

## 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 complaint's 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                                                                                                                                                                                                                                                                                                                        |
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| 1.2            | A complaint must be defined as:<br><i>'An expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the landlord, its own staff, or those acting on its behalf, affecting a resident or group of residents.'</i>                                                          | Yes              | Complaints Policy | This definition has been adopted within our Complaints Policy.                                                                                                                                                                                                                                                                                  |
| 1.3            | A resident does not have to use the word 'complaint' for it to be treated as such. Whenever a resident expresses dissatisfaction landlords must give them the choice to make complaint. A complaint that is submitted via a third party or representative must be handled in line with the landlord's complaints policy. | Yes              | Complaints Policy | We understand the difference between a service request, a complaint expressed as such, and an expression of dissatisfaction. It is part of our training for our teams and explained in our information for customers. We are clear that we normally accept complaints from third parties and advocates who have been given appropriate consent. |
| 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                    | Yes              | Complaints Policy | Our policy is clear about what we deem to be a service request versus a complaint, and it explains the route we will take when this is raised.                                                                                                                                                                                                  |

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|     | be recorded, monitored and reviewed regularly.                                                                                                                                                                                                                                                                                                                     |     |                   |                                                                                                                                                                                                                                                                                                |
| 1.5 | A complaint must be raised when the resident expresses dissatisfaction with the response to their service request, even if the handling of the service request remains ongoing. Landlords must not stop their efforts to address the service request if the resident complains.                                                                                    | Yes | Complaints Policy | We understand the difference between a service request, a complaint expressed as such and an expression of dissatisfaction. Teams have been trained and we will always review the history of the customers interaction and where we see that a service has failed, a complaint will be raised. |
| 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 | Complaints Policy | Any surveys we conduct will explain how feedback will be used and provide a link to our website and include our complaints email address.                                                                                                                                                      |

## Section 2: Exclusions

| Code provision | Code requirement                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | Comply: Yes / No | Evidence          | Commentary / explanation                                                                                                                                                                   |
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| 2.1            | Landlords must accept a complaint unless there is a valid reason not to do so. If landlords decide not to accept a complaint, they must be able to evidence their reasoning. Each complaint must be considered on its own merits                                                                                                                                                                                                                                                                                                           | Yes              | Complaints Policy | All complaints will be accepted unless the matter being raised is not covered under the “complaint” policy section.                                                                        |
| 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:<br>The issue giving rise to the complaint occurred over twelve months ago.<br>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.<br>Matters that have previously been considered under the complaints policy. | Yes              | Complaints Policy | Our Complaints Policy highlights the circumstances where we might not accept a complaint however, we will always ensure that residents are supported through the most appropriate channel. |
| 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                                                                                                                                                                                                                                                                                                                                                                                               | Yes              | Complaints Policy | Our complaints policy details that we will accept complaints within 12 months of the issue happening, or complainants becoming aware of the issue.                                         |

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|     | 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.                                                                                                                                                                                                   |     |                   |                                                                                                                                                           |
| 2.4 | If a landlord decides not to accept a complaint, an explanation must be provided to the resident setting out the reasons why the matter is not suitable for the complaints process and the right to take that decision to the Ombudsman. If the Ombudsman does not agree that the exclusion has been fairly applied, the Ombudsman may tell the landlord to take on the complaint. | Yes | Complaints Policy | If we do not accept a complaint, the reasoning, evidence, and details of how to refer the decision to the Housing Ombudsman will be included in response. |
| 2.5 | Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.                                                                                                                                                                                                                                             | Yes | Complaints Policy | All complaints are considered on the individual circumstances of each case. Refusals are only made in line with our Complaints Policy.                    |

