

## **CESSA Housing Association Ltd - Appendix A: Self-assessment form 2024**

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

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

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

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

## Section 1: Definition of a complaint

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
1.2	A complaint must be defined as: <i>'an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the landlord, its own staff, or those acting on its behalf, affecting a resident or group of residents.'</i>	Yes	Evidenced by Policy T01H	Defined under 'Definition of a Complaint'
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	Evidenced by Policy T01H & complaints	Defined under 'Definition of a Complaint' and evidenced by complaints received to: rescind a tenancy breach letter following ASB witnessed on CCTV; escalate a service request about their concern at the condition of the communal garden; and concerns about a carer's actions in the scheme laundry.
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	Evidenced by Policy T01H & complaints	Defined under 'Definition of a Complaint'. Service requests are monitored as part of the complaints monitoring process and evidenced by 2 of the 2024 formal complaints being

	are not complaints, but must be recorded, monitored and reviewed regularly.			originally received as service requests and escalated.
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	Evidenced by Policy T01H & complaints	Defined in the section '2 – Procedure – How a service request or a complaint can be made - Service Requests'. Evidenced by 2 of the formal complaints raised (about a scheme's garden and the actions of a carer)
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	Evidenced by Policy T01H	Defined under 'Definition of a Complaint'. No concerns raised by the tenant's survey in 2023 have been treated as a complaint.

## 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	Evidenced by Policy T01H	Evidenced under the section on 'Policy Aims & Objectives' with exclusions detailed under section '2 – Circumstances not covered by the complaints policy'. All complaints have been considered on their merits and none have been refused.
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	Evidenced by Policy T01H	Defined under section '2 – Circumstances not covered by the complaints policy'.

	<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	Evidenced by Policy T01H & complaints received	Defined under 'Policy Aims & Objectives'. All complaints received were within 12-months of the issue occurring or the resident becoming aware of it.
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	Evidenced by Policy T01H	Defined under 'Policy Aims & Objectives'. No complaints were refused in 2024.
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Yes	Evidenced by Policy T01H and by actions taken with formal complaints raised in 2024.	Defined under section '2 – Procedure – how a service request or a complaint can be made – Formal Complaints and Circumstances not covered by the complaints policy'.

### 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	Evidenced by Policy T01H and 2024 complaints received.	Defined under section '2 – Procedure – how a service request or a complaint can be made'. Complaints were received by email or hard-copy letter following being initially orally raised with a member of staff.
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	Evidenced by Policy T01H; the way that complaints were received, by email and hard-copy letter. Staff awareness is evidenced by the staff policy acknowledgement & recording process managed by the Tenant & Services Manager.	Defined under section '2 – Procedure – how a service request or a complaint can be made'. When reviewed all staff are provided with either a hard copy or link to the policy and then must respond to confirm that they have read and understand.
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	Evidenced by ratio of service requests to formal complaints	8 service requests vs 3 Stage 1 complaints, 2 of which had been escalated from a previous service request.

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	Evidenced by Policy T01H & the associated complaints leaflet.	The policy is published on the website together with the associated Complaints Submission Form. Hard copies are available in each scheme's Information Folder, explained in the Tenants Handbook and electronically on request.
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	Evidenced by Policy T01H	Defined under section '2 – Policy Aims and Objectives' & section '3 – Further Information – The Housing Ombudsman Service'.
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	Evidenced by Policy T01H	Defined under section '2 – Procedure – How a service request or a complaint can be made – Formal Complaints – Stage 1. – see also section '3 - Further Information - Use of Advocates'.
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	Evidenced by Policy T01H & and the escalation of a Stage 2 complaint about having access to CCTV footage to the HOS in 2023	Defined under section '3 – Further Information – The Housing Ombudsman Service'.

## 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	Evidenced by Policy T01H	The Complaints Officer is the Director of Housing
4.2	The complaints officer must have access to staff at all levels to facilitate the prompt resolution of complaints. They must also have the authority and autonomy to act to resolve disputes promptly and fairly.	Yes	Evidenced by Policy T01H	The Complaints Officer is the Director of Housing, who is a senior member of staff so has access to staff at all levels to facilitate the prompt resolution of complaints. DoH manages and controls the complaint data; monitoring actions taken and chasing updates as required.
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	Evidenced by Policy T01H	Defined in section 1 'Policy'. Covered and reviewed in staff 121s.



## 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	Evidenced by Policy T01H	
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	Evidenced by Policy T01H & evidenced by the service requests category of tenant concerns.	Defined under section '1 – Policy' & Policy Aims and Objectives
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	Evidenced by Policy T01H	
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.	N/A	Evidenced by Policy T01H	The Association handles all complaints in-house.

