

## Appendix A: Self-assessment form

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

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

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

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

## Section 1: Definition of a complaint

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
1.2	A complaint must be defined as: <i>'an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the landlord, its own staff, or those acting on its behalf, affecting a resident or group of residents.'</i>	Yes	Complaints Policy 2.2	This wording is replicated in our complaints policy
1.3	A resident does not have to use the word 'complaint' for it to be treated as such. Whenever a resident expresses dissatisfaction landlords must give them the choice to make complaint. A complaint that is submitted via a third party or representative must be handled in line with the landlord's complaints policy.	Yes	Complaints Policy 1.3; 2.2; 4.1	Our policy is reflective of this requirement
1.4	Landlords must recognise the difference between a service request and a complaint. This must be set out in their complaints policy. A service request is a request from a resident to the landlord requiring action to be taken to put something right. Service requests are not complaints, but must be	Yes	Complaints Policy 2.4	All service requests are recorded on our housing management system as a repair log or a referral for the relevant team. Reporting is available for both repairs and referrals

	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	Complaints Policy 2.4	Our policy is reflective of this requirement
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	IFF Protocol	We carry out circa 200 TSM surveys per month via IFF. Although any dissatisfaction raised is not treated as a complaint IFF flag any concerning responses to us to follow up, which may result in a complaint being raised. As of 1 <sup>st</sup> April 2024 IFF are also signposting dissatisfied customers to the complaints page on our website.

## Section 2: Exclusions

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
2.1	Landlords must accept a complaint unless there is a valid reason not to do so. If landlords decide not to accept a complaint they must be able to evidence their reasoning. Each complaint must be considered on its own merits	Yes	Complaints Policy 2.3; 2.5	If a complaint is not accepted from 1 <sup>st</sup> April 2024 customers will be sent a letter explaining the reasons why, what alternative action we are taking if applicable, and signposting to the HOS. The complaint referral will be updated to reflect this for reporting purposes.
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> <li>• Matters that have previously been considered under the complaints policy.</li> </ul>	Yes	Complaints Policy 2.3	Our policy sets out these exclusions

2.3	Landlords must accept complaints referred to them within 12 months of the issue occurring or the resident becoming aware of the issue, unless they are excluded on other grounds. Landlords must consider whether to apply discretion to accept complaints made outside this time limit where there are good reasons to do so.	Yes	Complaints Policy 2.3	Our policy is reflective of this requirement
2.4	If a landlord decides not to accept a complaint, an explanation must be provided to the resident setting out the reasons why the matter is not suitable for the complaints process and the right to take that decision to the Ombudsman. If the Ombudsman does not agree that the exclusion has been fairly applied, the Ombudsman may tell the landlord to take on the complaint.	Yes	Complaints Policy 2.3	If a complaint is not accepted from 1 <sup>st</sup> April 2024 customers will be sent a letter explaining the reasons why, what alternative action we are taking, and signposting to the HOS. The complaint referral will be updated to reflect this for reporting purposes.
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Yes	Complaints Policy 2.3	Our policy, and complaint handling process, allows for discretion.

### 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	One Manchester Website Complaints policy 4.1; 4.2; 4.3	Our website provides a telephone number, online submission form and an email address for the complaints team in addition to the complaints policy. Our website uses Browse Aloud and content can be translated into different languages. Customers can also complain in person to any OM Colleague. From April 2024 the complaints team will discuss and agree any reasonable adjustments required before the complaint is investigated. OM will also be implementing a new Reasonable Adjustments policy in FY25.
3.2	Residents must be able to raise their complaints in any way and with any member of staff. All staff must be aware of the complaints process and be able to pass details of the complaint to the appropriate person within the landlord.	Yes	Complaints Policy 4.1; 4.2; 4.3; 4.4 One Manchester Website	All Managers were provided with a copy of the amended complaints policy prior to 1 April to cascade to their teams. The policy is on One Manchester website and there are further internal communications scheduled between 1 April and 30 June