### Section 3: Accessibility and Awareness

| Code provision | Code requirement                                                                                                                                                                                                                                                                                                | Comply: Yes / No | Evidence                                                     | Commentary / explanation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
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| 3.1            | Landlords must make it easy for residents to complain by providing different channels through which they can make a complaint. Landlords must consider their duties under the Equality Act 2010 and anticipate the needs and reasonable adjustments of residents who may need to access the complaints process. | Yes              | Complaints Policy and Equality, Diversity & Inclusion Policy | <p>Complaints are accepted in many ways. For example, by phone, letter, email, in person and via our tenancy app.</p> <p>Where we have been notified of a condition or situation disadvantaging a customer, or other household members, we will seek to make reasonable adjustments to delivery of services in line with the Equality Act 2010.</p> <p>We will not make assumptions about customer requirements for reasonable adjustments or what those adjustments might be. We will endeavour to agree and deliver adjustments in a reasonable and mutually agreeable timescale. However, in specific circumstances there may be a delay whilst specialist advice is obtained. Where this is the case we will keep customer updated on progress.</p> |
| 3.2            | Residents must be able to raise their complaints in any way and with any member of staff. All staff must be aware of the complaints process and be able to pass details of the complaint to the appropriate person within the landlord.                                                                         | Yes              | Complaints Policy                                            | <p>Complaints are accepted in many ways. As outlined above.</p> <p>Guidance will be provided on the route to take for those that raise a complaint to our operational team members and our 3<sup>rd</sup> party contractors if a resident expresses dissatisfaction during a routine day to day visit.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                              |

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| 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 | Website link              | Our complaints policy is available on our website, guiding residents on how to make a complaint. We treat complaints as opportunities to learn and shape our improvement strategies.      |
| 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 | Website                   | Our complaints policy outlines our two-stage process, with details of each stage. It can be printed, translated, or provided in large print, when required by residents.                  |
| 3.5 | The policy must explain how the landlord will publicise details of the complaints policy, including information about the Ombudsman and this Code.                                                                                                                               | Yes | Complaints Policy         | Our complaints policy is available on our website. Links to the website and how to make a complaint or provide feedback are included in start of tenancy welcome packs.                   |
| 3.6 | Landlords must give residents the opportunity to have a representative deal with their complaint on their behalf, and to be represented or accompanied at any meeting with the landlord.                                                                                         | Yes | Complaints Policy         | We accept and progress complaints via third parties with consent as detailed in our Complaints Policy.                                                                                    |
| 3.7 | Landlords must provide residents with information on their right to access the Ombudsman service and how the                                                                                                                                                                     | Yes | Complaints Policy Website | Our policy, complaints acknowledgement templates and formal responses provide residents with information on their right to access the Ombudsman service and includes contact information. |

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|  | individual can engage with the Ombudsman about their complaint. |  |  |  |
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#### Section 4: Complaint Handling Staff

| Code provision | Code requirement                                                                                                                                                                                                                                                                                                                     | Comply: Yes / No | Evidence                                                                           | Commentary / explanation                                                                                                                                                                                                                                                                                                                                                 |
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| 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              | Complaint Officers and Senior Managers coordinate complaints through to resolution | Our dedicated Complaints Officers and Senior Managers are responsible for the management and oversight of complaints, including liaison with the Housing Ombudsman. Compliance and reporting for complaints to our governing body and Member Responsible for Complaints (MRC) are the responsibility of the Area Directors who report quarterly or as required to Board. |
| 4.2            | The complaints officer must have access to staff at all levels to facilitate the prompt resolution of complaints. They must also have the authority and autonomy to act to resolve disputes promptly and fairly.                                                                                                                     | Yes              | Complaints Policy                                                                  | The Complaints Officers and Senior Managers liaise with all levels of appropriate colleagues and have the authority and autonomy to resolve disputes.                                                                                                                                                                                                                    |
| 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                                                                                                                                                                                | Yes              | External and Internal Training                                                     | External and internal training is provided to operational / customer service employees to embed the importance of putting things right when we have got it wrong, learning from                                                                                                                                                                                          |