5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	N/A	Evidenced by Policy T01H	The Association handles all complaints in-house.
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	Evidenced by Policy T01H & by request for further information from the Stage 1 complaint about the Association’s refusal to rescind the breach of tenancy letter following ASB perpetrated by the tenant.	Defined under section ‘2 – Procedure – how a service request or a complaint can be made – Formal Complaints – Stages 1 & 2.
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	Evidenced by Policy T01H & by re-stating and setting out the concerns raised in the response letter.	There were no areas of the complaints received that the Association felt was not their responsibility to look into.
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	Evidenced by Policy T01H and the 3 Stage 1 complaints received in 2024.	

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	Evidenced by Policy T01H & 2024 complaints received when the average response time for the 3 received was 6 days, the quickest being 1 day and the slowest being 10.	Defined under section '2 – Procedure – how a service request or a complaint can be made – Formal Complaints – Stages 1 & 2
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	Evidenced by Policy T01H	Defined under section '1 – Policy Aims and Objectives' & 'Annex C' of the policy. Not required in 2024.
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	Evidenced by Policy T01H	Both requests to escalate a complaint were agreed in 2024.
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	Evidenced by the Complaints Handling Monitoring system and the Housing Management System	Recorded on the Complaints Handling system in P Drive and in the Housing Management System's Case filling cabinet system for access by relevant staff.

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	Evidenced by Policy T01H & by there being no escalations to Stage 2 in 2024.	The Association has a small team with frontline staff (most likely to deal with a service request made face-to-face by a tenant) having immediate access to the staff member with responsibility for Stage 1 complaints, & through them to their line manager, the Complaints Officer, who oversees Stage 2 complaints & all complaints processes. Daily updates are held between complaint dealing staff to ensure appropriate remediation and prevent escalation.
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	Evidenced by Policy T02 – Anti-Social Behaviour Involving tenants & its use.	There were no ASB case investigations in 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.	N/a		Restrictions are not placed on contact due to unacceptable behaviour.

## 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	Evidenced by Policy T01H & from the 2024 complaint resolution.	No 2024 Stage 2 complaints.
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	Evidenced by Policy T01H. All complaints acknowledged within 2 working days of being received.	Defined in section '2 – Procedure – How a service request or a complaint can be made – Formal Complaints – Stage 1'.
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	Evidenced by Policy T01H. The longest final response time was 10 days after receipt, the quickest in 1 day.	Defined in section '2 – Procedure – How a service request or a complaint can be made – Formal Complaints – Stage 1'.
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.	Yes	Evidenced by Policy T01H	Defined in section '2 – Procedure – How a service request or a complaint can be made – Formal Complaints – Stage 1'. Not

	Any extension must be no more than 10 working days without good reason, and the reason(s) must be clearly explained to the resident.			required in 2024, but has previously been implemented (in 2023)
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	Evidenced by Policy T01H	Defined in section '2 – Procedure – How a service request or a complaint can be made – Formal Complaints – Stage 1'. Not provided in 2024 as extensions to timescales were not required.
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	Evidenced by Policy T01H & complaint responses re gardens and actions of carer re the scheme laundry.	Defined in section '2 – Procedure – How a service request or a complaint can be made – Formal Complaints – Stage 1'.
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	Evidenced by Policy T01H & by responses provided to 2024 complaints received which listed the concerns raised and gave individual answers to each.	Defined in section '2 – Procedure – How a service request or a complaint can be made – Formal Complaints – Stage 1'.
6.8	Where residents raise additional complaints during the investigation, these must be incorporated into the stage 1 response if they are related and the stage 1 response has not been issued. Where the stage 1 response	Yes	Evidenced by Policy T01H	Defined in section '2 – Procedure – How a service request or a complaint can be made – Formal Complaints – Stage 1'. No additional complaints issues

	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.			were raised in 2024 during the complaints process.
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	Evidenced by Policy T01H & complaint responses issued in 2024.	Defined in section '2 – Procedure – How a service request or a complaint can be made – Formal Complaints – Stage 1'.

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	Evidenced by Policy T01H	Defined in section '2 – Procedure – How a service request or a complaint can be made – Formal Complaints – Stage 2'. There were no Stage 2 Complaints in 2024.

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	Evidenced by Policy T01H	Defined in section '2 – Procedure – How a service request or a complaint can be made – Formal Complaints – Stage 2'. There were no Stage 2 Complaints in 2024.
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	Evidenced by Policy T01H	Defined in section '2 – Procedure – How a service request or a complaint can be made – Formal Complaints – Stage 2'. There were no Stage 2 Complaints in 2024.
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Yes	Evidenced by Policy T01H. The Tenant & Services Manager considers Stage 1 complaints and the Complaints Officer, the Director of Housing considers Stage 2.	Defined in section '2 – Procedure – How a service request or a complaint can be made – Formal Complaints – Stage 2'.
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	Evidenced by Policy T01H	Defined in section '2 – Procedure – How a service request or a complaint can be made – Formal Complaints – Stage 2'. There were no Stage 2 Complaints in 2024.
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.	Yes	Evidenced by Policy T01H	Defined in section '2 – Procedure – How a service request or a complaint can be made – Formal Complaints – Stage 2'.



