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: '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 | Section 2.2 of the complaints policy. | STH use the definition as per the CHC. This is stated 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 | Section 2.1 & 2.2 of the complaints policy. | Detailed within the stated sections within the complaints policy. |
| 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 | Yes | Section 2.4.1 of the complaints policy. Corporate Feedback System. | Detailed within the stated section of the complaints policy. All requests for service are logged and recorded on the Corporate Feedback System. |

| | 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 | Corporate Feedback System | If a customer expresses dissatisfaction with their request for service, this is then escalated to a stage 1 complaint on the Corporate Feedback System. |
| 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 | Expressions of dissatisfaction through surveys are not logged as complaints. | Link to complaints page on our website is added to any Your View Surveys. Message on how to make complaints on Voicescape satisfaction surveys. |

Section 2: Exclusions

| Code provision | Code requirement | Comply: Yes / No | Evidence | Commentary / explanation |
|-------------------|---|---------------------|------------------------------------|---|
| 2.1 | Landlords must accept a complaint unless there is a valid reason not to do so. If landlords decide not to accept a complaint they must be able to evidence their reasoning. Each complaint must be considered on its own merits | Yes | Section 2.4.3 of complaints policy | Explanation detailed within the stated section of the complaints 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: 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. | Yes | Section 2.4.4 of complaints policy | Examples of what we may not consider a complaint are detailed within the stated section of the complaints policy. |

| | 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 | Section 2.4.4 of complaints policy | Each complaint is considered on it's individual merits and discretion is applied with necessary. Complaints officers can seek advice and discuss with Customer Feedback Team for any complaints where there maybe discrepancies. |
| 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 | Section 2.4.3. of the complaints policy. | If a complaint is rejected, a written response letter is provided explaining why and with contact details of the Housing Ombudsman Service. |
| 2.5 | Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint. | Yes | n/a | Each complaint is considered on its individual merits. Complaints officers can seek advice and discuss with Customer Feedback Team for any complaints where there maybe discrepancies. |

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 | Section 2.1. of the complaints policy. 'Make a complaint' section on STH website. <u>Make a complaint or give feedback -</u> <u>South Tyneside Homes</u> | Details provided in both the complaints policy and on our website of the multiple channels a customer can make a complaint. This includes web form, telephone, email and post. |
| 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 | Section 2.4.1 of the complaints policy | Details provided within the section of the complaints policy to advise customers that any member of STH staff can take their complaint. STH staff understand it is then their responsibility to ensure this complaint is logged on to the Corporate Feedback System. |
| 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 | Yes | All reporting figures | Complaint figures are reported on monthly. |

| | sign that residents are unable to complain. | | | STH regularly receive high volumes of complaints through multiple channels. |
|-----|---|-----|--|--|
| 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 | STH Website - <u>Make a complaint or</u> give feedback - South Tyneside Homes | STH have a dedicated section to complaints and feedback on our website. The complaints policy is available to view within this section of the website. |
| 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 | All information is detailed within our complaints policy. |
| 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 | Section 2.1 of the complaints policy | Stated section contains details of customer's having a representative or third party complain on their behalf. |
| 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 | STH Website All complaint response letters | Details of the HOS are provided on STH website in the dedicated complaints and feedback section. All complaints response letters, including acknowledgement and holding letters also have |

| | details for how the customer |
|--|------------------------------|
| | can contact the HOS. |
| | Details of the HOS is also |
| | provided within any ad-hoc |
| | complaint correspondence |
| | or information sent to |
| | customers. |

