

Housing Ombudsman

Complaint Handling Code Self-Assessment Form – June 2024

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.

Based on current housing complaints policy

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 Housing Complaints Policy has adopted this definition of a complaint in para 3.2.	
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 Housing Complaints Policy explicitly states this in para 3.3. This is also referred to in paras 3.5.1 to 3.5.6 of our Housing and Safer Communities Complaints Procedure.	
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.	Partial	Para 3.25 of our Housing Complaints Policy clarifies the difference between a service request and complaint. This is also referred to in paras 3.3.1 to 3.3.3 of our Housing and Safer Communities Complaints Procedure.	Although we don't specifically state this in our current policy, we do record, monitor and review service requests regularly. We intend to state this explicitly in our 2024 corporate complaints policy.

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	Section 1.1 and 3.25 of our Housing Complaints Policy outlines our approach in this regard	
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	Our Housing Complaints Policy outlines this in para 3.9. This is also referred to in paras 3.5.7 to 3.5.9 of our Housing and Safer Communities Complaints Procedure. Scripts from our survey provider invite residents to make a complaint and explain how to do so should wish to.	

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	Yes	Our Housing Complaints Policy states this in paras 3.21 to 3.24.	

	their reasoning. Each complaint must be considered on its own merits		Acceptable reasons for exclusions are referred to in paras 3.12.1 to 3.12.6 of our Housing and Safer Communities Complaints Procedure.	
2.2	<p>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:</p> <ul style="list-style-type: none"> • 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. 	Partial	<p>Para 3.22 of our Housing Complaints Policy lists exclusions we will consider as acceptable.</p> <p>This is also referred to in para 3.12.2 of our Housing and Safer Communities Complaints Procedure.</p>	<p>We currently exclude complaints which are older than 6 months. This is also in line with our corporate complaints policy. We will be changing our complaints policy to extend this exclusion to 12 months in June 2024.</p>
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	Partial	Our time based exclusion is currently 6 months however Para 3.24 of our Housing Complaints Policy advises we may accept a complaint even if it meets the exclusion conditions above, where it is appropriate and reasonable to do so.	We intend to change this to 12 months in our 2024 corporate complaints policy.

	are good reasons to do so.			
2.4	If a landlord decides not to accept a complaint, an explanation must be provided to the resident setting out the reasons why the matter is not suitable for the complaints process and the right to take that decision to the Ombudsman. If the Ombudsman does not agree that the exclusion has been fairly applied, the Ombudsman may tell the landlord to take on the complaint.	Yes	<p>We have response template letters to residents for when a complaint is excluded from the complaints process.</p> <p>Para 3.23 of our Housing Complaints Policy lists exclusions we will consider as acceptable and explicitly states this process.</p> <p>This is referred to in para 3.12.3 of our Housing and Safer Communities Complaints Procedure</p>	
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Yes	<p>Para 3.24 of our Housing Complaints Policy advised we may accept a complaint even if it meets the exclusion conditions above, where it is appropriate and reasonable to do so.</p>	

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	Yes	Our Housing Complaints Policy explicitly states this in	

	<p>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.</p>		<p>para 3.28 3.30.</p> <p>Complaints can be made via telephone, in person, via our web site, in writing, by email.</p> <p>This is also referred to in paras 3.4.1 to 3.4.4 our Housing and Safer Communities Complaints Procedure.</p> <p>We conducted an Equalities impact assessment when our new policy was released in 2022 and the impact of the new policy on groups with protected characteristics was considered low.</p>	
3.2	<p>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.</p>	Partial	<p>Our Housing Complaints Policy states channels residents can make complaints to the council at para 3.30. This covers all channels of communication open to residents with the Council.</p> <p>Our Housing Complaints Policy states at para 3.35 that all Housing staff who deal with complaint will receive appropriate</p>	<p>At present neither our complaints policy or procedure are specific about complaints made to individual members of staff.</p> <p>This will be met following agreement of our new 2024 corporate complaints policy.</p>

			training on how to handle complaints effectively.	
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	<p>We publicise how to make a complaint on our website and provide details of the Housing Ombudsman Scheme.</p> <p>We have developed a communications plan that outlines further details of how we plan to publicise this information.</p>	We do not measure the success of services based on volume of complaints
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	This is included in our Housing Complaints Policy in paras 3.11 to 3.16.	
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	<p>We include information regarding the Housing Ombudsman Scheme in all our complaint acknowledgement S1 and 2 letters.</p> <p>We have developed a communications plan that outlines further details of how we plan to publicise this</p>	

			information regularly with residents. We aim to deliver upon this in 2024/25.	
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	<p>This is included in our Housing Complaints Policy in paras 3.4 to 3.9.</p> <p>We offer the opportunity to provide third party or representative details on our webform, including the authority to act details.</p> <p>This is referred to in paras 3.5.1 to 3.5.6 of our Housing and Safer Communities Complaints Procedure.</p>	
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	<p>We include information regarding the Housing Ombudsman Scheme in all our complaint acknowledgement Stage 1 and Stage 2 letters.</p> <p>We have developed a communications plan that outlines further details of how we plan to publicise this information regularly with residents. We aim to deliver upon this in 2024/25.</p>	