	Any extension must be no more than 20 working days without good reason, and the reason(s) must be clearly explained to the resident.			There were no Stage 2 Complaints in 2024.
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	Evidenced by Policy T01H	Defined in section '2 – Procedure – How a service request or a complaint can be made – Formal Complaints – Stage 2'. There were no Stage 2 Complaints in 2024.
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	Evidenced by Policy T01H	Defined in section '2 – Procedure – How a service request or a complaint can be made – Formal Complaints – Stage 2'. There were no Stage 2 Complaints in 2024.
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	Evidenced by Policy T01H	Defined in section '2 – Procedure – How a service request or a complaint can be made – Formal Complaints – Stage 2'. There were no Stage 2 Complaints in 2024.
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;	Yes	Evidenced by Policy T01H	Defined in section '2 – Procedure – How a service request or a complaint can be made – Formal Complaints – Stage 2'.

	<p>d. the reasons for any decisions made;</p> <p>e. the details of any remedy offered to put things right;</p> <p>f. details of any outstanding actions; and</p> <p>g. details of how to escalate the matter to the Ombudsman Service if the individual remains dissatisfied.</p>			There were no Stage 2 Complaints in 2024.
6.20	Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.	Yes	Evidenced by Policy T01H & by the submission of a HOS complaint in 2023.	Defined in section '2 – Procedure – How a service request or a complaint can be made – Formal Complaints – Stage 2'.

## Section 7: Putting things right

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
7.1	<p>Where something has gone wrong a landlord must acknowledge this and set out the actions it has already taken, or intends to take, to put things right. These can include:</p> <ul style="list-style-type: none"> <li>• Apologising;</li> <li>• Acknowledging where things have gone wrong;</li> <li>• Providing an explanation, assistance or reasons;</li> <li>• Taking action if there has been delay;</li> </ul>	Yes	Evidenced by Policy T01H & and by complaint responses.	Defined in section '1 – Policy – Policy Aims and Objectives'.

	<ul style="list-style-type: none"> <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>			
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Yes	Evidenced by Policy T01H	Defined in section '1 – Policy – Policy Aims and Objectives'
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	Evidenced by Policy T01H & by response to complaint about a carer that resulted in the care agency being complained to and action taking to prevent the incident reoccurring.	Defined in section '1 – Policy – Policy Aims and Objectives'
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes	Evidenced by Policy T01H	Defined in section '1 – Policy – Policy Aims and Objectives'

## 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"> <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	Evidenced by the Annual Self-Assessment; Complaints Performance and Service Improvement Report and Analysis Sheet provided to MRC and the Association's Housing Committee annually in March.	
8.2	The annual complaints performance and service improvement report must be reported to the landlord's governing	Yes	Evidenced by publishing on website following receipt of the governing body's response to the	

	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.		report provided by the MRC on their behalf:	
8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	N/A	N/A	
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	Yes	Noted, but not applicable for 2024.	
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.	N/A	N/A	

## 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	Evidenced by Policy T01H	Defined in section '1 – Policy – Policy Aims and Objectives'. Not applicable to any 2024 complaints but has previously identified service improvements following previous years' complaints, (e.g. around the flying of flags on a scheme flagpole).
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	Evidenced by Policy T01H & and by the lessons learned section of the Tenants Annual Report that identifies areas for improvement.	Defined in section '1 – Policy – Policy Aims and Objectives'.
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	Reported to tenants by the Tenants Annual Report and to the Housing Committee that includes tenant members.	This information is then passed on to the Board for governance purposes.
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	Yes	Evidenced by the frequent review of Policy T01H (Mar. '19, Oct. '20, Nov. '22, Mar. '24 & Jan. '24).	The Director of Housing & the CEO assess any themes or trends to identify potential systemic issues,

	identify potential systemic issues, serious risks, or policies and procedures that require revision.			quarterly when compiling the MRC report and annually when preparing the Financial Annual Report, the Tenants Annual Report and submitted Governance Complaint performance reports to the Board (via the MRC).
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	Evidenced by there being a MRC on the Committee of Management and the provision of quarterly complaints update reports from the Complaints Officer	Position held by the Vice-Chair
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	Evidenced by minutes of meetings.	Provided annually in April with exceptions reported as required.
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	Complaint performance reports issued quarterly and Complaints Performance and Service Improvement Report issued annually at the end of the previous financial year in line with HOS guideline.	Quarterly reports issued throughout the year that includes regular reviews of issues and trends. Regular updates on the outcomes of the Ombudsman's investigations are included.

	<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>There has only ever been one about access to CCCTV footage, which the HOS signposted to the Information Commissioner's Office as fell outside of the HOS' jurisdiction.</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>	No		<p>Current strategic and operational objectives were reviewed prior to April 2024. Strategic Objectives are due for review in 2025, so will be updated accordingly. Operational Objectives are reviewed annually and agreed by the Housing Committee at their March meeting. This objective will be added for 2025 as a Business as Usual item.</p>