality Act 2010 and anticipate the needs and reasonable adjustments of residents who may need to access the complaints process.	Yes	Complaints Policy updated November 2025 SettleParadigm-Complaints-Policy.pdf settleparadigm-complaints-policy.pdf Make a complaint or compliment - Paradigm Housing Make a complaint - Settle	A variety of methods are available for residents and/or their representative to complain, which are easy to use and accessible. They include, over the telephone, face to face with a colleague or a contractor working on our behalf, in writing, email and via our customer portal or websites which includes an online form. Hard copies of our complaint form can be downloaded from our website or posted on request.
3.2	Residents must be able to raise their complaints in any way and with any member of staff. All staff must be aware of the complaints process and be able to pass details of the complaint to the appropriate person within the landlord.	Yes	Complaints Policy updated November 2025 SettleParadigm-Complaints-Policy.pdf settleparadigm-complaints-policy.pdf When relevant, any training delivered to colleagues will be reported in the quarterly complaint report.	We have an ongoing internal training and awareness campaigns to ensure colleagues understand our complaints process. Colleagues are trained to discuss matters with residents and to distinguish between a service request and dissatisfaction about the service they have received and offering the complaints process to customers who express concerns or dissatisfaction with our service.
3.3	High volumes of complaints must not be seen as a negative, as they can be indicative of a well-publicised and accessible	Yes	Complaints Policy updated November 2025 SettleParadigm-	We actively promote a positive complaints culture where feedback is welcomed and used to drive learning and continuous

	complaints process. Low complaint volumes are potentially a sign that residents are unable to complain.		Complaints-Policy.pdf settleparadigm-complaints-policy.pdf Documentation from the regular meetings held with service areas to track complaint themes, learnings and improvement actions.	improvement in our services. We closely monitor and report on complaint volumes to ensure we are appropriately resourced to investigate concerns effectively and within required timeframes. The learning we gain from complaints is used to drive service improvements, and we share these outcomes with our residents, highlighting where changes have been made because of their feedback.
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	Complaint Policy updated November 2025 SettleParadigm-Complaints-Policy.pdf settleparadigm-complaints-policy.pdf Make a complaint or compliment - Paradigm Housing Make a complaint - Settle	Our policy is published on our websites, which has tools to support accessibility and can also be provided in a different formats if needed. The policy outlines our two-stage process. Additional supporting information is also published on our websites.
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	Complaint Policy updated November 2025 SettleParadigm-Complaints-Policy.pdf settleparadigm-complaints-policy.pdf	The policy is published on our website. We inform our resident's on how to raise a complaint and access the Housing Ombudsman Service through our website, leaflets, newsletters and all complaint responses.
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	Complaint Policy updated November 2025 SettleParadigm-Complaints-Policy.pdf settleparadigm-complaints-policy.pdf	We're happy for residents to have a family member, friend, or representative support them with their complaint. We will always check whether someone is supporting them and will handle their information

				properly and in line with data protection rules.
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	Complaint Policy updated November 2025 SettleParadigm-Complaints-Policy.pdf settleparadigm-complaints-policy.pdf	Our Complaints Policy, our complaints leaflet, website and template letters used throughout our complaints process include information about the HOS and their contact details.

Section 4: Complaint Handling Staff

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
4.1	Landlords must have a person or team assigned to take responsibility for complaint handling, including liaison with the Ombudsman and ensuring complaints are reported to the governing body (or equivalent). This Code will refer to that person or team as the 'complaints officer'. This role may be in addition to other duties.	Yes	Complaints Policy updated November 2025 SettleParadigm-Complaints-Policy.pdf settleparadigm-complaints-policy.pdf Organisation charts and job descriptions	The Customer Resolutions Team are dedicated to investigating and responding to complaints and are independent of the service areas being complained about. The team will respond in line with the complaint handling code and our policy and procedures. The Executive Director – Customer Service is responsible for oversight and reporting to the Board.
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	Complaints Policy updated November 2025 SettleParadigm-Complaints-Policy.pdf settleparadigm-complaints-policy.pdf	The independent, centralised, Customer Resolutions Team, have access to staff at all levels to ensure complaints are resolved fairly and promptly and offer remedies that are in line with our Remedies and Compensation policy

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	Complaints Policy updated November 2025 SettleParadigm-Complaints-Policy.pdf settleparadigm-complaints-policy.pdf When relevant, any training delivered to colleagues will be reported in the quarterly complaint report.	We are committed to treating complaints as a core part of our service, ensuring they are handled promptly, fairly, and by trained staff. We use the learning from complaints to strengthen our services and prevent issues from recurring.

