

## 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.

Key:

No change to Code	
Amendment to Code	
New Code requirement	

## 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	Complaints Policy section 2.5	Policy section 2.5
1.3	A resident does not have to use the word 'complaint' for it to be treated as such. Whenever a resident expresses dissatisfaction landlords must give them the choice to make complaint. A complaint that is submitted via a third party or representative must be handled in line with the landlord's complaints policy.	Yes	Complaints Policy section 2.4.	Examples of third party include family member, friend/carer, mental health advocate and MP.
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	Yes	Policy section 3.5 and QL triage report	We will try to resolve issues at first point of contact as a service request. If this does not resolve the matter, or if the customer requests it, we will log a formal complaint if

	action to be taken to put something right. Service requests are not complaints, but must be recorded, monitored and reviewed regularly.			this is within the remit of the 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	Policy section 3.5	We will try to resolve issues at first point of contact as a service request. If this does not resolve the matter, or if the customer requests it, we will log a formal complaint if this is within the remit of the Complaints, Compensation and Compliments Policy.
1.6	An expression of dissatisfaction with services made through a survey is not defined as a complaint, though wherever possible, the person completing the survey should be made aware of how they can pursue a complaint if they wish to. Where landlords ask for wider feedback about their services, they also must provide details of how residents can complain.	Yes	<p>All survey participants are given the following info:</p> <p>If you would like to raise a compliment or formal complaint relating to any of the feedback you provided in this survey, you can do so in the following ways:</p> <p>Via the believe housing website at <a href="http://www.believehousing.co.uk/compliments">www.believehousing.co.uk/compliments</a> or <a href="http://www.believehousing.co.uk/complaints">www.believehousing.co.uk/complaints</a></p> <p>By emailing us at <a href="mailto:feedback@believehousing.co.uk">feedback@believehousing.co.uk</a> or by calling us on 0300 1311 999</p> <p>All participants in our focus groups are also given this information in the follow-up thank you email after they have taken part.</p>	

## Section 2: Exclusions

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
2.1	Landlords must accept a complaint unless there is a valid reason not to do so. If landlords decide not to accept a complaint, they must be able to evidence their reasoning. Each complaint must be considered on its own merits	Yes	<a href="#">Complaints Policy</a> section 2.6 and 2.7	We will carry out regular audits to ensure these decisions are recorded correctly.
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"> <li>• The issue giving rise to the complaint occurred over twelve months ago.</li> <li>• 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.</li> <li>• Matters that have previously been considered under the complaints policy.</li> </ul>	Yes	Complaints Policy section 2.6 and 2.7	We have defined these in accordance with the Code guidance.

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	Complaints Policy section 2.8	We amended our policy in October in accordance with the guidance, from six to 12 months.
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	Policy section 2.6	There are times when this policy does not apply and when we will not consider opening a complaint. Where a matter is not within the remit of this policy, we will provide a detailed explanation of why, and provide details of how to refer the matter to the HO and, if appropriate, direct the customer to the correct process or organisation. This will be logged in the triage process for reporting and analytics purposes.
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Yes	Policy section 2.9 (new)	When making a decision on excluding complaints, we will consider the individual circumstances of each complaint.

### Section 3: Accessibility and Awareness

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
3.1	Landlords must make it easy for residents to complain by providing different channels through which they can make a complaint. Landlords must consider their duties under the Equality Act 2010 and anticipate the needs and reasonable adjustments of residents who may need to access the complaints process.	Yes	<p>Policy Section 3.1</p> <p>Customers can raise a complaint by:</p> <ul style="list-style-type: none"> <li>• via the customer app and portal</li> <li>• email to <a href="mailto:feedback@believehousing.co.uk">feedback@believehousing.co.uk</a></li> <li>• through any member of staff either in person or by telephone on 0300 1311 999.</li> <li>• logging it on our website, or through our social media channels</li> <li>• writing to us at believe housing, First floor, Spectrum 4, Spectrum Business Park, Seaham, SR7 7TT</li> </ul>	<p>The number of complaints received in the last 12 months demonstrates that customers can effectively make a complaint to us and do so. In our annual Tenant Perception Survey 2023/24, we included a question on whether people knew how to make a complaint and feel confident to do so. 89% of people confirmed they would know how to make a complaint, and this is consistent with the previous year.</p>
3.2	Residents must be able to raise their complaints in any way and with any member of staff. All staff must be aware of the complaints process and be able to pass details of the complaint to the appropriate person within the landlord.	Yes	<p>believe housing has developed its own bespoke training module based on the Housing Ombudsman (HO)'s Complaints Handling Code e-learning, taking into account our behaviours, specific service areas, policies and procedures.</p>	<p>This has been placed on our own Learning Lounge system and will be mandatory annual training.</p>

