

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 Complaints Procedure	As per the Housing Ombudsman Complaint Handling Code (April 2024), the definition of a complaint has been explicitly defined within both Sanctuary’s Policy and Procedure documentation.
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 & Procedure	Residents do not have to use the word complaint for Sanctuary to log a formal complaint. Sanctuary can evidence through a review of complaints received and logged that customers do not need to use the word complaint for a formal complaint to be raised. Sanctuary process complaints received from third parties in line with Sanctuary'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	Yes	Complaints Policy & Procedure	Sanctuary recognise the difference between a service request and a complaint, Sanctuary's complaints policy outlines that initial service requests should be dealt with as Customer Contact and there is a Customer Contact Procedure in place. Regular communication takes place when required between Customer Service Centre and Complaints to ensure ongoing monitoring of the implementation of this.
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	Sanctuary recognise that a customer does not need to explicitly use the word complaint for an expression of dissatisfaction to be treated as such.
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	Customer Satisfaction feedback loop IFF Research requirements - Perception Measures	Where Sanctuary collate customer satisfaction survey information, customers who flag dissatisfaction are routed to operational teams who can make a judgement on the next steps, including contacting the customer to discuss any issues further. This is built into the contract for external satisfaction surveys, and internal tools are set up to deliver this.
Section 2 - Exclusions				
2.1	Landlords must accept a complaint unless there is a valid reason not to do so. If landlords decide not to accept a complaint they must be able to evidence their reasoning. Each complaint must be considered on its own merits	Yes	Complaints Policy Complaints Procedure	Sanctuary outline the circumstances where it would not accept a complaint. These circumstances are in line with the guidance set out in the Housing Ombudsman Complaint Handling Code (April 2024).
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	Complaints Policy	Sanctuary outline the circumstances where it would not accept a complaint. These circumstances are in line with the guidance set out in the Housing Ombudsman Complaint Handling Code (April 2024).
2.3	Landlords must accept complaints referred to them within 12 months of the issue occurring or the resident becoming aware of the issue, unless they are excluded on other grounds. Landlords must consider whether to apply discretion to accept complaints made outside this time limit where there are good reasons to do so.	Yes	Complaints Policy	Sanctuary outline the circumstances where it would not accept a complaint. These circumstances are in line with the guidance set out in the Housing Ombudsman Complaint Handling Code (April 2024).
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	Sanctuary outline the circumstances where it would not accept a complaint. These circumstances are in line with the guidance set out in the Housing Ombudsman Complaint Handling Code (April 2024).
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint	Yes	Complaints Policy	Sanctuary outline the circumstances where it would not accept a complaint and that a blanket approach is not to be applied, but that the individual circumstances must be considered. These circumstances are in line with the guidance set out in the Housing Ombudsman Complaint Handling Code (April 2024).
Section 3 - Accessibility & Awareness				
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 Equality and Diversity e-learning Complaints Guidance – Reasonable Adjustments	The complaints policy outlines that complaints are accepted in any format, including written, verbal and digitally. The Complaints Policy contains reference to the commitment to make reasonable adjustments when handling complaints. The Customer Relations team undertake equality and diversity training in line with the Sanctuary training framework.
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 Complaints Website	The complaints policy outlines that complaints are accepted in any format, including written via letters or email verbal, via the Customer Contact team and digitally via the customer website which, routes online complaint forms to the Complaints team.
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	Complaints Policy Complaints Website Complaints (MI) Management Information	The Complaints Policy makes clear the complaints process and that complaints are accepted in any format. In addition, FAQs positioned clearly within the Complaints Website detail how complaints can be made. Complaint volumes are also tracked via the Management Information, whereby increasing volumes can be evidenced and a steady stream of complaints for the teams to investigate. The number of complaints received per 1,000 homes is reviewed in Sanctuary's balanced business scorecard at each meeting of the Executive Committee and Group board.
3.4	Landlords must make their complaint policy available in a clear and accessible format for all residents. This will detail the two stage process, what will happen at each stage, and the timeframes for responding. The policy must also be published on the landlord’s website	Yes	Complaints Policy Complaints Website	The complaints policy is available on the Sanctuary website in the Complaints section. The policy includes the relevant information needed. The customer website has been built to high accessibility standards and the website has been accredited by the Plain English society. Where a copy of the policy is requested, this can be provided to residents and Sanctuary has tools and frameworks in place to adapt to customer communication preferences.
