

Appendix A: Self-assessment form

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

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

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

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

Section 1: Definition of a complaint

Code provision	Code requirement	Comply: Yes / No	Evidence Commentary / explanation
1.2	A complaint must be defined as: <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	Our policy defines what a complaint is, and our team members understand what constitutes a complaint. We gave an overview of what a complaint is and isn’t at Atrium, our all-staff meeting, on 17 January 2024. We have also completed companywide training and guidance around complaint handling, and all new starters receive an update on complaints as part of their induction.
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	Our policy and explains how we accept a complaint and how we manage these. We accept complaints on behalf of residents, with their permission. We respond to any MP or Councillor enquiry in the same case handling response times as complaints. We have completed a guide to complaint reporting both for staff and residents which is on our intranet. We gave an overview of what a complaint is and isn’t at Atrium, our all-staff meeting, on 17 January 2024.
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	Yes	This is contained within our policy and procedure documents for our teams. We have made improvements to how we determine a complaint and service request both for our residents and with our teams. This has seen an increase in complaints being

	to put something right. Service requests are not complaints, but must be recorded, monitored and reviewed regularly.		<p>upheld as we are recording more complaints relating to a service failure than a service request.</p> <p>We report to Leadership team, Resident Experience Committee (REC) and Board on the numbers of complaints we receive, the category of complaint, outcomes and lessons learned on a quarterly basis. We also include changes we're making and priorities for the next quarter.</p>
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	<p>We continue our work to complete a service request regardless of whether a complaint is raised as part of this. We have had several examples during 2023/24 where we have continued work to resolve the issue whilst the complaint has been investigated.</p> <p>This is also included in our policy and procedure for complaint handling.</p>
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	<p>We review all Tenant Satisfaction Measures (TSM) survey feedback and raise a case for the relevant team to contact a resident who has shared dissatisfaction, where their details have been provided.</p> <p>Where a complaint or service failure is identified, these are managed within our complaints process.</p>

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	We review each complaint and accept all complaints in line with our policy and procedure. This includes across all our service areas, accepting that some complaints will not be eligible to escalate to the Housing Ombudsman Service (HOS). Examples of these are set out within our policy.
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: <ul style="list-style-type: none"> <li data-bbox="360 1018 927 1123">• The issue giving rise to the complaint occurred over twelve months ago. <li data-bbox="360 1145 927 1321">• Legal proceedings have started. This is defined as details of the claim, such as the Claim Form and Particulars of Claim, having been filed at court. 	Yes	Yes, our complaints policy and associated procedure outlines the acceptable exclusions.

	<ul style="list-style-type: none"> Matters that have previously been considered under the complaints policy. 		
2.3	Landlords must accept complaints referred to them within 12 months of the issue occurring or the resident becoming aware of the issue, unless they are excluded on other grounds. Landlords must consider whether to apply discretion to accept complaints made outside this time limit where there are good reasons to do so.	Yes	This is outlined within our complaints policy. Our procedure for our complaint handling team sets out discretion around timescales and any discretion is discussed with the customer experience and insight manager.
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	<p>This is contained within our complaints policy and the template letters that we send to residents about the outcome or confirmation of their complaint, or not, if this is now a complaint as set out in the policy.</p> <p>We are registered and using the HOS online portal and have access to cases under review and respond accordingly, within the required timescales.</p>
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Yes	We review each complaint on an individual basis in line with our complaints policy and procedure. We use our vulnerable persons principles to ensure that we offer an individual responses, guidance and support.

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	<p>Accessibility is listed in our equality and diversity policy along with our complaint policy.</p> <p>Our complaints policy had an equality impact assessment completed and is reviewed when the policy is updated.</p> <p>Our policy lists the relevant legislation with which we will comply.</p> <p>Our teams who monitor the social media channels send any complaint for acknowledgement to our Customer Experience team.</p> <p>Our social media policy identifies our approach to confidentiality.</p> <p>We use our vulnerable persons principles to ensure that we offer an individual responses, guidance and support. Where we have concerns for a resident welfare, we make safeguarding referrals or use our internal 'somethings not right' process. This is an email referral to the Supported team, who will investigate any concerns raised. The use of this is well embedded within the business.</p>
3.2	Residents must be able to raise their complaints in any way and with any	Yes	This is in place. We accept complaints across multiple channels, and this is communicated and promoted in various

