

Appendix B – Self-Assessment Form

This self-assessment form should be completed by the complaints officer and discussed at the landlord’s governing body annually.

Evidence should be included to support all statements with additional commentary as necessary.

Explanations must also be provided where a mandatory ‘must’ requirement is not met to set out the rationale for the alternative approach adopted and why this delivers a better outcome.

Section 1 - Definition of a complaint

Mandatory ‘must’ requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
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 organisation, its own staff, or those acting on its behalf, affecting an individual resident or group of residents.</i>	Yes	This is the definition used in section 1 of our Feedback Policy: Brighter Places - 09-22 Customer Feedback Policy Final.pdf - All Documents (sharepoint.com) The complaints training that we are going to be delivering in 23/24 will help to ensure that all expressions of dissatisfaction about a service are logged and treated as complaints. This training will give us confidence that all colleagues understand the difference between recognising a situation that a customer simply wants rectified and a complaint about a service they have or haven’t received.

1.3	The resident does not have to use the word 'complaint' for it to be treated as such. A complaint that is submitted via a third party or representative must still be handled in line with the landlord's complaints policy.	Yes	Complaints are investigated, regardless of who submits them or how. We have specific examples already this year where a complaint has been submitted by a third party. The complaints training that we are going to be delivering in 23/24 will help to ensure that all expressions of dissatisfaction about a service are logged and treated as complaints, regardless of whether or not the word "complaint" is used.
1.6	... if further enquiries are needed to resolve the matter, or if the resident requests it, the issue must be logged as a complaint.	Yes	This is detailed in section 7 of our Customer Feedback Policy.
1.7	A landlord must accept a complaint unless there is a valid reason not to do so.	Yes	The reasons we would not accept a complaint are detailed under section 5 in our Customer Feedback Policy.
1.8	A complaints policy must clearly set out the circumstances in which a matter will not be considered, and these circumstances should be fair and reasonable to residents.	Yes	Section 5 (Exclusions) of our Customer Feedback Policy sets out the circumstances where a complaint won't be accepted, whilst section 17 sets out what is classed as "Unreasonable Complainant Behaviour".
1.9	If a landlord decides not to accept a complaint, a detailed 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.	Yes	This is detailed in section 5 of the Customer Feedback Policy.

Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
1.4	Landlords should recognise the difference between a service request , where a resident may be unhappy with a situation that they wish to have rectified, and a complaint about the service they have/have not received.	Yes	<p>The definitions are set out in Section 1 of the Customer Feedback Policy.</p> <p>The complaints training that we are going to be delivering in 23/24 will help to ensure that all expressions of dissatisfaction about a service are logged and treated as complaints.</p> <p>This training will give us confidence that all colleagues understand the difference between recognising a situation that a customer simply wants rectified and a complaint about a service they have or haven't received.</p>
1.5	Survey feedback may not necessarily need to be treated as a complaint, though, where possible, the person completing the survey should be made aware of how they can pursue their dissatisfaction as a complaint if they wish to.	Yes	The company who carry out our perception surveys flag to us any customers who have outstanding actions they wish to discuss and they also signpost respondents towards the web reporting form if they wish to make a complaint.

Section 2 - Accessibility and awareness

Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
2.1	Landlords must make it easy for residents to complain by providing different channels through which residents can make a complaint such as in person, over the telephone, in writing, by email and digitally. While the Ombudsman recognises that it may not be feasible for a landlord to use all of the potential channels, there must be more than one route of access into the complaints system.	Yes	Customers can raise dissatisfaction through any of our channels, whether this be face-to-face, phone, e-mail, Whatsapp, via social media or online. Online reporting can be done here: Feedback and complaints - Brighter Places
2.3	Landlords must make their complaint policy available in a clear and accessible format for all residents. This will detail the number of stages involved, what will happen at each stage and the timeframes for responding.	Yes	The Customer Feedback Policy is available on our website. The different stages, timeframes for responding and the Ombudsman's contact details are also displayed on the website in an easy to read format: Feedback and complaints - Brighter Places The percentage of customers reporting that they are satisfied that they know how to complain if they are unhappy has increased in 23/24 with the figure sitting at 84% for both Q1 and Q2.
2.4	Landlord websites, if they exist, must include information on how to raise a complaint. The complaints policy and process must be easy to find on the website.	Yes	Information about the Customer Feedback Policy, including the different stages and timeframes for responding is available online: Feedback and complaints - Brighter Places

