Appendix A: Self-assessment form

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 | Tell us policy and procedure Section 3.1 | Our complaints and compliments policy, "Tell us" clearly defines a complaint as such |
| 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 | Tell us policy and procedure Section 3.2 | Section 3.2 states that "we consider a complaint to be any expression of dissatisfaction" raised by a complainant and we do not require the word "complaint" to be required for it to be treated as such. |
| 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 | Tell us policy and procedure Section 3.4 | Section 3.4 defines the difference between a service request and a complaint |

| 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 | Tell us policy and procedure Section 3.4 | We state that "a complaint should be raised when a client raises dissatisfaction with their service request" |
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| 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 | Tell us policy and procedure Section 7.1 Client survey | Our annual client survey enquires as to whether a client who has raised a complaint feels the complaint was handled correctly. We use this information to assess how we manage complaints and how we communicate with clients. Our policy states how complaints can be made and this list excludes surveys. |

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 | Tell us policy and procedure Sections 8.9, 9.1 and 10.1 | In Section 8.1 we state that the responding manager must deal with each complaint on their merit. We only state two reasons to not accept a complaint if a complaint is more than twelve months old (Section 8.9) if a complaint is vexatious with the intent to be retaliatory in nature and/or intended to annoy or damage the reputation of the organisation. (Section 10.1) In both circumstances we would provide a detailed explanation setting out reasons why the matter isn't suitable for the complaints process |

| 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 | Tell us policy and procedure Sections 8.9 and 10.1 | Only exceptions are those that are stated in 2.1 of this assessment above |
|-----|--|-----|--|--|
| 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 | Tell us policy and procedure Section 8.9 | Our policy states we only consider complaints if the incident took place within 12 months of the date the complaint was made unless it is raised regarding a safeguarding or health and safety issue. |
| 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 | Tell us policy and procedure Sections 8.10 and 11.1 | Our policy states in Section 8.10 that we will provide a "detailed explanation" setting out reasons as to why their matter is not suitable for the complaints process. In Section 11.1 we provide them with the information to contact the Housing Ombudsman, if they wish for this decision to be reviewed independently. |

| 2.5 Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint. | Yes | Tell us policy and procedure Section 9.1 | Section 9.1 states that the contracts and performance manager must deal with the complaint on their merit and act independently and have an open mind. |
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Section 3: Accessibility and Awareness

| Code provision | Code requirement | Comply: Yes / No | Evidence | Commentary / explanation |
|-------------------|--|------------------------|--|---|
| 3.1 | Landlords must make it easy for residents to complain by providing different channels through which they can make a complaint. Landlords must consider their duties under the Equality Act 2010 and anticipate the needs and reasonable adjustments of residents who may need to access the complaints process. | Yes | Tell us policy and procedure Sections 8.1, 8.3, 8.4 and 8.5 | Section 8.1 states that complaints can be made in person; by telephone; by text message; by letter; by email; and via our website. Section 8.3 identifies support needs of our clients, for example language or literacy issues, mental health issues, disabilities or substance misuse. Reasonable adjustments include allowing a third party to log a complaint as their advocate, this may include a relative, friend or another agency as appropriate. |
| 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 | Tell us policy and procedure Section 16.4 | Managers are responsible for ensuring that their staff are adequately trained and inducted to deal with complaints. |

| 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 | Client Survey; MyFeedback leaflet; Service Guide; Client Engagement Quality Assurance Visit | We treat each complaint on its merit and use data of volumes of complaints to develop our service delivery. We clearly advertise in all services how complaints 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 must also be published on the landlord's website. | Yes | My Feedback leaflet and on our website | My Feedback leaflet is displayed in all services and included in clients service guides. It sets out our complaint's procedure including timeframes for each of stage process we have in place. It also states that if a client is still dissatisfied after stage 2 outcome, they can take their complaints to housing ombudsman. |
| 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 | Tell us policy and procedure Section 7 My Feedback leaflet | Section 7.1 states that our leaflet, MyFeedback is given to clients on arrival as part of their service guide and that the leaflets are on display at services. We also state how we publicise our complaints process on our website. My Feedback includes information about the Ombudsman and this code. |
| 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 | Tell us policy and procedure Section 8.3 and 8.5 | Our procedure sets out how a client can log their complaint via a third party as their advocate and that we will offer clients the opportunity to have a friend, relative or another agency support them as appropriate. |

| 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 | Tell us policy and procedure Appendix 6 | We provide clients information on their right to access the Ombudsman service in our response letter after the stage 2 review has been completed. |
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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 | Tell us policy and procedure Sections 5.5, 11.4 and 11.5 | We do not have a dedicated complaints officer within the organisation due to our size. If contact with the Ombudsman was required this would be handled by a member of the executive team and our Board would be informed by our Chief Executive Officer. |
| 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 | Tell Us policy and procedure Section 5.5 | Section 5.5 states our chief executive acts as the organisations complaints officer |
| 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 | Tell us policy and procedure Sections 2 and 16.4 | Managers are responsible for ensuring that their staff are adequately trained and inducted to deal with all complaints. Complaints are recorded and monitored to help the organisation to learn from mistakes and improve service delivery. |