3.5	The policy must explain how the landlord will publicise details of the complaints policy, including information about the Ombudsman and this Code	Yes	Complaints Policy Complaints Website Website promotes Ombudsman Contact	Sanctuary's complaints policy is included and referenced across a range of different customer communications, including specific large-scale communications.
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	Complaints Policy	Sanctuary's complaints policy sets out that complaints can be handled by third parties/representatives given appropriate authority from the resident.
3.7	Landlords must provide residents with information on their right to access the Ombudsman service and how the individual can engage with the Ombudsman about their complaint	Yes	Complaints Policy Complaints Website	Sanctuary's complaints policy details that at all stages of the complaints process the customer is made aware of their right to contact the Housing Ombudsman regarding their concerns. In addition the Complaints Website also includes details of how to engage the Housing Ombudsman.
Section 4 - Complaint Handling Staff				
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 procedure Complaint Handler Role profiles	The Customer Relations team has overall responsibility for complaint management and would be those generally identified as ‘Complaint Handlers’. Specific staff across Housing and Supported Living also support in complaint handling and would play the complaint handling role. This is outlined in the Complaints Procedure.
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 procedure Complaint Handler Role profiles 121s Complaint Quality Checks	The Customer Relations team is an independent team with a specific remit and skill set around complaint handling. The role profile outlines this skill set clearly. The Customer Relations team also has access to staff at all levels with escalation processes in place to operational Director level. The team has undergone inclusion and diversity training and work within the organisations behaviour framework which include 'Integrity' behaviours linked to Sanctuary's values.
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 Quality Assurance Framework Colleague training records	Sanctuary's Complaints Policy fosters a learning-centric culture, further supported by the Root Cause Analysis Framework which, further enhances the importance of complaint handling and putting things right. Teams have access to all training materials and receive regular feedback as part of quality checks. All complaint handlers have completed comprehensive complaint training developed to ensure complaints are managed effectively and deliver quality outcomes, with accompanying Quality Assurance framework including formal accreditation. All frontline staff have completed complaints e-learning training, to ensure understanding of the importance of identifying and handling complaints. In 2025/2026, a robust Quality Assurance (QA) framework has been designed, implemented, and embedded, with structured assurance activity fully operational since August 2025. QA coverage and output have increased steadily, providing an increasing level of confidence that complaint outcomes are fair, consistent, and aligned to policy and regulatory expectations. The framework has matured rapidly and is underpinned by a risk based approach and validated handler competency. A cohort of customers have been accredited to provide QA on complaints, this group complete QA on complaints quarterly. Their feedback is invaluable as it provides direct insight into how complaints handling can be improved from a customer perspective.
Section 5 - The Complaint Handling Process				
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	Complaints Policy	Sanctuary has a single policy in place for dealing with complaints, which includes provisions detailed within the Housing Ombudsman 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	Yes	Complaints Policy	Sanctuary operate a two stage process only - explicitly outlined in the Complaints Policy, reflecting the Housing Ombudsman Code.
5.3	A process with more than two stages is not acceptable under any circumstances as this will make the complaint process unduly long and delay access to the Ombudsman	Yes	Complaints Policy	Sanctuary operate a two stage process only - explicitly outlined in the Complaints Policy, reflecting the Housing Ombudsman Code.

5.4	Where a landlord’s complaint response is handled by a third party (e.g. a contractor or independent adjudicator) at any stage, it must form part of the two stage complaints process set out in this Code. Residents must not be expected to go through two complaints processes	Yes	Complaints Policy	Sanctuary operate a two stage process only - explicitly outlined in the Complaints Policy, reflecting the Housing Ombudsman Code.
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code	Yes	Complaints Policy	All staff working with, or on behalf of Sanctuary must adhere to the Code as specified by the Policy.
5.6	When a complaint is logged at Stage 1 or escalated to Stage 2, landlords must set out their understanding of the complaint and the outcomes the resident is seeking. The Code will refer to this as “the complaint definition”. If any aspect of the complaint is unclear, the resident must be asked for clarification	Yes	Complaints Policy Complaints Procedure Escalation Forms	All complaints are logged within the Complaints system and or escalated using the internal escalation forms that document the reason for the complaint moving to Stage 2. As per the Code whereby it is no longer required to provide a reason for the escalation the team is encouraged to contact the customer to better understand the issue.