2.5	Landlords must comply with the Equality Act 2010 and may need to adapt normal policies, procedures, or processes to accommodate an individual's needs. Landlords must satisfy themselves that their policy sets out how they will respond to reasonable adjustments requests in line with the Equality Act and that complaints handlers have had appropriate training to deal with such requests.	Yes	Section 16 of the Feedback Policy sets out our approach to Equality, Diversity and Inclusion in relation to complaints.
2.6	Landlords must publicise the complaints policy and process, the Complaint Handling Code and the Housing Ombudsman Scheme in leaflets, posters, newsletters, online and as part of regular correspondence with residents.	Yes	This is available online (Feedback and complaints - Brighter Places), in the leaflets we send customers throughout the complaints process: Complaints & Feedback Leaflet
2.7	Landlords must provide residents with contact information for the Ombudsman as part of its regular correspondence with residents.	Yes	This is available online (Feedback and complaints - Brighter Places), in the leaflets we send customers throughout the complaints process: Complaints & Feedback Leaflet
2.8	Landlords must provide early advice to residents regarding their right to access the Housing Ombudsman Service throughout their complaint, not only when the landlord's complaints process is exhausted.	Yes	This leaflet is sent out alongside every complaint outcome letter, regardless of whether it at Stage 1 or Stage 2: Complaints & Feedback Leaflet Information is also provided on our website.

Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
--------------	------------------	----------------	---

2.2	Where a landlord has set up channels to communicate with its residents via social media, then it should expect to receive complaints via those channels. Policies should contain details of the steps that will be taken when a complaint is received via social media and how confidentiality and privacy will be maintained.	Yes	Section 8 of the Customer Feedback Policy talks about enabling complaints, including via social media. Currently the Communications team would pass details directly to the Feedback Inbox for the team to manage or would report using this form: Complaint Reporting Form
-----	--	-----	---

Section 3 - Complaint handling personnel

Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
3.1	Landlords must have a person or team assigned to take responsibility for complaint handling to ensure complaints receive the necessary attention, and that these are reported to the governing body. This Code will refer to that person or team as the "complaints officer".	Yes	<p>We have a Customer Feedback & Quality Assurance Officer who co-ordinates our complaint responses and carries out reporting. They are supported by an Engagement & Insight Administrator.</p> <p>Stage 1 complaints are investigated by service managers, whilst Stage 2 complaints are investigated by a Director.</p>
3.2	...the complaint handler appointed must have appropriate complaint handling skills and no conflicts of interest.	Yes	<p>The Customer Feedback & Quality Assurance Officer has several years of experience in handling complaints and will receive training or attend conferences as required. They have no conflicts of interest.</p> <p>As part of the complaints training we are going to run in 23/24 there will be a focus on skills to support managers with investigations.</p>

Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
3.3	<p>Complaint handlers should:</p> <ul style="list-style-type: none"> • be able to act sensitively and fairly • be trained to handle complaints and deal with distressed and upset residents • have access to staff at all levels to facilitate quick resolution of complaints • have the authority and autonomy to act to resolve disputes quickly and fairly. 	Yes	The Customer Feedback & Quality Assurance Officer has the skills to manage complaints sensitively and efficiently. They liaise with teams across the business, including managers and directors as well as our partners, contractors. They will act to resolve some queries themselves, whilst encouraging the managers who are investigating officers to do the same.