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	We record service requests and monitor those contacts that have not become a formal complaint for opportunities for learning. Triage report shows contacts that have told us that they do not wish us to progress with a complaint.	We recognised during 2023/24 that our volumes of complaints were comparatively lower than some of our peers and have focused on ensuring everything is accurately logged. This has seen a significant increase in the number of complaints since April 2024. However, we are still dealing with these in line with the Code requirements.
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	Policy and website. Policy is on the website. Leaflet and website give guidance on the process in simple and clear terms.	Update policy on website and leaflet and web pages.
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	Policy section 6.2 - Annual report to tenants. Policy section 7.3	We signpost customers to the HO in leaflets, newsletters, online and by placing HO posters in our communal areas.
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	Policy section 2.4	We will not prevent a customer from being accompanied if they wish and encourage customers to appoint a third party to act on their behalf if it can help to resolve the issue quicker for them.

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	Policy section 7.3	We regularly seek guidance and advice from the HO to try and resolve issues in the right way. If the customer remains dissatisfied with our investigation into their complaint, they can also contact the HO to review our handling of it for them. We signpost customers to the HO in leaflets, newsletters, online and by placing HO posters in our communal areas. A customer can also contact the HO at any time while going through our internal complaints process to seek advice or guidance
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## 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	The Customer Insight Team led by the Customer Insight and Engagement Manager is the 'complaints officer'	The Customer Insight Team's sole focus is on dealing with complaints, HO investigations and MP enquiries.
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	The team has access to colleagues at all levels including specialists and Service Directors to resolve issues fairly and as quickly as possible. Assistant Directors and/or Directors review Stage 2 letters before they are sent to the customer to make sure that we can take all reasonable actions to resolve the complaint quickly and fairly.	The relevant Service Area Directors see all Stage 2 letters before they are issued, to ensure we are taking all appropriate actions to resolve a customer's complaint.
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	The team has been restructured with additional roles being introduced of a new Senior Insight Advisor and two new Case Officers. The Insight Team recently completed a programme of HQN training to ensure that professional standards are met.	

			Data on complaints is shared with Assistant Directors and Directors every quarter and with the Board every six months to highlight trends and drive learning.	
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## Section 5: The Complaint Handling Process

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
5.1	Landlords must have a single policy in place for dealing with complaints covered by this Code. Residents must not be treated differently if they complain.	Yes	We have a single Complaints Policy which is inclusive to all residents and used by the whole organisation.	
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	Policy section 3.5	We have a two-stage complaints process. We work with our customers within the first five days of receiving notification of dissatisfaction to clarify the exact nature of the complaint and what is needed to resolve this. We have worked across our services to embed the importance of raising formally if customers have made repeated attempts to resolve as a service request.

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	Policy section 3.6 – 3.22	The Complaints, Compensation and Compliments Policy outlines our two-stage process and timescales we aim to meet for a timely resolution.
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	We do not outsource formal investigations that are within the remit of the Complaints, Compensation and Compliments Policy.	
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Not applicable	We do not outsource formal investigations that are within the remit of the Complaints, Compensation and Compliments Policy. We have added a section to our procurement and tendering process to ensure that new contractors are clear on the need to follow our complaints process.	
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	Yes	Policy section 3.11 – 3.16	

	to this as “the complaint definition”. If any aspect of the complaint is unclear, the resident must be asked for clarification.			
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	We ensure that we are clear on this at triage and acknowledgement.	
5.8	At each stage of the complaints process, complaint handlers must: <ul style="list-style-type: none"> <li>a. deal with complaints on their merits, act independently, and have an open mind;</li> <li>b. give the resident a fair chance to set out their position;</li> <li>c. take measures to address any actual or perceived conflict of interest; and</li> <li>d. consider all relevant information and evidence carefully.</li> </ul>	Yes	Policy section 3.14	Our investigators will: <ul style="list-style-type: none"> <li>• deal with complaints on their merits</li> <li>• act independently and have an open mind</li> <li>• take measures to address any actual or perceived conflict of interest</li> <li>• consider all information and evidence carefully</li> <li>• keep the complaint confidential as far as possible, with information only disclosed if necessary to properly investigate the matter.</li> </ul>
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	Yes	Policy section 3.13	We will aim to provide a full written response within 10 working days from when we send the acknowledgement to the customer unless there are