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	Complaints Policy Complaints Procedure Acknowledgement Examples	Sanctuary’s Policy and Procedure makes clear complaints must be acknowledged and that said acknowledgement letter/email clearly outlines the complaints details.
5.8	At each stage of the complaints process, complaint handlers must: a. deal with complaints on their merits, act independently, and have an open mind; b. give the resident a fair chance to set out their position; c. take measures to address any actual or perceived conflict of interest; and d. consider all relevant information and evidence carefully	Yes	Complaints Policy Complaints Procedure	Sanctuary’s Policy clearly specifies the complaints process and each stage of the complaint, including contact with the resident and what evidence needs to, and will be, considered.
5.9	Where a response to a complaint will fall outside the timescales set out in this Code, the landlord must agree with the resident suitable intervals for keeping them informed about their complaint.	Yes	Complaints Policy Complaints Procedure	Residents are kept up to date at all stages of the complaints process. Sanctuary endeavour to address concerns within the timescales set within the Code. The Works Co-ordination team also continue to update the resident regarding any repairs following complaint resolution.
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	Complaints Policy Review of source of complaints received in 2024 Equality and Diversity e-learning Complaints Guidance – Reasonable Adjustments Vulnerabilities Policy and Procedure and training	The complaints policy outlines that complaints are accepted in any format, including written, verbal and digitally. The Complaints Policy contains reference to the commitment to make reasonable adjustments when handling complaints. The Customer Relations team undertake equality and diversity training in line with the Sanctuary training framework. Sanctuary’s implementation of the Vulnerabilities Policy and Procedure and training, developed with the Resident Advisory Panel which sets out how vulnerabilities should be identified, reinforces the empathetic listening approach and providing an enhanced service where needed.
5.11	Landlords must not refuse to escalate a complaint through all stages of the complaints procedure unless it has valid reasons to do so. Landlords must clearly set out these reasons, and they must comply with the provisions set out in section 2 of this Code	Yes	Complaints Policy	At Sanctuary customers are not required to explain why they wish to escalate their complaint and will escalate as required once the customer expresses a desire to move to the next stage, which the Policy supports including any 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	Complaints Policy Complaints System Internal Case Folders (SharePoint)	Record keeping is a mandatory part of Sanctuary’s complaints process, all staff who work complaints are able to save case details into the case folders and record any details within the Complaints Management System.
5.13	Landlords must have processes in place to ensure a complaint can be remedied at any stage of its complaints process. Landlords must ensure appropriate remedies can be provided at any stage of the complaints process without the need for escalation	Yes	Complaints Policy Complaints Procedure Internal Complaint Case Clinics	Sanctuary consider all individual circumstances when receiving a complaint and will provide an informed resolution once it is known. In addition, cases that cannot be resolved swiftly will be discussed in Case Clinics to ensure an appropriate resolution is provided as quickly as possible.
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	Complaints Policy Complaints Procedure	Sanctuary’s Policy and Procedure clearly sets out how to manage unacceptable behaviours and what restrictions are in place.
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	Complaints Policy	Sanctuary’s Policy and Procedure clearly sets out how to manage unacceptable behaviours and what restrictions are in place.
Section 6 - Complaints Stages				
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	Complaints Policy	Sanctuary consider all individual circumstances when receiving a complaint and will provide an informed resolution once it is known. The customer will be kept updated throughout the process.
6.2	Complaints must be acknowledged, defined and logged at stage 1 of the complaints procedure within five working days of the complaint being received.	Yes	Complaints Policy	Sanctuary’s Complaints Policy makes clear the timescales regarding acknowledgement at both stages of the process.
6.3	Landlords must issue a full response to stage 1 complaints within 10 working days of the complaint being acknowledged.	Yes	Complaints Policy Complaints performance information	Sanctuary’s complaints policy sets out a target of responding to complaints within 10 working days of a complaint being logged. Any extensions to this are minimal and logged and discussed with the resident in the spirit of the Ombudsman’s code. Where an extension is needed to ensure that Sanctuary is able to respond fully and resolve the issues for a resident are discussed with them.
