

# **Annual Submission Toolkit**

## **November 2025**

**Housing**  
Ombudsman Service

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## **Attachemements**

**Attachment A:** Compliant template complaints policy

**Attachment B:** Partly completed Self-assessment form – (additional commentary is required)

**Attachment C:** Examples of the annual complaints performance and service improvement report including governing body's /Board of Trustees statement

## Guidance notes for documents in attachments A-C

- The complaints policy is a template and therefore **all** sections that require details of the charity must be completed. Once completed and before publishing the policy please ensure:
  - the wording in blue at the beginning of the policy is removed
  - the information located on pages 11-14 that state for internal use only is also removed
- The self-assessment has been partially completed and the information within the evidence column relates directly to the template policy. Therefore, if the template policy has been used this information does not need to be changed or removed. The charity will just be required to ensure it provides commentary, and explanations were requested on how it complies with the provision.
- The examples of the annual complaints performance and service improvement report including governing body's /Board of Trustees responses are there as a support tool to show how reports could be structured. Please ensure that any information placed in a report relates to the charity directly, including the name of the charity and the date of the financial year the report data relates too. Whilst it is important to ensure that themes and trends are analysed within the report, the charity must **not** include any personal details that may identify an individual.
- Please take time to read through the full toolkit and documents provided, discuss with staff/volunteers to fully understand how this may change the charity's complaint handling (including responding to and recording complaints).

## Submissions Guidance

Why an annual submission is required:

From 1 April 2024, it is a condition of membership of the Housing Ombudsman Scheme that all member landlords regardless of size are required to have a complaint policy which is compliant with the statutory Complaint Handling Code and to complete an annual submission which includes the landlord's self-assessment, an annual complaints performance and service improvement report and a response from the landlords governing body (or equivalent) or the charity's Board of Trustees.

The requirements of the submission:

- The landlord/charity is required to have a compliant complaint policy.
- The landlord/charity should then complete a self-assessment against the Code. Please find a link to the [Self-Assessment-Form-2025.docx](#)
- Please see use the link [Guidance-on-completing-a-self-assessment \(13\).pdf](#) for further guidance on completing the self - assessment form.
- In addition to this, the landlord/charity is required to provide an annual complaints performance and service improvement report.
  - The report needs to cover the landlord/charity's full financial year.

Examples:

- The landlord/charity's financial year is 1 April - 31 March this year the report should cover date from 1 April 2024 -31 March 2025.
- The landlord/charity's financial year is 1 January – 31 December this year the report should cover data from 1 January 2025 -31 December 2025
- The landlord/charity will be expected to include their performance against the Code in place at that time, covering the following points:
  - a qualitative and quantitative analysis of the charity's complaint handling performance - this must also include a summary of the types of complaints the landlord has refused to accept
  - any findings of non-compliance with the Code by the Ombudsman
  - the service improvements made as a result of the learning from complaints
  - its actions following any annual report about the charity's performance from the Ombudsman
  - its actions following any other relevant reports or publications produced by the Ombudsman in relation to the work of the charity.

Please note, if no complaints have been received during the period, the report can reflect that, but the landlord/charity should use this as an opportunity to satisfy itself that the complaints process is accessible and that there are no barriers to complaints being raised, or that complaints are not being dealt with informally. The report should also include any actions following any other relevant reports or publications produced by the Ombudsman in relation to the work of the charity along with any service improvements

