Appendix A: Self-assessment form

This self-assessment form should be completed by the complaints officer and it must be reviewed and approved by the landlord's governing body at least annually.

Once approved, landlords must publish the self-assessment as part of the annual complaints performance and service improvement report on their website. The governing body's response to the report must be published alongside this.

Landlords are required to complete the self-assessment in full and support all statements with evidence, with additional commentary as necessary.

We recognise that there may be a small number of circumstances where landlords are unable to meet the requirements, for example, if they do not have a website. In these circumstances, we expect landlords to deliver the intentions of the Code in an alternative way, for example by publishing information in a public area so that it is easily accessible.

Section 1: Definition of a complaint

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
1.2	A complaint must be defined as: *'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.'*	Yes	Complaint Policy	The Complaint Policy and Procedure defines what a complaint is in line with this definition.
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	Complaint Policy and Procedure, induction and on-going training	If a customer or their representative expresses any dissatisfaction with a service Torus has provided, we will with their agreement, seek to resolve this through our 'rapid resolution' process (48hrs to resolve). They will always be given the choice to make a formal complaint at this initial contact. Torus accept complaints from our customers and also on their behalf from representatives, advocates and third parties.

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	Complaint Policy and Procedure	Torus acknowledge service requests through our 'rapid resolution' team and aim to put things right, in agreement with our customer within 48 hours. A service request or enquiry is defined in the Complaint Policy and Procedure at Section 3.1.
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	Complaint Policy and Procedure	Tours would record a complaint during the handling of a service request and would ensure that agreed actions are progressed accordingly.
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	The launch of 'Qualtrics'	Torus operates a series of transactional satisfactions surveys across a range of Torus services. Torus has now, in Q2 of 26/27 financial year, launched the use of 'Qualtrics' a new transactional survey with the intention of improving the transactional surveys for tenants and optimising the learning from this feedback.

				Dissatisfied feedback is shared with relevant teams and management structures. Any follow up actions required based on the feedback provided, contact will be made with the customer to understand their dissatisfaction in more detail and raise as necessary a formal complaint.

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	Section 3.16 of the Complaint Policy outlines any exclusions or valid reasons that a complaint will not be accepted by Torus.
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.	Yes	Complaint Policy	Section 3.16 of the Complaint Policy outlines any exclusions or valid reasons that a complaint will not be accepted by Torus. As per Section 3.16 of the policy, where a complaint cannot be accepted, the customer will be informed of their right to refer the matter to The Housing Ombudsman Service.

	• Matters that have previously been considered under the complaints policy.			
2.3	Landlords must accept complaints referred to them within 12 months of the issue occurring or the resident becoming aware of the issue, unless they are excluded on other grounds. Landlords must consider whether to apply discretion to accept complaints made outside this time limit where there are good reasons to do so.	Yes	Complaint Policy	As per Section 3.16 of the Complaint policy, which details when a complaint will not be accepted, where a complaint cannot be accepted, the customer will be informed of their right to refer the matter to The Housing Ombudsman Service.
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	Complaint Policy	Where a complaint has been excluded from the complaints process, Torus will communicate with the complainant the reason for this. This correspondence will detail their right to refer the matter to the Housing Ombudsman Service. Within the Service Improvement Plan for 2026/27 Torus has created an action for the Complaints Policy to be updated prior to its expiry in October 2027,

				clarifying it's obligation to respond to non-Torus tenants.
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Yes	Complaint Policy	All complaints are dealt with individually and considers the service failure that has occurred and the impact on the individual customer.

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	Complaint Policy, Torus website Complaint Easy Read document	Torus has a range of ways that customers can make a complaint. Complaints may be received by telephone, in writing, by email, through our website, face to face via Torus Officer's and in person when visiting a Torus office. This is outlined in the Complaints Policy (Section.3.3). In order to reduce any barriers to raising a complaint, an easy read version explaining 'How to complain' was introduced in April 2024 and is available on the Torus website.
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	Complaint Policy	Torus create a culture where customer complaints are important to us and understanding of complaints and how to log a complaint is embedded across all