	keeping them informed about their complaint.			valid reasons to extend this period. We want to make sure that we provide a thorough, quality response, which means that on occasions it is not possible to respond within 10 days. In these cases, we will let customers know that we are extending this and give a date within an additional 10 days where we aim to get the response to them.
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	Policy section 3.7	During the initial triage of the complaint we collect information on preferred communication methods and details of any record of disabilities/vulnerabilities disclosed and support needed during the making of the complaint. We also collect an email address to speed up communication where the customer is not available during business hours.
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	Policy section 3.16 – 3.18	If a customer is not satisfied with a Stage 1 response, they may appeal against the findings and ask to escalate to Stage 2 of the complaint's procedure. To move to Stage 2 of the complaints process,

				the customer must request escalation to Stage 2 within 20 working days of the closure of the Stage 1 complaint (customers do not have to do this in writing and where necessary we can provide support).
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	We have developed a new process, within our customer relationship management (CRM) system, to keep all records relating to complaints in one place. This is backed up within a dedicated complaints channel in Microsoft Teams for instances where the system is not available.	We are committed to improving our record-keeping in line with the HO Spotlight on knowledge and information management (KIM) and are moving to Salesforce this year to further improve our complaints-handling. This platform will link to our current CRM system and improve investigation notes.
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	Policy section 3.11	We will advise that the matter has been referred to an impartial investigator, confirm the issues we are investigating and what is required to put things right. We will take remedial actions as soon as possible and take action to resolve any urgent issues to the relevant service area for action. For example, following a health and safety incident.

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	Policy section 5 and Unreasonable 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.	Partial	Policy section 5 and Unreasonable Behaviour Policy	The Unreasonable Behaviour Policy involves an individual assessment form to assess the needs of the customer and take into account any reasonable adjustments required. Restrictions can only be imposed by the Insight Team Leader and the customer can appeal this to Assistant Director of Strategy and Insight. Any restrictions will automatically be reviewed every six months.

## 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	Policy section 3.7 - 3.10.	Complaints will be referred to our Customer Insight Team to complete a triage process and determine how the matter should be handled, preferred communication method and any vulnerabilities/support needs. Many complaints can be resolved quickly and fairly. However, if a vulnerable customer asks for extra time to allow them to submit their complaint or asks us to delay an investigation while we arrange a suitable time to visit them, we will always try to meet their needs. This can have an impact on our timescales, but our focus is on being customer-led and doing the right thing.



6.2	Complaints must be acknowledged, defined and logged at stage 1 of the complaints procedure <b><u>within five working days of the complaint being received.</u></b>	Yes	Policy section 3.7 - 3.10	<p>Complaints will be referred to our Customer Insight Team to complete a triage process and determine how the matter should be handled, confirm preferred communication method and any vulnerabilities/support needs. We will contact the customer within five working days of receiving the complaint to acknowledge that the issue has been received and to confirm exactly what we need to investigate and what is needed to put things right. For us to handle a complaint fairly and consistently for our customers we will ask them to work with us and be clear about:</p> <ul style="list-style-type: none"><li>• what we did wrong or failed to do</li><li>• how has this affected them</li><li>• what we can do to put things right.</li></ul>
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6.3	Landlords must issue a full response to stage 1 complaints <b><u>within 10 working days</u></b> of the complaint being acknowledged.	Yes	Policy section 3.13	We have admin support and a senior investigator to ensure that timescales are met more consistently. Where we are not able to do this, we will keep the customer informed.
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	Policy section 3.13	
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	Policy section 3.13	
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	Policy section 3.13 and 3.15 We will not delay a complaint response unnecessarily.	Resolution letters will be issued as soon as the answers to the complaint are known and actions are agreed and scheduled. These are then tracked by the Insight Team to ensure resolution. Complaints will not be delayed until actions have been completed.

