

Learning from: Duty to Monitor



**Taking key lessons from our work
monitoring compliance with the Complaint
Handling Code**

Published July 2026

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Introduction

The introduction of the Complaint Handling Code was a landmark change for social housing residents, giving them stronger rights and clearer routes to resolve complaints.

Prior to the Code, a postcode lottery existed in housing complaints across England. This is not to say there was poor practice everywhere. But typically access and awareness was haphazard. Upskilling colleagues, improving systems and resources for complaint handlers did not appear to be a priority for most landlords. Procedures and models varied, and reporting to executives and boards was more limited. Learning from complaints was unstructured.

The Code changed this landscape. It sets universal standards. It defines what a complaint is, the process and timescale for handling, and encourages a positive complaints culture and behaviour based on fairness. It increases governance oversight through the creation of the Member Responsible for Complaints role. Learning from complaints is supported through the creation of our Centre for Learning.

This Code was the product of discussion and engagement with both residents and landlords. Its effectiveness is reinforced through the data collection of the Tenants Satisfaction Measures (TSMs) and the in-depth assessments of consumer standards. This includes landlords demonstrating learning from complaints to the Regulator of Social Housing (RSH).

It also supports our legal duty to monitor the Code. We are now in the third year of monitoring. This report shares learning from the last 2 years. Our focus has been ensuring self-assessments are submitted and compliant and engaging with landlords who declare non-compliance. We have prioritised landlords who are subject to Further Investigations under our Scheme.

The outcome we have sought to drive is clarity, consistency, and convergence across the sector in landlord's complaint handling policies.

Self-assessment has been a vital tool for governing bodies. It should be more than a tick-box exercise and a moment for reflection, sharing, and improvement. It should

help governance and the Member Responsible for Complaints pinpoint where there is a disconnect between the aspirations of the complaints policy and what is happening in practice.

This report shares several lessons. It asks landlords to reflect on the appropriate complaints model for their organisation. The Code is largely principle-based, and several models would be compatible with it. But it is reasonable to conclude that a fully decentralised complaints model poses risks for landlords and a barrier to actioning learning.

Given complaints remain high and escalate to later stages, focus is needed on making the most of stage 2. The Code allows for double the time to handle, but too often the review is inadequate. Upskilling those handling stage 2 complaints, using the right information to make fair, non-defensive decisions and ensuring commitments are completed are important steps to make this part of the process more robust. Other areas for landlords to consider are exclusions to make sure these are fair and proportionate.

Ongoing transparency will help build trust with residents and confidence that making a complaint is worthwhile, as well as helping the sector learn from each other to the benefit of all.

There is room for improvement but, overall, complaint handling across social housing has transformed since the introduction of the Code. This reflects a commitment shown by most landlords to embedding a positive complaints culture.

Richard Blakeway

Housing Ombudsman

Overview

Before the Code was statutory, we knew many landlords recognised the importance and value of complaints. However, a sample review found that less than half of landlords had published both a complaints policy and self-assessment. It found limited evidence that complaint handling information was published consistently, or that learning from complaints, including findings from the Housing Ombudsman, was regularly shared with residents.

Our Duty to Monitor was established in 2024 to assess landlord compliance with the Complaint Handling Code ('the Code'). This is in line with the requirements of the Social Housing (Regulation) Act 2023.

Each year, member landlords are required to provide evidence of compliance through:

- a completed self-assessment
- a complaints policy
- an annual complaint handling and service improvement report
- a governing body statement providing assurance on the published documents.

Next, we built on this monitoring by reviewing individual landlord complaint policies and self-assessments provided to us through the annual submission.

This learning report shares insight from the last 2 years of annual submissions and complaint policy reviews. It highlights common themes and areas for improvement. It translates insights into practical learning to support Members Responsible for Complaints (MRCs), governing bodies, and complaint handling teams.

Findings show that while many landlords are engaging positively with the requirements of the Code, there remains inconsistency in how effectively these are reflected in both policy and practice.

Challenges arise where there is a disconnect between policy, operational delivery and the evidence provided through annual submissions. This limits the ability to demonstrate how complaint handling arrangements operate in practice.

The annual submission and complaints policy review should be viewed not only as compliance requirements, but as opportunity to test assurance, strengthen oversight, and improve service delivery.

The role of the MRC is central to this. Asking “*How do we know we are compliant, and what needs to improve?*” can strengthen scrutiny, improve transparency, and support a more consistent, evidence-led approach to complaint handling.

