

## Housing Ombudsman self-assessment form

Prepared by	Date	Board report
Head of Housing	05.02.24	28.02.24
Head of Housing	24.06.24	
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### 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 4.1, page 3)	This definition is included in our policy.
1.3	A resident does not have to use the word 'complaint' for it to be treated as such. Whenever a resident expresses dissatisfaction landlords must give them the choice to make complaint. A	Yes	Complaints Policy (sections 6.2 and 6.5, page 4)	Complaints training conducted with staff has reiterated that the word 'complaint' does not have to

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	complaint that is submitted via a third party or representative must be handled in line with the landlord's complaints policy.			be used for the tenant to make a complaint. Additional training sessions are ongoing.
1.4	Landlords must recognise the difference between a service request and a complaint. This must be set out in their complaints policy. A service request is a request from a resident to the landlord requiring action to be taken to put something right. Service requests are not complaints, but must be recorded, monitored and reviewed regularly.	Yes	Complaints policy (sections 6.1 – 6.5, page 4)	Complaints training conducted with staff and training sessions are ongoing. As of July 2024, all staff have been asked to complete the HO eLearning training on the HO Code and Dispute resolution. Staff will be asked to complete further courses on the eLearning platform from September 2024. Service requests are currently recorded, monitored and reviewed on different systems, including third party systems. In July 2024, we introduced a 'Service requests' app to the complaints section on our complaints management system. However, this is only for service requests that come through to the complaints team.

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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	Complaints policy (sections 6.1 - 6.5, page 4)	Complaints training conducted with staff and training sessions are ongoing. As of July 2024, all staff have been asked to complete the HO eLearning training on the HO Code and Dispute resolution. Staff will be asked to complete further courses on the eLearning platform from September 2024.
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	Voicescape, surveys	<p>Tenant satisfaction survey (TSS) feedback is responded to, and tenants are made aware of how to make a complaint.</p> <p>Voicescape software is used as a TSS tool for repairs and maintenance services. Any complaints raised via this platform are recorded and any dissatisfaction is investigated.</p> <p>All surveys now reference our complaints policy and how to make a complaint.</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	Complaints policy (sections 8.1 – 83, pages 7-8)	Complaints training conducted with staff and training sessions are ongoing. As of July 2024, all staff have been asked to complete the HO eLearning training on the HO Code and Dispute resolution. Staff will be asked to complete further courses on the eLearning platform from September 2024.
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> </ul>	Yes	Complaints policy (section 8.1, page 7)	

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	<ul style="list-style-type: none"> <li>Matters that have previously been considered under the complaints policy.</li> </ul>			
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 8.1, page 7)	
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	Complaints policy (section 8.2, page 8) and letters	If a complaint is not accepted, a response letter is provided with an explanation as to why and with details for the contacting the Ombudsman.
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Yes	Complaints policy (section 8.3, page 8)	Complaints training conducted with staff and training sessions are ongoing. As of July 2024, all staff have been asked to complete the HO eLearning training on the HO Code

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
				and Dispute resolution. Staff will be asked to complete further courses on the eLearning platform from September 2024.

### 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	Complaints policy (section 6.6, page 4 and section 13.2, page 9)	<p>Tenants can make a complaint via:</p> <ul style="list-style-type: none"> <li>Website</li> <li>Letter</li> <li>Email</li> <li>Phone</li> <li>Social media</li> <li>In person</li> </ul> <p>Policy, easy read and leaflet available on our website. Policy can be made in other formats, such as braille, when required.</p> <p>Easy read and leaflet versions were revised in March 2024.</p> <p>Our reasonable adjustments policy sets out how we will</p>

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
				<p>adjust normal approaches and practices to meet individual tenants' needs.</p> <p>Complaints training conducted with staff and training sessions are ongoing.</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	Complaints policy (section 6.6, page 4)	Complaints training conducted with staff and training sessions are ongoing. As of July 2024, all staff have been asked to complete the HO eLearning training on the HO Code and Dispute resolution. Staff will be asked to complete further courses on the eLearning platform from September 2024.
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		Complaints training conducted with staff and training sessions are ongoing. As of July 2024, all staff have been asked to complete the HO eLearning training on the HO Code and Dispute resolution. Staff will be asked to complete further courses on the eLearning platform from September 2024.
3.4	Landlords must make their complaint policy available in a clear	Yes	Complaints policy (section 7, pages 5-6)	Policy and procedure are accessible on our website.