- Our webinar about what the report should contain will assist the landlord/charity - [Annual complaint handling and service improvement report webinars - Housing Ombudsman \(housing-ombudsman.org.uk\)](#).
- The landlord/charity's governing body/Board of Trustees (or equivalent) will then need to approve the report and provide a statement to demonstrate that they have scrutinised the contents of the report and are satisfied that the report is an accurate reflection of the landlords/charity's position. This cannot be the Member Responsible for Complaints.
- All the above will need to be published on the landlord's website if it has one. If the landlord/charity does not have a website, then it needs to take steps to communicate this to its residents in an alternative way, e.g. information packs to residents, publishing the information on noticeboards in communal areas, etc. It will need to state in its self-assessment how it has published this information to residents.
- As well as publishing the information on its website (or alternative means), the landlord/charity will need to complete the process by completing the electronic submission form to the Housing Ombudsman Service. The link can be found here [updated annual submission form](#)
- Below are the links to our guidance on submissions and the submissions webinar:  
[Guidance-on-annual-submissions \(5\).pdf](#)  
[Submissions webinar - Housing Ombudsman \(housing-ombudsman.org.uk\)](#)
- Submissions are required annually
- Submissions for landlords/charities with less than 1,000 properties are required 6 months after their financial year-end.

Before completing your annual submission, you may wish to complete our eLearning and micro learning on the Complaint Handling Code how to complete your annual submission. These can be access through our Centre for Learning:

[Centre for Learning | Housing Ombudsman Service](#)