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	Policy section 3.15	We have produced templates and guidance for our investigators based on Ombudsman best practice. We also work closely with our Legal Team to ensure requirements are met.
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	Policy section 3.14	If any additional issues come to light during the Stage 1 complaints investigation process, then we will address those within our response wherever possible. If it is a separate issue that requires significantly more investigation, then we would log this as a separate complaint.
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"> <li>a. the complaint stage;</li> <li>b. the complaint definition;</li> <li>c. the decision on the complaint;</li> <li>d. the reasons for any decisions made;</li> <li>e. the details of any remedy offered to put things right;</li> <li>f. details of any outstanding actions; and</li> </ul>	Yes	Complaints Policy 3.11 – 3.15	We use a <a href="#">letter</a> template based on the Housing Ombudsman's sample on their website.

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

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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	Policy section 3.15	
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	Policy section 3.16	
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	Policy section 3.17	
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Yes	Policy section 3.19	
6.14	Landlords must issue a final response to the stage 2 <b><u>within 20 working days</u></b> of the complaint being acknowledged.	Partial	Policy Section 3.18	

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	Policy section 3.18	We aim to respond within 20 working days (unless there are mitigating reasons to extend this timescale). If we require further time to investigate the complaint, we will inform the customer and advise of a new target date to provide our response, which is normally within an additional 20 working days. Any further extension will be in agreement with the customer and would only be in exceptional circumstances.
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	Policy section 3.18	If there are exceptional reasons to delay a response by a further period beyond the additional 20 working days, this will be agreed with the customer. If this cannot be agreed, then we will provide a response based on the information available to us and provide contact information for the HO to prevent delays in accessing their service.
6.17	A complaint response must be provided to the resident when the answer to the	Yes	Policy Section 3.13 and 3.17	We will respond to complaints within

	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.			timescales laid out by the HO and not delay a complaint response unnecessarily.
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	Policy section 3.22	We have produced templates and guidance for our investigators based on Ombudsman best practice.
6.19	Landlords must confirm the following in writing to the resident at the completion of stage 2 in clear, plain language: <ul style="list-style-type: none"> <li>a. the complaint stage;</li> <li>b. the complaint definition;</li> <li>c. the decision on the complaint;</li> <li>d. the reasons for any decisions made;</li> <li>e. the details of any remedy offered to put things right;</li> <li>f. details of any outstanding actions; and</li> <li>g. details of how to escalate the matter to the Ombudsman Service if the individual remains dissatisfied.</li> </ul>	Yes	Policy section 3.19 and 3.22	We use a <a href="#">letter</a> template based on the Housing Ombudsman's sample on their website.
6.20	Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.	Yes	Policy 3.19	When a Stage 2 complaint is received, the Insight Team engages with the relevant service area to

				determine what actions need to be instigated to resolve the issues raised. Once agreed, the Stage 2 letter outlining these actions requires sign off by the relevant Director.
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### 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: <ul style="list-style-type: none"> <li>• Apologising;</li> <li>• Acknowledging where things have gone wrong;</li> </ul>	Yes	Policy section 4 – Putting things right	If we have identified through the complaints process that something has gone wrong, then we will look to address this and put things right in our response. We will ask the customer the resolution that they are seeking for their complaint to help

	<ul style="list-style-type: none"> <li>• Providing an explanation, assistance or reasons;</li> <li>• Taking action if there has been delay;</li> <li>• Reconsidering or changing a decision;</li> <li>• Amending a record or adding a correction or addendum;</li> <li>• Providing a financial remedy;</li> <li>• Changing policies, procedures or practices.</li> </ul>			<p>achieve this. The closing letter will set out what we have done to put things right. Remedies are logged within the housing system and actions referred to the relevant service are so the lessons loop can be closed.</p>
7.2	<p>Any remedy offered must reflect the impact on the resident as a result of any fault identified.</p>	Yes	<p>Compensation and remedies guidance</p>	<p>During the initial triage of the complaint, we work with our customers to clarify the exact nature of the complaint and what is needed to resolve this. Only when this is agreed will we assign an impartial investigator. Where the outcome is unreasonable, unrealistic and would be unfair to our other customers, we will advise the customer during triage or later in the process when it becomes clear from investigation. We monitor learning from previous HO determinations to ensure that our offers are reflective</p>



				of the situation and expectations.
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	Policy section 3.23	The closing letter will set out what we have done to put things right. Remedies are logged within the housing system and actions referred to the relevant service are so the lessons loop can be closed.
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes	We refer to the Ombudsman's Guidance on remedies and research Ombudsman case reviews for guidance on what is a reasonable redress for residents and have developed our compensation guide on this basis.	