				colleagues, regardless of role or service area. Customers are enabled to make complaints via a variety of channels and are able to pass their complaint onto a member of staff in person, via e-mail or telephone call. Once dissatisfaction has been raised to a member of staff, colleagues are expected to follow the complaints policy and procedure, which is available internally as well as on Torus's website.
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	Complaint policy and procedure	Torus welcomes complaints as they are a learning opportunity. Torus's complaints policy, procedure and easy read document outlines how a complaint can be made.
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	Yes	Complaint Policy and published 'easy read' document.	The Complaint Policy has been approved by customers in our Customer Resolution Panel. An easy read 'how to make a complaint' document was developed and is available in Torus Customer reception

	must also be published on the landlord’s website.			areas as well as on Torus’ website. The ‘Reachdeck' accessibility tool is available on Torus's website and translation services are available on request. Telephone and face to face support is available to assist those who wish to make a complaint.
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	Torus Complaints Policy includes reference to how we will publicise and signpost the Housing Ombudsman Service. the Complaint policy is included on our website and along with detail of the Housing Ombudsman Service. An easy read version of our Complaints policy has also been developed, to ensure it is accessible and understood by all customers. Our complaint responses and any communication when a complaint is extended, also include signposting to the HOS

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	Complaints Policy section 1.2
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	The right to refer a complaint to the Housing Ombudsman is outlined within Torus's Complaint Policy, and at all stages of our complaint process including in stage 1 and stage 2 outcome letters and when we communicate any extension.

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	Landlord Operating Committee (LOC)	In October 2023, Torus launched the Centralised Complaints Team, now rebranded as the Customer Resolution Team. The intention of this was to provide a consistent approach to how complaints were handled and ensure timely responses. As part of our Customer Resolution Team, we have designated Officers to manage our contact with the Housing Ombudsman Service and also a designated role to embed learning from complaints. Performance in relation to complaints is reported to our Landlord Operations Committee (LOC) each quarter as our governing body.
4.2	The complaints officer must have access to staff at all levels to facilitate	Yes	Complaint Procedure escalation guidance (Section.5)	Section 5 of the Complaints Procedure

	the prompt resolution of complaints. They must also have the authority and autonomy to act to resolve disputes promptly and fairly.			
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	Complaint Policy and Complaint Learning Framework	We have a designated role in our Customer Resolution Team as a Learning Officer. We also have a Complaint Learning Framework to structure our approach to learning from complaints and other forms of customer feedback.

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	Torus only operates a single Complaints Policy and Procedure which is applied to all complaints.
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	Yes	Complaint Policy and Procedure	The Complaint Policy and Procedure make clear that service requests/enquiries are distinguished from complaints:

	complaint') as this causes unnecessary confusion.			if an enquiry cannot be resolved 'there and then' or within 48 hrs (Rapid Resolution process), it will be treated, with the agreement of the customer, as a formal complaint.
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	Torus operates a w stage complaint process. Stage 1 complaints will be logged on notification, the complaint handler will contact the complainant within 2 working days to clarify the issues of concern and understand the outcome required. The complaint handler will provide a complete written response having investigated and proposed resolution(s) within 10 working days (unless an extension is applied). In cases where we apply an extension in line with the code we would only extend for a further 10 working days. Stage 2 the complaint handler will contact the complainant within 2

				working days to clarify the outstanding issues and understand the outcome required. They will provide a complete written response within 20 working days (unless an extension is applied). In cases where we apply an extension in line with the code we would only extend for a further 20 working days.
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	Complaint Policy	Torus would manage any customers complaints relating to third parties i.e. contractors and would follow Torus' complaints process.
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Yes	Complaint Policy	Torus would manage any customers 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	Yes	Complaint Policy	Torus outline our understanding of the complaint at both stages of our process. To ensure consistency we have template complaint

	any aspect of the complaint is unclear, the resident must be asked for clarification.			response letters with a section about our understanding of the complaint. In cases where our understanding is unclear, we would always communicate with the customer to ensure we have better understanding of the complaint and the proposed resolution.
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	Complaint Policy	Clarity about parts of a complaint that we are and are not responsible for would be included in our complaint responses. Complaint responses are audited internally to check adherence.
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	Complaint Policy	Staff training reinforces the principles of • Be fair, • Put things Right, and •Learn from Outcomes. The Customer Resolution Team is a central team independent of Torus's service delivery teams. Different officers investigate at Stage 1 and Stage 2 and