Section 4: Complaint Handling Staff

| Code provision | Code requirement | Comply: Yes / No | Evidence | Commentary / explanation |
|-------------------|--|---------------------|---|--|
| 4.1 | Landlords must have a person or team assigned to take responsibility for complaint handling, including liaison with the Ombudsman and ensuring complaints are reported to the governing body (or equivalent). This Code will refer to that person or team as the 'complaints officer'. This role may be in addition to other duties. | Yes | Complaints and Involvement Manager Customer Feedback Team | STH have a dedicated manager and team who are responsible for complaints and customer feedback. |
| 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 and Involvement Manager Customer Feedback Team | Team regularly liaise with all service areas, Heads of Service and Directors as part of their complaint handling process. All stage 2 complaints are discussed with relevant Heads of Service and all stage 2 letters are signed off by the Managing Director or Director of Operations in their absence. |
| 4.3 | Landlords are expected to prioritise complaint handling and a culture of learning from complaints. All relevant | Yes | Complaints Handling Training | Customer Feedback Team have a dedicated complaints handling training |

| 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 | programme which they use to train staff on effective complaint handling. |
|--|--|
| handle complaints effectively | |

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 | STH Complaints and Compliments Policy and Procedure | STH only have one 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 | STH Complaints and Compliments Policy and Procedure | STH only have two formal complaint handling stages – Stage 1 and Stage 2. We do not have any informal complaint 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 | STH Complaints and Compliments Policy and Procedure | STH only have two formal complaint handling stages – Stage 1 and Stage 2. We do not have any informal complaint stages. |
| 5.4 | Where a landlord's complaint response is handled by a third party (e.g. a contractor or independent adjudicator) | Yes | n/a | Complaint investigators will liaise with any external contractors for information |

| | 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. | | | and this will be used to formulate their complaint response to be issued as per STH complaints policy. |
|-----|--|-----|-------------------------|---|
| 5.5 | Landlords are responsible for ensuring that any third parties handle complaints in line with the Code. | Yes | n/a | If a third party is required to handle a complaint, the complaint response will be co-ordinated by the Customer Feedback Team to ensure compliance with the complaint handling code. |
| 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 | Acknowledgement letters | Complaint definition is now detailed within a customer's acknowledgement letter. |
| 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 | Acknowledgement letters | Any areas STH will not be responsible for investigating will be detailed within our acknowledgement letters. |

| 5.8 | At each stage of the complaints process, complaint handlers must: a. deal with complaints on their merits, act independently, and have an open mind; b. give the resident a fair chance to set out their position; c. take measures to address any actual or perceived conflict of interest; and d. consider all relevant information and evidence carefully. | Yes | Complaint Handling Training Customer Feedback Team | All of our complaints handling staff are trained to deal with complaints as detailed. Customer Feedback Team are available to provide advice and guidance on complaints at all time. |
|------|---|-----|---|--|
| 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 | Holding letters | When a complaint deadline is extended, the customer is provided with a holding letter detailing the new target timescales. Complaint officers will keep in regular contact with the customer during the complaint investigation. |
| 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 | Open Housing | Customer disabilities and vulnerabilities are recorded and monitored on Open Housing. |

| 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 | Section 2.4.4 of complaints policy | Examples of what we may not consider a complaint are detailed within the stated section of the complaints policy. |
|------|--|-----|---|--|
| 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 | Corporate Feedback System | All complaints are logged on the Corporate Feedback System. Additionally, the Customer Feedback Team create complaints files for each individual complaint they investigate which contains all documents and correspondence in relation to that case. |
| 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 | Customer Feedback Team Compensation and Sorry Fund | Customer Feedback Team can provide advice and guidance to complaint handling staff on remedies. We also have a compensation and sorry fund which can be accessed by all complaints handling staff. |
| 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 | Yes | Sections 4 & 5 of complaints policy Managing Unacceptable Behaviour Policy | Stated sections within complaints policy detail what we would deem an unreasonable/persistent complainant. |

| | putting any restrictions in place and must keep restrictions under regular review. | | | We have a separate policy and procedure on managing unacceptable 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 | Managing Unacceptable Behaviour Policy | Detailed within our policy. |