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	Complaint Policy updated November 2025 SettleParadigm-Complaints-Policy.pdf settleparadigm-complaints-policy.pdf	Our complaint policy and approach to complaints are based on a culture of putting things right, delivering fair outcomes, and learning when things go wrong. Just one complaint policy exists, and customers will not be treated differently should they complain.
5.2	The early and local resolution of issues between landlords and residents is key to effective complaint handling. It is not appropriate to have extra named stages	Yes	Complaint Policy updated November 2025 SettleParadigm-Complaints-Policy.pdf	We have a two stage complaint process

	(such as 'stage 0' or 'informal complaint') as this causes unnecessary confusion.		settleparadigm-complaints-policy.pdf	
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	Complaint Policy updated November 2025 SettleParadigm-Complaints-Policy.pdf settleparadigm-complaints-policy.pdf	We have a two stage complaint 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 complaint processes.	Yes	Complaint Policy updated November 2025 SettleParadigm-Complaints-Policy.pdf settleparadigm-complaints-policy.pdf	Complaints relating to third parties, such as contractors acting on our behalf, are investigated by the internal Customer Resolutions Team and managed in line with our complaints policy and procedure.
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Yes	Complaint Policy updated November 2025 SettleParadigm-Complaints-Policy.pdf settleparadigm-complaints-policy.pdf	Our complaints process is managed by a dedicated in-house team, even when a third party contractor is involved
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	Complaint Policy updated November 2025 SettleParadigm-Complaints-Policy.pdf settleparadigm-complaints-policy.pdf All complaint responses undergo a peer or senior level quality check before being issued and will	We will acknowledge a complaint within 5 working days of it being received in the business and we will seek to contact the resident to gain clarification on the reason for the complaint and the outcome they are hoping for, – we will set out our understanding of this in our written acknowledgement letter and complaint response.

			ensure these elements are included. In addition, the Customer Resolutions Manager carries out a monthly quality assurance review of a sample of responses to ensure consistency, accuracy, and compliance with all elements of the Complaint Handling 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	<p>Complaint Policy updated November 2025 SettleParadigm-Complaints-Policy.pdf settleparadigm-complaints-policy.pdf</p> <p>All complaint responses undergo a peer or senior-level quality check before being issued and will ensure this is included. In addition, the Customer Resolutions Manager carries out a monthly quality assurance review of a sample of responses to ensure consistency, accuracy, and compliance with all elements of the Complaint Handling Code.</p>	Our complaint acknowledgement letter outlines the scope of the complaint and what aspects we are responsible for. Any aspects we are responsible for will also be discussed and clarified in our complaint response.
5.8	<p>At each stage of the complaints process, complaint handlers must:</p> <ul style="list-style-type: none"> deal with complaints on their merits, act 	Yes	<p>Complaint Policy updated November 2025 SettleParadigm-</p>	The Customer Resolutions Team are trained in effective complaint handling and act independently and impartially. We are

	<p>independently, and have an open mind,</p> <ul style="list-style-type: none"> • give the resident a fair chance to set out their position. • take measures to address any actual or perceived conflict of interest; and • consider all relevant information and evidence carefully. 		<p>Complaints-Policy.pdf settleparadigm-complaints-policy.pdf</p> <p>All complaint responses undergo a peer or senior-level quality check before being issued and will ensure this is included. In addition, the Customer Resolutions Manager carries out a monthly quality assurance review of a sample of responses to ensure consistency, accuracy, and compliance with all elements of the Complaint Handling Code.</p>	<p>focused on putting things right, delivering fair outcomes and learning from when things go wrong.</p> <p>The investigating officer will have no previous involvement in the case and will conduct an independent, unbiased investigation. Residents are given opportunities to outline their complaint at various stages - from initial request, and at any point during the complaint investigation.</p> <p>If there is any conflict of interest, the complaint will be re-allocated to a different complaint officer.</p>
5.9	<p>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.</p>	Yes	<p>Complaint Policy updated November 2025 SettleParadigm-Complaints-Policy.pdf settleparadigm-complaints-policy.pdf</p>	<p>If for any reason the complaint cannot be responded within timescales the resident will be informed of this and timescales for updating the resident will be agreed and the HOS contact details will be provided.</p> <p>Extensions are authorised by a senior manager.</p>
5.10	<p>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.</p>	Yes	<p>Complaint Policy updated November 2025 SettleParadigm-Complaints-Policy.pdf settleparadigm-complaints-policy.pdf</p> <p>All complaint responses undergo a peer or senior level quality check before</p>	<p>Reasonable adjustments in accordance with the Equality Act 2010 will be made where appropriate and recorded on our systems and reviewed accordingly.</p> <p>We keep a record of all disclosed disabilities on our housing management system.</p>

