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: '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.'	Yes	We use the same wording to define a complaint as the HOS Code. This wording is in our Complaint Procedure. Customers' have access to this via our website, a link in our complaint responses to our policy and procedure. A paper copy will be provided if requested.	
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	We work to the HOS definition and do not expect a customer to use the word complaint to express dissatisfaction. We accept complaints from a third party which are handled as we would handle complaints direct from a customer.	When responding to complaints raised on behalf of our customer, we will only respond to our customer, unless we have a general authority to disclose to a third party.
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	Yes	We recognise the different between a service request and a complaint about the service received. The difference is clearly set out in our Complaint Policy, and this takes its wording from the HOS Code.	Service requests are monitored by the business area that the service falls under.

	are not complaints, but must be 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	We will raise a complaint in this instance and not stop efforts to address the initial service request.	Once a matter becomes a complaint our Resolution team will oversee progression of service requests.
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	Transactional survey responses are monitored by our Resolution team. When recovering negative feedback, the team will ask our customer if they wish to raise a formal complaint or if they are happy with our action to resolve matters. We have a 'banner' on our home page of our 'Voice' platform which advises customers how to make a complaint. We also include information on how to make a complaint on all wider surveys.	

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	Within our Complaint policy we provide details of when we will not consider accepting a complaint. Our Complaint policy states when we will consider a complaint outside of the 12 month period.	We will always accept a complaint except for exclusions set out in our Complaint Policy in line with the HOS Code.
2.2	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: 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	Within our Complaint policy we provide details of when we will not consider accepting a complaint.	We will always accept a complaint except for exclusions set out in our Complaint Policy in line with the HOS Code.

	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	Our Complaint policy sets the timeframe of 12 months as per the HOS Code. We also state in our policy, we will always use discretion, in relation to accepting complaints outside this timeframe.	
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	In our Complaint policy, we advise if we do not accept a complaint, we will provide in writing (preferably by email) a detailed explanation why and advise of the right to take the decision to the HOS.	The customer will be signposted to the Housing Ombudsman regardless and/or signposted to the relevant Ombudsman e.g. Financial Services Ombudsman.
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Yes	Our Complaint policy states we will always use discretion as to whether a complaint can be raised.	

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	Within our Complaint policy and our procedure, we list the channels our customers can use to make a complaint.	These channels are, website, online customer portal, email, letter, face to face, visiting staff, telephone, and social media.
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	All staff are aware of the role of our Resolution team and to pass any expression of dissatisfaction to them.	We are developing a mandatory online training course for all colleagues to ensure full understanding of our complaint process.
3.3	High volumes of complaints must not be seen as a negative, as they can be indicative of a well-publicised and accessible complaints process. Low complaint volumes are potentially a sign that residents are unable to complain.	Yes	We publicise on our website and regularly include details in our customer newsletter our complaints process and how to make a complaint.	

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	Our Complaint policy and procedure are accessible on our website, and we will provide a printed version on request. Our Complaint procedure details our two-stage process and timescales for responding.	
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	In our Complaint policy, we advise customers our policy, procedure, HOS Code and self-assessment against the code can be found on our website. It also advises customers we will provide paper copies upon request.	
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	Our Complaint policy and our procedure state customers can have a representative deal with their complaint.	When responding to complaints raised on behalf of our customer, we will only respond to our customer, unless we have a general authority to disclose to a third party.
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	At all stages we advise customers of their right to contact the HOS. This is also stated on our website.	Within our – Complaint acknowledgement Complaint holding letter. Stage 1 response

	Escalation acknowledgement to Stage 2. Stage 2 response. The customer is provided	
	with a link to the HOS website and details of how	
	to contact.	

Section 4: Complaint Handling Staff

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
4.1	Landlords must have a person or team assigned to take responsibility for complaint handling, including liaison with the Ombudsman and ensuring complaints are reported to the governing body (or equivalent). This Code will refer to that person or team as the 'complaints officer'. This role may be in addition to other duties.	Yes	Our Resolution Team Leader manages the Stage 1 complaint handling team, our Resolution team. Our Resolution Team Leader ensures complaints are dealt with in line with our Complaint policy and procedure at Stage 1 and Stage 2. Our Governing body receive KPI information which includes complaint volumes and categories.	We provide our Governing body, our Board with a copy of our Customer Experience Committee quarterly report on complaints and transactional surveys.
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	Our Resolution team are empowered to make decisions to resolve complaints.	Grand Union colleagues have been made aware of the need to provide information promptly to our Resolution team and Stage 2 complaint handlers.
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	We ensure complaint handlers are fully trained and have a good understanding of the HOS Code.	All complaint handlers are registered with the HOS Landlord Learning Hub, which is reviewed regularly for them to complete any courses. When seeking

core service and must be resourced to		guidance on resolutions,
handle complaints effectively		they may refer to case
·		studies on the HOS
		website.