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|  | importance of complaint handling. It is important that complaints are seen as a core service and must be resourced to handle complaints effectively |  |  | complaints to prevent reoccurrence and improve the resident experience. |
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## Section 5: The Complaint Handling Process

| Code provision | Code requirement                                                                                                                                                                                                                                    | Comply: Yes / No | Evidence          | Commentary / explanation                                                                                                                       |
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| 5.1            | Landlords must have a single policy in place for dealing with complaints covered by this Code. Residents must not be treated differently if they complain.                                                                                          | Yes              | Complaints Policy | We have on single policy in place that is in line with the Housing Ombudsman Code. residents will not be treated differently if they complain. |
| 5.2            | The early and local resolution of issues between landlords and residents is key to effective complaint handling. It is not appropriate to have extra named stages (such as 'stage 0' or 'informal complaint') as this causes unnecessary confusion. | Yes              | Complaints Policy | We clearly define the stages in our Complaints Policy.                                                                                         |
| 5.3            | A process with more than two stages is not acceptable under any circumstances as this will make the complaint process unduly long and delay access to the Ombudsman.                                                                                | Yes              | Complaints Policy | Our complaints process consists of two stages.                                                                                                 |
| 5.4            | Where a landlord's complaint response is handled by a third party (e.g. a                                                                                                                                                                           | Yes              | N/A               | We handle all complaints ourselves. No complaints are handled by a third party.                                                                |

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|     | 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.                                                                                                                  |     |                   |                                                                                                                                                                                                                                               |
| 5.5 | Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.                                                                                                                                                                                                                   | Yes | N/A               | As above, we handle all complaints ourselves. No complaints are handled by a third party.                                                                                                                                                     |
| 5.6 | When a complaint is logged at Stage 1 or escalated to Stage 2, landlords must set out their understanding of the complaint and the outcomes the resident is seeking. The Code will refer to this as “the complaint definition.” If any aspect of the complaint is unclear, the resident must be asked for clarification. | Yes | Complaints Policy | A complaint definition is included in our formal response. We summarise our understanding in writing, giving residents the opportunity to highlight any errors.                                                                               |
| 5.7 | When a complaint is acknowledged at either stage, landlords must be clear which aspects of the complaint they are, and are not, responsible for and clarify any areas where this is not clear.                                                                                                                           | Yes | Complaints Policy | We discuss with residents at the earliest opportunity where we are unable to meet their desired outcome, or expectation and explain why. We set out in our communication and responses to residents, what we are and are not responsible for. |
| 5.8 | At each stage of the complaints process, complaint handlers must:<br>a. deal with complaints on their merits, act independently, and have an open mind;                                                                                                                                                                  | Yes |                   | We have mandatory training for all colleagues on data protection, confidentiality and information governance.                                                                                                                                 |

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|      | <p>b. give the resident a fair chance to set out their position;</p> <p>c. take measures to address any actual or perceived conflict of interest; and</p> <p>d. consider all relevant information and evidence carefully.</p>                                                                                    |     |                   | <p>We will listen to the customer and allow them the time they need to set out their position.</p> <p>Where there are perceived conflicts of interest, we may look to get an independent view of the issue at hand. We will review the evidence provided by the customer and what the case history tells</p>                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| 5.9  | Where a response to a complaint will fall outside the timescales set out in this Code, the landlord must agree with the resident suitable intervals for keeping them informed about their complaint.                                                                                                             | Yes | Complaints Policy | If it is not possible to provide the complainant with a full response within the target timeframe, this will be discussed with the complainant and a revised timeframe will be given.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| 5.10 | Landlords must make reasonable adjustments for residents where appropriate under the Equality Act 2010. Landlords must keep a record of any reasonable adjustments agreed, as well as a record of any disabilities a resident has disclosed. Any agreed reasonable adjustments must be kept under active review. | Yes | Complaints Policy | <p>We acknowledge our duties under the Equality Act 2010 (the Act). Whilst the Act does not define what is a 'reasonable adjustment,' the Equality and Human Rights Commission recommends consideration of the following factors in determining what is 'reasonable':</p> <ul style="list-style-type: none"> <li>• How effective the adjustment will be in avoiding the disadvantage the customer would otherwise experience</li> <li>• The practicality of the adjustments</li> <li>• The extent of any disruption the adjustments might cause</li> <li>• The financial and other costs of making the adjustment</li> <li>• The amount resources already in place</li> <li>• The availability of financial support or other assistance</li> </ul> |

