



Self-Assessment: Complaint Handling Code

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	Talk to us policy – section 3.0	This definition is included in our policy and on the complaints section of our website. Complaints can be logged by any colleagues across the organisation that interact with customers, using our Customer Relationship Management system.
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 a complaint. A complaint that is submitted via a third party or representative must be handled in line with the landlord's complaints policy.	Yes	Talk to us policy – section 3.0 CRM training documentation	If a customer expresses dissatisfaction in a satisfaction survey they are provided with the option to raise a formal complaint. If the dissatisfaction relates to an ongoing issue that is not yet resolved an action will be raised for the Customer Resolutions team to contact the customer to discuss. If customers express dissatisfaction to Halton Housing colleagues they are trained to log this on the CRM system.
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	Yes	Talk to us policy – section 4.0	This is clearly stated in our complaints policy.

	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.			
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	Talk to us policy – section 4.0	<p>When a customer requests a service e.g. a repair or action related to Anti-Social Behaviour (ASB) this is logged and managed as a case on our CRM system.</p> <p>If a customer raises a complaint at any stage of their service request, the service request itself will continue to progress through the relevant stages and the complaint investigation will run alongside it.</p>
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	TSM survey process	<p>When dissatisfaction is expressed as part of a customer survey, the Insight Advisor completing the survey will make the customer aware of how they can raise a complaint should they wish to.</p> <p>Any expressions of dissatisfaction relating to current and unresolved issues will be logged as an action to be followed up by the Customer Resolutions Officer.</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	Talk to us policy – section 5	There are very few reasons that we would not accept a complaint, these are clearly outlined in our Talk to us policy
2.2	<p>A complaints policy must set out the circumstances in which a matter will not be considered as a complaint or escalated, and these circumstances must be fair and reasonable to residents. Acceptable exclusions include:</p> <ul style="list-style-type: none"> • The issue giving rise to the complaint occurred over twelve months ago. • Legal proceedings have started. This is defined as details of the claim, such as the Claim Form and Particulars of Claim, having been filed at court. • Matters that have previously been considered under the complaints policy. 	Yes	Talk to us policy – section 5	There are very few reasons that we would not accept a complaint, and these are clearly outlined in our Talk to us 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	Talk to us policy – section 5	If a customer raises issues that occurred over 12 months ago but are still ongoing then we would accept and investigate the complaint. If several issues are raised in a complaint and some of the issues are over 12 months old we will be clear that we are unable to investigate they will be considered in the overall context of the complaint.

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	Talk to us policy – section 5 Complaint rejection letter template	If we are unable to accept a complaint for the reasons outlined in the policy. We will write to customers clearly explaining the reasons and advising the customer of their rights to contact the Housing Ombudsman.
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Yes	Talk to us policy – section 5	Our Customer Resolutions team are trained to consider the circumstances of each complaint individually.

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	Talk to us policy – section 6 Unacceptable Behaviour policy	Customer can complain using the customer portal, telephone, with the reception team at our head office building, or to any Halton Housing Colleague that they interact with. When making a complaint we ask customers whether or not they require any reasonable adjustments and we will also use the information in our Customer Relationship Management system to consider whether any reasonable adjustments might be necessary.

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	CRM training documentation TSM process / procedure document	All Halton Housing colleagues are trained how to log a complaint on our Customer Relationship Management system. Complaints enter the system from various colleagues across the organisation including Neighbourhood Officers and Maintenance Technicians who have the largest number of interactions with customers.
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	Halton Housing Website – Complaints section. Annual complaint performance and service improvement report Customer magazine – REACH	We have a dedicated complaints section on our website, that encourages customers to let us know if they have a complaint so that we can put things right. We have a dedicated learning from complaints page as well as an information page on the supporting the Government’s “Make it right campaign” We acknowledge positive engagement with our complaints process in our annual Complaint performance and service improvement report, which is published on our website. We regularly feature complaints in our customer magazine REACH.
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.	Yes	Talk to us policy Complaint process leaflet Halton Housing Website	We publish our complaints policy on our website. We also have a dedicated information page on how to raise a

	The policy must also be published on the landlord's website.			complaint and our complaints process.
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	Talk to us policy – section 13 REACH magazine	We have a dedicated complaints section on our website. We regularly promote our complaints process as well as the role of the Housing Ombudsman in our customer magazine REACH.
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	Talk to us policy – section 8	This is clearly outlined in our policy. Our Customer Relationship Management system has also been designed to capture third party representative details and enable communication with a representative on the customers behalf.
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	Talk to us Policy Complaint acknowledgement and response letter templates Halton Housing Website Customer magazine – REACH	All complaint acknowledgement or response letters at each stage of the process include information on customers rights to contact the Housing Ombudsman at any stage of the process, alongside the Housing Ombudsman contact details. We regularly promote the role of the Housing Ombudsman in our customer magazine REACH

