

Complaint Handling Code - Self-Assessment (June 2023)

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

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

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

Section 1 - Definition of a complaint

Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
1.2	A complaint must be defined as: <i>'an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the organisation, its own staff, or those acting on its behalf, affecting an individual resident or group of residents.'</i>	Yes	This is set out in our Complaints and Compliments policy and supporting procedure for colleagues. This was adopted in March 2021 and communicated to colleagues via mandatory policy reads.
1.3	The resident does not have to use the word 'complaint' for it to be treated as such. A complaint that is submitted via a third party or representative must still be handled in line with the landlord's complaints policy.	Yes	Within our updated Complaints and Compliments policy this is clear. We have adopted the Housing Ombudsman definition of a complaint.
1.6	... if further enquiries are needed to resolve the matter, or if the resident requests it, the issue must be logged as a complaint.	Yes	Within our Complaints and Compliments policy and procedure we clarify our position.
1.7	A landlord must accept a complaint unless there is a valid reason not to do so.	Yes	Within our Complaints and Compliments policy and procedure, we outline matters not considered complaints, including service requests or services which have their own appeals process.

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
1.8	A complaints policy must clearly set out the circumstances in which a matter will not be considered, and these circumstances should be fair and reasonable to residents.	Yes	Our Complaints and Compliments policy lists exclusions for certain aspects of dissatisfaction, which all have alternate resolution and escalation routes to address such matters.
1.9	If a landlord decides not to accept a complaint, a detailed explanation must be provided to the resident setting out the reasons why the matter is not suitable for the complaints process and the right to take that decision to the Ombudsman.	Yes	If we are unable to accept a complaint, a written response is provided to the customer with Ombudsman details included in the response.

Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
1.4	Landlords should recognise the difference between a service request , where a resident may be unhappy with a situation that they wish to have rectified, and a complaint about the service they have/have not received.	Yes	There is a clear demarcation between First Point of Contact Resolution ie a service request where the recipient is seeking a remedy and making a complaint about a service failure.
1.5	Survey feedback may not necessarily need to be treated as a complaint, though, where possible, the person completing the survey should be made aware of how they can pursue their dissatisfaction as a complaint if they wish to.	Yes	As part of our transactional surveys and perception surveys, conducted by a third party, customers are offered the option to contact with Bernicia to pursue any issues, by requesting a follow up.

Section 2 - Accessibility and awareness

Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
2.1	Landlords must make it easy for residents to complain by providing different channels through which residents can make a complaint such as in person, over the telephone, in writing, by email and digitally. While the Ombudsman recognises that it may not be feasible for a landlord to use all of the potential channels, there must be more than one route of access into the complaints system.	Yes	Our Complaints and Compliments policy, plus customer leaflet illustrates all the various channels open to customers to make a complaint. This does include in person, telephone, website, MyBernicia, in writing and by email.
2.3	Landlords must make their complaint policy available in a clear and accessible format for all residents. This will detail the number of stages involved, what will happen at each stage and the timeframes for responding.	Yes	Our Complaints and Compliments policy is available online or in print on request. We also provide complaints leaflet to explain the policy in simpler terms. All definitions, the stages and how they work, how customers transition between stages and all timeframes are included.
2.4	Landlord websites, if they exist, must include information on how to raise a complaint. The complaints policy and process must be easy to find on the website.	Yes	We have a dedicated section on our website for complaints. This includes our Complaints and Compliments policy and procedure and customer leaflet. This is easily accessible through the search function using key words such as complain, complaint etc which returns results for links to the relevant section and documentation.
2.5	Landlords must comply with the Equality Act 2010 and may need to adapt normal policies, procedures, or processes to accommodate an individual's needs. Landlords must satisfy themselves that their policy sets out how they will respond to reasonable adjustments requests in line with the Equality Act and that complaints handlers have had appropriate training to deal with such requests.	Yes	Our Complaints and Compliments policy and procedure has a dedicated section on Equality and Diversity. We have a published Equality, Diversity and Inclusion Policy which covers all relevant aspects to ensure we consider and provide accessible and inclusive services which meet diverse needs. These documents are referenced in our policy.