Section 6: Complaints Stages

<u>Stage 1</u>

| 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 | Customer Feedback Team Complaint handling staff | Customer Feedback Team triage and assign all complaints. Complaint handling staff have received appropriate training to consider complaints. |
| 6.2 | Complaints must be acknowledged, defined and logged at stage 1 of the complaints procedure <u>within five</u> <u>working days of the complaint being</u> <u>received</u> . | Yes | Customer Feedback Team Corporate Feedback System | All complaints are entered onto the Corporate Feedback System and acknowledged by the Customer Feedback Team within 5 working days. |
| 6.3 | Landlords must issue a full response to stage 1 complaints <u>within 10 working</u> <u>days</u> of the complaint being acknowledged. | Yes | Complaints policy | Target timescales stated within our complaints policy. Complaint handling staff receive training and are aware of target timescales. These target timescales are also shown on the |

| | | | | Corporate Feedback System |
|-----|---|-----|--|--|
| 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 | Holding Letter Extension Request Form | If an extension is required to a target deadline, an extension request form must be completed by a complaint handler detailing the reasons for the extension. This is then submitted to the Customer Feedback Team to review and extend on the Corporate Feedback System. Complaint handler must also issue a holding letter to the customer detailing reason for the extension and new target date. |
| 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 | Holding Letter | Details of the HOS are provided within the holding letter. |
| 6.6 | A complaint response must be provided to the resident when the answer to the complaint is known, not when the outstanding actions required to address the issue are completed. Outstanding actions must still be tracked and actioned promptly with appropriate updates provided to the resident. | Yes | Complaint Handling Training | Complaint handling staff are advised to follow this process during the complaint handling training. |

| 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 | Complaint Handling Training Complaint response letters | Complaint handling staff are advised to follow this process during the complaint handling training. Complaint response letter templates prompt complaint handlers to clearly include all of this information. |
|-----|---|-----|---|--|
| 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 | Complaint Handling Training Complaint Logger Training | Complaint handling and complaint logging staff are advised to follow this process during the complaints training. |
| 6.9 | Landlords must confirm the following in writing to the resident at the completion of stage 1 in clear, plain language: a. the complaint stage; b. the complaint definition; c. the decision on the complaint; d. the reasons for any decisions made; e. the details of any remedy offered to put things right; f. details of any outstanding actions; and | Yes | Complaint response letters | Complaint response letter templates contain and prompt to include all of the detailed information. |

| g. details of how to escalate the | | |
|--|--|--|
| matter to stage 2 if the individual is | | |
| not satisfied with the response. | | |

<u>Stage 2</u>

| 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 | Complaints policy | Stage 2 process clearly detailed within our complaints policy. |
| 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 | Customer Feedback Team Corporate Feedback System | All complaints are entered onto the Corporate Feedback System and acknowledged by the Customer Feedback Team within 5 working days. |
| 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 | Stage 1 response letters STH website | Stage 1 response letter templates and STH website have been updated and the requirement to provide a reason for escalating to stage 2 has now been omitted. |
| 6.13 | The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1. | Yes | Customer Feedback Team | We have an independent/impartial team who deal with all stage 2 complaints. |

| 6.14 | Landlords must issue a final response to the stage 2 <u>within 20 working days</u> of the complaint being acknowledged. | Yes | Complaints policy | Target timescales stated within our complaints policy. Complaint handling staff receive training and are aware of target timescales. These target timescales are also shown on the Corporate Feedback System |
|------|---|-----|-----------------------------|---|
| 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 | Holding Letter | Customer Feedback Officer will review the complaint at stage 2 and if it requires an extension, they will issue a holding letter to the customer detailing reasons for an extension and new target date. The target date will then be updated and amended on the Corporate Feedback System. |
| 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 | Holding Letter | Details of the HOS are provided within the holding letter. |
| 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 | Complaint Handling Training | Complaint handling staff are advised to follow this process during the complaint handling training. |

| 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 | Complaint Handling Training Complaint response letters | Complaint handling staff are advised to follow this process during the complaint handling training. Complaint response letter templates prompt complaint handlers to clearly include all of this information. |
|------|--|-----|---|--|
| 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 | Complaint response letters | Complaint response letter templates contain and prompt to include all of the detailed information. |
| 6.20 | Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response. | Yes | Customer Feedback Team Heads of Service Director | As part of the stage 2 investigation process, Customer Feedback Officers will meet with the relevant heads of service and then the response letter |

| | | | is discussed and signed off by a Director. |
|--|--|--|---|
|--|--|--|---|