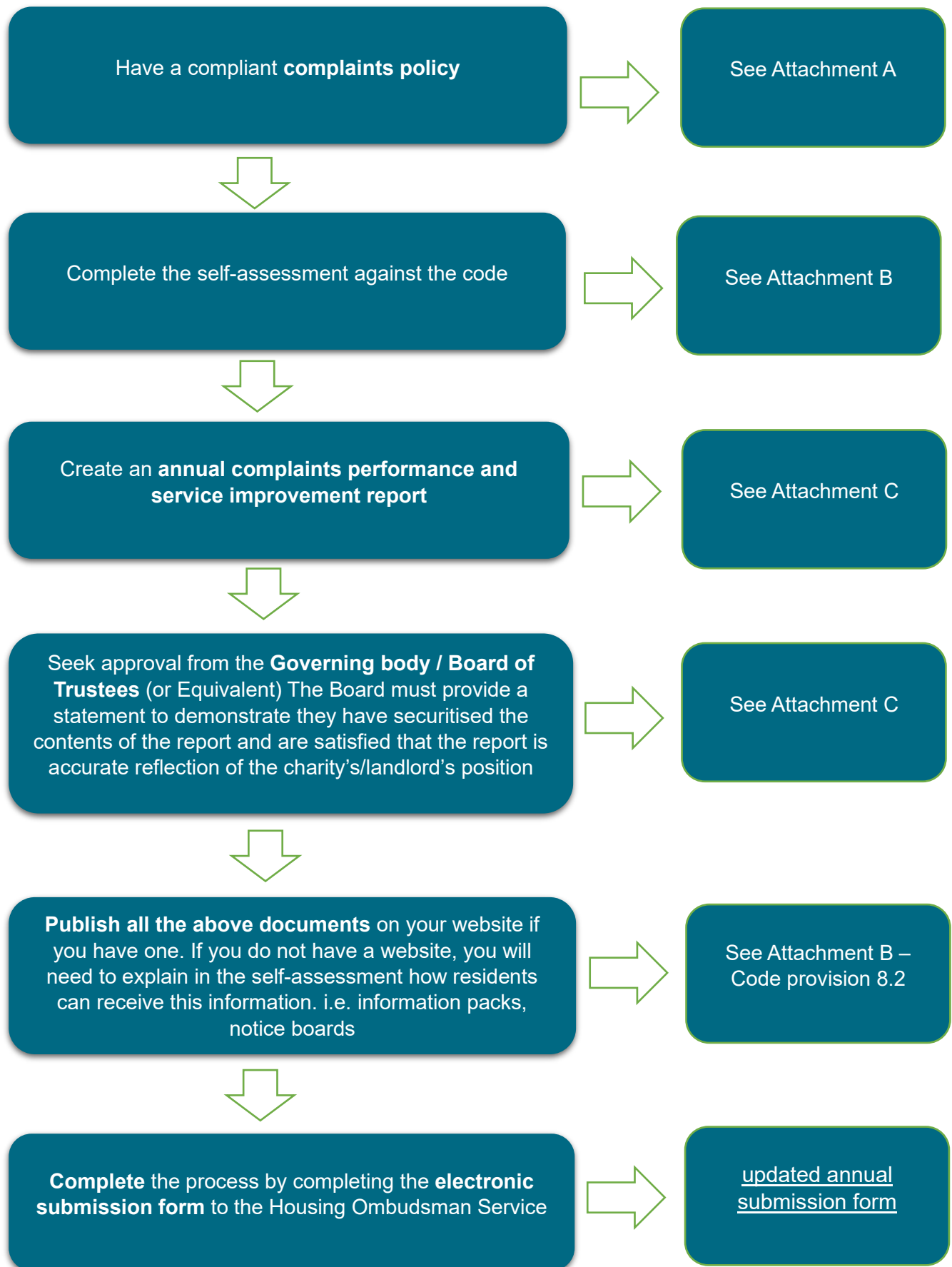
Complaint Handling Code -

<https://cfllearninghub.housingombudsman.org.uk/course/view.php?id=46>

Annual submission -

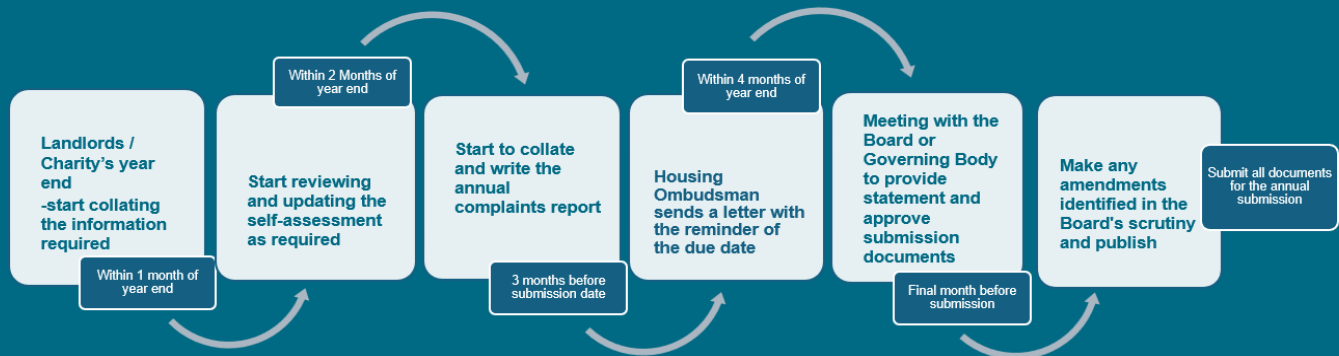
<https://cfllearninghub.housingombudsman.org.uk/course/view.php?id=194>

