No.	Area		Comply		Evidence, commentary and any explanations
1	Definition of a complaint	Ye	es l	No	
1.2	A complaint must be defined as: 'an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the landlord, its own staff, or those acting on its behalf, affecting a resident or group of residents.'	*	:		See CP5 Complaint and Feedback policy, section 1.0 'Policy statement' page 2.
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.	*	:		See CP5 Complaint and Feedback policy, section 1.0 'Policy statement' page 2. Section 5, page 7, identifies our approach to a complaint from a third party. The Complaint Handling factsheet provides a summary of this policy and raises awareness amongst customers and our front line teams of this requirement. Training 'The Complaint Handling Code April 2024 - Team Member Training' material is also available for front line team members.
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 recorded, monitored and reviewed regularly.	*	:		See CP5 Complaint and Feedback policy, section 1.0 'Policy statement' page 2. The Complaint Handling factsheet provides a summary of this policy and raises awareness amongst customers and front line teams of this requirement. Training 'The Complaint Handling Code April 2024 - Team Member Training' material is also available for front line team members. Our in-house IT software's complaint management module's escalation policy has been updated from 1st April 2024, replacing 'there and then complaint' with a Service Request.
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.	*	:		See CP5 Complaint and Feedback policy, section 1.0 'Policy statement' page 2. Supporting material - Resident Complaint Handling fact sheet and Training 'The Complaint Handling Code April 2024 - Team Member Training' material is also available for front line team members.

No.	Area	Со	mply	Evidence, commentary and any explanations
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.	*		See CP5 Complaint and Feedback policy, section 1.0 'Policy statement' page 2.
2	Exclusions	Yes	No	
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.	*		See CP5 Complaint and Feedback policy, section 6.0 'Exclusions' page 7.
2.2	A complaints policy must set out the circumstances in which a matter will not be considered as a complaint or escalated, and these circumstances must be fair and reasonable to residents. Acceptable exclusions include: • The issue giving rise to the complaint occurred over twelve months ago. • Legal proceedings have started. This is defined as details of the claim, such as the Claim Form and Particulars of Claim, having been filed at court. • Matters that have previously been considered under the complaints policy.	*		See CP5 Complaint and Feedback policy, section 6.0 'Exclusions' page 7. In addition to the three exclusions reasons set out in the Code, we have two additional exclusions. We do not accept a complaint about the care provider in our 3 extra care housing schemes as the care is commissioned and provided through the County Council. (We will support customers to make a complaint and have regular stakeholder engagement meetings with the Care Provider and County Council in attendance). We also exclude anonymous complaints, unless a cause for concern is identified. We allow all complaints to progress to Stage 2 of our Complaints policy.
2.3	Landlords must accept complaints referred to them within 12 months of the issue occurring or the resident becoming aware of the issue, unless they are excluded on other grounds. Landlords must consider whether to apply discretion to accept complaints made outside this time limit where there are good reasons to do so.	*		See CP5 Complaint and Feedback policy, section 6.0 'Exclusions' page 7. Examples of where we may allow a complaint outside of the 12 months limit is matters concerning Health and Safety, Safeguarding or where the complaint is reoccurring.

No.	Area	Cor	nply	Evidence, commentary and any explanations
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.	*		See CP5 Complaint and Feedback policy, section 6.0 'Exclusions', page 7. We have a standard letter template in Home Master (our ICT software) to explain the grounds for refusal and the role of the Housing Ombudsman in reviewing our decision.
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	*		See CP5 Complaint and Feedback policy, section 6.0 'Exclusions' page 7.
3	Accessibility and Awareness	Yes	No	
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.	*		See CP5 Complaint and Feedback policy, section 5.0, page 7, 'Making a complaint'. Complaints can be made in writing, by email, via the internet or we can complete the complaint form (used to capture the complaint definition) with a resident over the telephone or in person. We will support vulnerable residents to make a complaint.
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.	*		See CP5 Complaint and Feedback policy, section 5.0 'Making a complaint' page 7. The complaint policy is issued to all team members to read and confirm their understanding, supported by the complaint factsheet and 'The Complaint Handling Code April 2024 - Team Member Training' material is also available for front line team members.
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.	*		See 'The Complaint Handling Code April 2024 - Team Member Training' material available for front line team members.