Section 4 - Complaint handling principles

Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
4.1	<p>Any decision to try and resolve a concern must be taken in agreement with the resident and a landlord's audit trail/records should be able to demonstrate this. Landlords must ensure that efforts to resolve a resident's concerns do not obstruct access to the complaints procedure or result in any unreasonable delay. It is not appropriate to have extra named stages (such as 'stage 0' or 'pre-complaint stage') as this causes unnecessary confusion for residents. When a complaint is made, it must be acknowledged and logged at stage one of the complaints procedure within five days of receipt.</p>	Yes	<p>Section 7 of the Customer Feedback Policy sets outlines our two stage complaints process. Details of all complaints are held within a Tracker (Brighter Places Feedback Tracker.xlsx (sharepoint.com)) and all of the documentation linked to each complaint is held in Sharepoint (Feedback Folder).</p> <p>Complaints are acknowledged within five working days, although our Customer Feedback Policy does need to be updated to reflect this as it currently states that we</p>

			will acknowledge Stage 2 complaints within three working days.
4.2	Within the complaint acknowledgement, landlords must set out their understanding of the complaint and the outcomes the resident is seeking. If any aspect of the complaint is unclear, the resident must be asked for clarification and the full definition agreed between both parties.	Partially	Acknowledgement e-mails sometimes contain an overview of what the complaint is about and the outcomes the customer is seeking. However, this is less likely to happen on larger complaints where simply the investigating officer and timescales are included. We will assess how we can do this for all complaints going forward.
4.6	A complaint investigation must be conducted in an impartial manner.	Yes	The Feedback team and managers are aware of the need to conduct investigations in an impartial. This will also be touched upon in the upcoming Complaints training.
4.7	The complaint handler must: <ul style="list-style-type: none"> • deal with complaints on their merits • act independently and have an open mind • take measures to address any actual or perceived conflict of interest • consider all information and evidence carefully • keep the complaint confidential as far as possible, with information only disclosed if necessary to properly investigate the matter. 	Yes	The Feedback team and managers are aware of the need to conduct investigations with an open mind and consider the information carefully. This will also be touched upon in the upcoming Complaints training.
4.11	Landlords must adhere to any reasonable arrangements agreed with residents in terms of frequency and method of communication	Yes	Section 4 of the Customer Feedback Policy states that we will check if any reasonable adjustments need to be made to support the individual through the complaints process. Section 16 in the policy focuses on equality, diversity and

			inclusion and outlines how we will be flexible to meet the needs of the individual.
4.12	The resident, and if applicable any staff member who is the subject of the complaint, must also be given a fair chance to: <ul style="list-style-type: none"> • set out their position • comment on any adverse findings before a final decision is made. 	Yes	Any investigations involving individuals would be discussed with them to gather an understanding of the allegations. Section 6 of the Customer Feedback Policy outlines our approach to this.
4.13	A landlord must include in its complaints policy its timescales for a resident to request escalation of a complaint	Yes	This is detailed in Section 7 of the Customer Feedback Policy.
4.14	A landlord must not unreasonably refuse to escalate a complaint through all stages of the complaints procedure and must have clear and valid reasons for taking that course of action. Reasons for declining to escalate a complaint must be clearly set out in a landlord's complaints policy and must be the same as the reasons for not accepting a complaint.	Yes	Section 5 (Exclusions) of our Customer Feedback Policy sets out the circumstances where a complaint won't be accepted, whilst section 17 sets out what is classed as "Unreasonable Complainant Behaviour".
4.15	A full record must be kept of the complaint, any review 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 reports or surveys prepared.	Yes	All documentation linked to each complaint is held in Sharepoint (Feedback Folder).
4.18	Landlords must have policies and procedures in place for managing unacceptable behaviour from residents and/or their representatives when pursuing a complaint.	Yes	Section 17 of the Customer Feedback Policy sets out what is classed as "Unreasonable Complainant Behaviour".

Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
--------------	------------------	----------------	---

4.3	Landlords should manage residents' expectations from the outset, being clear where a desired outcome is unreasonable or unrealistic	Yes	"Being open and honest about the things we can and can't do" is one of our Customer Standards
4.4	A complaint should be resolved at the earliest possible opportunity, having assessed what evidence is needed to fully consider the issues, what outcome would resolve the matter for the resident and whether there are any urgent actions required.	Partially	The Feedback team and managers are aware that complaints can be closed with clear actions agreed as part of the outcome, even if these actions will be carried out at a later date. However, we still have some complaints that have gone over the Ombudsman's timescale for resolution.
4.5	Landlords should 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 where this is reasonable.	Yes	We have specific example this year where a representative has dealt with a complaint on behalf of a customer.
4.8	Where a key issue of a complaint relates to the parties' legal obligations landlords should clearly set out their understanding of the obligations of both parties.	Yes	We work with a solicitor who is on hand to offer advice in relation to investigations, any legal obligations and any legal wording.
4.9	Communication with the resident should not generally identify individual members of staff or contractors.	Yes	Exceptions are where the complaint is specifically about an individual and how we deal with these are detailed in Section 6 of the Customer Feedback Policy.
4.10	Landlords should keep residents regularly updated about the progress of the investigation.	Partially	The Feedback team provides information around outstanding complaints to investigating managers, but there are still some complaints that have going over the Ombudsman's timescale for resolution. We have now started setting reminders in colleagues diaries that will pop-up three days before a complaint is due and the Customer Experience & Insight Manager has started having one-

			to-one conversations with investigating officers to stress the importance of meeting deadlines and keeping the customer updated.
4.16	Landlords should seek feedback from residents in relation to the landlord's complaint handling as part of the drive to encourage a positive complaint and learning culture.	Yes	<p>Every quarter we ask over 200 customers their views on complaints handling. In Q3 we will also be asking an additional "open" question following this to capture more information from customers who are dissatisfied.</p> <p>We also send transactional surveys to people who have complained during a particular period. This last time this exercise was done was in June 2023. However, we want to start doing on a more frequent basis. We also want to get better at making changes on the back of the feedback we receive.</p>
4.17	Landlords should recognise the impact that being complained about can have on future service delivery. Landlords should ensure that staff are supported and engaged in the complaints process, including the learning that can be gained	Partially	<p>Trends from repairs complaints in relation to the length of time to complete the repair has led to a recent business case to Board that will help us improve in this area.</p> <p>More formal lessons learnt sessions are done sporadically, but this is something we will start doing on a regular basis.</p>
4.19	Any restrictions placed on a resident's contact due to unacceptable behaviour should be appropriate to their needs and should demonstrate regard for the provisions of the Equality Act 2010.	Yes	Sections 16 and 17 of the Customer Feedback Policy set out our approach to equality, diversity and inclusion as well as Unacceptable Complainant Behaviour.

Section 5 - Complaint stages

Mandatory 'must' requirements

Stage 1

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
5.1	Landlords must respond to the complaint <u>within 10 working days</u> of the complaint being logged. Exceptionally, landlords may provide an explanation to the resident containing a clear timeframe for when the response will be received. This should not exceed a further 10 days without good reason.	Partially	The Feedback team provides information around outstanding complaints to investigating managers, but there are still some complaints that have going over the Ombudsman's timescale for resolution. We have now started setting reminders in colleagues diaries that will pop-up three days before a complaint is due and the Customer Experience & Insight Manager has started having one-to-one conversations with investigating officers to stress the importance of meeting deadlines and keeping the customer updated.
5.5	A complaint response must be sent 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 expeditiously with regular updates provided to the resident.	Partially	The Feedback team and managers are aware that complaints can be closed with clear actions agreed as part of the outcome, even if these actions will be carried out at a later date. Outcome letters are stored in the Feedback Folder and actions are tracked on the Brighter Places Feedback Tracker.xlsx (sharepoint.com) . Repairs that need to be completed by our partner, Alliance, following a complaint are flagged in their system to minimise the risk of these being re-arranged.