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
2.6	Landlords must publicise the complaints policy and process, the Complaint Handling Code and the Housing Ombudsman Scheme in leaflets, posters, newsletters, online and as part of regular correspondence with residents.	Yes	We promote our Complaints and Compliments policy and process and the Housing Ombudsman Service and Complaint Handling Code on our website and in our Tenants Annual Review. We also display complaints leaflet within communal areas of Bernicia Living schemes and office reception areas.
2.7	Landlords must provide residents with contact information for the Ombudsman as part of its regular correspondence with residents.	Yes	Ombudsman details are provided in stage 1 and stage 2 response letters including if we are unable to progress the complaint through our process. Information is also included in our customer leaflet and on our website.
2.8	Landlords must provide early advice to residents regarding their right to access the Housing Ombudsman Service throughout their complaint, not only when the landlord's complaints process is exhausted.	Yes	Our Complaints and Compliments policy and procedure clearly sets this out, as does our complaint leaflet. We also provide Ombudsman details in stage 1 and stage 2 response letters and the customer's right to access the Ombudsman service throughout our internal procedure.

Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
2.2	Where a landlord has set up channels to communicate with its residents via social media, then it should expect to receive complaints via those channels. Policies should contain details of the steps that will be taken when a complaint is received via social media and how confidentiality and privacy will be maintained.	Yes	Our Complaints and Compliments policy and procedure confirms we accept complaints made via social media. Using direct messaging ensures confidentiality and privacy. These are routed into our Customer Contact Centre and Communications Team and dealt with as per our Complaints and Compliments policy and procedure.

Section 3 - Complaint handling personnel

Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
3.1	Landlords must have a person or team assigned to take responsibility for complaint handling to ensure complaints receive the necessary attention, and that these are reported to the governing body. This Code will refer to that person or team as the "complaints officer".	Yes	<p>We have a dedicated Feedback team who handle and manage all complaints. We also have a Customer Relationship Manager who oversees complaints and provides support to the Feedback Team. Case Handlers are assigned according to the nature and stage of the complaint. We present a detailed quarterly report to our Customer Services Committee, the Chair of which is a Group Board Member.</p> <p>The Committee also includes 3 tenants. This information is also provided to the Customer Feedback Panel, who scrutinise, challenge and discuss insight and make recommendations from learnings to drive improvement.</p>
3.2	...the complaint handler appointed must have appropriate complaint handling skills and no conflicts of interest.	Yes	Members of the Feedback Team and case handlers are trained in complaint handling and resolution. All front line colleagues have received complaint handling training as part of our Customer Service Excellence Strategic Project. Complaint handlers would not investigate a complaint where there is a conflict, nor would they be involved in both Stage 1 and 2.

Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
3.3	Complaint handlers should: <ul style="list-style-type: none"> • be able to act sensitively and fairly • be trained to handle complaints and deal with distressed and upset residents • have access to staff at all levels to facilitate quick resolution of complaints • have the authority and autonomy to act to resolve disputes quickly and fairly. 	Yes	Complaint handlers along with all frontline colleagues have received Customer Service Excellence training. The Bernicia Way details values and behaviours and is available through our learning management system. Our Feedback Team have access to case handlers within service areas, they have access to quick resolution and are empowered to exercise autonomy and authority.

Section 4 - Complaint handling principles

Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
4.1	Any decision to try and resolve a concern must be taken in agreement with the resident and a landlord's audit trail/records should be able to demonstrate this. Landlords must ensure that efforts to resolve a resident's concerns do not obstruct access to the complaints procedure or result in any unreasonable delay. It is not appropriate to have extra named stages (such as 'stage 0' or 'pre-complaint stage') as this causes unnecessary confusion for residents. When a complaint is made, it must be acknowledged and logged at stage one of the complaints procedure within five days of receipt.	Yes	We always seek to understand the outcome a customer is looking for and work with the customer to find a mutually agreeable solution. At stage 2 our procedure formally includes a question seeking the customers desired outcome and seeks to broker a discussion prior to investigation. Our systems are designed to capture this information and guide colleagues through the timelines. We do not have a pre complaint stage. Our policy and procedure aim to acknowledge stage one in two working day – whilst no longer than 5 working days.
4.2	Within the complaint acknowledgement, landlords must set out their understanding of the complaint and the outcomes the resident is seeking. If any aspect of the complaint is unclear, the resident must be asked for clarification and the full definition agreed between both parties.	Yes	Our complaint handling system has email and letter templates. The acknowledgement template includes a complaint summary. If this is unclear, we will seek further clarification. At stage 1 outcome we provide details of the next stage the customer can progress to if they remain dissatisfied. This also seeks further clarity on what they are unhappy with, the reason why and what they would like us to do. If this is not clear at point of escalation, we would seek clarification with the customer.
4.6	A complaint investigation must be conducted in an impartial manner.	Yes	Our Complaints and Compliments policy and procedure outline how the investigation will be impartial.

