# 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

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| --- | --- | --- | --- | --- |
| Code provision | Code requirement | Comply: Yes / No | Evidence | Commentary / explanation |
| 1.2 | A complaint must be defined as:*‘an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the landlord, its own staff, or those acting on its behalf, affecting a resident or group of residents.’*  | Yes | See Complaints Policy – 2.1 | This definition is used in 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 | See Complaints Policy – 2.1 | Our complaints policy demonstrates the terms in which we will accept a complaint and set out that it can be via a third party. |
| 1.4 | Landlords must recognise the difference between a service request and a complaint. This must be set out in their complaints policy. A service request is a request from a resident to the landlord requiring action to be taken to put something right. Service requests are not complaints, but must be recorded, monitored and reviewed regularly. | Yes | See Complaints Policy – 2.1 | Our Complaints Policy outlines the difference between a service request and a complaint. |
| 1.5 | A complaint must be raised when the resident expresses dissatisfaction with the response to their service request, even if the handling of the service request remains ongoing. Landlords must not stop their efforts to address the service request if the resident complains.  | Yes | See Complaints Policy – 2.1 | This is explained in our policy under “service requests”. |
| 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 – 2.1 | This is explained in our policy under “Feedback through surveys”. |

# Section 2: Exclusions

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| 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  | See Complaints Policy – 2.2 | Our policy outlines the reasons we may not accept a complaint and what customers can expect.  |
| 2.2 | A complaints policy must set out the circumstances in which a matter will not be considered as a complaint or escalated, and these circumstances must be fair and reasonable to residents. Acceptable exclusions include:* The issue giving rise to the complaint occurred over twelve months ago.
* Legal proceedings have started. This is defined as details of the claim, such as the Claim Form and Particulars of Claim, having been filed at court.
* Matters that have previously been considered under the complaints policy.
 | Yes | See Complaints Policy – 2.2 | Our policy clearly explains the reason we may not accept a complaint under “Exclusions”. |
| 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  | See Complaints Policy – 2.2 | Our policy clearly explains that we accept complaints referred within 12 months of the issue occurring, or the resident becomes aware of the issue.  |
| 2.4 | If a landlord decides not to accept a complaint, an explanation must be provided to the resident setting out the reasons why the matter is not suitable for the complaints process and the right to take that decision to the Ombudsman. If the Ombudsman does not agree that the exclusion has been fairly applied, the Ombudsman may tell the landlord to take on the complaint.  | Yes  | See Complaints Policy – 2.2 | Our policy outlines the reasons we may not accept a complaint and what customers can expect in terms of communication regarding this. |
| 2.5 | Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint. | Yes | See Complaints Policy – 2.2 | Our policy outlines the reasons we may not accept a complaint and that we will consider individual cases on their own merits. |

# Section 3: Accessibility and Awareness

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| 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  | See Complaints Policy – 2.3 and 3.0[Complaints policy - Wandle Housing Association](https://www.wandle.com/policies/complaints-policy/) | We make it easy for customers to complain and accept complaints via telephone, email, post, in person. Our publications, website provide easy access information about our Complaints Policy and how to submit concerns. |
| 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  | See Complaints Policy – 2.3 | All staff are aware of the channels available to customers to make a complaint and who to contact within the organisation – there is a designated complaints inbox for all staff to contact the complaint’s team to discuss any complaints or issues.  |
| 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 | See Complaints Policy – 3.5 |  Staff are aware that complaint volumes are not seen as a negative, it is taken as opportunity for learning. |
| 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  | On our website – [Complaints policy - Wandle Housing Association](https://www.wandle.com/policies/complaints-policy/) | Our Complaints Policy is available on our website. It includes information on the two-stage process and the next steps. |
| 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  | See Complaints Policy – 2.3 and 3.5 | Section 2.3 of our policy explains that our policy will be easily accessible on our website. It also explains how we will publicise information about the Ombudsman and this code.  |
| 3.6 | Landlords must give residents the opportunity to have a representative deal with their complaint on their behalf, and to be represented or accompanied at any meeting with the landlord.  | Yes  | See Complaints Policy – 2.3[Complaints and compliments - Wandle Housing Association](https://www.wandle.com/i-am-a-homeowner/your-lease-our-service/complaints-and-compliments/) | Our policy explains how customers can have a representative and what we require to ensure a third party is authorised.Our website also sets this out on our complaints page. |
| 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  | See Complaints Policy – 2.3 and 3.1 | The right to refer to the Ombudsman and their contact details are included in stage 2 responses and on our website. We are now also including them on our stage 1 responses. |

