

Appendix A: Self-assessment form

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

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

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

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

Section 1: Definition of a complaint

| Code provision | Code requirement | Comply: Yes / No | Evidence | Commentary / explanation |
|----------------|--|------------------|--------------------------------|--------------------------|
| 1.2 | A complaint must be defined as: <i>'an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the landlord, its own staff, or those acting on its behalf, affecting a resident or group of residents.'</i> | Yes | Housing Complaints Policy, 1.3 | |
| 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 | Housing Complaints Policy, 2.2 | |
| 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 | Housing Complaints Policy, 2.2 | |

| | | | | |
|-----|--|-----|---|---|
| | 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 | Housing Complaints Policy, 2.2 | |
| 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 | Housing Complaints Policy, 2.2 Tenant Satisfaction Surveys | <p>Further evidence of this can be shown in our Tenant Satisfaction Measure results, where tenants were contacted if they raised a complaint or expressed dissatisfaction.</p> <p>Staff training covers what is and what is not a complaint, so staff know when to signpost customers to the complaint's procedure.</p> <p>We include how to raise a complaint in a new programme of surveys.</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 | Housing Complaints Policy, 2.8 | |
| 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. | Yes | Housing Complaints Policy, 2.8 | |

| | | | | |
|-----|--|-----|--------------------------------|---|
| | <ul style="list-style-type: none"> Matters that have previously been considered under the complaints policy. | | | |
| 2.3 | Landlords must accept complaints referred to them within 12 months of the issue occurring or the resident becoming aware of the issue, unless they are excluded on other grounds. Landlords must consider whether to apply discretion to accept complaints made outside this time limit where there are good reasons to do so. | Yes | Housing Complaints Policy, 2.8 | |
| 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 | Housing Complaints Policy, 2.9 | The Housing Complaints Procedure explains that tenants must be provided with an explanation as to why their complaint was not accepted. |
| 2.5 | Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint. | Yes | Housing Complaints Policy, 2.8 | |

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 | Housing Complaints Policy, 2.5 & 2.17 | <p>There are multiple channels available for residents to complain, including a E-form, dedicated email address, contact number, by visiting the Civic Centre, and by letter. All this information is accessible through our website on dedicated Housing Complaint webpages, and the customer service centre.</p> <p>We will continue to add how to complaint through new, and when reviewing existing, documents for tenants.</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 | Housing Complaints Policy, 2.5, 3.2 | |

| | | | | |
|-----|--|-----|--|--|
| 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 | Housing Complaints Policy, 2.1 & 2.4 | Further evidence in the Complaints Procedure. This is encouraged and explained during complaints handling training. |
| 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 | https://www.runnymede.gov.uk/housing/housing-complaints https://www.runnymede.gov.uk/downloads/file/2260/tenants-newsletter-march-2024 Housing Complaints Policy, 4.1 | The Council's Complaints Policy is available on our website with a clear indication of the stages involved and the expected timeframes. We also publicise it in regular correspondence and communications, including the tenant newsletter. |
| 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 | Housing Complaints Policy, 3.1 | |
| 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 | Housing Complaints Policy, 2.6 | |
| 3.7 | Landlords must provide residents with information on their right to access the Ombudsman service and how the | Yes | Housing Complaints Policy, 3.1 & 2.13 | Our Housing Complaints Procedure includes a letter template for staff to use, |

| | | | | |
|--|---|--|--|--|
| | individual can engage with the Ombudsman about their complaint. | | | which includes the relevant Ombudsman's details. |
|--|---|--|--|--|

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 | Housing Complaints Procedure, Responsibilities Housing Complaints Policy, 4.3 | The Housing Policy and Performance Officer is responsible for logging all formal complaints about Housing. |
| 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 | Housing Complaints Procedure, Responsibilities Housing Complaints Policy, 4.3 | Complaints are logged corporately and in Housing by the Policy and Performance Officer who has the authority to engage with the relevant service or team to ensure the complaint is dealt with in accordance with policy and procedure. |
| 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 | Yes | Housing Complaints Policy, 2.1, 3.1 | |

| | | | | |
|--|---|--|--|--|
| | core service and must be resourced to 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 | <p>Housing Complaints Policy https://www.runnymede.gov.uk/housing/housing-complaints</p> <p>Housing Complaints Policy, 2.3</p> | <p>The two policies follow a similar process. Whereas the Corporate Complaints Policy deals with the council as a whole, the Housing Complaints Policy is specific to the Housing service.</p> <p>Residents are not dealt with differently if they are going through our complaints process.</p> |
| 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 | Housing Complaints Policy, 2.5 | We have a two stage complaints procedure. |
| 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 | Housing Complaints Policy, 2.5 | We have a two stage complaints procedure. |