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	KPI's TSMs	Although we measure complaint volume as a TSM measure there is no target associated with this measure to reduce volume.
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	One Manchester Website	<p>The complaints policy is published on the website and all colleagues have access to the policy to be able to provide a copy in person / by post / via email to customer on request.</p> <p>The policy on the website can be translated into different languages and/or read aloud.</p> <p>“Help us make things right” poster available for drop in venues.</p> <p>As part of an annual Tenancy Experience visit customers are asked if they know how to make a complaint and feel comfortable doing so.</p>
3.5	The policy must explain how the landlord will publicise details of the	Yes	Complaints Policy 7.3; 9.7 One Manchester Website	The complaints policy states that it will be published on

	complaints policy, including information about the Ombudsman and this Code.			our website, and includes contact details for the HOS. A copy of the Complaints handling code and contact details for the HOS are also on our website.
3.6	Landlords must give residents the opportunity to have a representative deal with their complaint on their behalf, and to be represented or accompanied at any meeting with the landlord.	Yes	Complaints Policy 1.3; 4.1	Our complaints policy is reflective of this requirement
3.7	Landlords must provide residents with information on their right to access the Ombudsman service and how the individual can engage with the Ombudsman about their complaint.	Yes	Complaints Policy 7.3 One Manchester Website	Contact details for the HOS are provided on all our complaint template letters at each stage in the process as well as published in the complaints policy and on the website. HOS contact details are also provided on One Manchester letterhead for non complaint related correspondence From April 2024.

#### Section 4: Complaint Handling Staff

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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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	Staffing Structure	One Manchester employs a Head of Customer Experience, a Customer Experience Manager and 2 x Complaint Resolution Officers
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	Complaints Policy 5.4; 5.5	The complaints team deal with complaints in line with the complaints policy and are able to allocate complaints to all managers within the business
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	Complaints policy 4.4 Action Learning Sessions Lessons Learned Sessions Customer Journey Maps	Although we have a complaints team to log and acknowledge complaints, coordinate investigations, send complaint responses, liaise with the HOS and carry out reporting we have taken the decision that complaints are investigated by managers within the service areas where issues have occurred to ensure there is accountability for

				<p>any failures as well as any resolutions required.</p> <p>Complaints are reported on to all managers and the Exec on a weekly basis.</p> <p>The Customer Experience team carry out quarterly Action Learning sessions with managers across the business, share customer journey maps, and carry out lessons learned sessions following any adverse HOS determination.</p>
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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	Complaints Policy 1.1; 3.2	The complaints policy is the only policy which is applied to all customers including shared owners and leaseholders.
5.2	The early and local resolution of issues between landlords and residents is key to effective complaint handling. It is not	Yes	Complaints Policy 5.3	Our complaints process consists of 2 stages – stage 1, and stage 2.

	appropriate to have extra named stages (such as 'stage 0' or 'informal complaint') as this causes unnecessary confusion.			
5.3	A process with more than two stages is not acceptable under any circumstances as this will make the complaint process unduly long and delay access to the Ombudsman.	Yes	Complaints Policy 5.3	Our complaints process consists of 2 stages – stage 1, and stage 2.
5.4	Where a landlord's complaint response is handled by a third party (e.g. a contractor or independent adjudicator) at any stage, it must form part of the two stage complaints process set out in this Code. Residents must not be expected to go through two complaints processes.	Yes	Complaints Policy 1.1	Our complaints process consists of 2 stages – stage 1, and stage 2. Although we may liaise with third parties during an investigation these third parties do not respond on our behalf.
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Yes	Complaints Policy 1.1	Our complaints process consists of 2 stages – stage 1, and stage 2. Although we liaise with third parties to investigate complaints these third parties do not respond on our behalf.
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	Yes	Complaints policy 5.4.3	From 1 <sup>st</sup> April 2024 our acknowledgement letter has been updated to include our understanding of the complaint (the complaint

	to this as “the complaint definition”. If any aspect of the complaint is unclear, the resident must be asked for clarification.			definition) Where the complaint has been referred to the complaints team or the complaint definition is unclear a Complaints Resolution Officer will contact the customer to fully understand the details of the complaint, any reasonable adjustments required, and the outcome the customer is seeking.
5.7	When a complaint is acknowledged at either stage, landlords must be clear which aspects of the complaint they are, and are not, responsible for and clarify any areas where this is not clear.	Yes	Complaints Policy 5.4.3	The acknowledgement letter sets out the details of the complaint OM are investigating. If there are multiple elements and not all are being accepted the expectation is this will be detailed in the acknowledgement letter.
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> </ul>	Yes	Complaints Policy 3.1; 3.2; 3.3	Our complaints policy reflects that all complaints must be managed under this criteria. To address any conflict of interest a person who is the subject of the complaint, or line manager of the subject will not be assigned the complaint to investigate. The customer will receive a