Ultimately, effective complaint handling depends not only on having the right policies in place, but on how consistently they are applied in practice. Landlords that embed learning from complaints and maintain clear accountability deliver fairer outcomes, drive service improvement, and build trust with residents.

Findings from annual submissions

Annual submissions provide valuable insight into how landlords are embedding the requirements of the Code.

Of the 1,541 submissions expected for Year 2, we have received 1,257 to date, representing an 81.6% submission rate. Of that 1,541 Year 2 data collection remains ongoing, with submissions continuing to be received within submission deadlines.

We engage with landlords and provide support for outstanding submissions. We will address issues where information is incomplete or further evidence is required to meet our minimum requirements.

Annual submissions:

- provide assurance to governing bodies that complaint handling processes are operating effectively
- support the MRC in overseeing performance, evidencing compliance and driving continuous improvement
- promote transparency, accountability and organisational learning through complaints
- build trust and confidence between landlords and residents through the publication of complaint handling information and performance
- help residents understand how to raise a complaint, what to expect, and how to access support or escalation through our service

Through engagement with landlords, we have seen a positive response to annual submissions. In some cases, where full compliance was not demonstrated through the self-assessment, landlords were transparent and set out a clear action plan and timescales to achieve compliance. This demonstrates a commitment to continuous improvement.

We have seen landlords referencing resident panels as a way of demonstrating change and assurance. This is a proactive approach and reflects openness in how landlords involve residents in shaping and scrutinising their complaints processes.

One landlord used its annual report to show how it had embedded resident-led scrutiny into its complaints approach and how it contacts dissatisfied residents to understand more about why they remained unhappy.

This included residents who had completed transactional surveys and those who had responded to the Tenant Satisfaction Measures survey.

This shows how landlords can use annual reporting to evidence resident involvement, provide assurance on fairness, and identify further opportunities for learning and service improvement.

We have seen examples of landlords using annual reports to include residents' perspectives. One landlord included commentary from its Chair of Customer Scrutiny. It described how a small group of customers use their lived experience to give residents a voice and help improve services.

The commentary noted the group's support for the Code and recognised the landlord's adoption of its processes to support compliance. It described how complaints, feedback, and resident satisfaction are reviewed collectively through the Customer Insight Group.

This brings together resident volunteers, operational managers and staff to understand the causes of satisfaction and dissatisfaction and ensure learning from residents' experiences.

What good looks like

Resident scrutiny panels can be used to provide assurance that complaint handling arrangements are operating fairly and effectively.

This includes engaging with residents who remain dissatisfied following complaints or customer surveys to better understand their experiences, identify barriers within the complaints process and inform service improvements.

Resident feedback can be used to review policies and practices, helping landlords improve transparency and strengthen arrangements for complaints involving third-party contractors.

Case study 1: Supporting a small co-operative landlord to achieve compliance

A small co-operative landlord managing 36 homes missed the annual self-assessment deadline. This case study shares what we learned from working with them to reach compliance.

What we found

The landlord missed the submission deadline. We issued reminder notices and made direct contact with the landlord to understand why. The landlord explained that recent organisational changes had caused delays and no one had clear responsibility for completing the submission.

The landlord provided its submission and supporting documents within an extended timeframe. However, our review identified areas of non-compliance: the annual complaints performance and service improvement report was incomplete.

The self-assessment did not clearly explain how residents without internet access could view documents.

What we did

We worked directly with the landlord to clarify requirements. We also identified further changes in personnel that had affected communication.

The landlord submitted revised documents within an agreed timeframe and achieved compliance. We did not need to issue a Complaint Handling Failure Notice (CHFNF)¹.

Impact

Our proportionate approach helped the landlord address gaps and aligned its

¹ **Complaint Handling Failure Notice (CHFNF):** A notice issued when a landlord fails to meet complaint handling requirements, such as annual submission obligations or the implementation of recommendations. It serves to notify landlords of non-compliance.

policies and reporting with the requirements of the Code. We avoided further action by offering targeted support early.

Learning

Smaller landlords may have limited capacity, especially during periods of change. Clear guidance, practical templates and flexible support can help landlords meet their obligations. Following this case, we developed additional resources to help smaller landlords with annual submissions and complaint policies.

Findings from complaints policy reviews

In the last 2 years, we have carried out 364 reviews of landlords' complaint policies submitted to us through annual submissions.

We check whether each complaints policy clearly sets out the key requirements residents should expect to find. The purpose of a review is to provide us with assurance that a policy is compliant with the Code.