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 | Tell us policy and procedure | Our Tell us policy is our single policy for dealing with 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 complaint') as this causes unnecessary confusion. | Yes | Tell us policy and procedure Section 9 | Our complaints process starts with Stage 1 and is handled by the relevant contracts and performance manager |
| 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 | Tell Us policy and procedure Section 9.1 | Our policy shows in section 9.1 we have a two stage complaints procedure |
| 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 | Contract with the contractor | Complaints about contractors are referred to our contractors and will be managed through a contract resolution process. The complaint will be made by Two Saints and will comply with the contractual complaints process. Any feedback from the response will be provided to the client. |
| 5.5 | Landlords are responsible for ensuring that any third parties handle complaints in line with the Code. | Yes | Contract with the contractor | We will expect the contractor to manage the complaint in line with the agreed contractual agreement. |

| 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 | Tell us policy and procedure Section 9.2 Appendix 1 and 4 | Our stage 2 process requests that the complainant clearly states the details of the complaint, why they're dissatisfied with the response from stage 1 and the resolution they're seeking. If the regional director requires any further clarification they'll ask the complainant for more information. |
|-----|--|-----|--|--|
| 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 | Tell us policy and procedure Appendix 1 and 4 | Our responses letters at each stage of the complaint make it clear what aspects of the complaint we're responsible for and we'll clarify any areas where this not clear. |
| 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 | Tell us policy and procedure Section 9.1 | Section 9.1 covers this process |
| 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 | Tell us – our complaints and compliments policy Section 9.2 Appendix 2 and 5 | Where a complaint can't be resolved within the set timescales we will inform the complainant in writing and advise them of the date a response will be ready by. |

| 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 | Equality, diversity and inclusion policy and procedure Tell Us policy and procedure Section 8.4 | Our Equality Diversity and Inclusion policy and procedure states we aim to provide fair access to the full range of services provided by the organisation. Our Tell us policy states we will make reasonable adjustments for clients where appropriate under the Equality Act 2010. |
|------|---|-----|---|--|
| 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 | Tell us policy and procedure Section 9.2 | We do not refuse to escalate complaints and clearly mark how a complainant is able to escalate the process to the next stage. |
| 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 form – On Connect (internal intranet) | Our complaints form is made up of stages that must be completed which will include the date received, the responses sent to the complainant and any supporting documentation. All complaints information is held securely by the business development team |
| 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 | Tell us policy and procedure Section 12 Compensation policy | Section 12 sets out guidelines for redress for the complainant, which starts with a written apology and an explanation of what steps will be taken as a result. Compensation may be given in line with our compensation policy. |

| 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 | Preventing evictions and abandonment policy Support intervention procedure | Section 3 of our Preventing evictions and abandonment policy and procedure includes our support intervention process which explains our warning system and the work we do to manage unacceptable behaviour whilst doing our best to support clients to prevent being evicted. |
|------|---|-----|--|---|
| 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 | Preventing Evictions and abandonment policy Support intervention procedure | We do not put any restrictions in place. We put clear management plans in place to enable contact with clients to continue. |

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 | Tell us policy and procedure Section 8 & 9 | Our procedure states how a complaint can be made, considers the timescale for all complaints and considers factors that may require additional investigation and therefore the need to write to the complainant and provide revised timescales if required and why. Most complaints are completed at stage 1 and responded in writing with the necessary explanation, resolution and/or apology where required. |

| 6.2 | Complaints must be acknowledged, defined and logged at stage 1 of the complaints procedure <u>within five working days of the</u> <u>complaint being received</u> . | Yes | Tell us policy and procedure Section 9.2 | Defined in our procedure |
|-----|--|-----|---|--|
| 6.3 | Landlords must issue a full response to stage 1 complaints within 10 working days of the complaint being acknowledged. | Yes | Tell us policy and procedure Section 9.2 | Defined in our procedure |
| 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 | Tell us policy and procedure Section 9.2 Appendix 2 | This is defined in our procedure and we have a template letter for stating why we have requested and extension and that the extension will be no more than 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 | Tell us policy and procedure Section 11.2 Appendix 2 | This is covered in our procedure and is stated in our template letter. |
| 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 | Tell us policy and procedure Section 9.2 Appendix 3 | Our contracts and performance managers respond with the outcome of the complaint, any actions outstanding will be completed within an agreed timescale provided in the response. |

| 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 | Tell us policy and procedure Section 9.2 Appendix 3 | Our template response letters support complaint investigators to cover these areas in their responses. |
|-----|--|-----|--|--|
| 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 | Tell us policy and procedure Section 9.2 | This is covered in our procedure |
| 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 | Tell us policy and procedure Section 9.2 Appendix 3 | Our template response letters support complaint investigators to cover these areas in their responses. |