## Requirements of the submission – Chart



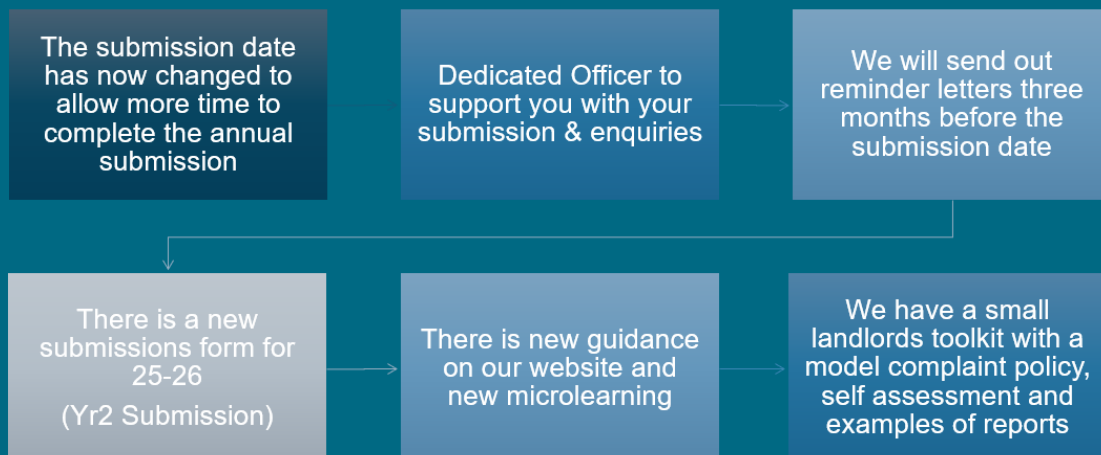
## Recommended timeline and support

### Recommended timeline



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### Support on Offer



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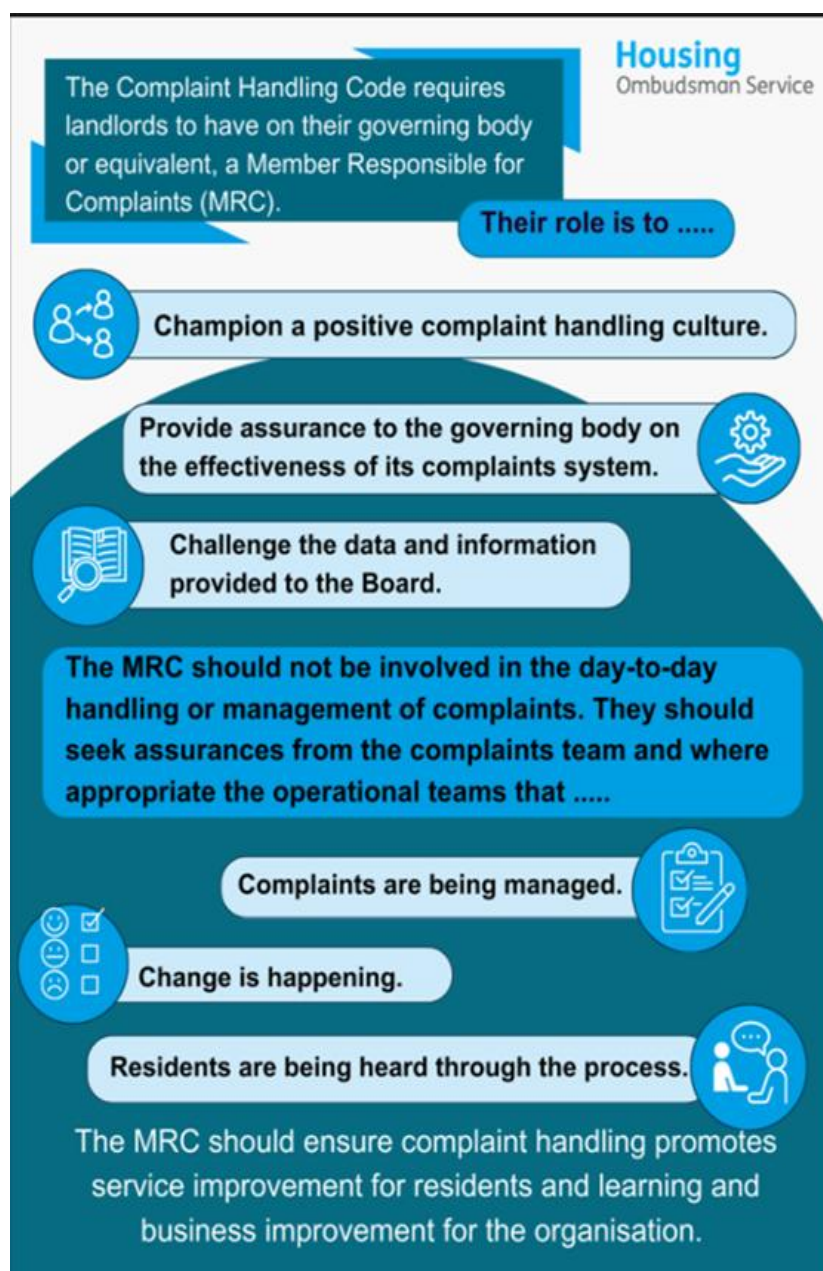
## Member Responsible for complaints

### Purpose

The statutory Complaint Handling Code requires landlords to have a Member Responsible for Complaints on its governing body.