6.4	Landlords must decide whether an extension to this timescale is needed when considering the complexity of the complaint and then inform the resident of the expected timescale for response. Any extension must be no more than 10 working days without good reason, and the reason(s) must be clearly explained to the resident	Yes	Complaints Policy Review of sampled complaint responses	Sanctuary’s standard complaints responses sent to customers contain the information outlined by the Housing Ombudsman. This is tested and monitored through ongoing complaint case reviews of each complaint handler.
6.5	When an organisation informs a resident about an extension to these timescales, they must be provided with the contact details of the Ombudsman	Yes	Complaints Policy Complaints Procedure Review of sampled complaint responses	Sanctuary’s standard complaints responses sent to customers contain the information outlined by the Housing Ombudsman. This is tested and monitored through ongoing complaint case reviews of each complaint handler.
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	Complaint procedure Complaint system specifications Quality Assurance Reviews Works Coordination Process	Sanctuary respond to all complaints when the answer is known and in line with other SLAs. Where further actions are identified to address the issue, the customer is informed. Customers are provided with an update. Where complaints have follow on actions needed, these are logged as such as remain at that status until the follow on actions are complete. In 2025/2026, a robust Quality Assurance (QA) framework was designed, implemented, and embedded, with structured assurance activity fully operational since August 2025. QA coverage and output have increased steadily, providing an increasing level of confidence that complaint outcomes are fair, consistent, and aligned to policy and regulatory expectations. The framework has matured rapidly and is underpinned by a risk based approach and validated handler competency. The dedicated Complaint Work Coordination team prioritises and manages all work raised within the complaint process. The Complaints Work Coordination team is responsible for ensuring that all repairs committed as part of complaint outcomes are tracked through to resolution and satisfactory completion, as well as keeping customers regularly updated throughout their repairs journey.
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	Complaint case audits Complaint procedure Review of sampled complaint responses Quality Assurance Framework	Complaint responses sent to residents are as comprehensive as possible based on each individual complaint. This will set out any rationale for decisions or actions, based on reference to policy, procedure or legislation where needed. In 2025/2026, a robust Quality Assurance (QA) framework was designed, implemented, and embedded, with structured assurance activity fully operational since August 2025. QA coverage and output have increased steadily, providing an increasing level of confidence that complaint outcomes are fair, consistent, and aligned to policy and regulatory expectations. The framework has matured rapidly and is underpinned by a risk based approach and validated handler competency.
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	Complaints Policy Quality Assurance Framework	Sanctuary’s Complaints Policy details the approach to additional complaints and unrelated/related issues. Complaints teams are trained accordingly. In 2025/2026, a robust Quality Assurance (QA) framework was designed, implemented, and embedded, with structured assurance activity fully operational since August 2025. QA coverage and output have increased steadily, providing an increasing level of confidence that complaint outcomes are fair, consistent, and aligned to policy and regulatory expectations. The framework has matured rapidly and is underpinned by a risk based approach and validated handler competency.
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	Complaint case audits Complaint procedure Review of sampled complaint responses Quality Assurance Reviews	Sanctuary’s standard complaints responses sent to customers contain the information outlined by the Housing Ombudsman. This is tested and monitored through ongoing complaint case reviews of each complaint handler. In 2025/2026, a robust Quality Assurance (QA) framework was designed, implemented, and embedded, with structured assurance activity fully operational since August 2025.

Stage Two

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	Complaints Policy Complaints Procedure Request to Escalate Complaint system specifications	The same principles apply to escalating a complaint as to initially accepting a complaint at stage 1. Sanctuary does not as a standard refuse customer request to escalate complaint to Stage 2, and see this as an important part of the process. This process is embedded within the complaint system specification to ensure it is monitored. In the exception that there would be a refusal to escalate, this would be confirmed in writing to the resident.
6.11	Requests for stage 2 must be acknowledged, defined and logged at stage 2 of the complaints procedure within five working days of the escalation request being received	Yes	Complaints Procedure	Sanctuary’s Complaints Procedure makes clear the timescales regarding acknowledgement at both stages of the process.