			being issued and will ensure this is included. In addition, the Customer Resolutions Manager carries out a monthly quality assurance review of a sample of responses to ensure consistency, accuracy, and compliance with all elements of the Complaint Handling Code.	
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	<p>Complaint Policy updated November 2025 SettleParadigm-Complaints-Policy.pdf settleparadigm-complaints-policy.pdf</p> <p>All complaint responses undergo a peer or senior-level quality check before being issued and will ensure this is included. In addition, the Customer Resolutions Manager carries out a monthly quality assurance review of a sample of responses to ensure consistency, accuracy, and compliance with all elements of the Complaint Handling Code.</p>	Complaints will not be refused unless there is a valid reason and we will fully comply with section 2 of the code. The resident will receive written communication outlining the reason for refusal and will be provided with information for the Housing Ombudsman Service.
5.12	A full record must be kept of the complaint,	Yes	System generated reports	All complaints are recorded on our system

	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.		and correspondence records on our system	which captures the stage, dates received, logged and resolved and all correspondence relating to the complaint, outcome, actions and learnings.
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	<p>Complaint Policy updated November 2025 SettleParadigm-Complaints-Policy.pdf settleparadigm-complaints-policy.pdf</p> <p>All complaint responses undergo a peer or senior-level quality check before being issued and will ensure this is included. In addition, the Customer Resolutions Manager carries out a monthly quality assurance review of a sample of responses to ensure consistency, accuracy, and compliance with all elements of the Complaint Handling Code.</p>	We will always aim to resolve a complaint as early as possible and appropriate remedies are available at both stages of our complaint's procedure, in line with our Remedies and Compensation Policy. Compensation and remedies policy - Paradigm Housing
5.14	Landlords must have policies and procedures in place for managing unacceptable behaviour from residents and/or their representatives. Landlords must be able to evidence reasons for putting any restrictions in place and must keep restrictions under regular review.	Yes	<p>Managing-Unacceptable-Behaviour-Sept-2024.pdf - Paradigm</p> <p>Unacceptable Behaviour Policy - Settle</p>	The Unacceptable Behaviour Policy outlines how this type of behaviour will be addressed. This also includes review periods.

5.15	Any restrictions placed on contact due to unacceptable behaviour must be proportionate and demonstrate regard for the provisions of the Equality Act (EA) 2010.	Yes		<p>We take a resident and colleague-centred approach and carry out a proportionality assessment before any restrictions are put in place. We will always explain why the restriction has been put in place and when it will be reviewed.</p> <p>The Unacceptable Behaviour Policy takes the Equality Act 2021 into consideration.</p>
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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	<p>Complaint Policy updated November 2025</p> <p>SettleParadigm-Complaints-Policy.pdf</p> <p>settleparadigm-complaints-policy.pdf</p> <p>Our quarterly complaint report issued to the Executive Board, Resident Experience Committee and Group Common Board will include percentage of complaints</p>	<p>The Customer Resolutions Team triage all complaints as soon as they are received and if matters can be resolved quickly, they will do this. Any next steps are included in our responses, and our response is issued as soon as the answer is known and not delayed until all the actions have been completed.</p>