The role is to champion a positive complaint handling culture. To provide assurance to the governing body on the efficacy of its complaints system, including challenging the data and information provided to the Board. To seek assurances from the complaints team and where appropriate the operational teams that complaints are being managed, change is happening and that residents are being heard through the process. To ensure complaint handling promotes service improvement for residents and learning and business improvement for the organisation.

### Member Responsible for Complaints (MRC) Leaflet





## **Group structures and subsidiaries**

### **Group structures operating one policy across all subsidiaries**

Where a group operates one policy, the Ombudsman may accept a single annual submission. For a single submission to be accepted, landlords must ensure that:

- the self-assessment and published policy clearly state which subsidiaries this applies to
- the governing body statement sets out clearly how the Board (or equivalent) has assured itself that the policy is applied to each subsidiary, and the self-assessment and annual report accurately reflects complaint handling practices for each subsidiary
- the annual report sets out clearly which subsidiaries are included if data is consolidated

If a landlord has one complaint policy but cannot provide assurance that the same procedures are applied across all subsidiaries, it is expected to provide an individual submission for each. For these to be accepted, landlords must ensure that:

- individual self-assessments are provided for each subsidiary
- the governing body statement clearly confirms that the individual self-assessments have been assured
- the annual report sets out information about each subsidiary separately; consolidated data only will not be accepted

### **Group structures operating more than one policy across its subsidiaries**

If a landlord has more than 1 policy in place, covering one or more subsidiary, it must provide an individual submission for each organisation separately.

In the submission, landlords may refer to 1 governing body statement in each submission. For this to be accepted, landlords must ensure that the governing body response sets out clearly how it has assured that the self-assessment and annual complaint handling performance and service improvement report, for each subsidiary, is accurate.

Landlords may also refer to a single annual report in each submission. For this to be accepted, landlords must ensure that information for each individual subsidiary is set out clearly – consolidated data only will not be accepted.

### **Example A: 1 policy across a group**

The landlord has 5 subsidiaries and has 1 complaint policy that applies across the group. Any procedures underpinning the policy are consistent across each subsidiary.

We would expect:

- 1 annual submission, confirming it covers 5 subsidiaries
- 1 self-assessment explaining how the landlord complies
- an annual report that covers all subsidiaries
- a governance statement that confirms all subsidiaries are included

### **Example B: 1 policy across a group**

The landlord has 2 subsidiaries and operates 1 policy. It operates 2 separate procedures because one subsidiary provides specialist services to residents with support, and the landlord accepts that 2 different processes are in place.

We would expect:

- 2 annual submissions, one for each subsidiary
- 2 self-assessments explaining how each subsidiary applies
- 1 annual report that covers all subsidiaries, reporting them separately
- 1 governance statement that assures both self-assessments

### **Example C: 3 policies across a group**

The landlord has 3 subsidiaries that have different complaint policies and procedures in place for each. The landlord accepts that different processes are in place due to the operating arrangements.

We would expect:

- 3 annual submissions, 1 for each subsidiary
- 3 individual self-assessments, 1 for each policy in place
- separate annual reports or 1 that talks about each subsidiary
- 3 governance statements or 1 that assures each separately

## Managing Agents

The difference between a managing agent compared to group structures, is that whilst the complaint handling may be done by the managing agent, the landlord retains responsibility for ensuring this complies with the Code. Therefore, we cannot accept group submissions. Each landlord (or managing agent on their behalf) must do their own submission.