6.12	Residents must not be required to explain their reasons for requesting a stage 2 consideration. Landlords are expected to make reasonable efforts to understand why a resident remains unhappy as part of its stage 2 response	Yes	Complaints Policy Complaints Procedure Request to Escalate Complaint system specifications	The same principles apply to escalating a complaint as to initially accepting a complaint at stage 1. Sanctuary does not as a standard refuse customer request to escalate complaint to Stage 2, and see this as an important part of the process. This process is embedded within the complaint system specification to ensure it is monitored.
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1	Yes	Complaints Procedure	The complaint procedure specifically states that the person investigating a complaint at Stage 2 cannot be the same person as Stage 1.
6.14	Landlords must issue a final response to the stage 2 within 20 working days of the complaint being acknowledged	Yes	Complaints Policy Complaints performance information	Sanctuary's complaints policy sets out a target of responding to complaints within 20 working days of a complaint being logged. Any extensions to this are minimal and logged and discussed with the resident in the spirit of the Ombudsman’s Code. Where an extension is needed to ensure that Sanctuary is able to respond fully and resolve the issues for a resident are discussed with them.
6.15	Landlords must decide whether an extension to this timescale is needed when considering the complexity of the complaint and then inform the resident of the expected timescale for response. Any extension must be no more than 20 working days without good reason, and the reason(s) must be clearly explained to the resident	Yes	Complaints Policy Complaints performance information	Sanctuary's complaints policy sets out a target of responding to complaints within 20 working days of a complaint being logged. Any extensions to this are minimal and logged and discussed with the resident in the spirit of the Ombudsman’s Code. Where an extension is needed to ensure that Sanctuary is able to respond fully and resolve the issues for a resident are discussed with them.
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	Complaints Policy Complaints Procedure Review of sampled complaint responses	Sanctuary's standard complaints responses sent to customers contain the information outlined by the Housing Ombudsman. This is tested and monitored through ongoing complaint case reviews of each complaint handler.
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 procedure Complaint system specifications Quality Assurance Framework Works Coordination Process	Sanctuary respond to all complaints when the answer is known and in line with the SLAs. Where further actions are identified to address the issue, the customer is informed within their complaint response. The dedicated Complaint Work Coordination team prioritises and manages all work raised within the complaint process. The Complaints Work Coordination team is responsible for ensuring that all repairs committed as part of complaint outcomes are tracked through to resolution and satisfactory completion, as well as keeping customers regularly updated throughout their repairs journey. Compliance is checked through the Quality Assurance process embedded during financial year 2025/2026.
6.18	Landlords must address all points raised in the complaint definition and provide clear reasons for any decisions, referencing the relevant policy, law and good practice where appropriate	Yes	Complaints Policy Complaints Procedure Review of sampled complaint responses Quality Assurance Framework	Sanctuary's standard complaints responses sent to customers contain the information outlined by the Housing Ombudsman, ensuring all points raised are addressed and how the outcome has been reached is clearly explained, referencing policy and legislation where relevant. In 2025/2026, a robust Quality Assurance (QA) framework was designed, implemented, and embedded, with structured assurance activity fully operational since August 2025, ensuring complaint responses meet all requirements outlined within the HOS Complaint Handling code. QA coverage and output have increased steadily, providing an increasing level of confidence that complaint outcomes are fair, consistent, and aligned to policy and regulatory expectations. The framework has matured rapidly and is underpinned by a risk based approach and validated handler competency.
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 matter to the Ombudsman Service if the individual remains dissatisfied	Yes	Complaints Policy Complaints Procedure Review of sampled complaint responses Quality Assurance Framework	Sanctuary's standard complaints responses sent to customers contain the information outlined by the Housing Ombudsman. This is tested and monitored through ongoing complaint case reviews of each complaint handler. Compliance is checked through the Quality Assurance process embedded during financial year 2025/2026.
6.20	Stage 2 is the landlord’s final response and must involve all suitable staff members needed to issue such a response	Yes	Complaints Policy	Sanctuary only operate a two stage process, the Final Response is provided at Stage Two and the investigation is then concluded.
Section 7 - Putting Things Right				
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	Complaints Policy Complaints Procedure Compensation guidance Review of sampled complaint responses Quality Assurance Framework	Sanctuary's standard complaints responses sent to customers contain the information outlined by the Housing Ombudsman. This is tested and monitored through ongoing complaint case reviews of each complaint handler - working within a compensation and redress framework to consider other things that can be done to put things right.