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	Talk to us policy – section 14 Job descriptions Quarterly Customer report	We have a central team of Customer Resolutions Officers who are responsible for handling complaints and liaising with the Housing Ombudsman. The Director of Customer Experience reports complaint performance to the MRC, Customer Forum and the Governing Body on a Quarterly basis.
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	Talk to us policy – section 4	Customer Resolutions Officers have end to end ownership of complaints. Liaising with all areas of the organisation to gather information to support their investigation. The Customer Resolutions Officer has the authority to offer resolutions in line with the Housing Ombudsman Guidance.
4.3	Landlords are expected to prioritise complaint handling and a culture of learning from complaints. All relevant staff must be suitably trained in the importance of complaint handling. It is important that complaints are seen as a core service and must be resourced to handle complaints effectively	Yes	Talk to us policy Training Certifications Listen, Learn, Act tracker	We have a dedicated Customer Resolutions team whose core role is to respond to customer issues and complaints. We have a network of managers and senior managers across the organisation who can also handle complaints. All complaint handling colleagues have received stage 1 and

				stage 2 complaint handling training provided by Westminster Insights.
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Section 5: The Complaint Handling Process

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
5.1	Landlords must have a single policy in place for dealing with complaints covered by this Code. Residents must not be treated differently if they complain.	Yes	Talk to us policy	The policy is published on the website along with information on our complaint process. We regularly raise awareness of our complaints process in our customer magazine, REACH. We will continue to treat customers fairly and with respect during and after any complaints raised.
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	Talk to us policy	Where possible when a customer contacts us with an issue, we will try to resolve that at the first point of contact. If that is not possible then it will be logged and acknowledged as a stage one complaint. Any issues that can be solved at the first point of contact will still be logged, monitored and reported on using the CRM system.
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	Talk to us policy	Our complaint process has only two stages in line with the code.

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	Talk to us policy	All complaint responses are handled by Halton Housing colleagues.
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Yes	Talk to us policy	All complaint responses are handled by Halton Housing colleagues.
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	Talk to us policy Stage 1 & stage 2 acknowledgement letter template	We clarify our understanding of the complaint in all acknowledgement letters and again in our response letter. We also contact the customer within 3-5 days of acknowledging their complaint to confirm our understanding and seek clarification where appropriate.
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	Talk to us policy Stage 1 & stage 2 acknowledgement letter template CRM	We will outline in our complaint acknowledgement letter the key aspects of the complaint that we are investigating. We will also list anything that we are not able to investigate and why. The section headings in our complaint letter templates also encourage this.
5.8	At each stage of the complaints process, complaint handlers must: <ul style="list-style-type: none"> a. deal with complaints on their merits, act independently, and have an open mind; b. give the resident a fair chance to set out their position; 	Yes	Talk to us policy – section 8	We have a central Customer Resolutions team, who are independent from any specific service areas. They will liaise with customers to fully understand the complaint from their perspective, use all the systems, evidence and

	<p>c. take measures to address any actual or perceived conflict of interest; and</p> <p>d. consider all relevant information and evidence carefully.</p>			information available to them and liaise with relevant internal colleagues to reach a conclusion.
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	Talk to us policy – section 9	We use action requests in our Customer Relationship Management system to manage this. All action requests have a target completion date and we have automated workflows that will create alerts and escalations if these are open and overdue.
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	Talk to us policy – section 6 Unacceptable Behaviour policy	When raising a complaint, we ask all customers whether any adjustments are required. These are logged on our Customer Relationship Management system
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	Talk to us policy – section 10	There are very limited reasons that we would refuse to escalate a complaint. These reasons are clearly outlined in our policy.
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	Yes	Talk to us policy – section 8	All complaints are logged on our CRM system. When a complaint case is raised all contacts and documents relevant to that complaint can be attached to the case. We close all stage 1 and stage 2

	documentation such as reports or surveys.			complaints with an outcome as well as learning opportunities
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	Talk to us policy	All complaint handlers are empowered to agree remedies in line with Housing Ombudsman guidance.
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	Talk to us policy Unacceptable Behaviour policy	Any instances of unacceptable behaviour and any restrictions put in place as a result will be logged and managed in our CRM system.
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	Unacceptable Behaviour policy	Any restrictions on contact must be agreed by Head Of Customer Support or Head of Neighbourhoods and will be reviewed at agreed timescales