Section 5: The Complaint Handling Process

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
5.1	Landlords must have a single policy in place for dealing with complaints covered by this Code. Residents must not be treated differently if they complain.	Yes	We have a single policy for dealing with complaints covered by the HOS Code.	We welcome complaints from all customers and will not treat them differently to those who have not made a complaint.
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	We do not have additional stages in our process, we only have Stage 1 and Stage 2.	We have only ever had a two-stage process. Our process is outlined in our Complaint 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	We do not have additional stages in our process, we only have Stage 1 and Stage 2.	We have only ever had a two-stage process. Our process is outlined in our Complaint 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	Yes	We do now allow complaints to be handled by a third party.	Where a third party is involved e.g. a contractor, or service provider, we will collaborate on an

	two stage complaints process set out in this Code. Residents must not be expected to go through two complaints processes.			investigation, but the response will be sent by Grand Union.
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Yes	We do now allow complaints to be handled by a third party.	Where a third party is involved e.g. a contractor, we will collaborate on an investigation, but the response will be sent by Grand Union.
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	Our acknowledgement at Stage 1 and escalation acknowledgement to Stage 2 letters set out our understanding of the complaint and outcome our customer is seeking.	Our letters templates include prompts to ensure this information is captured.
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	Should any aspect of the customer complaint not be under our jurisdiction, they will be advised accordingly.	
5.8	At each stage of the complaints process, complaint handlers must:	Yes	All complaints are handled on their own merit. Our complaint handlers complete a full investigation. We collaborate	Our complaint handlers are instructed to review all complaints from a customer perspective even though

	 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. 		with teams across the business to gather facts and make decisions based on the facts.	they are employed by Grand Union.
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	Should a complaint fall outside timescales set out in the Code, we will always agree when and how the customer wishes to be updated.	
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	In our related policies and documents section of our Complaint policy, we refer to the Equality Act 2010. In our Complaint procedure we state we will review complaints and make reasonable adjustments. Our complaint handlers are trained to deal with such requests.	Should a customer make us aware of any disability during the complaint process, this will be recorded within the complaint and only recorded on our database, should our customer request it. Should our customer ask us to record any disability, we will add this to our database. Any such information provided whilst dealing with a complaint does not

				automatically get recorded outside of the complaint.
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	Our Complaint policy sets out our reason for not escalating a complaint. In our procedure, we advise if we refuse to escalate to Stage 2, we will notify our customer in writing setting out the reason why and advising of the right to approach the HOS about our decision.	
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	A full record is kept in our CRM under the relevant complaint reference.	
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	Our aim is to resolve complaints at Stage 1 of our process wherever possible and ensure agreed actions are completed.	The Resolution team have autonomy to make decisions to resolve matters and to award compensation as per our Compensation Procedure.
5.14	Landlords must have policies and procedures in place for managing unacceptable behaviour from residents and/or their representatives. Landlords	Yes	We have a Customer Conduct Policy that balances. We operate a 'red flag' process e.g. visit in pairs, this is reviewed regularly	

	must be able to evidence reasons for putting any restrictions in place and must keep restrictions under regular review.		by our Successful Tenancies team. Where appropriate, we will assign a customer a Single Point of Contact, this is reviewed regularly.	
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	Any decision made to restrict contact sits with our Successful Tenancies Manager or their delegated Team Leader. We will also consider the Equality Act 2010.	