| | | | | |
|-----|--|-----|--|--|
| 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 | Housing Complaints Policy, 2.6 | We log all complaints, including ones received through contractors, in our Corrective Action Log, and track to ensure a tenant does not have to go through two processes. |
| 5.5 | Landlords are responsible for ensuring that any third parties handle complaints in line with the Code. | Yes | Housing Complaints Policy, 2.6 | |
| 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 | Housing Complaints Procedure, step 4 | The Housing Complaints Procedure includes an acknowledgement template letter for staff to use where staff are required to include items specified on the left. |
| 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 | Housing Complaints Procedure, step 1 and an acknowledgement letter | The procedure requires complaint handlers to ensure the customer received a detailed explanation of the reasons the complaint is not appropriate for the process, ensure that they are not left without a response for a lengthy period, and |

| | | | | |
|------|---|-----|---|--|
| | | | | alternative advice is provided. |
| 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 | Housing Complaints Procedure, step 4 & 11 | The criteria when investigating a complaint, requires items listed on the left. |
| 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 | Housing Complaints Procedure, step 6 | The procedure includes that we will agree to an extension with complainant to provide an update and will advise when we expect to respond. |
| 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 | Housing Complaints Policy, 5.3 | We will also be introducing a Vulnerable Persons Strategy which will include reasonable adjustments for those who require more support when working with and communicating to the Council. |
| 5.11 | Landlords must not refuse to escalate a complaint through all stages of the | Yes | Housing Complaints Policy, 2.8 & 2.16 | The Complaints Procedure and the Unreasonable |

| | | | | |
|------|---|-----|---|---|
| | 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. | | | Complaints procedure required that steps are taken before a complaint is refused. |
| 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 | Housing Complaints Procedure, step 2 Complaints Action Log Housing Complaints Policy, 2.2 | All complaints correspondence and reviews are recorded. Should a resident complete a survey and their response informs us of their dissatisfaction we will act on it, should it not conflict with one of our existing policies. We do however hope to strengthen documenting reports of dissatisfied service through surveys when upgrading our tenant platform, Housing Online. |
| 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 | Housing Complaints Policy, 2.15 | |
| 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 | Housing Complaints Policy, 2.16 | If it is decided that a complaint is unreasonable, steps are considered, including how long these actions should be in force. |

| | | | | |
|------|--|-----|---------------------------------|--|
| | putting any restrictions in place and must keep restrictions under regular review. | | | |
| 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 | Housing Complaints Policy, 2.16 | |

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 | Housing Complaints Policy, 2.5 & 5.2 Housing Complaints Procedure, step 4 | We will refresh our procedure to reflect our reasonable adjustments when vulnerable residents make complaints. |
| 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 | Housing Complaints Policy, 2.10 | |
| 6.3 | Landlords must issue a full response to stage 1 complaints <u>within 10 working days</u> of the complaint being acknowledged. | Yes | Housing Complaints Policy, 2.10 | |
| 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 | Yes | Housing Complaints Procedure, step 6. Housing Complaints Policy, 2.10 | |

| | | | | |
|-----|---|-----|--|--|
| | 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. | | | |
| 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 | Housing Complaints Policy, 2.14 | |
| 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 | Housing Complaints Procedure, step 6. | Decision letter consists of statement of complaint as agreed with complainant and any actions. Letter details any action to be taken (how, when and by who). We will amend the procedure to include |
| 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 | Housing Complaints Procedure, step 4 & 15. | The procedure advises what a good decision letter consists of, including the requirements to the left. |
| 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 | Yes | Housing Complaints Procedure, step 16. | If a tenant raises additional issues prior the stage one response, it will be added to the complaint. We consider each complaint on a case by case basis, and |

| | | | | |
|-----|---|-----|---|---|
| | 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. | | | depending on the issues raised will dictate whether a new complaint is logged. |
| 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; f. details of any outstanding actions; and g. details of how to escalate the matter to stage 2 if the individual is not satisfied with the response. | Yes | Housing Complaints Procedure, Acknowledgement letter template | The acknowledgement template letter provided in the procedure includes the requirements listed to the left. |

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 | Housing Complaints Policy, 2.13 & 2.14 Housing Complaints Procedure, step 17. | |

| | | | | |
|------|---|-----|---|--|
| 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. | | Housing Complaints Policy, 2.10 | |
| 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 | Housing Complaints Policy, 2.13 | |
| 6.13 | The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1. | Yes | Housing Complaints Policy, 2.11 Housing Complaints Procedure, step 5 & 8 | Stage 1 is handled by a senior manager, whereas stage 2 will be handled by the head of service. This is set out in the Complaints Procedure. |
| 6.14 | Landlords must issue a final response to the stage 2 <u>within 20 working days</u> of the complaint being acknowledged. | Yes | Housing Complaints Policy, 2.14 | . |
| 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 | Housing Complaints Policy, 2.14 | Further evidence in the Complaints Procedure, step 8. |
| 6.16 | When an organisation informs a resident about an extension to these | Yes | Housing Complaints Policy, 2.14 | . |

| | | | | |
|------|---|-----|--|--|
| | timescales, they must be provided with the contact details of the Ombudsman. | | | |
| 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 | Housing Complaints Procedure, Step 8 | Decision letter consists of statement of complaint as agreed with complainant and any actions. Letter details any action to be taken (how, when and by who). |
| 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 | Housing Complaints Procedure, step 4 & 11 | The procedure advises what a good decision letter consists of, including the requirements to the left. |
| 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"> 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 | Housing Complaints Procedure, Acknowledgement letter | The Complaints Procedure includes a template stage 2 acknowledgement letter, which includes the requirements to the left. |

| | | | | |
|------|---|-----|--------------------------------------|--|
| 6.20 | Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response. | Yes | Housing Complaints Procedure, step 8 | Stage 2 responses are dealt with by the Head of Housing. |
|------|---|-----|--------------------------------------|--|