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	Yes	Talk to us policy – Section 8	Customer Resolutions Officers can log quick resolutions on our CRM system. Our average days to respond to a stage one complaint (Apr 23-March 24) was 9 days, demonstrating that where possible we try to exceed the 10-day target time

	promptly, and an explanation, apology or resolution provided to the resident.			frame for responses at this stage.
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.	Yes	Talk to us policy – section 9	This is tracked and monitored using our CRM system with automated alerts and escalations if breached.
6.3	Landlords must issue a full response to stage 1 complaints within 10 working days of the complaint being acknowledged.	Yes	Talk to us policy - section 10 Complaint performance and service improvement report Halton Housing website – Complaints section	This is tracked and monitored using our CRM system. The percentage of responses issued in target time frame is reported monthly to management team and quarterly to the Governing body. This is also published on the complaints page of our website.
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	Talk to us policy – sections 9 & 10	Extensions are recorded and tracked in our CRM system. Extensions have to be agreed by the Customer Services manager before being applied and the reason for extensions are recorded in our CRM system.
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	Talk to us policy – sections 9 & 10 Extension letter template	When we inform customers of an extension to their complaint we will communicate this to the customer in writing, including their right to contact the Housing Ombudsman and the Housing Ombudsman’s 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	Yes	Talk to us policy – sections 9 & 10	We respond to the customer within the timescales set out by the Housing Ombudsman. Any outstanding actions are

	issue are completed. Outstanding actions must still be tracked and actioned promptly with appropriate updates provided to the resident.			recorded, tracked and monitored using 'Complaint Commitments' in our CRM system.
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	Talk to us policy – sections 9 & 10 Stage 1 response letter template Stage 2 response letter template	We have letter templates that are automatically generated from our CRM system. The headers in the letter templates encourage the complaint handler to address all the points raised the outcome of the complaint and a clear explanation of how this outcome was reached.
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	Talk to us policy – section 9	This is clearly stated in our policy. Wherever possible we will incorporate any new points raised. If new issues are raised persistently throughout the complaint and that impedes our ability to investigate the complaint or achieve or target timeframe we will deal with this in line with our unacceptable behaviour policy.
6.9	Landlords must confirm the following in writing to the resident at the completion of stage 1 in clear, plain language: <ul style="list-style-type: none"> a. the complaint stage; b. the complaint definition; c. the decision on the complaint; d. the reasons for any decisions made; e. the details of any remedy offered to put things right; f. details of any outstanding actions; and	Yes	Talk to us policy – section 9 Stage 1 response letter template	We have letter templates that are automatically generated from our CRM system. The headers in the letter templates are aligned to the requirements of this section of the code.

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

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
6.10	If all or part of the complaint is not resolved to the resident's satisfaction at stage 1, it must be progressed to stage 2 of the landlord's procedure. Stage 2 is the landlord's final response.	Yes	Talk to us policy – section 10	This is clearly outlined in our policy and explained on the complaints section of our website.
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	Talk to us policy – section 10	This is logged and managed in our CRM system. Automated workflows will generate a target date and any breaches can trigger alerts and escalations.
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	Talk to us policy – section 10	We do not require customers to explain their reasons before escalating the complaint to stage two but where possible we contact the customer within 5 working days of receiving the escalation to try and understand their complaint, the reasons they are not satisfied with the stage 1 response and what resolution they are seeking.
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Yes	Talk to us policy – section 10	Stage 1 complaints are handled by the Customer Resolutions team. Stage 2 complaints are assigned to senior managers, Heads of Service or Directors from the relevant service area.

6.14	Landlords must issue a final response to the stage 2 within 20 working days of the complaint being acknowledged.		Talk to us policy – section 10	Percentage of stage two complaints responded to in target time frame is reported to management, monthly and the Governing Body quarterly.
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	Talk to us policy – section 10 Extension letter template	Extensions must be agreed by the Customer Services Manager. We will notify the customer of the extension in writing clearly outlining our reasons. Extensions are recorded and tracked in our CRM system.
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	Talk to us policy – section 10 Extension letter template	A customers right to contact the Housing Ombudsman at any stage of the process alongside the Housing Ombudsman contact details is included in all complaint letter templates (Acknowledgement, response and extension letters)
6.17	A complaint response must be provided to the resident when the answer to the complaint is known, not when the outstanding actions required to address the issue are completed. Outstanding actions must still be tracked and actioned promptly with appropriate updates provided to the resident.	Yes	Talk to us policy – section 10	We respond to the customer within the timescales set out by the Housing Ombudsman. Any outstanding actions are recorded, tracked and monitored using ‘Complaint commitments’ in our CRM system.
6.18	Landlords must address all points raised in the complaint definition and provide clear	Yes	Talk to us policy – section 10 Stage 2 response letter template	Stage 2 response letter templates are generated from