				routine quality checks are undertaken.
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	Complaint Policy Staff Training	Extensions advised to complainants via written notification with the new resolution date.
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	Complaint Policy, Complaints Procedure Vulnerability and Reasonable Adjustments Policy	Torus complies with its legal and regulatory obligations. The Complaint Policy makes clear (Section.6) that we will comply with the Equality Act 2010 and acknowledges that we may need adapt our processes, procedure and policy to accommodate an individual customer's needs. Torus also ensures any disabilities and vulnerabilities are recorded on our Housing Management System and any reasonable adjustments are agreed are clearly documented and reviewed as appropriate.
5.11	Landlords must not refuse to escalate a complaint through all stages of the complaints procedure unless it has	Yes	Complaint Policy and Procedure	As per the Complaints Policy and Procedure, complaints will be escalated

	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.			to stage 2 where the customer remains dissatisfied and wishes to escalate the complaint.
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	Housing Management System complaint case records, Housing Ombudsman evidence submissions	Torus has case management system for the recording of complaints in our Housing Management System, Aareon QL. This includes a full record of each complaint, when the complaint was received and at each stage of the process.
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	Complaint Policy and Procedure	The Customer Resolution Officers benefit from comprehensive induction and training, they receive specific training on effective complaints handling emphasising the complaint handling principles: • Be fair, • Put things Right, and • Learn from Outcomes. Within the framework of the Complaints Procedure, they have authority and autonomy to seek early resolution.

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	Complaint Policy and Unacceptable Service User Policy	The Complaint Policy (section 3.17) has a clear statement on unreasonable behaviour. Torus applies, monitors and reviews any restrictions in line with a separate Torus Unacceptable Service User Policy.
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	Complaint Policy and Unacceptable Service User policy	Torus applies our Unacceptable Service User Policy after careful consideration of the behaviour demonstrated, ensures this is appropriate and that restrictions and access to services are clearly outlined.

Section 6: Complaints Stages

Stage 1

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
6.1	Landlords must have processes in place to consider which complaints can be responded to as early as possible, and which require further investigation. Landlords must consider factors such as the complexity of the complaint and whether the resident is vulnerable or at risk. Most stage 1 complaints can be resolved promptly, and an explanation, apology or resolution provided to the resident.	Yes	Complaint Policy and Procedure	Torus's Policy and separate Complaints Procedure make clear how service enquiries are distinguished from complaints. If an enquiry cannot be resolved 'there and then' or within 48 hrs, it will be treated, with the agreement of the customer, as a formal complaint.
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**.	No	Complaint Policy and Procedure	Torus recognise the importance of complaints being acknowledged and logged within 5 working days. In order to meet this timescale our Housing Management sends an automatic acknowledgement to customers when a complaint is recorded. Torus did however have a delay in October, when due to an IT issue, there was a

				period of approximately 2 weeks, where web based dissatisfaction forms were not pulled through to email for logging. This resulted in 59 complaints being logged outside of the 5 day timeframe. Once identified this issue was immediately rectified. In cases where there had been a delay, we contacted the customer, apologised, acknowledged this service failure in our response and redress was provided.
6.3	Landlords must issue a full response to stage 1 complaints **within 10 working days** of the complaint being acknowledged.	No	Complaints Policy and Procedure	In 2025/2026, 98.95% of Stage One Complaints were responded to within target. This is an increase in performance when compared with 2024/2025 were 93.77% of Stage One complaints were responded within target. This is a 5.18% increase in the number of complaints responded to within target when compared with 2024/2025 complaints.