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
4.7	The complaint handler must: <ul style="list-style-type: none"> • deal with complaints on their merits • act independently and have an open mind • take measures to address any actual or perceived conflict of interest • consider all information and evidence carefully • keep the complaint confidential as far as possible, with information only disclosed if necessary to properly investigate the matter. 	Yes	Our Complaint and Compliments procedure outlines the various roles of colleagues who are involved in complaint handling.
4.11	Landlords must adhere to any reasonable arrangements agreed with residents in terms of frequency and method of communication	Yes	We use a complainant's preferred method of communication during the investigation of their complaint. We also share when and how we will communicate with them and, when asked, we will adapt.
4.12	The resident, and if applicable any staff member who is the subject of the complaint, must also be given a fair chance to: <ul style="list-style-type: none"> • set out their position • comment on any adverse findings before a final decision is made. 	Yes	Complaint handlers discuss with the customer the nature of their complaint at Stage 1 and Stage 2, to establish their position. Where a complaint involves a colleague, a discussion is conducted to enable them to share and present their position and offer full information.
4.13	A landlord must include in its complaints policy its timescales for a resident to request escalation of a complaint	Yes	Within our policy, we advise customers they have 10 working days to escalate to stage 2. We also share this in stage 1 response letter.
4.14	A landlord must not unreasonably refuse to escalate a complaint through all stages of the complaints procedure and must have clear and valid reasons for taking that course of action. Reasons for declining to escalate a complaint must be clearly set out in a landlord's complaints policy and must be the same as the reasons for not accepting a complaint.	Yes	We ask customers to answer 3 questions as part of their request to escalate to stage 2. If they do not answer the questions, we will contact the customer to establish this. If we were to refuse to escalate, we would explain in writing, including guidance on next steps. We also articulate in our policy where we would not accept a complaint such as matter being dealt with through legal action.

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
4.15	A full record must be kept of the complaint, any review and the outcomes at each stage. This must include the original complaint and the date received, all correspondence with the resident, correspondence with other parties and any reports or surveys prepared.	Yes	All notes and contacts in relation to the investigation of the complaint will be held in our complaints management system (Salesforce), supported by integrated document management system (MRI).
4.18	Landlords must have policies and procedures in place for managing unacceptable behaviour from residents and/or their representatives when pursuing a complaint.	Yes	We have a Managing Unacceptable Behaviour Policy in place.

Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
4.3	Landlords should manage residents' expectations from the outset, being clear where a desired outcome is unreasonable or unrealistic	Yes	Colleagues endeavour to manage customer expectations, which is underpinned by clear policy and process.
4.4	A complaint should be resolved at the earliest possible opportunity, having assessed what evidence is needed to fully consider the issues, what outcome would resolve the matter for the resident and whether there are any urgent actions required.	Yes	We aim to resolve Stage 1 complaints within 10 working days, and Stage 2 complaints within 20 working days, we endeavour to resolve earlier where possible. The timescales are outlined in our Complaints and Compliments policy and procedure.
4.5	Landlords should give residents the opportunity to have a representative deal with their complaint on their behalf, and to be represented or accompanied at any meeting with the landlord where this is reasonable.	Yes	This is within our Complaints and Compliments policy and reflected in the customer leaflet.
4.8	Where a key issue of a complaint relates to the parties' legal obligations landlords should clearly set out their understanding of the obligations of both parties.	Yes	Where this is the case, we make it clear, for instance, where we and the customer are obliged to complete Gas Safety tests. (amongst other legal obligations).
4.9	Communication with the resident should not generally identify individual members of staff or contractors.	Yes	Where this is appropriate, we'll name an individual, perhaps for example in identifying who may be visiting the customer. However, we would not name people when it's not relevant or appropriate, such as the individual or contractor involved in the complaint.
4.10	Landlords should keep residents regularly updated about the progress of the investigation.	Yes	Our policy and process support this. Complaint handlers provide contact details, so they are accessible during the complaint. Any updates outside of prearranged contacts are relayed to the customer by the complaint handler as and when these occur.