What would we expect:

- A submission from the landlord / managing agent that only relates to that landlord
- The submission form asks if the landlord uses a managing agent for complaints and the landlord/managing agent should ensure this is completed with the relevant details.
- The submission form asks for the details of the MRC, and this must be completed for the individual landlord
- If a managing agent uses the same complaint policy across multiple landlords, the policy must state which landlord/s it applies to. For example, on some managing agent websites they have multiple branded policies for each landlord they act on behalf of so it's clear for residents what policy will be used if they make a complaint about their landlord.
- Sections 5.4 and 5.5 of the Code ask about third parties who manage complaints on behalf of the landlord, and the landlord should make sure this part of the self-assessment form is completed to explain how it ensures the managing agent is handling complaints in line with the Code, such as by doing quality checks of responses, or getting data quarterly on complaints performance and discussing this at Board meetings again this will be individual to each landlord
- Sections 9.4-9.6 of the Code talks about the MRC and a senior lead within the landlord's organisation, as these people will be specific individuals to each landlord, each self-assessment will need to reflect this information within the commentary
- An annual report – if the managing agent prepares this, it can cover multiple landlords as long as it clearly breaks down the complaint data for each landlord (the data cannot be consolidated)
- A governance statement from the Board of Trustees / governing body must be submitted from the individual landlord to confirm scrutiny & oversight – even if the managing agent prepares the other documents for the landlord, the landlord must provide this response for the submission.

## Managing Agents – what to consider



Can use one complaints policy, across multiple landlords, **but** it must specifically state the landlords name on the policy for each individual submission. It must also be clear if the managing agent responds to complaints at stage1, Stage 2 or both stages. Correct contact details must also be provided



Can use the same self-assessment, for the policy provisions if one policy is in place **but** for each individual submission the managing agent must ensure it has been personalised specifically to that landlord, so the landlords name and then as above, the provisions that will require commentary specific to that individual landlord



Can use the same annual report **but** clearly breaks down complaint data/service improvements/publications for each landlord. A managing agent may wish to use their own template annual report and then input the data for each landlord and submit, this may provide a clearer picture to residents and the Board.  
(This is just a suggestion not a must)



**Must** provide a governing body response for each individual landlord.

## Trouble shooting guidance

### Issues with the Complaint Handling Code Annual Submissions Form:

If you are experiencing issues with logging into our engagement platform to complete the Complaint Handling Code Annual Submissions Form, it is most likely an issue with your browser/device that can easily be addressed by clearing your cache.

### Clearing your cache:

Clearing your cache is the act of:

- deleting temporary files your browser has downloaded
- removing locally stored information about webpages you've visited
- forcing your web browser to re-download fresh versions of files
- freeing up storage space on your device
- resolving loading issues

To clear your cache, you can follow these steps for different platforms:

**Google Chrome:** Click the three-dot menu > More Tools > Clear browsing data

**Microsoft Edge:** Go to Settings > Privacy > Clear browsing data

Once this is complete, go back to the Complaint Handling Code Annual Submissions Form and log in to [updated annual submission form](#)

You may also be required to reset your password using this link - '[Forgot password? | Engage Housing Ombudsman \(housing-ombudsman.org.uk\)](#)'

### Ongoing Technical Issues:

If the landlord/ charity continues to experience technical difficulties or is unable to submit its documentation via the electronic form, please contact us at [compliance@housing-ombudsman.org.uk](mailto:compliance@housing-ombudsman.org.uk)

We will ask for further information from the landlord/charity and investigate the issues on a case-by-case basis. If the issues continue, we will be able to discuss other ways the landlord can provide its submission.

## **Additional support material**

Links to additional support material:

[Complaint Handling Code 2024 FAQs | Housing Ombudsman](#)

[Landlords | Housing Ombudsman Service](#)

Access the Centre for Learning and sign up to our learning hub:

[Centre for Learning | Housing Ombudsman Service](#)

Sign up to our newsletter:

[Housing Ombudsman Service](#)

What is the MRC (Member responsible for complaints) and their role:

[Member Responsible for Complaints \(MRC\) | Housing Ombudsman](#)

Housing Ombudsman remedies guidance:

[Guidance on remedies | Housing Ombudsman](#)

Completing the annual submission:

[HOS Policy, Strategy, Guidance Template](#)

We will update more guidance and micro-learning throughout the year to our Centre of learning. Please sign up and check for updates.

## **Contacting The Housing Ombudsman**

Email: [compliance@housing-ombudsman.org.uk](mailto:compliance@housing-ombudsman.org.uk)