**Section 4: Complaint Handling Staff**

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| Code provision | Code requirement | Comply: Yes / No | Evidence | Commentary / explanation |
| 4.1 | Landlords must have a person or team assigned to take responsibility for complaint handling, including liaison with the Ombudsman and ensuring complaints are reported to the governing body (or equivalent). This Code will refer to that person or team as the ‘complaints officer’. This role may be in addition to other duties.  | Yes  | See Complaints Policy – 4.0 | We have a Complaint Resolution Team including a manager and complaints officer. The team monitor complaints and service improvement. The Resolution Team manager is our liaison for the Housing Ombudsman Service.  |
| 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  | See Complaints Policy – 4.0 | All members of the complaint resolution team have access to all staff and have the authority and skills necessary to resolve disputes in a fair way. |
| 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  | See Complaints Policy – 3.5  | All staff receive complaint handling training as part of their induction to ensure they understand our process and handling principles. |

# Section 5: The Complaint Handling Process

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| --- | --- | --- | --- | --- |
| 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  | [Complaints policy - Wandle Housing Association](https://www.wandle.com/policies/complaints-policy/) | Wandle has a single policy for complaints. |
| 5.2 | The early and local resolution of issues between landlords and residents is key to effective complaint handling. It is not appropriate to have extra named stages (such as ‘stage 0’ or ‘informal complaint’) as this causes unnecessary confusion.  | Yes | See Complaints Policy – 3.1 | Our definition of a service request is clearly stated in our policy. There are no informal complaint handling stages outside of the two stages. |
| 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  | See Complaints Policy – 3.1 | We follow a two-stage complaint process, as outlined in our policy. |
| 5.4 | Where a landlord’s complaint response is handled by a third party (e.g. a contractor or independent adjudicator) at any stage, it must form part of the two stage complaints process set out in this Code. Residents must not be expected to go through two complaints processes. | Yes | See Complaints Policy – 3.0 | Where our contractors respond to complaints, they respond at stage one and this forms part of the two-stage process. At stage 2, responses are reviewed and responded to by the landlord. |
| 5.5 | Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.   | Yes  | See Complaints Policy – 3.0 | Our agreements with contractors stipulate how complaints will be dealt with in line with our policy and adherence is managed by us and discussed in contract meetings.  |
| 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  | See Complaints Policy – 3.0 and 3.1 | Our policy explains how we will set out our understanding of the complaint when providing our response. |
| 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 | See Complaints Policy – 3.0 | All complaint responses clearly detail what is and is not under our responsibility, and where possible refers customers to the correct body to escalate issues outside of our remit. |
| 5.8 | At each stage of the complaints process, complaint handlers must:  1. deal with complaints on their merits, act independently, and have an open mind;
2. give the resident a fair chance to set out their position;
3. take measures to address any actual or perceived conflict of interest; and
4. consider all relevant information and evidence carefully.
 | Yes  | See Complaints Policy – 3.0 under our investigation. | In addition to our complaint policy, we have a complaint handling guide that sets out complaint investigation process to ensure we deliver on this part of the code.  |
| 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  | See Complaints Policy – 3.1 | If we cannot meet the timescales set out in the code, then we will seek agreement from the resident and ask how they would like to be communicated with and when. |
| 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  | See Complaints Policy – 2.3 and 3.0 | Identified communication needs or any disabilities are recorded under our flag system. Reasonable adjustments are accommodated based on their needs. We have a date set to review these to ensure relevant and up to date. We also have an Additional Support and Reasonable Adjustments Policy in place to support customers further.  |
| 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  | See Complaints Policy – 2.2 | Our policy outlines the circumstances under which we may consider or decline a complaint. Regardless of the decision, we will provide a written response explaining the rationale. Additionally, we may restrict contact where deemed appropriate following a thorough assessment, enabling a more focused and efficient resolution process. |
| 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  | Customer Relationship Management System (Dynamics CRM) | Our CRM system records the dates when complaints are raised, escalated, and closed at each stage, including the date the response is sent. We maintain comprehensive records for each case, documenting all responses sent and communications received from residents. |
| 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  | See Complaints Policy  – 3.0 | Our policy makes clear that we will seek to resolve complaints throughout the complaint handling process. This may be at first point of contact and through both stages. |
| 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  | See Complaints Policy – 3.4 | Our Complaints Policy explains what behaviour we consider to be unacceptable behaviour and what may happen if it occurs. Any restrictions put in place are recorded under our flag system on the resident’s record and has a review date to ensure it remains relevant and up to date. |
| 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  | Restricted Contact Policy | Our Restricted Contact Policy clearly sets out our approach to restricting contact due to unacceptable behaviour. We will always ensure we meet our duties under the Equality Act and any restriction is approved by a panel. |