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
4.16	Landlords should seek feedback from residents in relation to the landlord's complaint handling as part of the drive to encourage a positive complaint and learning culture.	Yes	In our Tenant Satisfaction Survey (STAR) and ICS survey, we asked customers about their satisfaction with our complaints service. Transactional surveys are to be reintroduced from September 2023. Additionally, feedback will be collected to meet the requirements of the regulatory TSM Consumer Standard.
4.17	Landlords should recognise the impact that being complained about can have on future service delivery. Landlords should ensure that staff are supported and engaged in the complaints process, including the learning that can be gained	Yes	Learnings, where identified, from complaints are reviewed to establish what we can share as good practice and development opportunities. We have Wellbeing support available to all colleagues. Complaint learning is shared in the Feedback report available to customers and colleagues.
4.19	Any restrictions placed on a resident's contact due to unacceptable behaviour should be appropriate to their needs and should demonstrate regard for the provisions of the Equality Act 2010.	Yes	Before restricting a customer's contact, an assessment will be undertaken to ensure the sanctions are proportionate taking into account the provisions of the Equality Act 2010.

Section 5 - Complaint stages

Mandatory 'must' requirements

Stage 1

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
5.1	Landlords must respond to the complaint <u>within 10 working days</u> of the complaint being logged. Exceptionally, landlords may provide an explanation to the resident containing a clear timeframe for when the response will be received. This should not exceed a further 10 days without good reason.	Yes	Within our Complaints and Compliments policy, procedure and customer leaflet we express our aim to respond within the timescales stated. We will also explain how if we need more time, we will agree this with the customer and confirm the extension in writing.
5.5	A complaint response must be sent to the resident when the answer to the complaint is known, not when the outstanding actions required to address the issue, are completed. Outstanding actions must still be tracked and actioned expeditiously with regular updates provided to the resident.	Yes	Within our Complaints and Compliments policy and procedure, updates and substantive responses will be provided as soon as the result is known. Contact will be maintained with the customer until all outstanding actions are complete.
5.6	Landlords must address all points raised in the complaint and provide clear reasons for any decisions, referencing the relevant policy, law and good practice where appropriate.	Yes	Response templates prompt and provide guidance to ensure all points raised are responded to and the rationale for all decisions are presented.
5.8	Landlords must confirm the following in writing to the resident at the completion of stage one in clear, plain language: <ul style="list-style-type: none"> the complaint stage the decision on the complaint the reasons for any decisions made 	Yes	The letter templates provided by the Housing Ombudsman have been adopted.

	<ul style="list-style-type: none"> the details of any remedy offered to put things right details of any outstanding actions details of how to escalate the matter to stage two if the resident is not satisfied with the answer 		
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Stage 2

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
5.9	If all or part of the complaint is not resolved to the resident's satisfaction at stage one it must be progressed to stage two of the landlord's procedure, unless an exclusion ground now applies. In instances where a landlord declines to escalate a complaint it must clearly communicate in writing its reasons for not escalating as well as the resident's right to approach the Ombudsman about its decision.	Yes	Our Complaints and Compliments policy and procedure explains this, including the transition between each stage and exclusions. If a customer requests escalation this is carried out in accordance with the procedure and timescales. If an escalation is declined, then reference will be made to the exclusions highlighted within the Complaints and Compliments Policy and procedure, this will be confirmed along with their right to approach the Housing Ombudsman. Contact details for the Ombudsman are provided.
5.10	On receipt of the escalation request, landlords must set out their understanding of issues outstanding and the outcomes the resident is seeking. If any aspect of the complaint is unclear, the resident must be asked for clarification and the full definition agreed between both parties.	Yes	A summary is provided within the acknowledgement template We also ask the complainant to explain their reason for escalating their complaint using 3 questions. If this is not clear, contact will be made to establish and clarify this information.
5.11	Landlords must only escalate a complaint to stage two once it has completed stage one and at the request of the resident.	Yes	Our Complaints and Compliments policy, procedure and customer leaflet explain this.
5.12	The person considering the complaint at stage two, must not be the same person that considered the complaint at stage one.	Yes	Our Complaints and Compliments policy and procedure detail this. Complaint handlers are identified for Stage 1 and 2. Should they have had involvement in the handling of the complaint, they will not be involved and delegated to another complaint handler.