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	All complaints are triaged when received to identify any vulnerabilities or risk. These complaints are given priority.	
6.2	Complaints must be acknowledged, defined and logged at stage 1 of the complaints procedure within five working days of the complaint being received.	No	Whilst our policy is explicit and in most cases, we acknowledge complaints within the timescales set out in the HOS Code we accept that there have been instances where this has not been the case.	We are recruiting an additional Customer Resolution Advisor and will be developing new reporting indicators to monitor the impact.
6.3	Landlords must issue a full response to stage 1 complaints within 10 working days of the complaint being acknowledged.	No	Our policy is explicit in its aim is to always resolve complaints within 10 working days of the acknowledgement. If due to the complexity of the complaint we need an extension of time, we	Through our new CRM system we are developing a new stage reporting indicators that will be reported to management.

			will advise the customer at the earliest opportunity. There is evidence that some cases have not been dealt with within 10 days in the previous 12 months.	We are recruiting an additional Customer Resolution Advisor and will monitor impact.
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	Our acknowledgement letter includes wording advising that if we need longer to respond and provide a resolution, we will contact our customer to keep them updated.	
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	All our letters signpost the customer to the HOS website and provide contact details.	
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	We will close complaints once a resolution has been agreed and will monitor actions promised to conclusion.	On occasions, customers have requested a complaint is not closed until the promised actions are completed. In this instance, we will respect the customer's decision and ask they confirm the request in writing. This demonstrates we have acted in accordance with

				our customer request and not necessarily in line with the HOS Code.
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	Our complaints handlers are expected to cover all aspects of the customer complaint and consider policy and law.	
6.8	Where residents raise additional complaints during the investigation, these must be incorporated into the stage 1 response if they are related and the stage 1 response has not been issued. Where the stage 1 response has been issued, the new issues are unrelated to the issues already being investigated or it would unreasonably delay the response, the new issues must be logged as a new complaint.	Yes	If we have not issued our Stage 1 response, we will add any other related issue into the complaint. Should a Stage 1 have been issued or the matter is unrelated, a new complaint will be raised.	
6.9	Landlords must confirm the following in writing to the resident at the completion of stage 1 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;	Yes	Our complaint handlers use a letter template which provides prompts to ensure all the items 'a' to 'g; are included in the Stage 1 response.	

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.	

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	We do not refuse escalation to Stage 2 unless it is on the grounds of exclusions set out in our Complaint policy. Stage 2 is our final response.	
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	We acknowledge escalation of complaints within the timescales set out in the HOS Code.	
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	Although customers are not required to explain their reasons for requesting escalation to Stage 2, so we can address the complaint fully and to the customer satisfaction, we will make effort to understand the reason.	
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Yes	Our Stage 2 complaints are addressed by the Director of Service or their delegated member of staff. The delegated	

			person will never be a Stage 1 complaint handler.	
6.14	Landlords must issue a final response to the stage 2 within 20 working days of the complaint being acknowledged.	No	Our policy is explicit in its aim to always resolve complaints within 20 working days of the escalation acknowledgement. If due to the complexity of the complaint we need an extension of time, we will advise the customer at the earliest opportunity. Our historical IT system does not enable us to evidence full compliance, however case reviews suggest customers have been kept informed.	Our new CRM system enables us to record and track complaints and will help with this and the recording of agreements to extend when necessary.
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	Our escalation acknowledgement letter includes wording advising that if we need longer to respond and provide a resolution, we will contact our customer to keep them updated.	
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	All our letters signpost the customer to the HOS website and provide contact details.	
6.17	A complaint response must be provided to the resident when the answer to the complaint is known, not when the	Yes	We will close complaints once a resolution has been agreed and	On occasions, customers have requested a complaint is not closed until 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.		will monitor actions promised to conclusion.	promised actions are completed. In this instance, we will respect the customer's decision and ask they confirm the request in writing. This demonstrates we have acted in accordance with our customer request and not necessarily in line with the HOS Code.
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	Our complaints handlers are expected to cover all aspects of the customer complaint and consider policy and law.	
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	Our complaint handlers use a letter template which provides prompts to ensure all the items 'a' to 'g; are included in the Stage 1 response.	

	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	We always collaborate to gain the best resolution for our customers.	

Section 7: Putting things right

Code provisio	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: 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; 	Yes	We have reviewed and amended our letter templates to include all items on list.	