			responded in target.	
6.2	Complaints must be acknowledged, defined and logged at stage 1 of the complaint procedure within five working days of the complaint being received.	Yes	Complaint Policy updated November 2025 SettleParadigm-Complaints-Policy.pdf settleparadigm-complaints-policy.pdf	Our complaints policy, website and complaints leaflet explain that we will acknowledge a complaint in writing, including our understanding of the complaint, within 5 working days of being received in the business.
6.3	Landlords must issue a full response to stage 1 complaints within 10 working days of the complaint being acknowledged.	Yes	Complaint Policy updated November 2025 SettleParadigm-Complaints-Policy.pdf settleparadigm-complaints-policy.pdf	All stage one complaints will be responded to within 10 working days. This is explained in our complaints policy, on our website and in our complaint leaflet
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	Complaint Policy updated November 2025 SettleParadigm-Complaints-Policy.pdf settleparadigm-complaints-policy.pdf	Any extensions will be discussed with and authorised by a more senior manager. This will be communicated to the resident and timescales for updating the resident will be agreed.
6.5	When an organisation informs a resident about an extension to these timescales, they must be provided with the contact	Yes	Complaint Policy updated November 2025	Where we agree an extension to the timeframe, we will write to the resident and provide contact details of the Housing Ombudsman Service.

	details of the Ombudsman.		SettleParadigm-Complaints-Policy.pdf settleparadigm-complaints-policy.pdf	
			<p>All complaint responses undergo a peer or senior level quality check before being issued and will ensure this is included. In addition, the Customer Resolutions Manager carries out a monthly quality assurance review of a sample of responses to ensure consistency, accuracy, and compliance with all elements of the Complaint Handling Code.</p>	
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	<p>Complaint Policy updated November 2025</p> SettleParadigm-Complaints-Policy.pdf settleparadigm-complaints-	We will provide a written response as soon as the complaint has been fully investigated and will not wait until the resolution actions are completed. Where we agree follow up actions, such as repairs, we will outline the commitments and the dates we expect to complete them by in our response.

			policy.pdf	
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	All complaint responses undergo a peer or senior-level quality check before being issued and will ensure this is included. In addition, the Customer Resolutions Manager carries out a monthly quality assurance review of a sample of responses to ensure consistency, accuracy, and compliance with all elements of the Complaint Handling Code.	The Customer Resolutions Team are trained on effective complaint handling which includes what aspects to consider when investigating and responding to complaints. Where applicable, reference will be made to relevant policies, laws and good practice.
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		Where residents raise additional complaints during an ongoing investigation and the response has not yet been issued, these additional matters will be incorporated into the existing complaint. Where the response has been issued and the new issues are unrelated to the issues already being investigated or would unreasonably delay the response, the new issue will be logged as a new complaint.
6.9	Landlords must confirm the following in writing to the resident at the completion of stage 1 in clear, plain language: <ul style="list-style-type: none"> 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		Letter templates are in place to support the Customer Resolutions Team and includes all the details outlined in points a-g, including details of how to escalate if the resident remains dissatisfied. Wherever possible, we will always aim to discuss the outcome of the complaint with the resident before issuing a written response.

Stage 2

Code provision	Code requirement	Comply: Yes	Evidence	Commentary / explanation
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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	Complaint Policy updated November 2025 SettleParadigm-Complaints-Policy.pdf settleparadigm-complaints-policy.pdf	If all or part of the complaint is not resolved to the resident's satisfaction, the complaint will be escalated to stage 2, the final stage. The resident does not need to explain their reason for requesting a stage 2 but we will make every effort to understand their concerns and resolve them promptly and fairly.
6.11	Requests for stage 2 must be acknowledged, defined and logged at stage 2 of the complaint's procedure within five working days of the escalation request being received.	Yes	Complaint Policy updated November 2025 SettleParadigm-Complaints-Policy.pdf settleparadigm-complaints-policy.pdf	All complaints will be logged within 5 working days of being received. This is explained in our complaints policy, on our website and on our complaint leaflet.
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	All complaint responses undergo a peer or senior-level quality check before being issued and will ensure this is included. In addition, the Customer Resolutions Manager carries out a monthly quality assurance review of a sample of responses to ensure	It is always helpful to have any additional information a resident may want to share to help us resolve a complaint and put things right, however residents are not required to explain their reasons for escalation.

			consistency, accuracy, and compliance with all elements of the Complaint Handling Code.	
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 Policy updated November 2025 SettleParadigm-Complaints-Policy.pdf settleparadigm-complaints-policy.pdf	Stage two complaints will be investigated and responded to by a more senior member of staff than the officer who dealt with it at stage 1.
6.14	Landlords must issue a final response to the stage 2 within 20 working days of the complaint being acknowledged.	Yes	Complaint Policy updated November 2025 SettleParadigm-Complaints-Policy.pdf settleparadigm-complaints-policy.pdf Our quarterly complaint report issued to the Executive Board, Resident Experience Committee and Group Common Board will include %	Stage two responses will be issued within 20 working days. This is explained in our complaints policy, on our website and on our complaint leaflet.