				Our KPI for response times is 100% and we are committed to improving the number of complaints responded to within target to meet compliance with the code.
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 and Procedure	This is stated in the Complaint Policy (Section.3.7) and in the Procedure. We would always inform the customer of an extension being applied any extension would be a maximum of 10 working days.
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 and Procedure	This is stated in the Complaint Policy and in the Procedure. Our communication about an extension provides the contact details of the Housing Ombudsman Service.
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	Yes	Complaints Procedure	This practice is routinely demonstrated in complaint responses and monitoring of ‘with customer' stage to enable us to follow through any outstanding actions.

	actioned promptly with appropriate updates provided to the resident.			
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 Policy and Procedure	Complaint Policy (Section 3.7 and Section 3.8) Procedure. Letter templates are used to ensure we include the detail of the complaint, as well as what is required to achieve a satisfactory resolution. Quality checks ensure all aspects of complaints are addressed.
6.8	Where residents raise additional complaints during the investigation, these must be incorporated into the stage 1 response if they are related and the stage 1 response has not been issued. Where the stage 1 response has been issued, the new issues are unrelated to the issues already being investigated or it would unreasonably delay the response, the new issues must be logged as a new complaint.	Yes	Complaint Policy and Procedure	Complaint Procedure and Complaint Handling training
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;	Yes	Complaint Policy	Complaint Policy Standard letter template is used. Sample checks are undertaken to test adherence. All letters at Stage 1 and Stage 2 provide contact

	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.			details and advise complainants of their right to contact the Housing Ombudsman Service.

Stage 2

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
6.10	If all or part of the complaint is not resolved to the resident's satisfaction at stage 1, it must be progressed to stage 2 of the landlord's procedure. Stage 2 is the landlord's final response.	Yes	Complaint Policy and Procedure	The Complaint Policy (Section 3.7 and Section 3.8) ensures that complaints at Stage 1 can be escalated if the complainant remains dissatisfied.
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	Complaint Policy and Complaints Procedure	Stage 2 complaints will be logged on notification. The complaint will be acknowledged and assigned within 5 working days and the complaint handler will provide a complete written response having investigated and proposed resolution(s) within 20 working days of this.

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	Complaint Policy and Procedure	All complaints are escalated at the customer's request.
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 and Procedure	Complaints that are escalated to stage 2, would not be handled by the same Officer who had investigated at Stage 1. This is outlined in our Complaint Policy.
6.14	Landlords must issue a final response to the stage 2 **within 20 working days** of the complaint being acknowledged.	No	Complaint Policy and Procedure	In 2025/2026 99.64% of Stage Two Complaints were responded to within target. This is an increase on 2024/2025 performance of 98.14 % of Stage Two Complaints were responded to within target. Our KPI for response times is 100% and we are committed to improving the number of complaints responded to within target to meet compliance with the code.
6.15	Landlords must decide whether an extension to this timescale is needed when considering the complexity of the	Yes	Complaint Procedure	This is stated in the Complaint Policy (Section.3.8) and in 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.			Procedure. We would always inform the customer of an extension being applied any extension would be a maximum of 10 working days.
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 Procedure	This is stated in the Complaint Policy and in the Procedure. Our communication about an extension provides the contact details of the Housing Ombudsman Service.
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	This practice is routinely demonstrated in complaint responses and monitoring of ‘with customer' stage to enable us to follow through any outstanding actions.
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 and Procedure	Complaint Policy (Section 3.7 and Section 3.8) Procedure. Letter templates are used to ensure we include the detail of the complaint, as well as what is required to achieve a satisfactory resolution. Quality checks ensure all

				aspects of complaints are addressed.
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	Complaint Procedure	Complaint Policy Standard letter template is used. Sample checks are undertaken to test adherence. All letters at Stage 1 and Stage 2 provide contact details and advise complainants of their right to contact the Housing Ombudsman Service.
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	Torus has implemented learning from determinations, escalations and tenant voice feedback. Stage 2 response letters address all aspects of complaint and include where appropriate a variety of staff feedback. Where applicable, any redress offered is offered in line with the Housing Ombudsman's redress guidance.