	d. consider all relevant information and evidence carefully.			call before the complaint is logged and/or as part of the investigation stage to ensure they have a chance to set out their position. An in person visit may also be arranged.
5.9	Where a response to a complaint will fall outside the timescales set out in this Code, the landlord must agree with the resident suitable intervals for keeping them informed about their complaint.	Yes	Complaints policy 5.2	<p>If a case manager cannot conduct a thorough investigation within 10 days this will be confirmed with the customer and followed up with an extension letter confirming the extended deadline for response. In rare cases where investigations extend beyond the timeframes allowed in the code the expectation would be for the manager responsible to maintain oversight to completion and agree contact frequency with the customer.</p> <p>If a complaint response falls outside of the initial 10 working days plus 10 working day extension it will be reported as non compliant for our KPIs and TSMs</p>

5.10	Landlords must make reasonable adjustments for residents where appropriate under the Equality Act 2010. Landlords must keep a record of any reasonable adjustments agreed, as well as a record of any disabilities a resident has disclosed. Any agreed reasonable adjustments must be kept under active review.	Yes	Complaints Policy 4.3; 9	This is detailed in our complaints policy and on our website. Any reasonable adjustments required will also be discussed prior to an investigation commencing.
5.11	Landlords must not refuse to escalate a complaint through all stages of the complaints procedure unless it has valid reasons to do so. Landlords must clearly set out these reasons, and they must comply with the provisions set out in section 2 of this Code.	Yes	Complaints Policy 5.5.3	Any exclusions are detailed in our complaints policy. From 1st April 2024 our stage 1 response letters have been updated to remove any set requirement for the customer to escalate a complaint.
5.12	A full record must be kept of the complaint, and the outcomes at each stage. This must include the original complaint and the date received, all correspondence with the resident, correspondence with other parties, and any relevant supporting documentation such as reports or surveys.	Yes	Complaints Reporting QL case management	All complaint cases are managed within our housing management system QL and reported on directly from QL. There is a document archive for each case where all relevant letters and documents are uploaded.
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	Yes	Complaints Policy 6.3 Compensation Policy	There is no difference in the redress that can be offered at stage 1 or stage 2

	at any stage of the complaints process without the need for 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	Complaints policy 8	OM has an Unacceptable Behaviour policy which will be used where necessary in conjunction with the Complaints policy.
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	Complaints policy 8	The Unacceptable Behaviour policy was reviewed and approved by Pace Committee in December 2023

## 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	Yes	Triage Process	From April OM have introduced a triage process where customers raising a complaint will receive a call from a CRO before the complaint is logged and acknowledged. The CRO

	risk. Most stage 1 complaints can be resolved promptly, and an explanation, apology or resolution provided to the resident.			will establish any vulnerabilities/ reasonable adjustments as well as any immediate action required to resolve a complaint i.e. providing an apology or raising a repair. If a complaint requires further investigation full details of the issue, required outcome, and any vulnerability and/or risk will be provided to the investigating manager.
6.2	Complaints must be acknowledged, defined and logged at stage 1 of the complaints procedure <b><u>within five working days of the complaint being received.</u></b>	Yes	Complaints Policy 5.4.3	Any complaint by way of telephone call or web submission into our contact centre is sent as referral to the complaints team who must call the customer, log, and acknowledge the complaint by day 5. Any late referrals are flagged in QL and can be reported on. This timescale is also published in our complaints policy and on the website
6.3	Landlords must issue a full response to stage 1 complaints <b><u>within 10 working days</u></b> of the complaint being acknowledged.	Yes	Complaints Policy 5.4.5	When a complaint is logged in QL it is allocated a deadline date of 10 working days. This date is provided the customer in the acknowledgement letter.