			complaints responded 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	Complaint Policy updated November 2025 SettleParadigm-Complaints-Policy.pdf settleparadigm-complaints-policy.pdf	Any extensions will be authorised by a senior colleague. This will be communicated to the resident and timescales for updating the resident will be agreed.
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	Complaint Policy updated November 2025 SettleParadigm-Complaints-Policy.pdf settleparadigm-complaints-policy.pdf All complaint responses undergo a peer or senior-level quality check before being issued and will ensure this is included. In addition, the Customer Resolutions Manager carries out a monthly quality	Where extensions are needed and agreed with the resident, this will be confirmed in writing and they will be provided with the Housing Ombudsman contact details.

			assurance review of a sample of responses to ensure consistency, accuracy, and compliance with all elements of the Complaint Handling 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	Complaint Policy updated November 2025 SettleParadigm-Complaints-Policy.pdf settleparadigm-complaints-policy.pdf	We will provide a written response as soon as the complaint has been fully investigated and will not wait until the resolution actions are completed. Where we agree follow up actions, such as repairs, we will outline the commitments and the dates we expect to complete them by in our response.
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	All complaint responses undergo a peer or senior-level quality check before being issued and will ensure this is included. In addition, the Customer Resolutions Manager carries out a monthly quality assurance review of a sample of responses to ensure consistency,	The Customer Resolutions Team are trained on effective complaint handling which includes what aspects to consider when investigating and responding to complaints. Where applicable reference will be made to relevant policies, laws and good practice.
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 g. details of how to escalate the	Yes		Letter templates are in place to support the Customer Resolutions Team and includes all the details outlined in points a-g, including details of how to escalate to the Housing Ombudsman if the resident remains dissatisfied. Wherever possible, we will always aim to discuss the outcome of the complaint with the resident before issuing a written response.

	matter to the Ombudsman Service if the individual remains dissatisfied.		accuracy, and compliance with all elements of the Complaint Handling Code.	
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 Policy updated November 2025 SettleParadigm-Complaints-Policy.pdf settleparadigm-complaints-policy.pdf	All stage 2 complaints are investigated in collaboration with senior managers from the service areas involved and are reviewed by a more senior member of the Customer Resolutions Team or Leadership Team before being sent.

Section 7: Putting things right

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
7.1	Where something has gone wrong a landlord must acknowledge this and set out the actions it has already taken, or intends to take, to put things right. These can include: <ul style="list-style-type: none"> • Apologising; • Acknowledging where things have gone wrong; • Providing an explanation, assistance or reasons; • Taking action if there has been delay; • Reconsidering or changing a 	Yes	Complaint Policy updated November 2025 SettleParadigm-Complaints-Policy.pdf settleparadigm-complaints-policy.pdf All complaint responses undergo	We aim to put things right, deliver a fair outcome and learn from when things go wrong and all elements of this requirement will be considered and included where appropriate.

	<p>decision;</p> <ul style="list-style-type: none"> • Amending a record or adding a correction or addendum; • Providing a financial remedy; • Changing policies, procedures or practices. 		<p>a peer or senior-level quality check before being issued and will ensure this is included. In addition, the Customer Resolutions Manager carries out a monthly quality assurance review of a sample of responses to ensure consistency, accuracy, and compliance with all elements of the Complaint Handling Code.</p>	
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Yes	<p>Remedies and Compensation Policy and Guidance</p> <p>Compensation and remedies policy - Paradigm Housing</p>	Any remedies will be made in line with our Remedies and Compensation guidance, which has been written in line with the guidance set out by the Housing Ombudsman Service.
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	<p>Complaint Policy updated November 2025</p> <p>SettleParadigm-Complaints-Policy.pdf</p> <p>settleparadigm-complaints-policy.pdf</p>	Complaint responses will outline the remedy offered. All actions are tracked and logged by the Customer Resolutions Team to resolution.
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes		The Remedies and Compensation policy and colleague guidance is written in line with the Housing Ombudsman. guidance.