This supports transparency for residents and makes sure the complaints procedure is clearly explained. Our aim is to review each member policy every 3 years.

If a complaints policy does not meet the requirements of the Code, we will make recommendations to assist the landlord to achieve compliance.

If a significant number of recommendations are made, or where we identify weakness in oversight of third-party arrangements, we engage directly with landlords to discuss our findings and monitor progress against agreed actions.

Our initial focus for policy reviews is landlords with high levels of maladministration in complaint handling, identified through our casework.

Initial findings show many landlords have updated their policies to reflect the Code, including:

- adopting the definition of a complaint, with minor adjustments to reflect operating arrangements
- aligning timescales for stage 1 and stage 2 responses
- improving awareness and access to the complaints process, including increased visibility, translation services, and wider access channels.

Reviews have identified common weaknesses in complaint policies, particularly in relation to:

- clearly defining the complaint at the acknowledgment stage
- setting out when a complaint may be extended and by how long
- offering escalation or recognising ongoing dissatisfaction with a service request as a complaint

- the application of exclusions, including how residents' behaviour is managed.

We made a total of 5,904 recommendations across the Code over a 2-year period. In year one, 2,164 recommendations were made across 114 landlords. In year 2, 3,740 recommendations were made across 250 landlords.

This includes partially and non-adopted recommendations from our first policy reviews. The findings show the highest volume of recommendations relate to complaint handling processes, followed by complaint recognition and accessibility, and complaint handling involving third parties.

Key themes and insights

Theme 1 – Complaint handling processes

Complaint handling processes account for around half of all findings in our policy reviews. Provisions of the Code that are most frequently not complied with include:

Code provision	Key extract from the Code
6.2	Complaints must be acknowledged, defined and logged at stage 1 of the complaint's procedure within 5 working days of the complaint being received.
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.
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.
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.
6.11	Requests for stage 2 must be acknowledged, defined, and logged at stage 2 of the complaint procedure within 5 working days of the escalation request being received.
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.
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.
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.

The main challenge is not whether landlords have a complaints process, but how effectively it operates day to day. Common issues include:

- failure to meet timescales
- managing stage 1 and stage 2 consistently
- providing clear outcome-focused responses
- demonstrating learning from complaints.

In practice, these issues can result in complaints not being acknowledged within required timescales (Code provisions 6.2 and 6.8), not clearly defining complaints (Code provision 1.2), or responses being delayed until actions are completed. This can lead to confusion for residents, delays in resolution, and low confidence in how complaints are managed or learned from.

What good looks like

Landlords should ensure complaint handling is consistent in practice across the organisation.

Complaints must be clearly defined at the outset; making sure residents understand what is being investigated and joint understanding on desired outcomes. There is clear ownership of complaints throughout each stage, with effective communication, timely decision-making and a focus on achieving fair outcomes for residents.

Effective landlords regularly review complaint handling performance through quality assurance activity, governance oversight and resident feedback. They use complaints as a source of insight, identifying trends, sharing learning across teams and implementing service improvements.

This provides assurance that complaint handling arrangements are operating as intended and supports a culture where complaints are viewed as an opportunity to learn and improve services.

We have plenty of free resources on complaint handling available through the Centre for Learning.

Theme 2 – Accessibility and definition of complaints

Accessibility and definition of complaints account for around 14% of findings. Key provisions include:

Code provision number	Key extract from the Code
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,</i>

	<i>its own staff, or those acting on its behalf, affecting a resident or group of residents.'</i>
1.3	A resident does not have to use the word 'complaint' for it to be treated as such. Whenever a resident expresses dissatisfaction landlords must give them the choice to make a complaint. A complaint that is submitted via a third party or representative must be handled in line with the landlord's complaints policy.
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.
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.

There are persistent issues at the start of the complaints process, including how complaints are defined, recognised and accepted.

We found that some landlords apply overly narrow definitions of a complaint, fail to capture all expressions of dissatisfaction, create barriers, or misunderstand service requests. This impacts a resident's accessibility to make a complaint.

We identified inconsistencies between self-assessments and supporting documents, reporting compliance not reflected in policies or procedures.

This creates contradictory information and limits the ability to demonstrate how complaint handling arrangements operate in practice.

Case study 2: Removing barriers to complaint escalation

A landlord's complaints policy did not make it clear that residents can escalate to stage 2 without giving a reason. This case study explains what we found and what changed as a result.