Section 7: Putting things right

| Code provision | Code requirement | Comply: Yes / No | Evidence | Commentary / explanation |
|----------------|--|------------------|---|--|
| 7.1 | <p>Where something has gone wrong a landlord must acknowledge this and set out the actions it has already taken, or intends to take, to put things right. These can include:</p> <ul style="list-style-type: none"> • Apologising; • Acknowledging where things have gone wrong; • Providing an explanation, assistance or reasons; • Taking action if there has been delay; • Reconsidering or changing a decision; • Amending a record or adding a correction or addendum; • Providing a financial remedy; • Changing policies, procedures or practices. | Yes | Housing Complaints Procedure, steps 10 & 11 | The Housing Complaints Procedure required that complaint handlers include the items to the left in their response. |

| | | | | |
|-----|---|-----|--------------------------|--|
| 7.2 | Any remedy offered must reflect the impact on the resident as a result of any fault identified. | Yes | Compensation Policy | Our Compensation Policy considered quantifiable costs and the severity of the impact it has had on the tenant. |
| 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 | Compensation Policy, 6.2 | |
| 7.4 | Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies. | Yes | Compensation Policy, 3.6 | The Compensation Policy ensures we are compliant with the Housing Ombudsman guidance, and we will act promptly to comply with Ombudsman recommendations. |

Section 8: Putting things right

| 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. | Yes | Housing Complaints Policy, 4.6 | <p>We currently provide tenants with an annual report which includes complaints.</p> <p>We also provide regular reports to Housing Committee.</p> |

| | | | | |
|-----|--|-----|--------------------------------------|---|
| 8.2 | <p>The annual complaints performance and service improvement report must be reported to the landlord's governing body (or equivalent) and published on the on the section of its website relating to complaints. The governing body's response to the report must be published alongside this.</p> | Yes | Housing Complaints Policy, 4.5 & 2.1 | <p>We provide regular performance information on complaints to the Housing Committee. The management team have access to key performance information on complaint handling. As part of the complaints analysis, we look at common causes, which informs our priorities for policies and procedures. We publish information on Ombudsman findings when applicable, and Committee reports and minutes of this is published on our website.</p> <p>Housing Committee Report</p> <p>Housing Committee Minutes</p> |
| 8.3 | <p>Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.</p> | Yes | | <p>Though our organisation has not experienced a significant restructure, should this occur we will carry out a self-assessment to ensure we continue to follow the Ombudsman's requirements.</p> |

| | | | | |
|-----|--|-----|--|--|
| 8.4 | Landlords may be asked to review and update the self-assessment following an Ombudsman investigation. | Yes | | In this circumstance, we will review and update our self-assessment. |
| 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 | | We will carry out these actions, should exceptional circumstances arise. |

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 | Housing Complaints Policy, 2.4 & 4.3 | |
| 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 | Housing Complaints Policy, 2.1 & 2.4 | |
| 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 | Housing Complaints Policy, 4.6 | We regularly report to Housing Committee, include learnings in regular communications such as annual reports and newsletters, and complaints learning and review is included in the Terms of Reference to upcoming tenant groups. |
| 9.4 | Landlords must appoint a suitably senior lead person as accountable for their complaint handling. This person must assess any themes or | Yes | Housing Complaints Policy, 4.3 | . |

| | | | | |
|-----|---|-----|--------------------------------|--|
| | trends to identify potential systemic issues, serious risks, or policies and procedures that require revision. | | | |
| 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 | Housing Complaints Policy, 4.4 | |
| 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 | Housing Complaints Policy, 4.4 | |
| 9.7 | As a minimum, the MRC and the governing body (or equivalent) must receive: <ul style="list-style-type: none"> a. regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance; b. regular reviews of issues and trends arising from complaint handling; | No | Housing Complaints Policy, 4.5 | |

| | | | | |
|-----|---|-----|--|--|
| | <p>c. regular updates on the outcomes of the Ombudsman's investigations and progress made in complying with orders related to severe maladministration findings; and</p> <p>d. annual complaints performance and service improvement report.</p> | | | |
| 9.8 | <p>Landlords must have a standard objective in relation to complaint handling for all relevant employees or third parties that reflects the need to:</p> <p>a. have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments;</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> | Yes | Housing Complaints Procedure, Stage 2 acknowledgement letter | <p>In our letter template response to stage 2, we offer signposting which encourages the respondent to signpost the complaint to other services.</p> <p>We collaborate with other departments to ensure complaints are put right in a timely manner.</p> |