Section 7: Putting things right

| Code provision | Code requirement | Comply: Yes / No | Evidence | Commentary / explanation |
|-------------------|---|---------------------|--------------------------------|--|
| 7.1 | Where something has gone wrong a landlord must acknowledge this and set out the actions it has already taken, or intends to take, to put things right. These can include: Apologising; Acknowledging where things have gone wrong; Providing an explanation, assistance or reasons; Taking action if there has been delay; Reconsidering or changing a decision; Amending a record or adding a correction or addendum; Providing a financial remedy; Changing policies, procedures or practices. | Yes | Section 3 of complaints policy | Remedies guidance is detailed within the stated section of the complaints policy. |
| 7.2 | Any remedy offered must reflect the impact on the resident as a result of any fault identified. | Yes | Section 3 of complaints policy | Remedies guidance is detailed within the stated section of the complaints policy. |

| 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 response letters | Remedy offers are clearly stated within the complaint response letters |
|-----|---|-----|--------------------------------|--|
| 7.4 | Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies. | Yes | Section 3 of complaints policy | Remedies guidance within our complaints policy has been done in conjunction with the guidance issued 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 include a summary of the types of complaints the landlord has refused to accept; c. any findings of non-compliance with this Code by the Ombudsman; d. the service improvements made as a result of the learning from complaints; e. any annual report about the landlord's performance from the Ombudsman; and f. any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord. | Yes | Self-Assessment document Annual Complaints Performance and Service Improvements Report 2023/2024 STH website | Both Self-Assessment and Annual Complaints Performance and Service Improvements Report 2023/2024 have been completed and are available on STH website to view. |

| 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 | Annual Complaints Performance and Service Improvements Report 2023/2024 STH website | Foreword within the report gives the Board's response to both the self-assessment and Annual Complaints Performance and Service Improvements Report 2023/2024. |
|-----|---|-----|--|--|
| 8.3 | Landlords must also carry out a self- assessment following a significant restructure, merger and/or change in procedures. | Yes | Self-Assessment document | Once merger with South Tyneside Council is complete, a new self- assessment will need to be carried out. This will then be re-submitted to the HOS to ensure compliance. |
| 8.4 | Landlords may be asked to review and update the self-assessment following an Ombudsman investigation. | n/a | n/a | Will carry this out where applicable. |
| 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. | n/a | n/a | Will carry this out where applicable. |

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 | Corporate Feedback System Pentana Complaint handling training | When a complaint is completed on the Corporate Feedback System, there is a requirement to add a service improvement for the complaint. The service improvements are then entered onto Pentana to monitor. Additionally, service improvements and learnings from complaints form an integral part of the |
| 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 | Complaints reports | complaint handling training. Quarterly complaints reports are produced which analyse and look at customer feedback and use this information to identify issues and drive service improvements. |
| 9.3 | Accountability and transparency are also integral to a positive complaint handling culture. Landlords must report back on wider learning and | Yes | Complaints reports | Quarterly complaints reports are produced which analyse and look at customer feedback and use this |

| | improvements from complaints to stakeholders, such as residents' panels, staff and relevant committees. | | | information to identify issues and drive service improvements. |
|-----|---|-----|---|---|
| 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 | Complaints and Involvement Manager | Complaints and Involvement Manager is responsible for both operational and strategic management of the complaints service. |
| 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 | Tenant Board Member | This is currently a tenant board member. |
| 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 | Tenant Board Member | This is currently a tenant board member. |
| 9.7 | As a minimum, the MRC and the governing body (or equivalent) must receive: a. regular updates on the volume, categories and outcomes of complaints, | Yes | Tenant Board Member Operations Committee | Tenant board member is a member of our Operations Committee where a quarterly complaints report |

| | 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. | | | is submitted for both challenge and scrutiny. Annual complaints performance report will be presented to board before final publication to allow for comment and for a foreword to be included in the 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: 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 | Monthly meetings/1-2-1 forms. | Standard objective included within the 1-2-1 check in forms for all staff and discussed in monthly meetings with their managers. |