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	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.			<a href="https://bestha.co.uk/complaints-and-compliments.php">https://bestha.co.uk/complaints-and-compliments.php</a>  Easy read version was revised in March 2024.
3.5	The policy must explain how the landlord will publicise details of the complaints policy, including information about the Ombudsman and this Code.	Yes	Complaints policy (section 1.3, page 2 and section 7.2.5, page 6)	Policy and information about the Ombudsman and Code are available on our website.
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	Complaints policy (section 6.1, page 4)	
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	Complaints policy (sections 7.2.5 and 7.2.6, page 6) and letters.	Provided in our complaint letters.



## 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	Policy (section 15.2, page 9)	<p>The Head of Housing is responsible for complaints management and the Communications and Tenant Engagement Lead is our Complaints Officer.</p> <p>The complaints steering group handles complaints.</p> <p>Complaints training conducted with staff and training sessions are ongoing.</p>
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		<p>The complaints officer has access to staff at all levels and authority and autonomy to act to resolve disputes promptly and fairly.</p> <p>Complaints training conducted with staff and training sessions are ongoing.</p>
4.3	Landlords are expected to prioritise complaint handling and a culture of learning from complaints. All relevant	Yes		Complaints training conducted with staff and training sessions are

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	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			ongoing. As of July 2024, all staff have been asked to complete the HO eLearning training on the HO Code and Dispute resolution. Staff will be asked to complete further courses on the eLearning platform from September 2024. Ongoing training ensures complaint handlers have the skills and are kept up to date with changes in relevant policy and best practices.

### 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	Complaints policy and equality, diversity and inclusion policy	Single complaints policy and tenants are treated fairly and not discriminated against if they complain.
5.2	The early and local resolution of issues between landlords and residents is key to effective complaint handling. It is not	Yes	Complaints policy (section 7, page 5-6)	

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	appropriate to have extra named stages (such as 'stage 0' or 'informal complaint') as this causes unnecessary confusion.			We have a 2 stage process which is clearly defined in our policy and 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	Complaints policy (section 7, page 5-6)	As above
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	Complaints policy (section 15.2, page 9)	Complaints training conducted with staff and training sessions are ongoing.  Our policy and procedure have been shared with our main third party contractor and monthly meetings have been scheduled.
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Yes	Complaints policy	As above.
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	Yes	Complaints policy (section 7, page 5-6) and letters	Included in complaint letters.

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	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	Complaints policy section 7, page 5-6)	
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	Complaints policy (section 7, page 5-6)	
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	Complaints policy (section 7.1.5, page 5 and section 7.2.4, page 6) and letters	<p>This is evidenced in letters and through agreed communication methods and online meetings.</p> <p>Due to a lack of training, resources, and a previous backlog of complaints,</p>

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
				<p>communication has not always been consistent, and extension letters have sometimes not been sent. However, since April 2024, the backlog has been cleared, and we now have the resources, with a complaints steering group and processes in place.</p> <p>Complaints training conducted with staff and training sessions are ongoing. As of July 2024, all staff have been asked to complete the HO eLearning training on the HO Code and Dispute resolution. Staff will be asked to complete further courses on the eLearning platform from September 2024.</p>
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	Yes	Complaints policy (section 13.2, page 9)	The majority of our complaints are received from support providers on tenants' behalf or tenants who have their support providers attend any