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
5.13	Landlords must respond to the stage two complaint within 20 working days of the complaint being escalated. Exceptionally, landlords may provide an explanation to the resident containing a clear timeframe for when the response will be received. This should not exceed a further 10 days without good reason.	Yes	Within our Complaints and Compliments policy, procedure and customer leaflet we will respond in 20 working days. We also explain how if we need more time, we will agree this with the customer and confirm this in writing.
5.16	<p>Landlords must confirm the following in writing to the resident at the completion of stage two in clear, plain language:</p> <ul style="list-style-type: none"> • the complaint stage • the complaint definition • the decision on the complaint • the reasons for any decisions made • the details of any remedy offered to put things right • details of any outstanding actions <p>and</p> <ul style="list-style-type: none"> • if the landlord has a third stage, details of how to escalate the matter to stage three • if this was the final stage, details of how to escalate the matter to the Housing Ombudsman Service if the resident remains dissatisfied. 	Yes	<p>Letter templates provide all of these details and our policy and procedure guide case handlers on what is expected of them.</p> <p>We do not operate a 3rd stage</p>

Stage 3

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
5.17	Two stage landlord complaint procedures are ideal. This ensures that the complaint process is not unduly long. If landlords strongly believe a third stage is necessary, they must set out their reasons for this as part of their self-assessment. A process with more than three stages is not acceptable under any circumstances.	N/A	We currently only have two formal complaints stages – stage 1 and stage 2.
5.20	Landlords must confirm the following in writing to the resident at the completion of stage three in clear, plain language: <ul style="list-style-type: none"> • the complaint stage • the complaint definition • the decision on the complaint • the reasons for any decisions made • the details of any remedy offered to put things right • details of any outstanding actions • details of how to escalate the matter to the Housing Ombudsman Service if the resident remains dissatisfied 	N/A	We currently only have two formal complaint stages – stage 1 and stage 2.

Best practice 'should' requirements

Stage 1

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

Stage 2

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
5.14	If an extension beyond 10 working days is required to enable the landlord to respond to the complaint fully, this should be agreed by both parties.	Yes	Our Complaints and Compliments policy and procedure explain this, and we have templates for extensions.
5.15	Where agreement over an extension period cannot be reached, landlords should provide the Housing Ombudsman's contact details so the resident can challenge the landlord's plan for responding and/or the proposed timeliness of a landlord's response	Yes	Our extension template includes the Housing Ombudsman contact details.

Stage 3

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
5.18	Complaints should only go to a third stage if the resident has actively requested a third stage review of their complaint. Where a third stage is in place and has been requested, landlords must respond to the stage three complaint within 20 working days of the complaint being escalated. Additional time will only be justified if related to convening a panel. An explanation and a date for when the stage three response will be received should be provided to the resident.	N/A	We currently only have two formal complaint stages – stage 1 and stage 2.
5.19	Where agreement over an extension period cannot be reached, landlords should provide the Housing Ombudsman's contact details so the resident can challenge the landlord's plan for responding and/or the proposed timeliness of a landlord's response.	N/A	We currently only have two formal complaint stages – stage 1 and stage 2.

Section 6 - Putting things right

Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
6.1	Effective dispute resolution requires a process designed to resolve complaints. Where something has gone wrong a landlord must acknowledge this and set out the actions it has already taken, or intends to take, to put things right.	Yes	Our Complaints and Compliments policy and procedure explains this, and we provide response templates which prompts this
6.2	Any remedy offered must reflect the extent of any service failures and the level of detriment caused to the resident as a result. A landlord must carefully manage the expectations of residents and not promise anything that cannot be delivered or would cause unfairness to other residents.	Yes	Our Complaints and Compliments procedure explains this. When customers are offered compensation, our Compensation policy guides colleagues to provide a fair and reasonable settlement Complaint handlers endeavour to manage expectations from initial contact.
6.5	The remedy offer must clearly set out what will happen and by when, in agreement with the resident where appropriate. Any remedy proposed must be followed through to completion.	Yes	Our Complaints and Compliments policy and procedure explains this, and we provide response templates which prompts this.
6.6	In awarding compensation, a landlord must consider whether any statutory payments are due, if any quantifiable losses have been incurred, the time and trouble a resident has been put to as well as any distress and inconvenience caused.	Yes	Our Compensation policy explains this.

Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
6.3	Landlords should look beyond the circumstances of the individual complaint and consider whether anything needs to be 'put right' in terms of process or systems to the benefit of all residents.	Yes	Learnings and outcomes are recorded with any changes to policy, process or working practices for the wider customer benefit.
6.7	In some cases, a resident may have a legal entitlement to redress. The landlord should still offer a resolution where possible, obtaining legal advice as to how any offer of resolution should be worded.	Yes	Our Compliments and Complaints policy and procedure explains this.

Section 7 - Continuous learning and improvement

Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
7.2	Accountability and transparency are integral to a positive complaint handling culture. Landlords must report back on wider learning and improvements from complaints in their annual report and more frequently to their residents, staff and scrutiny panels.	Yes	We publish learnings on our website and intranet in our Tenants Annual Review. A quarterly report is provided to Customer Services Committee and Customer Feedback Panel.

Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary, and any explanations
7.3	<p>A member of the governing body should be appointed to have lead responsibility for complaints to support a positive complaint handling culture. This role will be responsible for ensuring the governing body receives regular information on complaints that provides insight to the governing body on the landlord's complaint handling performance.</p>	Yes	<p>Our Customer Services Committee, which includes Board and Independent Members (3 of which are tenants) oversee our complaints performance. The Chair of this committee is a Board Member and has lead responsibility for overseeing our complaint's approach, customer voice arrangements, performance and culture</p>
7.4	<p>As a minimum, governing bodies should receive:</p> <ul style="list-style-type: none"> • Regular updates on the volume, categories and outcome of complaints, alongside complaint handling performance including compliance with the Ombudsman's orders • Regular reviews of issues and trends arising from complaint handling, • The annual performance report produced by the Ombudsman, where applicable • Individual complaint outcomes where necessary, including where the Ombudsman made findings of severe maladministration or referrals to regulatory bodies. The implementation of management responses should be tracked to ensure they are delivered to agreed timescales. The annual self-assessment against the Complaint Handling Code for scrutiny and challenge. 	Yes	<p>We provide a quarterly report to our Customer Services Committee, which includes:</p> <ul style="list-style-type: none"> • Performance on case handling • Statistical data on complaints • Details of all cases investigated by the Ombudsman • Complaint learning activity and findings • Audit or risk activity relating to the complaints service • An update on initiatives and progress

Code section	Code requirement	Comply: Yes/No	Evidence, commentary, and any explanations
7.5	Any themes or trends should be assessed by senior management to identify potential systemic issues, serious risks or policies and procedures that require revision. They should also be used to inform staff and contractor training.	Yes	Themes and trends are analysed at Executive Director and Director level. There is an escalation process to highlight any adverse trends or risk of systemic failure. This includes full Executive and Group Board. Themes emerging from complaints have been used to inform the elearning and face to face training delivered to colleagues during 2022 / 23. Consideration is being given to rolling training out to contractors. Complaints form part of contractor monitoring and management.
7.6	Landlords should have a standard objective in relation to complaint handling for all employees that reflects the need to: <ul style="list-style-type: none"> • have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments • take collective responsibility for any shortfalls identified through complaints rather than blaming others • act within the Professional Standards for engaging with complaints as set by the Chartered Institute of Housing. 	Yes	Our vision, values and behaviours are well communicated to colleagues and embedded in our culture through effective leadership. Our behaviours include those specific to how we interact with our customers. Customer Service Excellence training further supports colleagues' complaint handling and their role to work collaboratively across teams and departments, taking ownership and responsibility and delivering this in a professional way as set out in the CIH's Professional Standards.

Section 8 - Self-assessment and compliance

Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
8.1	Landlords must carry out an annual self-assessment against the Code to ensure their complaint handling remains in line with its requirements.	Yes	We have completed a self-assessment annually since this was introduced.
8.2	Landlords must also carry out a self-assessment following a significant restructure and/or change in procedures.	Yes	A change in policy and procedure has triggered a self-assessment outwith the annual cycle.
8.3	Following each self-assessment, a landlord must: <ul style="list-style-type: none"> • report the outcome of their self-assessment to their governing body. In the case of local authorities, self-assessment outcomes should be reported to elected members • publish the outcome of their assessment on their website if they have one, or otherwise make accessible to residents • include the self-assessment in their annual report section on complaints handling performance 	Yes	This is communicated as per guidance: <ul style="list-style-type: none"> • To Customer Services Committee • Published on website in the dedicated complaints and compliments area • Referenced in Tenants Annual Review