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified	Yes	Complaints policy Complaints Procedure Additional Guidance – compensation Compensation payments Review of complaint response Ongoing complaint audits Quality Assurance Framework	When responding to a complaint, handlers consider a range of impacts and issues when confirming the resolution. First and foremost the team is focussed on addressing the underlying cause of the complaint, but then work within a compensation and redress framework to consider other things that can be done to put things right.
7.3	The remedy offer must clearly set out what will happen and by when, in agreement with the resident where appropriate. Any remedy proposed must be followed through to completion	Yes	Complaint procedure Complaint system specification and status Work coordination Process	Complaints responses seek to set out the timescale or timeframe that actions will be completed, to ensure a resolution is achieved as a result of the customers complaint. The dedicated Complaint Work Coordination team prioritises and manages all works raised within the complaint process, ensuring commitments made within the complaint handling process are adhered to. The Complaints Work Coordination team is responsible for ensuring that all repairs committed as part of complaint outcomes are tracked through to resolution and satisfactory completion, as well as keeping customers regularly updated throughout their repairs journey, to ensure Sanctuary meet the commitments and expectations set with customers.
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies	Yes	HOS Website RCA Framework HOS Case Clinics & Case Reviews	Guidance and best practice shared by the HOS is regularly reviewed and adopted where appropriate within processes, to ensure a consistent approach and appropriate remedies. Sanctuary has developed a Root Cause Analysis framework that analyses and then remedies that service failures to continuously improve customer outcomes.
Section 8 - Putting Things Right Cont....				
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	Complaints Performance/Insight Report 2025/2026 https://www.sanctuary.co.uk/learning-from-our-customers/when-we-get-it-wrong Will link to new report once data is available and report produced	Sanctuary has a single policy in place for dealing with complaints, which includes provisions detailed within the Housing Ombudsman 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 relating to complaints. The governing body’s response to the report must be published alongside this	Yes	Complaints Performance/Insight Report 2025/2026 https://www.sanctuary.co.uk/learning-from-our-customers/when-we-get-it-wrong Will link to new report once data is available and report produced	The Annual Complaints Insight Report 2025/2026 has been approved by Sanctuary’s Executive Committee and Group Board and published on the Sanctuary website, in the ‘Learning from when we get it wrong’ section.

8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures	Yes	Sanctuary's Self-Assessment https://www.sanctuary.co.uk/learning-from-our-customers/when-we-get-it-wrong	Sanctuary's self-assessment will serve as evidence of compliance in this respect. Sanctuary is committed to development and efficiency and would look to conduct a self-assessment following a restructure, merger and/or change in procedures.
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation	Yes	Sanctuary's Self-Assessment https://www.sanctuary.co.uk/learning-from-our-customers/when-we-get-it-wrong	Sanctuary is committed to development and efficiency and would look to comply with any ask following an Ombudsman investigation.
8.5	If a landlord is unable to comply with the Code due to exceptional circumstances, such as a cyber incident, they must inform the Ombudsman, provide information to residents who may be affected, and publish this on their website Landlords must provide a timescale for returning to compliance with the Code	Yes	Sanctuary's Self-Assessment https://www.sanctuary.co.uk/learning-from-our-customers/when-we-get-it-wrong	Sanctuary will endeavour to publish the required information if unable to comply with the Code for any reason and inform the Ombudsman of timescales and reasoning.
Section 9 - Scrutiny & Oversight, Continuous Learning & Improvement				
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	RCA Framework Peer Reviews Resident Quality Assurance	Sanctuary track and monitor complaint themes to identify where there are learning opportunities from complaints. Actions identified following HOS determination case reviews are tracked centrally by the Service Improvement team, monitored alongside customer feedback following complaints, enabling themes and learning identified to be tracked and wider service improvement opportunities identified. The Complaint Root Cause Analysis (RCA) team launched in April 2025 use an established RCA framework to uncover the fundamental causes of service shortfalls and implement scalable, preventative solutions that enhance the customer experience. Conducting in-depth investigations to identify the root causes of complaints, enabling the development of sustainable solutions that reduce repeat issues. A key element of the Complaints Quality Assurance (QA) framework is independent resident scrutiny. Throughout 2025/2026, a cohort of residents has been trained and accredited to review complaint handling alongside internal QA, providing transparency and a direct customer perspective.