				Reporting is carried out no less than once per week to track complaint progress against deadlines.
6.4	Landlords must decide whether an extension to this timescale is needed when considering the complexity of the complaint and then inform the resident of the expected timescale for response. Any extension must be no more than 10 working days without good reason, and the reason(s) must be clearly explained to the resident.	Yes	Complaints Policy 5.4.6	If a case manager cannot conduct a thorough investigation within 10 days this is confirmed with the customer and followed up with an extension letter confirming the extended deadline for response. The extension letter also provides details of the HOS.
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	Extension letter QL	Our system generated template letter provides customers with the extended deadline and contact details for the HOS
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	Complaints Policy 5.4.5	Our complaints policy and way of working reflects this approach.
6.7	Landlords must address all points raised in the complaint definition and provide clear reasons for any decisions,	Yes	Complaints Policy 5.4.5	Our complaints policy reflects this approach and from 1 <sup>st</sup> April our outcome letters have been amended to ensure customers are

	referencing the relevant policy, law and good practice where appropriate.			provided with this information, where appropriate.
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	Complaints Policy 5.4.5	Our complaints policy and way of working reflects this approach.
6.9	Landlords must confirm the following in writing to the resident at the completion of stage 1 in clear, plain language: <ul style="list-style-type: none"> <li>a. the complaint stage;</li> <li>b. the complaint definition;</li> <li>c. the decision on the complaint;</li> <li>d. the reasons for any decisions made;</li> <li>e. the details of any remedy offered to put things right;</li> <li>f. details of any outstanding actions; and</li> <li>g. details of how to escalate the matter to stage 2 if the individual is not satisfied with the response.</li> </ul>	Yes	Complaints Policy 5.4.5	This is detailed in our complaints policy and our outcome letters have been amended from 1st April 2024 to reflect these requirements.

## Stage 2

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
6.10	If all or part of the complaint is not resolved to the resident's satisfaction at stage 1, it must be progressed to stage 2 of the landlord's procedure. Stage 2 is the landlord's final response.	Yes	Complaints Policy 5.5	This is reflected in our complaints policy
6.11	Requests for stage 2 must be acknowledged, defined and logged at stage 2 of the complaints procedure within five working days of the escalation request being received.	Yes	Complaints Policy 5.5.5	This is reflected in our complaints policy
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	Complaints Policy 5.5.3	From 1 <sup>st</sup> April we have removed any reference to information customers must provide to escalate their complaint from the policy and our stage one outcome letters.
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Yes	Complaints Policy 5.5.6	Stage 2 complaints are currently investigated by a Head of Service, Director, or a member of the Exec whereas Stage 1 complaints are investigated by service area Managers.

6.14	Landlords must issue a final response to the stage 2 <b><u>within 20 working days</u></b> of the complaint being acknowledged.	Yes	Complaints Policy 5.5.7	When a complaint is logged in QL it is allocated a deadline date of 20 working days. This date is provided the customer in the acknowledgement letter. Reporting is carried out no less than once per week to track complaint progress against deadlines.
6.15	Landlords must decide whether an extension to this timescale is needed when considering the complexity of the complaint and then inform the resident of the expected timescale for response. Any extension must be no more than 20 working days without good reason, and the reason(s) must be clearly explained to the resident.	Yes	Complaints Policy 5.5.8	If a case manager cannot conduct a thorough investigation within 20 working days this will be confirmed with the customer and followed up with an extension letter confirming the extended deadline for response. The extension letter also provides details of the HOS. QL has been updated to allow 20 working day extensions for S2 complaints, as well as the system generated extension letter from 1st April 2024 (previously 10)
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	Extension letter QL	Our system generated template letter provides customers with the extended deadline and contact details for the HOS

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	Complaints Policy 5.5.7; 5.5.11	Our complaints policy and ways of working reflect this approach.
6.18	Landlords must address all points raised in the complaint definition and provide clear reasons for any decisions, referencing the relevant policy, law and good practice where appropriate.	Yes	Complaints Policy 5.5.7	Our complaints policy reflects this approach and from 1 <sup>st</sup> April our outcome letters have been amended to ensure customers are provided with this information, where appropriate.
6.19	Landlords must confirm the following in writing to the resident at the completion of stage 2 in clear, plain language: a. the complaint stage; b. the complaint definition; c. the decision on the complaint; d. the reasons for any decisions made; e. the details of any remedy offered to put things right; f. details of any outstanding actions; and g. details of how to escalate the matter to the Ombudsman Service if the individual remains dissatisfied.	Yes	Complaints Policy 5.5.7	This is detailed in our complaints policy and the template outcome letters have been amended from 1 April 2024 to include these requirements.