	<p>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.</p>		<p>channels such as our website, social media, residents' magazine and on the telephone.</p> <p>All of our teams are aware that they can accept complaints from a resident at any point of contact they have. This was confirmed in our atrium meeting for all staff on 17 January 2024.</p>
3.3	<p>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.</p>	Yes	<p>We have seen the number of complaints we receive overall increase over the last few years, and we think having an accessible and centralised process has made this easier for residents.</p> <p>We report quarterly our complaints key performance indicators to Leadership team, REC and Board.</p> <p>Details of complaints numbers are shared, and full explanations provided for the reasons for the complaint's trends.</p> <p>We expect to receive complaints and are focussed on the lessons learnt and reasons behind these, so we can improve our services.</p>
3.4	<p>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.</p>	Yes	<p>Our policy is on our website, as well as a summary of this within the page dedicated to complaint handling. We send copies of this as required through print, email, or translated.</p> <p>We have also recently included a link to our policy in our letter templates. Our letter templates set out our process and what will happen at stage one and two of the complaints process, along with the timescales for these.</p>

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	This is contained within our policy and is also set out in our letter templates and on our website.
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	We facilitate this and accept complaints from others, providing permission from the resident has been given. We now link to our policy within our letter templates as part of the complaints process, which also sets this out. We have updated our complaint acknowledgement to include that a resident can be represented. This will also be discussed in the telephone call we make.
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	We outline the ways to contact the HOS on all correspondence we send as part of our complaints process at every stage of our process. Information is also within our policy and on our website

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	Yes	Complaints are managed via the Customer Experience team, who have three designated complaints officer roles. The policy and process of complaint handling ensures the process is consistent and our new customer experience and insight manager has reviewed these to ensure we not only

	Code will refer to that person or team as the 'complaints officer'. This role may be in addition to other duties.		<p>comply with the code but that we are delivering great service to all our residents.</p> <p>The team have been updated of changes in workshops and they have all attended complaints handling training.</p> <p>We report quarterly our complaints key performance indicators to Leadership team, REC and Board.</p>
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	<p>The team are independent from any other service area and have the required level of autonomy required.</p> <p>The team are also fully responsible for investigating and producing a complaint response, working with the relevant service manager.</p> <p>All the team attended complaint handling training to further enhance their knowledge on 24.1.2024.</p>
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	<p>We have regular training, including 'lessons learnt' with our teams.</p> <p>Our customer experience coordinator role is focused on complaint handling and a positive culture of complaints. We have recently produced a video guide for staff around effective complaint handling.</p> <p>Our team have autonomy and authority to resolve disputes, including working with managers and other teams to agree resolutions. They undertake complaint and also attend webinars such as those hosted by the HOS.</p>

			All new team members have a complaint handling induction as part of our general induction, and we present complaints themes, numbers, outcomes and lessons learned at our quarterly all business events, Atrium.
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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	We have a single complaints policy which covers all areas of dissatisfaction across the business. We do not treat any resident 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	We do not have stage 0 or informal complaints. Our approach to complaints handling is set out in our policy and procedure. All teams have received training and can access guidance around early resolution.
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	N/A - we only have a two-stage process.
5.4	Where a landlord's complaint response is handled by a third party (e.g. a	Yes	Contractor complaints are responded through our complaints policy.

	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.		These are recorded and shared as part of our quarterly reporting.
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Yes	N/A
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	Our complaint handling letter templates set out the elements of the complaint, which are agreed with the resident during the initial contact and complaint acknowledgement. We also confirm the preferred outcomes as part of each complaint.
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	Our complaint handling letter templates set out the elements of the complaint, which are agreed with the resident during the initial contact and complaint acknowledgement. At this point, we will clarify with a resident if there are elements of a complaint we are not responsible for and confirm this in writing. We also confirm the preferred outcomes as part of each complaint.
5.8	At each stage of the complaints process, complaint handlers must:	Yes	The Customer Experience team review the complaint information and any reference to individuals.