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	resident has disclosed. Any agreed reasonable adjustments must be kept under active review.			<p>meetings and discussions regarding the complaint. If reasonable adjustments are requested, then we make any necessary adjustments. However, they were not previously recorded under the complaints cases.</p> <p>Application forms identify support needs, and this is recorded on our housing management system.</p> <p>Our reasonable adjustment policy sets out how we will adjust normal approaches and practices to meet individual tenants' needs.</p> <p>Reasonable adjustments are now recorded and reviewed on our complaints system from 1<sup>st</sup> April 2024.</p> <p>Complaints training conducted with staff and</p>

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
				training sessions are ongoing.
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	Complaints policy (section 8.1, page 7)	Unless one of these reasons apply, we do not refuse complaints escalations.
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	Complaints case management system.	<p>Captured in our complaints system.</p> <p>There have been occasions in the past where we haven't received all the correspondence from the person investigating the complaint to record this in the system. However, we now have processes in place, and training has been conducted to ensure that correspondence is now recorded.</p> <p>Complaints training conducted with staff and training sessions are ongoing. As of July 2024, all</p>

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
				<p>staff have been asked to complete the HO eLearning training on the HO Code and Dispute resolution. Staff will be asked to complete further courses on the eLearning platform from September 2024.</p>
5.13	<p>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.</p>	Yes	<p>Complaints policy and procedure and compensation policy.</p>	<p>The complaints officer is responsible for providing remedies at any stage.</p> <p>Compensation policy was reviewed 27<sup>th</sup> March 2024 and approved by executive team on 3<sup>rd</sup> July 2024. .</p> <p>Complaints training conducted with staff and training sessions are ongoing. As of July 2024, all staff have been asked to complete the HO eLearning training on the HO Code and Dispute resolution. Staff will be asked to complete further courses on the eLearning platform from September 2024.</p>



Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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	Complaints policy (section 8.1, page 7) and unacceptable and unreasonable behaviour policy	Unacceptable and Unreasonable behaviour policy was reviewed 30 <sup>th</sup> March 2024 and approved by executive team on 3 <sup>rd</sup> July 2024.
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	As above	As above

## 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,	Yes	Complaints policy and procedure.	Complaints training conducted with staff and training sessions are ongoing. As of July 2024, all staff have been asked to complete the HO eLearning training on the HO Code and Dispute resolution. Staff will be asked to complete

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	apology or resolution provided to the resident.			further courses on the eLearning platform from September 2024.
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	Complaints policy (section 7.1.1, page 5) and letters	Evidenced in our letters.  Due to lack of processes in place and resource constraints, only 58% of stage 1 complaints were acknowledged within 5 working days from April 2023 to March 2024.  However, we have implemented new processes, and since April 2024, 100% of stage 1 complaints have been logged and acknowledged within 5 working days.
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	Complaints policy (section 7.1.4, page 5) and letters	Evidenced in our letters.  Due to lack of processes in place and resource constraints, only 14% of stage 1 complaints were responded to within 10 working days from April 2023 to March 2024.

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
				However, we have implemented new processes and in May 2024 75% of stage 1 complaints were responded to within 10 working days and in June 2024 100% of stage 1 complaints were responded to within this timeframe.
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	Complaints policy (section 7.1.5, page 5) and letters	Evidenced in our letters.
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	Complaints policy (section 7.1.5, page 5) and letters	Evidenced in our letters.
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	Yes	Complaints policy (section 7.1.6, page 5) and letters	Evidenced in our letters.  As of July 2024, we have a separate process on our complaints management system to monitor any agreed actions following the

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	actioned promptly with appropriate updates provided to the resident.			complaint response being issued. These will be monitored through to the conclusion and will not be closed until any agreed actions have been met.
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	Complaints policy (section 7.1.6, page 5) and letters	Evidenced in our letters.  Complaints training conducted with staff and training sessions are ongoing. As of July 2024, all staff have been asked to complete the HO eLearning training on the HO Code and Dispute resolution. Staff will be asked to complete further courses on the eLearning platform from September 2024.
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	Yes	Complaints policy (section 7.1.3, page 5)	Complaints training conducted with staff and training sessions are ongoing. As of July 2024, all staff have been asked to complete the HO eLearning training on the HO Code and Dispute resolution. Staff will be asked to complete

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	delay the response, the new issues must be logged as a new complaint.			further courses on the eLearning platform from September 2024.
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> <li>g. details of how to escalate the matter to stage 2 if the individual is not satisfied with the response.</li> </ul>	Yes	Complaints letters.	Evidenced in our letters.