			Internally, we don't currently have a process for tracking the actions following complaints to ensure these are completed and instead rely on colleagues across the business to take individual ownership for this. In 23/24, we are looking to implement a technical solution (Web 360) where tasks with SLA's can be allocated through our Housing Management system. This will help us ensure that actions promised in outcome letters are completed in time.
5.6	Landlords must address all points raised in the complaint and provide clear reasons for any decisions, referencing the relevant policy, law and good practice where appropriate.	Yes	Section 7 of our Customer Feedback Policy sets out the need for this and the outcome letters stored in Sharepoint reflect this (Feedback Folder).
5.8	Landlords must confirm the following in writing to the resident at the completion of stage one in clear, plain language: <ul style="list-style-type: none"> • the complaint stage • the decision on the complaint • the reasons for any decisions made • the details of any remedy offered to put things right • details of any outstanding actions • details of how to escalate the matter to stage two if the resident is not satisfied with the answer 	Yes	Outcome letters are visible in Sharepoint (Feedback Folder) and our draft template letter helps structure investigations for both completeness and consistency.

Stage 2

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
--------------	------------------	----------------	---

5.9	If all or part of the complaint is not resolved to the resident's satisfaction at stage one it must be progressed to stage two of the landlord's procedure, unless an exclusion ground now applies. In instances where a landlord declines to escalate a complaint it must clearly communicate in writing its reasons for not escalating as well as the resident's right to approach the Ombudsman about its decision.	Yes	This is outlined in Sections 5 and 7 of our Customer Feedback Policy and in the outcome letters that are sent.
5.10	On receipt of the escalation request, landlords must set out their understanding of issues outstanding and the outcomes the resident is seeking. If any aspect of the complaint is unclear, the resident must be asked for clarification and the full definition agreed between both parties.	Partially	Acknowledgement e-mails sometimes contain an overview of what the complaint is about and the outcomes the customer is seeking. However, this is less likely to happen on larger complaints where simply the investigating officer and timescales are included. We will assess how we can do this for all complaints.
5.11	Landlords must only escalate a complaint to stage two once it has completed stage one and at the request of the resident.	Yes	This is detailed under section 7 of our Customer Feedback Policy.
5.12	The person considering the complaint at stage two, must not be the same person that considered the complaint at stage one.	Yes	Stage one complaints are investigated by the service manager, whilst stage two complaints are investigated by a Director.
5.13	Landlords must respond to the stage two complaint <u>within 20 working days</u> of the complaint being escalated. Exceptionally, landlords may provide an explanation to the resident containing a clear timeframe for when the response will be received. This should not exceed a further 10 days without good reason.	Yes	Timescales are outlined in section 7 of the Customer Feedback Policy. In the main these are resolved in time. In the first six months of 23/24, we received twenty Stage 2 complaints and three of these were overdue. One of these three was overdue by one day.
5.16	Landlords must confirm the following in writing to the resident at the completion of stage two in clear, plain language: <ul style="list-style-type: none"> • the complaint stage • the complaint definition 	Yes	Template outcome letters help ensure this structure and can be evidence in the letters that are sent and stored in Sharepoint (Feedback Folder)

	<ul style="list-style-type: none"> • the decision on the complaint • the reasons for any decisions made • the details of any remedy offered to put things right • details of any outstanding actions <p>and</p> <ul style="list-style-type: none"> • if the landlord has a third stage, details of how to escalate the matter to stage three • if this was the final stage, details of how to escalate the matter to the Housing Ombudsman Service if the resident remains dissatisfied. 		Section 7 of our Customer Feedback Policy states that we have a two tier complaints process and information about the Ombudsman is shared at both stages.
--	---	--	---

Stage 3

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
5.17	Two stage landlord complaint procedures are ideal. This ensures that the complaint process is not unduly long. If landlords strongly believe a third stage is necessary, they must set out their reasons for this as part of their self-assessment. A process with more than three stages is not acceptable under any circumstances.	N/A	Section 7 of our Customer Feedback Policy states that we have a two tier complaints process.
5.20	Landlords must confirm the following in writing to the resident at the completion of stage three in clear, plain language: <ul style="list-style-type: none"> • the complaint stage • the complaint definition • the decision on the complaint • the reasons for any decisions made • the details of any remedy offered to put things right • details of any outstanding actions • details of how to escalate the matter to the Housing Ombudsman Service if the resident remains dissatisfied 	N/A	Section 7 of our Customer Feedback Policy states that we have a two tier complaints process.