	<ul style="list-style-type: none"> 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. 		<p>Our complaint handling letter templates set out the elements of the complaint, which are agreed with the resident during the initial contact and complaint acknowledgement. We also confirm the preferred outcomes as part of each complaint.</p> <p>We also speak to the resident on receipt of a complaint, and at stage 2 by a member of the Leadership team, to allow the resident the opportunity to set out their position, how they are feeling about the complaint and to provide reassurance and support as needed.</p> <p>Our vulnerable persons principles also support an individual response.</p> <p>We have taken the decision to build accountability and trust within this process so complaints can be viewed and those involved in the complaint are included in part of the investigation and response.</p> <p>We ensure any lessons learnt are anonymised when training/presenting.</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	<p>We have used extensions in a small number of cases. But where we have, these have been agreed by the complainant and have always been relevant to ongoing investigations related to works for the complaint.</p> <p>Where we have extended, we have given a full response within that extension time and have not exceeded the timescales.</p>
5.10	Landlords must make reasonable adjustments for residents where appropriate under the Equality Act	Yes	'Accessibility' is listed in our equality and diversity policy.

	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.		<p>Our complaints policy had an equality impact assessment completed.</p> <p>Our policy lists the relevant legislation with which we will comply.</p> <p>We have also created a vulnerable persons guide which is being rolled out to all teams in January 2024 and our housing management system, CX, enables us to capture accessibility needs or adjustments that are required. This will be enhanced following the completion of our resident survey.</p>
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	<p>Our complaints policy and procedure outline our escalation route. We have not yet made any refusal to escalate.</p> <p>Where we may need to do this in future, our policy outlines that we will set out the reasons clearly.</p>
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	Our housing management system records all stages of the complaint. We also keep copies of our responses and complaints information within a secure team folder.
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	Yes	Our focus in complaint handling is to align to the preferred outcomes of a complaint. We identify these when we make initial contact with a complainant and can use discretion to apply remedies to resolve a complaint.

	appropriate remedies can be provided at any stage of the complaints process without the need for escalation.		
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	We have a separate 'managing unacceptable behaviour' policy. Our decision making and communications with any resident that we have used this policy for, is recorded on our housing management system and the resident is notified.
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	Our managing unacceptable behaviour policy has been equality impact assessed. The application of this policy is done in conjunction with our vulnerable persons principles but also in partnership with our supported team.

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	Yes	We report on the number of complaints resolved at stage one, or where they progress to stage two and identify trends or areas for improvement. These are reported to Leadership team, REC and Board on a quarterly basis.

	resolved promptly, and an explanation, apology or resolution provided to the resident.		Our customer experience coordinator is responsible for reviewing lessons learnt and implementing remedies to resolve complaints at the earliest stage.
6.2	Complaints must be acknowledged, defined and logged at stage 1 of the complaints procedure <u>within five working days of the complaint being received</u> .	Yes	Our policy and procedure reflect the timescales and we acknowledge and comply with this timescale. Our housing management system supports our management of case handling timescales.
6.3	Landlords must issue a full response to stage 1 complaints <u>within 10 working days</u> of the complaint being acknowledged.	Yes	Our policy and procedure reflect the timescales and we acknowledge and comply with this timescale. Our housing management system supports our management of case handling timescales.
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	We review any potential extension on a case-by-case basis and any decision is in line with the prescriptions of the code, and in agreement with the resident with clear explanations as to the reasons for this extension. We have not gone beyond the agreed extension period for complaints during 2023/24.
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	All our communications with residents in our complaints process, outline the contact details for the HOS. These are in our template letters used for complaint handling.
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	Yes	As above, all responses are sent in time. Where works are still outstanding, we detail these in our responses and a timescale, wherever known, is also detailed. If we don't know, when we write a response, when an outstanding action will happen, we detail instead when we will give the next update.

	actions must still be tracked and actioned promptly with appropriate updates provided to the resident.		We share outstanding actions with the relevant team and now build in a review of the outstanding actions by the Customer Experience team.
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	<p>'Elements of complaint' and 'preferred outcomes' are set out in all responses at each stage and are responded to accordingly in the full reply.</p> <p>We discuss with the complainant any elements that will not be considered within the complaint response and provide an explanation for this.</p> <p>Our complaint responses are detailed and refer to the relevant legislation, policy or practice.</p>
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	<p>We review any additional requests on an individual basis, in line with the requirements of the code, and as per our policy and procedure. We have added elements of a complaint at stage one and stage two during complaint investigation.</p> <p>Where issues are unrelated or we have already provided a response, a new complaint is raised and processed in line with our policy and procedure.</p>
6.9	Landlords must confirm the following in writing to the resident at the completion of stage 1 in clear, plain language: <ul style="list-style-type: none"> a. the complaint stage; b. the complaint definition; c. the decision on the complaint; 		<p>This is included in each response.</p> <p>Revised letter templates were created to include plain language, and now the customer experience officer completes the full investigation and drafts the complaint response this means each letter is consistent and includes all elements of the complaint.</p>