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|      |                                                                                                                                                                                                                                                                                             |     |                   | Adjustments will be highlighted on our CRM at the start of tenancy and reviewed throughout the tenancy.                                                                                                                                                                                                                                                                                                                                      |
| 5.11 | Landlords must not refuse to escalate a complaint through all stages of the complaints procedure unless it has valid reasons to do so. Landlords must clearly set out these reasons, and they must comply with the provisions set out in section 2 of this Code.                            | Yes | Complaints Policy | We do not unreasonable refuse to escalate a complaint through all stages of our complaints process. Where it is clear a dispute remains about the level of compensation offered, we may use our compensation review process rather than escalation as the detail of the complaint does not require a review. The customer is informed of this and retains the right to escalate their case if they are unhappy with the compensation review. |
| 5.12 | A full record must be kept of the complaint, and the outcomes at each stage. This must include the original complaint and the date received, all correspondence with the resident, correspondence with other parties, and any relevant supporting documentation such as reports or surveys. | Yes | Complaints Policy | Our complaints process ensure we capture all records of communications, documents, and decisions of every case on our Complaint "Tracker." We carry out checks to make sure we are doing this consistently and will act on any issues arising.                                                                                                                                                                                               |
| 5.13 | Landlords must have processes in place to ensure a complaint can be remedied at any stage of its complaints process. Landlords must ensure appropriate remedies can be provided at any stage of the complaints process without the need for escalation.                                     | Yes | Complaints Policy | Complaint Officers and Senior Managers will work with colleagues to resolve problems swiftly and to provide our response to the complaint. They will work together to understand the complaint and how the resident wishes us to put things right; they'll provide updates, and the final decision will come from them.                                                                                                                      |

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| 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 | Unacceptable Behaviour Policy | Our Unacceptable Behaviour Policy outlines how we manage unacceptable behaviour and restrictions which may be put in place for such behaviour. |
| 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 | Unacceptable Behaviour Policy | This is reflected in our Unacceptable Behaviour Policy                                                                                         |

## Section 6: Complaints Stages

### Stage 1

| Code provision | Code requirement                                                                                                                                                                                                                                                                                                                                        | Comply: Yes / No | Evidence          | Commentary / explanation                                                                                                                                                                                                                                                                 |
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| 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, | Yes              | Complaints Policy | All complaints are assessed to understand what is required to fully consider the issues and resolution actions. Complaints Officers will consider vulnerabilities and potential risks and use this information to prioritise actions and provide a response at the earliest opportunity. |

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|     | apology or resolution provided to the resident.                                                                                                                                                                                                                                                                                   |     |                   |                                                                                                                                                                                                                                                   |
| 6.2 | Complaints must be acknowledged, defined, and logged at stage 1 of the complaint's procedure <b><u>within five working days of the complaint being received</u></b> .                                                                                                                                                             | Yes | Complaints Policy | We define the stages of our complaint process in our Complaints Policy. When a complaint is received, we commit to logging and acknowledgement within five working days of receipt.                                                               |
| 6.3 | Landlords must issue a full response to stage 1 complaints <b><u>within 10 working days</u></b> of the complaint being acknowledged.                                                                                                                                                                                              | Yes | Complaints Policy | The timescale is outlined in our Complaints Policy and is regularly monitored as a key performance indicator.                                                                                                                                     |
| 6.4 | Landlords must decide whether an extension to this timescale is needed when considering the complexity of the complaint and then inform the resident of the expected timescale for response. Any extension must be no more than 10 working days without good reason, and the reason(s) must be clearly explained to the resident. | Yes | Complaints Policy | If, during our investigation, we need more time to respond, we will contact the resident, explain the reasons, and seek agreement. Then we will confirm this in writing.                                                                          |
| 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 | We will signpost residents to the Housing Ombudsman Service for independent advice, or review when we extend a timescale for response                                                                                                             |
| 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                                                                                                                  | Yes | Complaints Policy | We send a response as soon as we know the outcome of the complaint. This may be before we have completed all the actions required to remedy the issue. Our responses include an action plan for remaining actions with expected completion dates. |