# Section 6: Complaints Stages

Stage 1

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| Code provision | Code requirement | Comply: Yes / No | Evidence | Commentary / explanation |
| 6.1 | Landlords must have processes in place to consider which complaints can be responded to as early as possible, and which require further investigation. Landlords must consider factors such as the complexity of the complaint and whether the resident is vulnerable or at risk. Most stage 1 complaints can be resolved promptly, and an explanation, apology or resolution provided to the resident.  | Yes  | See Complaints Policy – 3.1 | Stage one complaints are allocated to complaint handlers at the earliest opportunity so they can be reviewed, and it can be established if further investigation is required. We aim to resolve complaints as early as we can, subject to our ability to do so. |
| 6.2 | Complaints must be acknowledged, defined and logged at stage 1 of the complaints procedure **within five working days of the complaint being received**.  | Yes  | See Complaints Policy – 3.1 | Our policy states that we will acknowledge complaints within 5 working days of receipt.  |
| 6.3 | Landlords must issue a full response to stage 1 complaints **within 10 working days** of the complaint being acknowledged.   | Yes  | See Complaints Policy – 3.1 | Our policy states that we will issue a full response within 10 working days of being acknowledged. Where extension is required, this is discussed and agreed with the customer.  |
| 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  | See Complaints Policy – 3.1 | Our policy sets out that we will not extend timeframes without good reason. The resident is contacted (usually in writing) to confirm this and the reasons with an expected date for response.If the timescale exceeds the maximum allowed, we seek agreement from the resident |
| 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  | See Complaints Policy – 3.1 | Our policy clearly states that if an agreement cannot be reached then the resident can contact the Ombudsman. |
| 6.6 | A complaint response must be provided to the resident when the answer to the complaint is known, not when the outstanding actions required to address the issue are completed. Outstanding actions must still be tracked and actioned promptly with appropriate updates provided to the resident.    | Yes  | See Complaints Policy – 3.1 | Responses are sent within the set timeframes regardless of any action being outstanding. Our complaints team tracks the outstanding actions and informs the relevant departments of action needed.  |
| 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  | See Complaints Policy – 3.1 | Our policy states that we will address all points raised in the complaint, referencing policies where relevant.  |
| 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 | See Complaints Policy – 3.1 | Where new unrelated issues have been identified, a new stage one complaint will be raised.  |
| 6.9 | Landlords must confirm the following in writing to the resident at the completion of stage 1 in clear, plain language:  1. the complaint stage;
2. the complaint definition;
3. the decision on the complaint;
4. the reasons for any decisions made;
5. the details of any remedy offered to put things right;
6. details of any outstanding actions; and
7. details of how to escalate the matter to stage 2 if the individual is not satisfied with the response.
 | Yes  | See Complaints Policy – 3.1 | Staff have been trained in complaint handling and always use our stage 1 response template which covers all these aspects. |

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  | See Complaints Policy – 3.1 | Our policy explains our two-stage approach and what is expected  |
| 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  | See Complaints Policy – 3.1 | Our policy states that we will acknowledge escalation requests within 5 working days of receipt. |
| 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  | See Complaints Policy – 3.1 | We will always make reasonable attempts to contact a resident if anything is unclear or needs clarification. |
| 6.13 | The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.  | Yes  | See Complaints Policy – 3.1 | Our policy explains that stage two response will be responded to by a senior member of the relevant service. |
| 6.14 | Landlords must issue a final response to the stage 2 **within 20 working days** of the complaint being acknowledged.   | Yes  | See Complaints Policy – 3.1 | Our policy states that we will issue a full response within 20 working days of being acknowledged. |
| 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  | See Complaints Policy – 3.1 | Our policy set out that we will not extend timeframes without good reason. Extension is confirmed, usually in writing, detailing reasons for the extension and the expected response date.  |
| 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 | See Complaints Policy – 3.1 | This is set out in our policy.  |
| 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  | See Complaints Policy – 3.1 |  Responses are sent within the set timeframes regardless of outstanding actions. These responses set out expected completion dates of any outstanding actions. Our resolutions team now tracks all complaints to help ensure actions are completed. |
| 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  | See Complaints Policy – 3.1 | It is understood by all complaint handlers that all points should be addressed and that they should refer to the relevant policy. Our policy explains what our responses are expected to include. |
| 6.19 | Landlords must confirm the following in writing to the resident at the completion of stage 2 in clear, plain language:  1. the complaint stage;
2. the complaint definition;
3. the decision on the complaint;
4. the reasons for any decisions made;
5. the details of any remedy offered to put things right;
6. details of any outstanding actions; and
7. details of how to escalate the matter to the Ombudsman Service if the individual remains dissatisfied.
 | Yes  | See Complaints Polic – 3.1 | Our policy and response templates reflect all of these requirements |
| 6.20 | Stage 2 is the landlord’s final response and must involve all suitable staff members needed to issue such a response. | Yes  | See Complaints Policy – 3.1 | All staff issuing Stage 2 responses are suitably trained and authorised to send responses. They will always involve other teams and staff as required to handle and respond to the complaint. |