	reasons for any decisions, referencing the relevant policy, law and good practice where appropriate.			our CRM system. The headers in the letter template are in line with the requirements of this section of the code.
6.19	Landlords must confirm the following in writing to the resident at the completion of stage 2 in clear, plain language: <ul style="list-style-type: none"> a. the complaint stage; b. the complaint definition; c. the decision on the complaint; d. the reasons for any decisions made; e. the details of any remedy offered to put things right; f. details of any outstanding actions; and g. details of how to escalate the matter to the Ombudsman Service if the individual remains dissatisfied. 	Yes	Talk to us policy – section 10 Stage 2 response letter	<p>Stage 2 response letter templates are generated from our CRM system. The headers in the letter template are in line with the requirements of this section of the code.</p> <p>Stage 2 response letters will also be checked by the Customer Resolutions team for consistency.</p>
6.20	Stage 2 is the landlord’s final response and must involve all suitable staff members needed to issue such a response.	Yes	Talk to us policy – section 10	Stage 2 complaints are assigned to senior managers, Heads of Service or Directors for the relevant service areas. They will be supported by the Customer Resolutions team to ensure the complaint response is in line with the requirements of the code.

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:	Yes	Talk to us policy – section 11 Stage 1 and stage 2 response letter templates	All relevant complaint handling colleagues have received stage 1 and stage 2 complaint training. Including putting things right in line with

	<ul style="list-style-type: none"> • Apologising; • Acknowledging where things have gone wrong; • Providing an explanation, assistance or reasons; • Taking action if there has been delay; • Reconsidering or changing a decision; • Amending a record or adding a correction or addendum; • Providing a financial remedy; • Changing policies, procedures or practices. 			Housing Ombudsman guidance on remedies.
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Yes	Talk to us policy – section 11	All complaint handling colleagues are trained on the Housing Ombudsman guidance on remedies.
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	Talk to us policy – section 11	All actions to resolve a complaint are logged and monitored through ‘Complaint Commitments’ in our CRM system.
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes	Talk to us policy – section 11	All complaint handling colleagues are trained on the Housing Ombudsman guidance on remedies.

Section 8: Putting things right

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
8.1	<p>Landlords must produce an annual complaints performance and service improvement report for scrutiny and challenge, which must include:</p> <ul style="list-style-type: none"> a. the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements. b. a qualitative and quantitative analysis of the landlord's complaint handling performance. This must also include a summary of the types of complaints the landlord has refused to accept; c. any findings of non-compliance with this Code by the Ombudsman; d. the service improvements made as a result of the learning from complaints; e. any annual report about the landlord's performance from the Ombudsman; and f. any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord. 	Yes	Complaint performance and service improvement report. 2023-2024	<p>When developing the annual complaint performance report we consulted with our Customer Forum. The headings in the report are inline with the requirements of this section of the code. The report has been approved by Governing body and published on the complaints section of our website alongside a statement from our Customer Forum and Governing Body.</p>
8.2	<p>The annual complaints performance and service improvement report must be reported to the landlord's governing body (or equivalent) and published on the on the section of its website relating to complaints. The governing body's response to the report must be published alongside this.</p>	Yes	Complaint performance and service improvement report. 2023-2024	<p>The report has been shared with the MRC and Governing Body. The Governing body's response to the report is published within the report itself alongside a response from our Customer Forum members.</p>

8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	Yes		No significant change in structure of procedures in 2023/2024
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	Yes		We will adhere to any recommendations or requests made by the Housing Ombudsman
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		Informing the Housing Ombudsman of our inability to comply is included in our Business Continuity Plans for exceptional circumstances.

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	Listen, Learn, Act tracker Monthly Customer Experience Report.	All complaints are closed in the CRM system with a learning opportunity. These are analysed every three months with key trends and recommendations reported to management team.
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	Listen, Learn, Act tracker Monthly Customer Experience Report Learning from complaints page on our website Annual report Complaint performance and service improvement report	Learning from complaints are discussed with management on a monthly basis. Included in a report to the MRC and Governing body on a quarterly basis.
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	Learning from complaints page on our website Annual report Complaint performance and service improvement report REACH magazine	We have a dedicated complaints section on website. Learning from complaints are published here and updated on a quarterly basis. We also publish learning from complaints in our customer magazine REACH and in our annual report. Complaint performance and performance against the Tenant Satisfaction measures are discussed with our

				Customer Forum at the end and half way through each year.
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	Monthly Customer Experience Report. Quarterly complaint performance report	The Director of Customer Experience has overall accountability for complaints performance. Reports performance to management on a monthly basis and to MRC and Governing body quarterly.
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	Quarterly complaint performance report. Quarterly Customer Experience report	The Director of Customer Experience and the MRC meet Quarterly to review complaint performance and agree any actions for improvement.
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	Quarterly complaint performance report. Quarterly Customer Experience report	A summary of MRC meeting and actions agreed is provided to the Governing Body on a regular basis
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; 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	Yes	Quarterly Complaint Performance report	A complaint performance report is provided to the MRC quarterly and the Customer Experience Director and MRC meet to review the report, discuss key themes and trends and agree any actions.

	d. annual complaints performance and service improvement report.			
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		This is reflected in the job descriptions for all complaint handling colleagues.