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|     | tracked and 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 | Complaints Policy | Complaint Officers and Senior Management ensure that all concerns are fully answered in the complaint response.<br><br>If a resident feels we have not answered all parts of their complaint, this is grounds for escalation.                                  |
| 6.8 | Where residents raise additional complaints during the investigation, these must be incorporated into the stage 1 response if they are related, and the stage 1 response has not been issued. Where the stage 1 response has been issued, the new issues are unrelated to the issues already being investigated or it would unreasonably delay the response, the new issues must be logged as a new complaint. | Yes | Complaints Policy | Any additional complaints raised during a complaint investigation will be incorporated into the original complaint and recorded on the Complaint Management Tracker and CRM. New issues unrelated to the original complaint will be raised as a new complaint. |
| 6.9 | Landlords must confirm the following in writing to the resident at the completion of stage 1 in clear, plain language:<br>a. the complaint stage;<br>b. the complaint definition;<br>c. the decision on the complaint;<br>d. the reasons for any decisions made;<br>e. the details of any remedy offered to put things right;                                                                                  | Yes | Complaints Policy | Our template letters and training reflect these code requirements                                                                                                                                                                                              |

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|  | f. details of any outstanding actions; and<br>g. details of how to escalate the matter to stage 2 if the individual is not satisfied with the response. |  |  |  |
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## Stage 2

| Code provision | Code requirement                                                                                                                                                                                                                | Comply: Yes / No | Evidence          | Commentary / explanation                                                                                                                                                                                                                                                     |
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| 6.10           | If all or part of the complaint is not resolved to the resident's satisfaction at stage 1, it must be progressed to stage 2 of the landlord's procedure. Stage 2 is the landlord's final response.                              | Yes              | Complaints Policy | Our Complaints Policy details how we will escalate to stage two, our final response. If the complaint is not resolved to the resident's satisfaction, we provide the Housing Ombudsman Service contact information.                                                          |
| 6.11           | Requests for stage 2 must be acknowledged, defined, and logged at stage 2 of the complaint's procedure within five working days of the escalation request being received.                                                       | Yes              | Complaints Policy | When a stage two escalation is requested, we commit to acknowledging and logging the complaint as stage two within five working days of receipt. When acknowledging Stage two complaints, we summarise our understanding of the issues outstanding and the desired outcomes. |
| 6.12           | Residents must not be required to explain their reasons for requesting a stage 2 consideration. Landlords are expected to make reasonable efforts to understand why a resident remains unhappy as part of its stage 2 response. | Yes              | Complaints Policy | We do not require an explanation of reasons for requesting a Stage two review. We do seek to understand why the resident remains unhappy and the outcomes they are seeking to resolve the complaint, so that we can give an effective response.                              |
| 6.13           | The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.                                                                                                           | Yes              | Complaints Policy | Our Complaints Policy states that an appropriately trained, senior complaint officer with no previous involvement will conduct the complaint review.                                                                                                                         |