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	Our corporate team reports all complaints quarterly. This is included in 2.0 'Roles and Responsibilities' within the Housing and Safer Communities Complaints Procedure. This outlines the definitions and responsibilities within the complaint handling process including 'complaint officer' and 'complaint handler' role clarity.	
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	We encourage staff to collaborate across teams and work to reduce barrier to them doing this. Dispute resolution sits with investigating managers, who have autonomy to act and resolve disputes.	
4.3	Landlords are expected to prioritise complaint handling and a culture of learning from complaints. All relevant	Yes	Our systems is set up to capture learning from complaints. We also report learning outcomes	

	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		<p>quarterly to our Directorate Leadership Team as outlined in section 4 of our policy. We also include learning in our annual report which is due to be published by June 2024</p> <p>This is included in our Housing Complaints Policy in paras 3.35 to 3.36</p> <p>This is also referred to in paras 3.16.1 to 3.16.5 and 3.30.1 of our Housing and Safer Communities Complaints Procedure.</p>	
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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	All complaints covered by this code fall under our Housing Complaint Policy launched in November 2022	
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	Yes	<p>We do not have a stage '0'.</p> <p>Our stages of complaints are outlined in our Housing Complaints Policy</p>	

	complaint') as this causes unnecessary confusion.		<p>in paras: 3.11</p> <p>Our standard complaint response templates encourage this.</p> <p>Our Housing and Safer Communities Complaints Procedure (paras 3.9.8 to 3.9.20) details the process of early resolution within Stage 1 on the complaints process. This enables a discussion between the resident and RBG on a mutually agreed outcome to resolve the matter.</p>	
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	<p>We do not have more than two stages in our policy..</p> <p>Our stages of complaints are outlined in our Housing Complaints Policy in paras: 3.11</p>	
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.	Partial	<p>We state this in our Royal Greenwich complaint policy at 8</p>	<p>Our current policy states that where a contractor provides a service on behalf of the council a complaints process should be agreed. This doesn't however confirm that the process should mirror the two stage process in the Code.</p>

				This will be met following agreement of our new 2024 corporate complaints policy.
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Partial	We state this in our Royal Greenwich complaint policy at 8	Our policy states that where a contractor provides a service on behalf of the council a complaints process should be agreed. This doesn't however confirm that the process should mirror the Code. This will be met following agreement of our new 2024 corporate complaints policy.
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	We state this in our Housing Complaints Policy at 3.14. The understanding of the complaint is included on our acknowledgment template. We state this in our HSC Complaints Procedure at 3.7.9, 3.9.2 to 3.9.3 and 3.9.6 to 3.9.7 (Initial Contact).	
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.	No		This isn't made specific on our policy or procedure, nor is it a specific section within the acknowledgement template. This will be met following agreement of our new 2024 complaints policy.

5.8	<p>At each stage of the complaints process, complaint handlers must:</p> <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. 	Yes	<p>We state this in our Housing Complaints Policy at 3.42.</p> <p>We state this in our HSC Complaints Procedure at 3.9.2 to 3.9.7 and 3.9.23</p>	
5.9	<p>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.</p>	Yes	<p>We state this in our Housing Complaints Policy at 3.17.</p> <p>We have a standard template for holding responses and our system is set up to identify the date a holding response is due.</p> <p>We state this in our HSC Complaints Procedure at 3.10.1</p>	
5.10	<p>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</p>	Partial	<p>Officers are aware of our responsibilities under the Equality Act inc. 149 (Public Sector equality duty).</p> <p>We have implemented a programme of complaints training which includes learning about our obligations under the Equality Act.</p>	<p>We do not currently have a robust process in place for keeping reasonable adjustments required in the complaint handling process under active review. We intend to review how we collect and record this information.</p>

	review.		<p>Our standard responses state that they are available in other formats, e.g. braille.</p> <p>We state this in our Housing Complaints Policy at 3.27 to 3.29</p> <p>We state this in our HSC Complaints Procedure at 3.15.1 to 3.15.2</p>	<p>Our housing management system enables us to record alerts for disabled residents.</p> <p>These alert staff on any additional needs of residents to enable them to consider any reasonable adjustments.</p> <p>We review these regularly.</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>We state this in our Housing Complaints Policy at 3.23.</p> <p>We state this in our HSC Complaints Procedure at 3.12.3</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	<p>We state this in our Housing Complaints Policy in para 3.23</p> <p>We state this in our HSC Complaints procedure at 3.12.3</p>	
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	Yes	We state this in our Housing Complaints Policy at 3.18	Our complaints responses consider remedies at both stages. It isn't specific about not needed to escalate to gain a remedy.