Best practice 'should' requirements

Stage 1

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
5.2	If an extension beyond 20 working days is required to enable the landlord to respond to the complaint fully, this should be agreed by both parties.	Yes	This is outlined in section 7 of our Customer Feedback Policy.
5.3	Where agreement over an extension period cannot be reached, landlords should provide the Housing Ombudsman's contact details so the resident can challenge the landlord's plan for responding and/or the proposed timeliness of a landlord's response.	Yes	This is outlined in section 7 of our Customer Feedback Policy.
5.4	Where the problem is a recurring issue, the landlord should consider any older reports as part of the background to the complaint if this will help to resolve the issue for the resident.	Yes	This is outlined in section 7 of our Customer Feedback Policy.
5.7	Where residents raise additional complaints during the investigation, these should be incorporated into the stage one response if they are relevant and the stage one response has not been issued. Where the stage one response has been issued, or it would unreasonably delay the response, the complaint should be logged as a new complaint.	Yes	This is outlined in section 7 of our Customer Feedback Policy.

Stage 2

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
5.14	If an extension beyond 10 working days is required to enable the landlord to respond to the complaint fully, this should be agreed by both parties.	Yes	This is outlined in section 7 of our Customer Feedback Policy.

5.15	Where agreement over an extension period cannot be reached, landlords should provide the Housing Ombudsman's contact details so the resident can challenge the landlord's plan for responding and/or the proposed timeliness of a landlord's response	Yes	This is outlined in section 7 of our Customer Feedback Policy.
------	---	-----	--

Stage 3

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
5.18	Complaints should only go to a third stage if the resident has actively requested a third stage review of their complaint. Where a third stage is in place and has been requested, landlords must respond to the stage three complaint <u>within 20 working days</u> of the complaint being escalated. Additional time will only be justified if related to convening a panel. An explanation and a date for when the stage three response will be received should be provided to the resident.	N/A	Section 7 of our Customer Feedback Policy states that we have a two tier complaints process.
5.19	Where agreement over an extension period cannot be reached, landlords should provide the Housing Ombudsman's contact details so the resident can challenge the landlord's plan for responding and/or the proposed timeliness of a landlord's response.	N/A	Section 7 of our Customer Feedback Policy states that we have a two tier complaints process.

Section 6 - Putting things right

Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
6.1	Effective dispute resolution requires a process designed to resolve complaints. 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.	Yes	Template outcome letters help ensure that investigating officers address what actions will be taken to put things right. This can be evidenced by the letters that

			are sent and stored in Sharepoint (Feedback Folder).
6.2	Any remedy offered must reflect the extent of any service failures and the level of detriment caused to the resident as a result. A landlord must carefully manage the expectations of residents and not promise anything that cannot be delivered or would cause unfairness to other residents.	Yes	Our Compensation Policy helps investigating officers determine the levels of compensation that is fair and also has a section around “goodwill & practical actions” to prompt investigating officers to think about other ways to resolve dissatisfaction.
6.5	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.	Partially	There have been some outcome letters where actions have been agreed, but sometimes timeframes for delivering them haven't been included. We will partially address this through training. Through quality assurance we will identify where actions have been agreed, but without timescales. We will also define the roles of the investigating officer and the Feedback team in relation to tracking actions and following them through to completion.
6.6	In awarding compensation, a landlord must consider whether any statutory payments are due, if any quantifiable losses have been incurred, the time and trouble a resident has been put to as well as any distress and inconvenience caused.	Yes	Our Compensation Policy sets out calculations for mandatory compensation, quantifiable loss and discretionary compensation.

Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
--------------	------------------	----------------	---

6.3	Landlords should look beyond the circumstances of the individual complaint and consider whether anything needs to be 'put right' in terms of process or systems to the benefit of all residents.	Partially	Trends from repairs complaints in relation to the length of time to complete the repair has led to a recent business case to Board that will help us improve in this area. More formal lessons learnt sessions are done sporadically, but this is something we will start doing on a regular basis.
6.7	In some cases, a resident may have a legal entitlement to redress. The landlord should still offer a resolution where possible, obtaining legal advice as to how any offer of resolution should be worded.	Yes	We work with a solicitor who is on hand to offer advice in relation to investigations, any legal obligations and any legal wording.

Section 7 - Continuous learning and improvement

Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
7.2	Accountability and transparency are integral to a positive complaint handling culture. Landlords must report back on wider learning and improvements from complaints in their annual report and more frequently to their residents, staff and scrutiny panels.	Partially	Reports are shared periodically with the Exec team. Although we report back to customers on our complaints performance through our newsletters, we need to do more when it comes to outbound communications. Our plan is to start publishing more "you said, we did" articles that evidence how we have listened to dissatisfaction and made changes as a result.

Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
---------------------	-------------------------	-----------------------	--

7.3	A member of the governing body should be appointed to have lead responsibility for complaints to support a positive complaint handling culture. This role will be responsible for ensuring the governing body receives regular information on complaints that provides insight to the governing body on the landlord's complaint handling performance.	Yes	Complaints performance is reported to Board, and will be scrutinised in detail by the newly formed Customer Experience Committee.
7.4	As a minimum, governing bodies should receive: <ul style="list-style-type: none"> • Regular updates on the volume, categories and outcome of complaints, alongside complaint handling performance including compliance with the Ombudsman's orders • Regular reviews of issues and trends arising from complaint handling, • The annual performance report produced by the Ombudsman, where applicable • Individual complaint outcomes where necessary, including where the Ombudsman made findings of severe maladministration or referrals to regulatory bodies. The implementation of management responses should be tracked to ensure they are delivered to agreed timescales. The annual self-assessment against the Complaint Handling Code for scrutiny and challenge. 	Yes	Monthly and quarterly KPIs along with a narrative on complaints performance and trends are shared with the Exec team and the Board.
7.5	Any themes or trends should be assessed by senior management to identify potential systemic issues, serious risks or policies and procedures that require revision. They should also be used to inform staff and contractor training.	Partially	Trends from repairs complaints in relation to the length of time to complete the repair has led to a recent business case to Board that will help us improve in this area. More formal lessons learnt sessions are done sporadically, but this is something we will start doing on a regular basis.
7.6	Landlords should have a standard objective in relation to complaint handling for all employees that reflects the need to: <ul style="list-style-type: none"> • have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments 	Partially	Our Customer Care Standards set out certain expectations for Customer Care more generally. Whilst our values describe the "how" – our approach. Although not mentioned specially, if

	<ul style="list-style-type: none"> take collective responsibility for any shortfalls identified through complaints rather than blaming others act within the Professional Standards for engaging with complaints as set by the Chartered Institute of Housing. 		everyone applies these values to complaints handling then owning our mistakes, collaboration to find solutions and thinking innovatively to improve customer experiences would be the result.
--	--	--	---

Section 8 - Self-assessment and compliance

Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
8.1	Landlords must carry out an annual self-assessment against the Code to ensure their complaint handling remains in line with its requirements.	Yes	This self-assessment is done annually with the results shared and discussed.
8.2	Landlords must also carry out a self-assessment following a significant restructure and/or change in procedures.	Yes	A restructure happened in April 2023, but the people who co-ordinated our complaints responses on a day-to-day remained the same and the processes weren't affected by it. A self-assessment was done following the merger in 2021.
8.3	<p>Following each self-assessment, a landlord must:</p> <ul style="list-style-type: none"> report the outcome of their self-assessment to their governing body. In the case of local authorities, self-assessment outcomes should be reported to elected members publish the outcome of their assessment on their website if they have one, or otherwise make accessible to residents include the self-assessment in their annual report section on complaints handling performance 	Yes	This self-assessment will be available on our website. It will also be discussed with the Exec Team in October 2023, alongside a wider Complaints Report.