Section 7: Putting things right

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
7.1	Where something has gone wrong a landlord must acknowledge this and set out the actions it has already taken, or intends to take, to put things right. These can include: • Apologising; • Acknowledging where things have gone wrong; • Providing an explanation, assistance or reasons; • Taking action if there has been delay; • Reconsidering or changing a decision; • Amending a record or adding a correction or addendum; • Providing a financial remedy; • Changing policies, procedures or practices.	Yes	Complaint Procedure	Complaint response letter templates provide this framework. There are Day 8 and Day 18 Audit of letters by the Customer Resolution Team Leader on quality and compliance with Section 7.1
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Yes	Torus Compensation Policy	Torus ensures that remedies offered reflect the impact of the failures and is led by Housing Ombudsman Compensation Guidance. Torus has

				recently reviewed our Compensation Policy.
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	‘With customer' actions are routinely tracked to ensure completion.
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes	Complaint Procedure and internal practice	Torus has made the Housing Ombudsman redress guidance and compensation guidance integral to remedies provided within the complaints process.

Section 8: Self-assessment, reporting and compliance

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
8.1	Landlords must produce an annual complaints performance and service improvement report for scrutiny and challenge, which must include: a. the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements. b. a qualitative and quantitative analysis of the landlord's complaint handling performance. This must also include a summary of the types of complaints the landlord has refused to accept; c. any findings of non-compliance with this Code by the Ombudsman; d. the service improvements made as a result of the learning from complaints; e. any annual report about the landlord's performance from the Ombudsman; and f. any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord.	Yes	HOS Self-Assessment, Complaint Performance Report and Service Improvement Plan. Landlord Operations Committee (LOC) quarterly reporting.	Complaints Performance and Service Improvement Plans are a new (2024) requirement. Annual performance is currently reported, and Landlord Operations Committee (LOC) receives quarterly performance and complaints updates. This information is shared with the Member Responsible for Complaints.

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	Torus website	The 2025/26 Housing Ombudsman Self assessment, annual performance report and service improvement report will be presented to out Landlord Operations Committee for approval on 29 July 2026. There will also be an update to our Group Board during September. All documents along with the governing body's response will be published on Torus's website and then submitted to the Housing Ombudsman Service by 30 September 2026.
8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	Yes	N/A	N/A
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	Yes	Torus has received no Determinations to date (June 2026) requesting a review of the Self-Assessment	N/A
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	Yes	Business Continuity Plan and Housing Impact Assessment	N/A

	residents who may be affected, and publish this on their website Landlords must provide a timescale for returning to compliance with the Code.			

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	Monthly operational learning meetings. Individual post-determination meetings to drive systematic change Introduction of the internal complaint feedback form	These are coordinated by the Complaints Learning Officer
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	Monthly operational learning meetings Individual post-determination meetings to drive systematic change Introduction of the internal complaint feedback form	These are coordinated by the Complaints Learning Officer Meetings are held with key stakeholders to evidence the learning obtained from individual complaints, determinations, trend analysis and feedback provided from internal Customer Resolution Officers.
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	LOC reports, Tenant Complaints Panel, Tenant Scrutiny and Board agendas	

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	Group Director of Housing Services	Torus takes it's responsibility from learning from complaints seriously. Torus has a dedicated Complaints Learning Officer within its Centralised Customer Resolution Function. Torus promotes a culture that complaints are everyone's responsibility, and monthly operational complaints meetings gathers key stakeholders together to ensure learning has been captured and distributed to the relevant service areas.
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	Chair of LOC/Board Member	
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	Yes	LOC and Board reports	The MRC (Member Responsible for Complaints) is provided with complaint performance data, ombudsman determinations

	person must have access to suitable information and staff to perform this role and report on their findings.			outcomes and improvement plans and learning. Attendance and invitations to Housing Ombudsman MRC Conference are supported.
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	LOC Quarterly Reports	In addition, we support attendance and representation to sector wide learning of Complaints and networking with other MRCs at relevant Customer First Round Tables roles of an MRC and invitations to Housing Ombudsman MRC Conference
9.8	Landlords must have a standard objective in relation to complaint handling for all relevant employees or third parties that reflects the need to: a. have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments;	Yes	Objective in place for Housing Services Directors and included in Competency Framework for the complaints handling team	Torus understands the importance of collaborative working and has implemented a series of tracked meetings to ensure interdepartmental communication, co-ordination and information sharing. The nature of the

	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.			meetings varies depending on task, but ensure key stakeholders are in attendance and are formally diarised.