What we found

When we reviewed the landlord's complaints policy, we identified a gap. The policy did not clearly state that residents do not need to explain why they want to escalate to stage 2.

This created an unnecessary barrier. Residents, particularly those with vulnerabilities or additional support needs, may have felt they needed to justify their decision before escalating.

What we did

We contacted the landlord directly and explained the issue. We highlighted that the Code requires complaints policies to be clear, accessible, and free from barriers. We worked with the landlord to update the policy, so it accurately reflected resident's rights.

Impact

The landlord updated its complaints policy. Residents can now clearly see they do not need to give a reason to escalate their complaint to stage 2.

Learning

Complaints policies must clearly reflect resident's rights. Even small gaps in wording can discourage residents from pursuing complaints. Regularly reviewing policies can make sure barriers are removed.

What good looks like

Residents can easily raise concerns and have confidence that expressions of dissatisfaction will be recognised and acted upon. Complaint policies clearly distinguish between service requests and complaints, and staff are supported to apply these definitions consistently in practice.

Resident feedback, scrutiny, and quality assurance checks are used to test whether complaints are being correctly identified, recorded, and progressed, helping to remove barriers to the complaints process and ensuring residents can access it when needed.

Landlords can access [Centre for Learning resources](#) to support staff in recognising complaints, understanding accessibility requirements and applying the Code consistently.

Theme 3 – Managing third parties and end-to-end ownership

Complaint handling processes and managing third parties account for around 16% of findings from our policy reviews. Key provisions include:

Code provision number	Key extract from the Code
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.
5.3	A process with more than 2 stages is not acceptable under any circumstances as this will make the complaint process unduly long and delay access to the Ombudsman.
5.4	Where a landlord's complaint response is handled by a third party (for example a contractor or independent adjudicator) at any stage, it must form part of the 2 stage complaints process set out in this Code. Residents must not be expected to go through two complaints processes.

5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.
5.6	When a complaint is logged at stage 1 or escalated to stage 2, landlords must set out their understanding of the complaint and the outcomes the resident is seeking. The Code will refer to this as “the complaint definition”. If any aspect of the complaint is unclear, the resident must be asked for clarification.
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.
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.

Our recommendations highlight weaknesses in how landlords manage the complaint process end-to-end. In particular, where responsibility sits across multiple teams or involves third-party contractors and service providers.

We are seeing landlords inconsistently maintaining ownership of complaints where services are delivered by third parties. This can impact residents’ understanding around accessibility and ownership. This can leave complaints unanswered or not being involved in wider improvement measures between landlord and a third party.

Case study 3: Landlord oversight of Tenant Management Organisations

A landlord’s annual submission stated that several Tenant Management Organisations (TMOs) managed properties on its behalf.

However, the self-assessment did not identify these TMOs or explain how the landlord assured itself their complaint handling met the Code.

What we found

We reviewed the landlord's oversight arrangements and found significant gaps. One TMO operated under a complaints policy dated 1994 with no evidence of a review. The landlord could not provide details of its contractual arrangements with the TMO.

What we did

We contacted the landlord and shared our findings. The landlord acknowledged the gaps and committed to reviewing its TMO arrangements, updating its policies and publishing information.

Impact

The gaps in the self-assessment reduced transparency and prevented the landlord from demonstrating Code compliance across its third-party arrangements. This weakened accountability to residents and highlighted gaps in governance and oversight. Stronger internal scrutiny of the self-assessment process could have identified these issues sooner.

Learning

Landlords must actively oversee third-party complaint handling. This means regularly reviewing third-party policies and ensuring clear arrangements are in place. Without this, there is risk of residents being passed between landlords and contractors. Complaints lack clear ownership, responses become inconsistent and resolutions are delayed. This can reduce confidence in how complaints are managed.

What good looks like

Landlords must establish strong working relationships with third-party providers from the outset, rather than only engaging when a complaint arises.

This includes setting clear expectations on complaint handling and ensuring third parties understand the requirements of the Code. Landlords should maintain regular

oversight through contract management, performance monitoring and assurance activity.

Landlords retain full visibility of how complaints are handled on their behalf, regularly review third-party policies and practices. Use resident feedback to test whether arrangements are operating effectively in practice.

This ensures accountability remains with the landlord and provides a seamless and transparent complaints process.

Learning resources are available [through the Centre for Learning](#) to support member landlords in strengthening their oversight arrangements and ensuring that third-party providers understand the requirements of the Complaint Handling Code.