	<p>d. the reasons for any decisions made;</p> <p>e. the details of any remedy offered to put things right;</p> <p>f. details of any outstanding actions; and</p> <p>g. details of how to escalate the matter to stage 2 if the individual is not satisfied with the response.</p>		<p>All team members attended Plain English training during 2022/23 and we have more training sessions planned during 2024/25 to ensure a continuous learning environment to ensure the standard and quality of letters/communications to residents has improved.</p>
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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	This is within our process. Anyone wishing to escalate to stage two if they remain dissatisfied is entitled to do so. We do not have any other stage beyond stage two.
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	Our policy and procedure have been updated to reflect the timescales. Our housing management system supports our management of case handling timescales.
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	We have updated our complaint handling procedure to align with this new requirement. our complaints panel, which includes involved residents, review the elements of complaint, preferred outcomes and the handling/response of the complaint at stage two.

6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Yes	<p>We have complaints review panel, which comprises of up to three involved residents (one of whom chairs this), and a member of the Leadership team, who wasn't involved at stage 1 of the process.</p> <p>The Leadership team member will contact the resident ahead of the panel to obtain greater understanding of the issues and hear the complaint first hand.</p>
6.14	Landlords must issue a final response to the stage 2 <u>within 20 working days</u> of the complaint being acknowledged.		We have had one stage two complaint go over the timescale by one working day. We addressed this in the response and awarded compensation. All other complaints have been responded to within the target time.
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	We review any potential extension on a case-by-case basis and any decision is in line with the prescriptions of the code, and in agreement with the resident with clear explanations as to the reasons for this extension. We have never gone beyond the agreed extension period for complaints during 2023/24.
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	All our communications with residents in our complaints process, outline the contact details for the HOS. These are in our template letters used for complaint handling.
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	Yes	As above, all responses are sent in time. Where works are still outstanding, we detail these in our responses and a timescale, wherever known, is also detailed. If we don't know, when we write a response, when an outstanding action will happen, we detail instead when we will give the next update. We share outstanding actions with the relevant team and now build in a review of the outstanding actions.

	actioned promptly with appropriate updates provided to the resident.		
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	The elements of complaint and preferred outcomes are set out in all responses at each stage and are responded to accordingly in the full reply. We discuss with the complainant any elements that will not be considered within the complaint response and provide an explanation for this. Our complaint responses are detailed and refer to the relevant legislation, policy or practice.
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	This is included in each response. Revised letter templates were created to include plain language, and now that the customer experience officer completes the full investigation and drafts the complaint response this means each letter is consistent and includes all elements of the complaint. All staff attended Plain English training during 2022/23 and we have more training sessions planned during 2024/25 to ensure a continuous learning environment to ensure the standard and quality of letters/communications to residents has improved.
6.20	Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.	Yes	This is within our process and set out within our complaints policy. Anyone wishing to escalate to stage two if they remain dissatisfied it entitled to do so. We do not have any other stage beyond stage two.

Section 7: Putting things right

Code provision	Code requirement	Comply: Yes / No	Evidence Commentary / explanation
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"> • 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	Our outcome letter confirms details of the investigation that was completed, the errors and issues and what is being put in place to prevent this happening again, with clear timescales if relevant.
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Yes	Our compensation policy is aligned to the Housing Ombudsman Service guidance and sets out our approach to compensation. It was reviewed following the updated guidance issued by the HOS in October 2022, and we routinely update the policy to any updates from the HOS and now refer to aggravating factors etc.
7.3	The remedy offer must clearly set out what will happen and by when, in agreement with the resident where	Yes	Our outcome letter confirms details of the investigation that was completed, the errors and issues and what is being put in place

	appropriate. Any remedy proposed must be followed through to completion.		to prevent this happening again, with clear timescales if relevant. The relevant, responsible manager for the actions, are responsible for delivery. The customer experience team also keep a record of actions due and follow up to ensure these have been completed. This is an additional step that has been added.
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes	Relevant policies and procedures have been updated and align to HOS guidance. We subscribe the to HOS communications and review decisions and update our own processes, where required. We have also completed the self-assessment best practice guides following HOS spotlight reports (anti-social behaviour, noise nuisance and damp & mould). The team also attend webinars and training, hosted by the HOS.