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| 6.14 | Landlords must issue a final response to the stage 2 <b><u>within 20 working days</u></b> of the complaint being acknowledged.                                                                                                                                                                                                    | Yes | Complaints Policy | This timescale for response is included in our Complaints Policy, compliance and performance are monitored and reported to management and governance groups/board on a quarterly basis.                                                               |
| 6.15 | Landlords must decide whether an extension to this timescale is needed when considering the complexity of the complaint and then inform the resident of the expected timescale for response. Any extension must be no more than 20 working days without good reason, and the reason(s) must be clearly explained to the resident. | Yes | Complaints Policy | If, during our investigation, we need more time to provide a response, we will inform the resident and explain why additional time is needed. We will confirm this in writing.                                                                        |
| 6.16 | When an organisation informs a resident about an extension to these timescales, they must be provided with the contact details of the Ombudsman.                                                                                                                                                                                  | Yes | Complaints Policy | For any extension to timescales, we will signpost the resident to the Housing Ombudsman Service for independent advice or review.                                                                                                                     |
| 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 | Complaints Policy | We send a response as soon as we know the outcome of the complaint. This may be before we have completed all the actions required to remedy the issue. Our responses include an action plan for any remaining actions with expected completion dates. |
| 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 | Complaint officers ensure that all points agreed in within the complaint are fully answered in the complaint response. Our template response letters include guidance for colleagues to help with consistency.                                        |

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| 6.19 | Landlords must confirm the following in writing to the resident at the completion of stage 2 in clear, plain language:<br>a. the complaint stage;<br>b. the complaint definition;<br>c. the decision on the complaint;<br>d. the reasons for any decisions made;<br>e. the details of any remedy offered to put things right;<br>f. details of any outstanding actions; and<br>g. details of how to escalate the matter to the Ombudsman Service if the individual remains dissatisfied. | Yes | Complaints Policy | These details are provided in our response and are included in our Complaints Policy and training.                                                                                                                                                                      |
| 6.20 | Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.                                                                                                                                                                                                                                                                                                                                                                    | Yes | Complaints Policy | After gaining an understanding of the outcomes required for the complaint to be resolved, the complaint officer and "senior complaint resolution lead" Senior Management will arrange a meeting with all appropriate colleagues to support the resolution and response. |

## Section 7: Putting things right

| Code provision | Code requirement | Comply: Yes / No | Evidence | Commentary / explanation |
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| 7.1 | <p>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:</p> <ul style="list-style-type: none"> <li>• Apologising;</li> <li>• Acknowledging where things have gone wrong;</li> <li>• Providing an explanation, assistance or reasons;</li> <li>• Taking action if there has been delay;</li> <li>• Reconsidering or changing a decision;</li> <li>• Amending a record or adding a correction or addendum;</li> <li>• Providing a financial remedy;</li> <li>• Changing policies, procedures or practices.</li> </ul> | Yes | Complaints Policy and Compensation Policy | In our responses to residents, we apologise, acknowledge where things went wrong and say what we will do to fix the problem. We offer compensation in line with our Compensation Policy. We outline in our response, where lessons have been learnt, and any improvements that have been made as a result of the complaint, where applicable.                    |
| 7.2 | Any remedy offered must reflect the impact on the resident as a result of any fault identified.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Yes | Compensation Policy                       | We offer remedies that reflect the extent of service failure and detriment caused to the resident.                                                                                                                                                                                                                                                               |
| 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 Policy and Compensation Policy  | We send a response as soon as we know the outcome of the complaint. This may be before we have completed all the actions required to remedy the issue. Our responses include an action plan for any remaining actions with expected completion dates. Offer of compensation in a response will detail the next steps if the resident wishes to accept the offer. |

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| 7.4 | Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies. | Yes | Compensation Policy | Our Compensation Policy has been created using the Housing Ombudsman remedies guidance. |
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## Section 8: Self-assessment, reporting and compliance

| Code provision | Code requirement                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Comply: Yes / No | Evidence                                                                                          | Commentary / explanation                                                                                                                                                                                                        |
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| 8.1            | Landlords must produce an annual complaints performance and service improvement report for scrutiny and challenge, which must include:<br>a. the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements.<br>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;<br>c. any findings of non-compliance with this Code by the Ombudsman; | Yes              | Complaints Performance And Service Improvement Report.<br><br>Complaint Handling Self- Assessment | Our annual complaints performance has been produced alongside the self-assessment.<br><br>There's also greater scrutiny on, and accountability for, complaints management and performance by our board and our leadership team. |