6.20	Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.	Yes	Complaints Policy 5.5.1	One Manchester has a 2 stage complaints policy. Stage 2 complaints are investigated by Senior colleagues with access to all colleagues across the business.
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### 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> <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>	Yes	Compensation Policy Complaints Policy 6.2	Our Complaints and Compensation policies reflect this requirement and our outcome letters allow for this information to be provided.

7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Yes	Compensation Policy – discretionary compensation	Our compensation policy and ways of working reflect this requirement
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	Complaints Policy 5.5.4; 5.5.7	Our complaints policy and ways of working reflect this approach. Any outstanding actions are logged and monitored by the CROs to completion.
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes	Complaints policy 6.2 Compensation Policy	Our compensation policy has been reviewed by an independent solicitor to ensure it is in line with HOS guidance.

## Section 8: Self-assessment, reporting and compliance

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	Annual Complaints Performance and Service Improvement Report Self Assessment Against Code 2024	Our annual complaints report was reviewed by Board alongside our self-assessment against the new code on 1 May 2024. The annual report was published on our website on 26 <sup>th</sup> June 2024



8.2	The annual complaints performance and service improvement report must be reported to the landlord's governing body (or equivalent) and published on the on the section of its website relating to complaints. The governing body's response to the report must be published alongside this.	Yes	Annual Complaints Performance and Service Improvement Report	Our annual complaints report was reviewed by Board alongside our self-assessment against the new code on 1 May 2024. The annual report and board response was published on our website on 26 June 2024
8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	Yes	N/A	OM understands this requirement should it become applicable
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	Yes	N/A	OM understands this requirement should it become applicable
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	N/A	OM understands this requirement should it become applicable

## 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	Customer Experience Strategy	The Customer Experience (CX) team and the Complaints team sit under the same Manager and Head of Service to ensure learning from complaints is prioritised and actioned. CX activity is reported monthly to Leadership and quarterly to Customer and Communities Committee.
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	Customer Experience Strategy	Complaints are one of the sources of data and insight highlighted in our CX strategy to influence business change.
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	Customer Experience Strategy Customer Scrutiny Panel Customers and Communities Committee	The CX Team carry out quarterly action learning sessions with a cross section of managers. CX activity is reported monthly to Leadership and quarterly to Customer and Communities Committee.

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	Staffing Structure	The Head of CX has accountability for complaints handling with performance information provided to Leadership Team on a monthly basis, Customer and Communities Committee on a quarterly basis and MRC meetings on a quarterly basis.
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	Member Responsible for Complaints	Sue Lock, a member of our board and Chair of the Customer and Communities Committee has been appointed as our MRC
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	Member Responsible for Complaints	The MRC has been appointed and has reviewed the annual complaints performance report and self assessment. The MRC and Head of CX have quarterly meetings scheduled where complaints performance, complaints themes, and complaints learning is reviewed.
9.7	As a minimum, the MRC and the governing body (or equivalent) must receive:	Yes	Board Papers	The MRC, and Board have received the annual complaints performance

	<p>a. regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance;</p> <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>report in May 2024, prior to this they received a YTD complaints performance report in December 2023 including information of complaints themes and demographics. The Board were updated on a quarterly basis throughout 2023/24 on HOS determinations via the Chief Execs update and will continue to be updated throughout 2024/25.</p>
9.8	<p>Landlords must have a standard objective in relation to complaint handling for all relevant employees or third parties that reflects the need to:</p> <p>a. have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments;</p> <p>b. take collective responsibility for any shortfalls identified through complaints, rather than blaming others; and</p> <p>c. act within the professional standards for engaging with complaints as set by any relevant professional body.</p>	Yes	Performance Framework	<p>Although annual appraisals have a submission deadline of July 2024 a new performance framework has been implemented and any manager with responsibility for complaints will be assessed against a standard complaints objective. Line managers have been provided with reporting to have visibility of their own, and their teams complaints performance.</p>