### 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	Complaints policy (section 7.1.7, page 5) and letters	Evidenced in our letters.

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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	Complaints policy (section 7.2.1, page 6) and letters	<p>Evidenced in our letters.</p> <p>Due to lack of processes in place and resource constraints, only 25% of stage 2 complaints were acknowledged within 5 working days from April 2023 to March 2024.</p> <p>However, we have implemented new processes and since April 2024 100% of stage 2 complaints were acknowledged within 5 working days.</p>
6.12	Residents must not be required to explain their reasons for requesting a stage 2 consideration. Landlords are expected to make reasonable efforts to understand why a resident remains unhappy as part of its stage 2 response.	Yes		Tenants do not need to explain their reasons for escalating a complaint.
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Yes	Complaints policy (section 7.2.2, page 6)	

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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.	Yes	Complaints policy (section 7.2.3, page 6)	<p>Due to lack of processes in place and resource constraints, only 25% of stage 2 complaints were responded to within 20 working days from April 2023 to March 2024.</p> <p>However, we have implemented new processes and since May 2024 100% of stage 2 complaints were responded to within 20 working days.</p>
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	Complaints policy (section 7.2.4, page 6) and letters	Evidenced in our letters.
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	Complaints extension letters	Evidenced in our letters.
6.17	A complaint response must be provided to the resident when the answer to the	Yes	Complaints policy (section 7.1.6, page 5) and letters	Evidenced in our letters.

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	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.			We have developed a separate process to monitor any agreed actions following the complaint response being issued. These will be monitored through to the conclusion and not closed until any agreed actions have been met.
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	Complaints policy (section 7.1.6, page 5)	Evidenced in our letters.
6.19	Landlords must confirm the following in writing to the resident at the completion of stage 2 in clear, plain language: a. the complaint stage; b. the complaint definition; c. the decision on the complaint; d. the reasons for any decisions made; e. the details of any remedy offered to put things right; f. details of any outstanding actions; and g. details of how to escalate the matter to the Ombudsman	Yes	Complaints letters	Evidenced in our letters.



Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	Service if the individual remains dissatisfied.			
6.20	Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.	Yes	Complaints policy.	Complaints training conducted with staff and training sessions are ongoing. As of July 2024, all staff have been asked to complete the HO eLearning training on the HO Code and Dispute resolution. Staff will be asked to complete further courses on the eLearning platform from September 2024.

## 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> <li>• Providing an explanation, assistance or reasons;</li> </ul>	Yes	Complaints policy (section 7.3.1, page 7) and letters	Evidenced in our response letters.  Complaints training conducted with staff and training sessions are ongoing. As of July 2024, all staff have been asked to complete the HO eLearning training on the HO Code

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	<ul style="list-style-type: none"> <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>			and Dispute resolution. Staff will be asked to complete further courses on the eLearning platform from September 2024.
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Yes	Complaints policy (section 10, page 8) and compensation policy.	Complaints training conducted with staff and training sessions are ongoing.
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 and letters.	Response letter covers remedies.  Complaints training conducted with staff and training sessions are ongoing.
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes		Complaints training conducted with staff and training sessions are ongoing.