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|     | <p>d. the service improvements made as a result of the learning from complaints;</p> <p>e. any annual report about the landlord's performance from the Ombudsman; and</p> <p>f. any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord.</p> |     |  |                                                                                                                                                                                                   |
| 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 |  | The annual complaints performance and service improvement report has been shared with our board members and will be published on our website at the same time as the self-assessment is produced. |
| 8.3 | Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.                                                                                                                                                                          | Yes |  | No significant restructure, merger and/or change in procedures                                                                                                                                    |
| 8.4 | Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.                                                                                                                                                                                             | Yes |  | We will review and update this self-assessment if required to do so.                                                                                                                              |
| 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                                                                                             | Yes |  | If we are unable to comply with the code, we will inform the Ombudsman and affected residents, providing a timescale for compliance.                                                              |

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|  | publish this on their website Landlords must provide a timescale for returning to compliance with the Code. |  |  |  |
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## Section 9: Scrutiny & oversight: continuous learning and improvement

| Code provision | Code requirement                                                                                                                                                                                                                                      | Comply: Yes / No | Evidence                                               | Commentary / explanation                                                                                                                                                                                                                                                                      |
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| 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              | Complaints Performance And Service Improvement Report. | We review lessons learnt from complaints and take action to improve resident experience and to prevent further complaints of a similar nature.<br><br>Lessons learnt from complaints and service improvements made over the last years are outlined in our annual service improvement report. |
| 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              | As above                                               | Our Area Directors oversee our lessons learnt framework which helps us to discover, agree, track improvements, define the impact, and promote lessons learnt from multiple sources, including complaints.                                                                                     |
| 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              | As above                                               | Learnings from complaints are included in our reports to residents, committees, and Board.                                                                                                                                                                                                    |

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| 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 | As above                                               | Area Directors hold accountability for the management of complaints. The Board conducts quarterly reviews of emerging trends, lessons learned, and any improvements implemented or proposed.                                                                                                                                                                                 |
| 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 |                                                        | We have a lead Board Member who is responsible for complaints (MRC).                                                                                                                                                                                                                                                                                                         |
| 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 |                                                        | Our Board Member role description outlines responsibilities – this includes challenging performance and improvement.                                                                                                                                                                                                                                                         |
| 9.7 | As a minimum, the MRC, and the governing body (or equivalent) must receive:<br>a. regular updates on the volume, categories, and outcomes of complaints, alongside complaint handling performance;                                                                                               | Yes | Complaints Performance And Service Improvement Report. | Our MRC and Board Members receive and review: <ul style="list-style-type: none"> <li>Regular updates on the volume, categories, and outcomes of complaints, alongside complaint handling performance</li> <li>Regular reviews of issues and trends arising from complaint handling</li> <li>Regular updates on the outcomes of the Ombudsman's investigations and</li> </ul> |

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|     | <p>b. regular reviews of issues and trends arising from complaint handling;</p> <p>c. regular updates on the outcomes of the Ombudsman's investigations and progress made in complying with orders related to severe maladministration findings; and</p> <p>d. annual complaints performance and service improvement report.</p>                                                                                                                                                                                                                        |     |  | <p>progress made in complying with orders related to severe maladministration findings</p> <ul style="list-style-type: none"> <li>Annual complaints performance and service improvement reports.</li> </ul> |
| 9.8 | <p>Landlords must have a standard objective in relation to complaint handling for all relevant employees or third parties that reflects the need to:</p> <p>a. have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments;</p> <p>b. take collective responsibility for any shortfalls identified through complaints, rather than blaming others; and</p> <p>c. act within the professional standards for engaging with complaints as set by any relevant professional body.</p> | Yes |  | <p>All front facing employees have a standard objective in relation to complaint handling.</p>                                                                                                              |