What our findings tell us

Our monitoring work over the last 2 years has identified 5 key areas where landlords can strengthen their approach to complaint handling. These go beyond meeting minimum requirements and focus on building a more consistent, evidence-led culture that involves residents.

1. Using the annual submission as an assurance tool

Treat the annual submission as an active assurance tool, not a one-off exercise. Use it to check that your self-assessment reflects what happens in practice and that published information is accurate and up to date.

2. Scrutiny and challenge

Make sure your governance arrangements give the right level of challenge and visibility over complaint handling performance. Use insight alongside data, to understand how you're performing and identify areas for improvement. The MRC has a key role here.

3. Consistency across the organisation

Apply a consistent approach to complaint handling across all teams, services and third-party providers. Make sure everyone understands what is expected of them and how to apply it in practice.

4. Ownership and accountability

Maintain clear ownership of complaints throughout the process, including where services are delivered by third parties. You are responsible for handling complaints in line with the Code and giving residents a consistent, end-to-end response.

5. Embedding learning and culture

Identify learning from complaints, act on it and share it with residents and teams across the organisation. View complaints as a valuable source of insight to inform service improvement and supports a positive organisational culture.

Conclusion

Good complaint handling builds trust with residents, strengthens governance, and improves services. That is a goal we all share.

Our first 2 years of monitoring show that compliance with the Code is strongest where complaint handling is embedded across the whole organisation. Effective governance, oversight, and a commitment to learning all make a difference.

Many landlords are demonstrating positive practice. But recurring themes in our reviews shows greater assurance is still needed in some areas. Policies, processes, and day-to-day delivery do not always align.

The annual submission and complaint policy review are more than compliance checks. Used well, they are honest tools for self-reflection.

They give landlords the opportunity to ask:

- does our policy reflect how we operate?
- can we show residents we are learning from complaints?
- are the right people held to account?

The MRC is central to answering these questions. Strong MRC oversight means complaints drive real improvement, not just process.

Common challenges remain. These include how complaints are recognised at the first point of contact, managing complaints involving third parties, and gaps between what self-assessments report and what evidence shows.

These issues are not new. They reflect something deeper than policy design. They show how well complaint handling is embedded, or not, across an organisation's culture and governance. Having the right policy in place is not enough. What matters is how consistently it is applied day to day, and whether landlords can demonstrate this.

A focus on transparency, ownership, consistency and learning from complaints will be essential as landlords continue to embed the Code.

Using complaints as a source of insight and acting on what they reveal, will help landlords build resident trust, improve services and deliver better outcomes for residents.

Centre for Learning

The learning highlighted throughout this report form part of our Centre for Learning. Landlords can sign up to access free CPD-accredited eLearning, microlearning, webinars, workshops and guidance developed from monitoring activity, casework and sector engagement.

Appendix

Practical learning tools to support landlords and MRCs

Role of the MRC

The MRC has 2 core functions:

- championing a positive complaint handling culture within the organisation
- overseeing complaints performance and providing assurance to the governing body

The MRC challenges data and information presented to the board, cabinet, or committee. They seek assurance from complaints and operational teams that complaints are being managed well, learning is happening, and residents are being heard.

Effective MRC oversight means complaint handling drives business improvement and deliver better services for residents.

Questions to support MRC's

Use these prompts to test, scrutinise, demonstrate compliance, and to support a positive learning culture. They can be applied both internally and as a sounding board with resident panels.

- How do we know our complaints policy fully meets the requirements of the Code?
- Where have we identified gaps between policy, procedure, and delivery?
- What does our performance data tell us, and what does it not tell us?
- What are the key trends, and what actions are we taking to address them?
- What are residents telling us about their experience of the complaints process?

- Can we evidence that learning from complaints has led to service improvement?
- How is learning from complaints shared across the organisation?

Questions to consider before publication of policy

Use these prompts to test whether the annual report, self-assessment and supporting evidence align with the Code.

- Does the published complaints policy reflect internal procedures and meet requirements of the Code?
- Is the self-assessment complete and clearly aligned to the Code?
- Does the supporting evidence demonstrate that policy requirements are being applied in practice?
- Are any areas of non-compliance clearly explained, with actions identified to address them?

The findings in this report show why learning and support must sit alongside compliance monitoring. Where we have found common misunderstandings with what should be submitted in an annual report.

We have shared these with our Centre for Learning team, who have translated these insights into [practical learning](#) for landlords, MRCs, governing bodies and complaint handling teams.