Section 8: Putting things right

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> <ul style="list-style-type: none"> 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	Our Annual Complaints report and self-assessment will be published on our website by 30 June each year.	Our Annual Complaints Performance and Service Improvement report will be issued to the Executive Board, Resident Experience Committee and Common Board and will include the details outlined in this requirement.
8.2	<p>The annual complaints performance and service improvement report must be reported to the landlord's governing body (or equivalent) and published on the on the section of its website relating to complaints. The governing body's response to the report</p>	Yes		Annual complaints performance and service improvement report will be submitted to Executive Board, Resident Experience Committee and Board for approval, including a response from the Board, before being published on the website.

	must be published alongside this.			
8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	Yes	Self-assessment	The merger of Settle and Paradigm on 26 Oct 2025 has triggered this updated self assessment.
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	Yes	Self-assessment	If required, a review and update of the self-assessment will be completed as per the instructions of the Ombudsman. Learnings will be taken from this and shared with the business and the board.
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		The Ombudsman will be informed in the event we are unable to comply with the Code. This information will also be shared with affected resident's and published on our website and will include expected timescales when service will return to normal.

Section 9: Scrutiny & oversight: continuous learning and improvement

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
9.1	Landlords must look beyond the circumstances of the individual complaint and consider whether service improvements can be made as a result of any learning from the complaint.	Yes	Complaint Policy updated November 2025 SettleParadigm-Complaints-Policy.pdf	Each complaint is assessed and consideration is given to wider service improvements and learnings that can be implemented. We also review the Spotlight Reports issued by the Ombudsman to further enhance our learnings.
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	settleparadigm-complaints-policy.pdf	Regular complaint learning meetings are held with service area managers to review themes, learnings and service improvement opportunities. These are tracked and will be included in the regular reporting provided to the Member Responsible for Complaints and governing bodies.
9.3	Accountability and transparency are also integral to a positive complaint handling culture. Landlords must report back on	Yes	Documentation from the regular meetings held with service areas to track complaint themes, learnings and improvement actions.	Complaint themes and learnings will be included in regular reporting to all stakeholders, including our Joint Resident

	wider learning and improvements from complaints to stakeholders, such as residents' panels, staff and relevant committees.		Our quarterly complaint report issued to the Executive Board, Resident Experience Committee and Group Common Board will detail learning from complaints, as will the annual complaints performance and service improvement report.	Steering Committee. Improvements implemented as a result of complaints are also periodically included in our resident newsletter and in our Annual Complaint Performance and Service Improvement report.
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	Executive Customer job description	The Executive Director of Customer is the senior lead accountable for complaint handling at SettleParadigm.
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	Our quarterly complaint report issued to the Executive Board, Resident Experience Committee and Group Common Board will detail learning from complaints, as will the annual complaints report	The appointed Member Responsible for Complaints (MRC) is chair of Resident Experience Committee, a subsidiary of the Common Board.
9.6	The MRC will be responsible for ensuring the governing body receives regular information on complaints that provides	Yes	Our MRC will receive regular complaint	We report complaints to the Resident Experience Committee and Group Common Board quarterly. The member responsible for

	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.		reporting via our quarterly complaint report issued to the Executive Board, Resident Experience Committee and Group Common Board will detail learning from complaints, as will the annual complaints performance and service improvement report.	complaints meets regularly with the senior lead for complaint handling.
9.7	As a minimum, the MRC and the governing body (or equivalent) must receive: <ul style="list-style-type: none"> 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	Our quarterly complaint report issued to the Executive Board, Resident Experience Committee and Group Common Board includes the information outlined in points a-d.	The Chair of the Resident Experience Committee (a member of the Group Common Board) will receive regular reporting of complaint volumes, outcomes, performance and trends. They will also receive updates on HOS investigations as well as the 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: <ul style="list-style-type: none"> a) have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and 	Yes	Complaint Policy updated November 2025 SettleParadigm-Complaints-Policy.pdf settleparadigm-complaints-policy.pdf	We have adopted an objective for all relevant colleagues at SettleParadigm to consistently deliver a brilliant resident-focused service by: <ul style="list-style-type: none"> • improving communication, • prompt resolution of issues raised • ensuring complaints are identified and passed to the Customer Resolutions

	<p>departments</p> <p>b) take collective responsibility for any shortfalls identified through complaints, rather than blaming others; and</p> <p>c) act within the professional standards for engaging with complaints as set by any relevant professional body.</p>		<p>Customer Resolution Team and other relevant colleague job descriptions</p>	<p>Team-promptly</p> <ul style="list-style-type: none"> • taking responsibility for improvements based on feedback.
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