	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 state this in our Housing Complaints Policy at 3.50 to 3.51 We have a corporate Unreasonable and Persistent Behaviour policy	
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 Corporate policy on managing unacceptable behaviour requires a report including reference to equalities	

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	Yes	Our standard complaint response templates encourage this. We state this in our HSC Complaints Procedure at 3.9.8 to 3.9.20. details the process of early resolution within Stage 1 on the complaints process. This enables a discussion between the resident and RBG on a mutually agreed outcome to resolve the	

	resident.		matter.	
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	We state this in our Housing Complaints Policy at 3.13 We state this in our HSC Complaints Procedure at 3.6.1 and 3.7.1	
6.3	Landlords must issue a full response to stage 1 complaints <u>within 10 working days</u> of the complaint being acknowledged.	Yes	We state this in our Housing Complaints Policy at 3.15 and 3.17 We state this in our HSC Complaints Procedure at 3.6.1 and 3.10.3	
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 state this in our Housing Complaints Policy at 3.17 We state this in our HSC Complaints Procedure at 3.10.4	
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	We state this in our Housing Complaints Policy at 3.17 We state this in our HSC Complaints Procedure at 3.10.4	
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	Once a complaint response is issued, services manage follow-on actions internally. We state this in our Housing Complaints Policy at 3.19	

	actions must still be tracked and actioned promptly with appropriate updates provided to the resident.		We state this in our HSC Complaints Procedure at 3.9.27	
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	We state this in our HSC Complaints Procedure at 3.9.27 We have a standard complaint template based on the HOS standard response template has been developed to support this.	
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	We state this in our Housing Complaints Policy at 3.19 We state this in our HSC Complaints Procedure at 3.9.26	
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; d. the reasons for any decisions made; e. the details of any remedy offered to put things right; 	Yes	We use standard response templates based on the HOS response template at Stages 1 & 2. We state this in our Housing Complaints Policy at 3.18 We state this in our HSC Complaints Procedure at 3.9.27	

	<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>			
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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	<p>We state this in our Housing Complaints Policy at 3.11 and 3.16</p> <p>We state this in our HSC Complaints Procedure at 3.11</p>	
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	<p>We state this in our Housing Complaints Policy at 3.13</p> <p>We state this in our HSC Complaints Procedure at 3.6.1 and 3.7.1</p>	
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	<p>We state this in our complaint policy at 3.16.</p> <p>We state this in our HSC Complaints Procedure at 3.11</p>	
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Yes	We state this in our complaint policy at 3.39.	

6.14	Landlords must issue a final response to the stage 2 <u>within 20 working days</u> of the complaint being acknowledged.	Yes	We state this in our complaint policy at 3.16	20 days from date of receipt.
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 state this in our complaint policy at 3.17	10 working days.
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	We state this in our complaint policy at 3.17	
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	We state this in our complaint policy at 3.19 and our HSC Procedure at 3.9.26	
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	We state this in our complaint policy at 3.14. Our complaint templates invite consideration of these factors when responding to a complaint.	
6.19	Landlords must confirm the following in writing to the resident at the completion of stage 2 in clear, plain language:	Yes	We state this in our complaint policy at 3.18	

	<ul style="list-style-type: none"> 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. 			
6.20	Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.	Partial	We state this in our complaint policy at 3.11	Our policy and procedure do not refer explicitly to staff being involved.

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, 	Yes	We state this in our complaint policy at 3.44 - 3.46 and in our Compensation policy. Our complaint templates invite consideration of these factors when responding to a complaint.	

	<ul style="list-style-type: none"> • 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. 			
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Yes	We state this in our complaint policy at 3.46	
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	<p>This is in our HSC procedure at 3.9.27.</p> <p>We also have a policy on compensation that sets out our approach. Our complaint templates invite consideration of these factors when responding to a complaint</p>	
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Partial	Our compensation policy was written in consideration of the Ombudsman's guidance on remedies at the time.	This will be met following agreement of our new 2024 corporate complaints policy.

Section 8: Self-assessment, reporting and compliance

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
8.1	<p>Landlords must produce an annual complaints performance and service improvement report for scrutiny and challenge, which must include:</p> <ul style="list-style-type: none"> 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. 	Partial	We cover elements of this in our policy at 4.1	

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.	Partial	We cover elements of this in our policy at 4.1	
8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	Yes	We state this in our complaint policy at 4.2	
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	No		We do not state this in our policies or procedures. However, this is statement of intent from the Housing Ombudsman and not a matter we need to take a position on.
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.	No		We do not state this in our policies or procedures.

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	We state this in our complaint policy at 3.32	
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	We state this in our complaint policy at 3.33 and 3.48	
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	We state this in our complaint policy at 3.34	
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.	No		We do not state this in our policies or procedures.

9.5	In addition to this a member of the governing body (or equivalent) must be appointed to have lead responsibility for complaints to support a positive complaint handling culture. This person is referred to as the Member Responsible for Complaints ('the MRC').	Yes	We state this in our HSC complaint Procedure at 3.22.1	
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.	No		Our policy does not refer to the MRC
9.7	As a minimum, the MRC and the governing body (or equivalent) must receive: a. regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance; b. regular reviews of issues and trends arising from complaint handling; c. regular updates on the outcomes of the Ombudsman's investigations and progress made in complying with orders related to severe maladministration findings; and d. annual complaints performance and service improvement report.	Partial	We cover elements of this in our policy at 4.1	

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	We state this in our complaint policy at 3.4 - 3.9, 3.48 and 3.49	
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