Section 8: Putting things right

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	Yes	We complete quarterly feedback to the Board, REC and Leadership team around lessons learnt and key issues/themes. Our self-assessment against the complaint handling code has been shared with Board, REC and Leadership team in previous years, including this one. HOS determinations have also been shared, as will future ones.

	<p>include a summary of the types of complaints the landlord has refused to accept;</p> <p>c. any findings of non-compliance with this Code by the Ombudsman;</p> <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>		<p>We report on our complaint numbers and other key messages in our communications to residents, for example our resident's magazine and annual residents report.</p> <p>Involved residents are part of the stage two complaints hearing, and they also review on a quarterly basis, our approach to complaint handling.</p> <p>Our performance and scrutiny panel completed a deep dive into complaint handling in 2022 and we accepted the recommendations and are in the process of implementing these. We also had significant assurance from our internal audit on complaint handling in 2022/23 audit programme.</p> <p>We have also completed the self-assessment best practice guides following HOS spotlight reports (anti-social behaviour, noise nuisance and damp & mould).</p>
8.2	<p>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.</p>	Yes	<p>As above, complaints performance is reported quarterly to leadership team, REC and Board.</p> <p>We also publish our complaints handling performance for residents on our website monthly, in our resident newsletter twice yearly and include a summary in our annual report.</p>
8.3	<p>Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.</p>	Yes	<p>We have not had any significant restructure, merger and/or change in procedures but would do this where required.</p>

8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	Yes	We would respond accordingly to any guidance or direction from the HOS.
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	If this was something we were impacted by, we would notify and publish this as set out.

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	Within our complaints handling process, we review lessons learnt across specific areas but also themes. Our customer experience coordinator is responsible for reviewing these and implementing changes required. These lessons learnt and key themes are shared as part of our quarterly reporting as set out in earlier comments.
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	Our customer experience coordinator and customer experience & insight manager ensure complaint handling is alive within the business, attending team meetings and sharing lessons learnt, good practice and areas for improvement. Complaints performance information including lessons learned is also shared at our quarterly all business meeting.

			All team members have an objective around complaints handling, as described, as well as preventing complaints such as taking ownership and implementing lessons learnt.
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	<p>Our reporting structure to Board and REC, both of which include residents, present a full complement of complaints handling indicators, along with lessons learnt and opportunities to improve.</p> <p>We share our complaints performance at each quarterly all-staff meetings and discuss complaints at our service collaborative meetings, also held quarterly.</p> <p>Our resident voice panels have also received information on our complaints handling, along with our performance being shared on our website.</p>
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	Our director of operations is the senior lead.
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	<p>Our MRC is a Board member and chair of the REC</p> <p>We submit the annual complaints review to our Board, as well as REC, with both also receiving quarterly updates including numbers, trends and lessons learned.</p>

9.6	<p>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.</p>	Yes	<p>Our MRC receives regular information on complaints as set out through REC and the Board. They have direct access to the Director of Operations and other members of the customer experience team to discuss cases.</p> <p>Our complaint review panel members attended a REC session in November 2023 to outline their role and provide assurance around their independence but also autonomy around complaint handling and reviews. The chair of this panel, who also sits on REC, joined our Board in early 2024.</p> <p>Board and REC receive quarterly updates including numbers, trends and lessons learned.</p>
9.7	<p>As a minimum, the MRC and the governing body (or equivalent) must receive:</p> <ul style="list-style-type: none"> 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	<p>As outlined above, we report quarterly to the MRC via Board and REC.</p>

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> <ul style="list-style-type: none"> 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	<p>All team members have an objective around complaints handling, as described, as well as preventing complaints such as taking ownership and implementing lessons learnt.</p> <p>Any new member of the team receives an induction on complaint handling.</p>
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