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 | Tell us policy and procedure Section 9.2 | Defined in our policy and procedure. |
| 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 | Tell us policy and procedure Section 9.2 Appendix 4 | Defined within our policy and procedure |
| 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 | Tell us policy and procedure Section 9.2 | Defined within our policy and procedure |
| 6.13 | The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1. | Yes | Tell us policy and procedure Section 9.2 | Stage 2 complaints are heard by a regional director |
| 6.14 | Landlords must issue a final response to the stage 2 within 20 working days of the complaint being acknowledged. | Yes | Tell us policy and procedure Section 9.2 | Defined within our procedure and template letters |
| 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 | Tell us policy and procedure Section 9.2 | Defined within our policy and procedure |

| 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 | Tell us policy and procedure Section 9.2 Appendix 5 | Defined within our policy and procedure |
|------|--|-----|--|---|
| 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 | Tell us policy and procedure Appendix 6 | Our regional directors respond with the outcome of the complaint, any actions outstanding will be completed within an agreed timescale provided in the response. |
| 6.18 | Landlords must address all points raised in the complaint definition and provide clear reasons for any decisions, referencing the relevant policy, law and good practice where appropriate. | Yes | Tell us policy and procedure Section 9.2 Appendix 6 | We respond to all complaints in writing. |
| 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 | Tell us policy and procedure Section 9.2 Appendix 6 | Our template response letters support complaint investigators to cover these areas in their responses. |
| 6.20 | Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response. | Yes | Tell us policy and procedure Sections 9.1 and 9.2 | Defined within our policy and procedure. |

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 | Tell us policy and procedure Section 12 Quality assurance, performance and monitoring policy and procedure | Our procedure states that in this circumstance we will provide a written apology, an explanation of actions, considering financial remedies. We have covered the other points in our response letters. Our quality assurance policy covers that we acknowledge where things have gone wrong and how we learn and make amendments to decisions, policies or procedures. |
| 7.2 | Any remedy offered must reflect the impact on the resident as a result of any fault identified. | Yes | Tell us policy and procedure Sections 12.1 and 12.2 Compensation policy | Defined within our policy and procedure |
| 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 | Tell us policy and procedure Section 12.1 Appendix 3 and 6 | Our procedure and template letters clearly state what remedies will be provided and the timescales for this to be actioned |

| 7.4 Junction of the State account of the Junction of the State account o | Yes | Iell us policy and procedure Section 11.5 | Defined within our policy and procedure |
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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 | Tell us policy and procedure Section 13.2 | Reviewed by our Board and published on our website. We have not had any contact from the Ombudsman regarding our handling of 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 | Tell us policy and procedure Section 13.3 and 13.4 | Published on our website |
|-----|--|-----|---|--|
| 8.3 | Landlords must also carry out a self- assessment following a significant restructure, merger and/or change in procedures. | Yes | | No significant changes are planned, however if this were to occur we could consider this |
| 8.4 | Landlords may be asked to review and update the self-assessment following an Ombudsman investigation. | Yes | | If an investigation takes place we will review and update our self-assessment |
| 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 | | In exceptional circumstances we will inform the Ombudsman |

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 | Quality assurance policy Section 4 Tell us policy and procedure Section 13.3 | We are committed to continuous improvement Our report provides changes to service delivery as a result of a complaint |

| 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 | Quality assurance, performance and monitoring policy Section 4 Tell us policy and procedure Section 13.3 | We've examples in services where we have made changes to practice as a result of complaints. This includes changes to policies and procedures and the development of service user guides. |
|-----|--|-----|--|--|
| 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 | Quality assurance, performance and monitoring policy Section 4 Tell us Procedure Section 13.3 | Annual reports are provided to our client engagement team, who'll offer recommendations for change in service delivery and highlight any considerations to be communicated organisation-wide. Monthly complaints reports are provided to contracts and performance managers so they can report to commissioners and other stakeholders. |
| 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 | Tell Us policy and procedure Section 5.5 | The business development and improvement manager who reports to the executive director of client services is responsible for compiling complaint analysis reports. |
| 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 | Tell us policy and procedure Section 14 | We have a named Board member who acts as our Member Responsible for Complaints |

| 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 | Tell us policy and procedure Section 14.1 and 14.2 | Included in our policy and procedure |
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| 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 | Tell us policy and procedure Section 14.2 | Included in our policy and procedure |
| 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; 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 | Co-production strategy Managers, performance team, executive team and Board meetings | a) our co-production strategy encourages a collaborative approach towards resolving complaints, we encourage feedback and agree improvements to service delivery with our clients, staff and stakeholders b) our culture is to work together and identify required changes to ensure a better service to our clients. We use reflective practice amongst teams and reflect on suggested changes at meetings at different levels. c) Our staff act professionally and in line with code of handling complaints as set out by the housing ombudsman. |