### Section 8: Self-assessment, reporting and compliance

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.	Yes	Our annual report is being published alongside this self-assessment.	

	<p>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;</p> <p>c. any findings of non-compliance with this Code by the Ombudsman;</p> <p>d. the service improvements made as a result of the learning from complaints;</p> <p>e. any annual report about the landlord's performance from the Ombudsman; and</p> <p>f. any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord.</p>			
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 section of its website relating to complaints. The governing body's response to the report must be published alongside this.	Yes		This is being published alongside this self-assessment.
8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	Yes		We will review the self-assessment as part of the Simple Done Right process review to ensure any

				changes continue to be in line with the Code.
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	Yes	Noted	
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	Business continuity plans take the HO Code into account.	Business continuity planning has been strengthened to reflect this with also reference to keeping the Member Responsible for Complaints involved. Report to Audit Committee on 13 March 2024.

## 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	Policy section 6.2	Trends are now monitored for systemic issues, lessons learned and service improvements.
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	<p>We review Spotlight reports and Special reports to identify opportunities to learn from complaints made about other landlords. We have introduced a 'lessons loop' process to share learning across the business through Assistant Directors and identify corporate and service specific opportunities for learning.</p> <p>We also used HO examples of complaints where there had been maladministration as part of exercises to launch our new behaviour framework to show how important our culture and behaviours are to delivering a positive complaints approach.</p>	
9.3	Accountability and transparency are also integral to a positive complaint handling culture. Landlords must	Yes	Policy section 6.2	Trends are monitored for systemic issues, lessons learned and service

	report back on wider learning and improvements from complaints to stakeholders, such as residents' panels, staff and relevant committees.			improvements. Have introduced a framework where lessons and trends are shared with Assistant Directors, Directors and the Member Responsible for Complaints quarterly, the Board and Customer Voice bi-annually.
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	The Executive Director of Governance and Strategy.	
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	Monica Burns has been appointed Board Member Responsible for Complaints from 1 April 2024.	
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	Yes	Executive Director for Governance and Strategy meets with the Member Responsible for Complaints quarterly with an agreed framework of key areas to discuss alongside the ability to	

	staff to perform this role and report on their findings.		request further information as necessary to undertake the role effectively.	
9.7	<p>As a minimum, the MRC and the governing body (or equivalent) must receive:</p> <ul style="list-style-type: none"> <li>a. regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance;</li> <li>b. regular reviews of issues and trends arising from complaint handling;</li> <li>c. regular updates on the outcomes of the Ombudsman's investigations and progress made in complying with orders related to severe maladministration findings; and</li> <li>d. annual complaints performance and service improvement report.</li> </ul>	Yes	Executive Director for Governance and Strategy meets with the Member Responsible for Complaints quarterly with an agreed framework of key areas to discuss alongside the ability to request further information as necessary to undertake the role effectively.	
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"> <li>a. have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments;</li> </ul>	Yes	<p>We are committed to working collaboratively across teams to resolve complaints quickly and effectively for our customers. These values and behaviours and strategic objectives are outlined on page 5 of our corporate plan and include: 'work together for the good of our customers' and 'provide</p>	<p>We have recently launched our new behaviours framework, which makes clear our expectations and ensures our actions are focused on achieving our core purpose: 'We improve the lives of our customers by providing healthy,</p>

	<p>b. take collective responsibility for any shortfalls identified through complaints, rather than blaming others; and</p> <p>c. act within the professional standards for engaging with complaints as set by any relevant professional body.</p>		<p>services that have the biggest impact in supporting our customers'. Our managers have taken part in a influencers programme to develop cross-departmental relationships and strengthen collaborative working. Our Insight Team is undergoing a programme of complaints handling training, which will ensure that we meet the professional requirements.</p>	<p>affordable homes and enhancing our communities'.</p> <p>We have also recently launched a new Customer Strategy to ensure we put the customer at the heart of everything we do.</p>
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