	Changing policies, procedures or practices.			
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Yes	All complaints are reviewed and progressed taking into consideration the impact on our customer. In the case of repairs, we will aim to pass the repair to the contractor which provides the quickest resolution for our customer.	
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.	No	All our responses include next steps and timeframes for next steps. Our complaint handlers should monitor through to completion any promised actions. They must contact the customer to ensure matters are resolved to the customer's satisfaction.	To ensure we can monitor all promised actions to completion, we are recruiting an additional Customer Resolution Advisor and will be developing new reporting indicators to monitor the impact.
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes	We review any Ombudsman guidance when deciding appropriate resolution.	

Section 8: Self-assessment, reporting and compliance

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
8.1	Landlords must produce an annual complaints performance and service improvement report for scrutiny and challenge, which must include: a. the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements. 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	Yes	The report is compiled by our Customer Experience Manager and reviewed by our Executive Director of Operations before submission. We will obtain sources of information to include in the report from teams across the business. The report will go to Group Board ahead of submission to the Ombudsman.	

	Ombudsman in relation to the work of the landlord.			
8.2	The annual complaints performance and service improvement report must be reported to the landlord's governing body (or equivalent) and published on the on the section of its website relating to complaints. The governing body's response to the report must be published alongside this.	Yes	The report will go to Group Board ahead of submission to the Ombudsman.	
8.3	Landlords must also carry out a self- assessment following a significant restructure, merger and/or change in procedures.	Yes	In the event of significant restructure or change in procedure, we will carry out a self-assessment.	
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	Yes	If requested, we will review and update.	
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	In this event, we will comply with the HOS request.	

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	Upon closure of every complaint, we capture on our CRM 'lessons learnt'. These are reviewed weekly by our Resolution Team Leader and our Head of Business Transformation with a view to address any service improvements identified.	Whilst we review 'lessons learnt' to identify improvements, we should improve in this area. Where instructions are sent to an area to implement a change, we must monitor to ensure the change is embedded.
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	Upon closure of every complaint, we capture on our CRM 'lessons learnt'. These are reviewed weekly by our Resolution Team Leader and our Head of Business Transformation with a view to address any service improvements identified.	Whilst we review 'lessons learnt' to identify improvements, we should improve in this area. Where instructions are sent to an area to implement a change, we must monitor to ensure the change is embedded.
9.3	Accountability and transparency are also integral to a positive complaint handling culture. Landlords must report back on wider learning and improvements from complaints to stakeholders, such as residents' panels, staff and relevant committees.	Yes	We report quarterly to our Customer Experience Committee. This report contains learnings from feedback or complaints which could lead to service improvements. Our CRM system where all complaints are recorded has a mandatory requirement to capture potential	

			service improvements. Our Head of Transformation and Resolution Team Leader discuss comments captured on a weekly basis.	
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	Our Executive Director or Operations for complaint handling. Our Head of Transformation is responsible for assessing themes or trends.	
9.5	In addition to this a member of the governing body (or equivalent) must be appointed to have lead responsibility for complaints to support a positive complaint handling culture. This person is referred to as the Member Responsible for Complaints ('the MRC').	Yes	We've appointed an MRC from our Group Board. Our MRC is Ashleigh Webber.	
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	We will ensure our MRC receives any information requested or deemed relevant. In addition, our MRC also sits on our Customer Experience Committee who receive quarterly reports.	
9.7	As a minimum, the MRC and the governing body (or equivalent) must receive:	Yes	Our MRC and Group board see through reports to our Customer Experience Committee a quarterly report and an annual	

	a. regular updates on the volume,		summary report. All papers to	
	categories and outcomes of complaints,		Customer Experience Committee	
	alongside complaint handling		go to all Board members.	
	performance;			
	b. regular reviews of issues and			
	trends arising from complaint			
	handling;			
	c. regular updates on the outcomes			
	of the Ombudsman's investigations and			
	progress made in complying with			
	orders related to severe			
	maladministration findings; and			
	d. annual complaints performance			
	and service improvement report.			
	Landlords must have a standard			
	objective in relation to complaint			
	handling for all relevant employees or			
	third parties that reflects the need to:			
	a. have a collaborative and co-			
	operative approach towards resolving			
	complaints, working with colleagues			
	across teams and departments;		All colleagues who are complaint	
9.8	b. take collective responsibility for	Yes	handlers have a standard	
9.0		165		
	any shortfalls identified through		objective which covers 'a' to 'c'.	
	complaints, rather than blaming others;			
	and			
	c. act within the professional			
	standards for engaging with complaints			
	as set by any relevant professional			
	body.			