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	RCA Framework Complaint performance information Learning outcomes Complaint Reports to Committees and Board Quality Assurance Framework	Complaint trends, drivers and learning are shared with Executive Committee, Group Housing Committee and Group Board throughout the year to provide assurance and oversight of learning and service improvements as a result. Monthly government sessions are held with each regional senior management team, to provide regional insight and learning from complaint trends, enabling operational changes to delivery based on customer feedback, as well as learning outcomes on individual complaints where issues are highlighted are also discussed and raised with individual managers. The Resident Scrutiny Panel receive a complaints update at each formal meeting, with questions and scrutiny on this. The complaint community of interest are the key route through for conducting deep dive activity. The Complaint Root Cause Analysis (RCA) team launched in April 2025 use an established RCA framework to uncover the fundamental causes of service shortfalls, based on trend analysis and service insight on both a regional and national scale and implement scalable, preventative solutions that enhance the customer experience. Monthly RCA insight decks are produced and shared with senior managers, providing oversight of key trends in customer complaints. Using a developed and established risk matrix, the team conducts in-depth investigations to identify the root causes of complaint trends, enabling the development of sustainable solutions that reduce repeat issues, areas in 2025/2026 include, damp and mould, emergency repairs and gas works. Complaint handling compliance is checked through the Quality Assurance process embedded during financial year 2025/2026. Trend analysis on findings from both the internal QA framework, as well as the resident QA framework is shared with senior managers, to ensure insight and learnings are shared with teams to ensure the understanding of the insights and trends identified, as well as the reason behind service improvements based from customer feedback through complaints is fully addressed and embedded.
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	Lessons Learnt Logs Peer Reviews	Complaint trends, drivers and learning are shared with Executive Committee, Group Housing Committee and Group Board throughout the year. Learning outcomes on individual complaints where issues are highlighted are also discussed and raised with individual managers. The Resident Scrutiny Panel receive a complaints update at each formal meeting, with questions and scrutiny on this. The complaint community of interest are the key route through for conducting deep dive activity.
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	RCA Framework Complaint performance information Learning outcomes Complaint Reports to Committees and Board	Sanctuary has a dedicated Head of Complaints, who is responsible for leading all complaints related activity. The Complaint Root Cause Analysis (RCA) team launched in April 2025 use an established RCA framework to uncover the fundamental causes of service shortfalls and implement scalable, preventative solutions that enhance the customer experience. Conducting in-depth investigations to identify the root causes of complaints, enabling the development of sustainable solutions that reduce repeat issues. Key themes or trends from the RCA from complaints are reported monthly to the Head of Complaints and senior management to allow for consideration of service improvement, business risks and recommended improvements, demonstrating a direct link from the monitoring of complaints and ongoing service improvement.
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	Complaints Policy Complaints Website	Group Board is committed to ensuring Sanctuary meet regulatory and industry requirements. It also makes sure that Sanctuary is transparent and accountable. The Non-Executive and Executive Members Responsible for Complaints are Arvinda Gohil, and Nicole Seymour, respectively.
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	Complaints Website Complaint reports to Board and Committees (Annual Complaints & Performance Report)	Complaint trends, drivers and learning are shared with Executive Committee, Group Housing Committee and Group Board throughout the year. Update reports contain the information shared - Annual Complaints and Performance Reports.
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	Complaint reports to Board and Committees (Annual Complaints & Performance Report)	Complaint trends, drivers and learning are shared with Executive Committee, Group Housing Committee and Group Board throughout the year. Update reports contain the information shared - Annual Complaints and Performance Reports.
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 cooperative 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	RCA Framework	All staff are expected to follow Sanctuary policies and procedures when undertaking their roles. This includes complying with the Complaints Policy and Procedure. All frontline staff have completed complaints e-learning training, to ensure understanding of the importance of reporting and handling complaints. Sanctuary does not have a standard complaint handling objective for all staff; however, the intentions of this requirements are delivered through the described approach. The Resident Scrutiny Panel supports this view.