## Section 8: Putting things right

Cod 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"> <li>a. the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements.</li> <li>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;</li> <li>c. any findings of non-compliance with this Code by the Ombudsman;</li> <li>d. the service improvements made as a result of the learning from complaints;</li> <li>e. any annual report about the landlord's performance from the Ombudsman; and</li> <li>f. any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord.</li> </ul>	Yes	Complaints policy (section 11.2, page 8) and self-assessment. Annual complaints performance and service improvement report 2023/24.	<p>An annual complaints performance and service improvement report was circulated to the Board in June 2024 before being uploaded to the website.</p> <p>From April 2024, complaints performance and service improvement reports are presented to the board quarterly as part of the performance reporting and complaints data is discussed at the Executive level quarterly.</p> <p>Our annual complaints performance and service improvement report and the board's response will be shared with tenants and their representatives in our monthly scrutiny sessions and published online.</p>
8.2	The annual complaints performance and service improvement report must be reported to the landlord's governing	Yes	Complaints policy (section 11.2, page 8)	First report published in June 2024.

Cod provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	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.			
8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	Yes	Self-assessment	A reorganisation of the repairs and maintenance service and assets team has been undertaken during quarters 1 and 2 (2023-24). The complaints self-assessment has taken this into consideration and reviewed again in July 2024 following procedure changes.
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	Yes		We will review and update our self-assessment if this happens.
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 inform the ombudsman and provide information to tenants who may be affected and publish this on our website if this happens.

## 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	Complaints policy (section 11.3, page 8)	<p>Complaints training conducted with staff and training sessions are ongoing. As of July 2024, all staff have been asked to complete the HO eLearning training on the HO Code and Dispute resolution. Staff will be asked to complete further courses on the eLearning platform from September 2024.</p> <p>We also have quarterly executive reviews of complaints, process and learnings.</p>
9.2	A positive complaint handling culture is integral to the effectiveness with which landlords resolve disputes. Landlords must use complaints as a source of intelligence to identify issues and introduce positive changes in service delivery.	Yes	Complaints policy (section 12, page 8)	As above
9.3	Accountability and transparency are also integral to a positive complaint handling culture. Landlords must report back on wider learning and	Yes	Complaints policy (section 11.1, page 8)	We publish complaints information in our newsletter and tenants' annual report, but we need

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	improvements from complaints to stakeholders, such as residents' panels, staff and relevant committees.			<p>to include more on learning and service improvements from complaints.</p> <p>Further analysis for learning and improvements is being undertaken.</p> <p>Complaints training conducted with staff and training sessions are ongoing. As of July 2024, all staff have been asked to complete the HO eLearning training on the HO Code and Dispute resolution. Staff will be asked to complete further courses on the eLearning platform from September 2024.</p>
9.4	Landlords must appoint a suitably senior lead person as accountable for their complaint handling. This person must assess any themes or trends to identify potential systemic issues, serious risks, or policies and procedures that require revision.	Yes	Complaints policy (section 15.2, page 9)	<p>Trends and themes are identified by our Complaints Officer and reported.</p> <p>This is done manually as we do not have a CRM or automation highlighting themes and trends.</p>

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
				Complaints training conducted with staff and training sessions are ongoing.
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	Minutes of Board meeting on 28 February 2024	Paul Carhart was appointed MRC at the Board meeting on 28 February 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 staff to perform this role and report on their findings.	Yes		The MRC receives quarterly performance information on complaints that provides insights into our complaints handling performance.
9.7	As a minimum, the MRC and the governing body (or equivalent) must receive: a. regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance;	Yes	Complaints policy (section 11.1, page 8) and quarterly board performance reports.	The board receives quarterly information on complaints performance.  As of July 2024, the report is more in-depth and includes volume, categories and outcomes of complaints, complaints

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	<p>b. regular reviews of issues and trends arising from complaint handling;</p> <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>			<p>handling performance and an annual complaints performance and service improvement report. Regular reviews of issues and trends arising from complaint handling and regular updates on the outcomes of any ombudsman investigations and progress made.</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	Complaints policy principles (section 5.1, pages 3-4)	<p>These objectives are in place for complaints handling staff.</p> <p>Complaints training conducted with staff and training sessions are ongoing. As of July 2024, all staff have been asked to complete the HO eLearning training on the HO Code and Dispute resolution. Staff will be asked to complete further courses on the eLearning platform from September 2024.</p>