# Section 7: Putting things right

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| Code provision | Code requirement | Comply: Yes / No | Evidence | Commentary / explanation |
| 7.1 | Where something has gone wrong a landlord must acknowledge this and set out the actions it has already taken, or intends to take, to put things right. These can include: * Apologising;
* Acknowledging where things have gone wrong;
* Providing an explanation, assistance or reasons;
* Taking action if there has been delay;
* Reconsidering or changing a decision;
* Amending a record or adding a correction or addendum;
* Providing a financial remedy;
* Changing policies, procedures or practices.
 | Yes  | See Complaints Policy – 3.2 | Our policy sets out how we will put things right, giving examples as to what this may include, in line with this code. |
| 7.2 | Any remedy offered must reflect the impact on the resident as a result of any fault identified.  | Yes  | See Complaints Policy – 3.3 | Our policy emphasises our commitment to providing fair and proportionate redress. |
| 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  | See Complaints Policy  | This is clearly outlined in our policy and further supported by our complaints handling guide.  |
| 7.4 | Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.  | Yes  | See Complaints Policy – 3.3 | Our approach to remedies mirrors that of the Ombudsman’s remedy guidance. |

# Section 8: Self-assessment, reporting and compliance

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| 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: 1. the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements.
2. 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;
3. any findings of non-compliance with this Code by the Ombudsman.
4. the service improvements made as a result of the learning from complaints;
5. any annual report about the landlord’s performance from the Ombudsman; and
6. any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord.
 | Yes  | See Complaint Performance and Service Improvement Report.  | All points requirements have been covered. The report and this self-assessment are available on our website.  |
| 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  | Report is available on our website. See Complaints Policy. |  The report has been reviewed by our Resolutions Steering Group and Customer Experience Committee. The final draft has been approved by our Board.  |
| 8.3 | Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures. | Yes  | See Complaints Policy – 7.1 |  In the event of a restructure, merger and or change in procedure, the self-assessment will be completed to ensure we remain compliant. |
| 8.4 | Landlords may be asked to review and update the self-assessment following an Ombudsman investigation. | Yes  | See Complaints Policy – 7.1 | It is understood that we may be asked to do so and will willingly assist in any way. |
| 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  | See Complaints Policy – 7.1 | In such circumstances, we will inform residents of the timescale for returning to compliance with the Code. This is included in our Business Continuity Plan. |

# Section 9: Scrutiny & oversight: continuous learning and improvement

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| 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  | See Complaints Policy – 3.5 | We view all complaints as valuable opportunities for learning. We systematically log and track central themes to facilitate continuous improvement. Additionally, we hold monthly meetings with Senior Management Team to discuss insights and identify further opportunities for enhancement. |
| 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  | See Complaints Policy – 1.0 | We continue to enhance visibility and quality of our data, using it as a source of intelligence to refine service offerings. We share regular reports with our Complaints Resolutions Steering Group and Customer Experience Committee.  |
| 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  | See Complaints Policy – 3.5 | We provide regular reports on learning to the Customer Excellence Panel, committees and Board. |
| 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  | See Complaints Policy – 4.0 | Our Head of Customer Experience is the lead officer responsible for complaint handling. |
| 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  | See Complaints Policy – 4.0 | The Chair of our Customer Experience Committee has been appointed as the lead Board member for complaints. |
| 9.6 | The MRC will be responsible for ensuring the governing body receives regular information on complaints that provides insight on the landlord’s complaint handling performance. This person must have access to suitable information and staff to perform this role and report on their findings. | Yes  | See Complaints Policy – 4.0 | As above. |
| 9.7 | As a minimum, the MRC and the governing body (or equivalent) must receive: 1. regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance;
2. regular reviews of issues and trends arising from complaint handling;
3. regular updates on the outcomes of the Ombudsman’s investigations and progress made in complying with orders related to severe maladministration findings; and
4. annual complaints performance and service improvement report.
 | Yes  | See Complaints Policy – 4.0 | The Resolutions Steering Group and the Customer Experience Committee receives regular reports on complaints performance. Severe Maladministration cases are presented to the Committee, and the Chair of our Board is informed. Board review our corporate KPIs, which include complaints performance, at each meeting and approve our annual complaints performance and service improvement report.  |
| 9.8 | Landlords must have a standard objective in relation to complaint handling for all relevant employees or third parties that reflects the need to: 1. have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments;
2. take collective responsibility for any shortfalls identified through complaints, rather than blaming others; and
3. act within the professional standards for engaging with complaints as set by any relevant professional body.
 | Yes  | See Complaints Policy – 4.0 | The Complaint Resolution Manager is the contact between service areas offering advice and support. Regular meetings take place with service leads to build relationships, discuss issues and encourage positive approach to complaint handling. |