No.	Area	Cor	nply	Evidence, commentary and any explanations
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.	*		See website and complaint fact sheet published on the website and included as part of standard Home Master letter templates - at start of tenancy, as part of tenant handbook, or when making a complaint. Leaseholder handbook to be updated once separate information on insurance (requested by leaseholders) is provided by our insurance broker.
3.5	The policy must explain how the landlord will publicise details of the complaints policy, including information about the Ombudsman and this Code.	*		See CP5 Complaint and Feedback policy, section 1.0 'Policy statement' page 3. We have a series of standard letter templates in Home Master that reference the role of 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.	*		See CP5 Complaint and Feedback policy, section 5.0, page 7, 'Making a complaint'. We will check our housing records to see if the customer has elected an advocate to assist in their communication with the Association. If not, we will confirm the request in our complaint acknowledgement letter. We will normally write to both the complainant and their advocate, unless requested otherwise.

No.	Area	Comply		Evidence, commentary and any explanations
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.	*		See website and complaint factsheet published on the website and included as part of standard Home Master letter templates - at start of tenancy, or as making a complaint.
		V.	N.	
4.1	Complaint handling staff 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.	*		PA to the CEO. See CP5 Complaint and Feedback policy, section 3.5, page 5, 'Responsibilities and accountabilities - Complaints Officer' section 3.4, page 5, Director of Operations acting as Senior Lead Officer and Section 12, page 11, for reporting framework of complaints quarterly to the Audit and Compliance Sub-committee, reporting to the Board. A yearly review of complaints directly to the full Board. (Whilst the Complaints Officer is normally the PA to the CEO we are currently awaiting recruitment to this post and we have appointed a temporary Complaint Officer who we believe has the skills to meet the expectations of the HOS).
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.	*		PA to the CEO fulfils this requirement (note the temporary appointment whilst we appoint a PA to the CEO, see 4.1. of this assessment).
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.	*		See 'The Complaint Handling Code April 2024 - Team Member Training' material for front line team members, written in support of the updated Code. Relevant officers will be asked to complete Housing Ombudsman webinars as these are made available.

No.	Area	Cor	mply	Evidence, commentary and any explanations
5	The Complaint Handling Process	Yes	No	
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.	*		See CP5 Complaint and Feedback policy.
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.	*		See CP5 Complaint and Feedback policy which is based on a stage 1 and stage 2 complaint process. See section 7, pages 8-10, 'Complaint Handling Framework'.
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.	*		See CP5 Complaint and Feedback policy. See section 7, pages 8-10, 'Complaint Handling Framework'.
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.	*		See CP5 Complaint and Feedback policy.
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	*		The Association has not passed any of its complaints to a third party. We note this need, should the situation arise in the future.
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.	*		See CP5 Complaint and Feedback policy, sections 1.0, page 2, 'Policy statement' and 7.0m pages 8-10, 'Complaint handling framework' and complaint form and Home Master complaint template.
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.	*		See CP5 Complaint and Feedback policy section 1.0, page 2, 'Policy statement'.

No.	Area	Со	mply	Evidence, commentary and any explanations
5.8	At each stage of the complaints process, complaint handlers must: a. deal with complaints on their merits, act independently, and have an open mind; b. give the resident a fair chance to set out their position; c. take measures to address any actual or perceived conflict of interest; and d. consider all relevant information and evidence carefully.	*		See CP5 Complaint and Feedback policy section 3.5, page 5 'Responsibilities and accountabilities - Complaints Officer'
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.	*		See Complaint Policy, section 7.2, page 8, 'Complaint timescales'. See 'The Complaint Handling Code April 2024 - Team Member Training' material for front line team members on the new complaint policy and from the 1st April 2024, the Home Master complaint policy, which includes this as a stage.
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.	*		See CP5 Complaint and Feedback policy, sections 5.0, page 7 'Making a Complaint' and 11.0. page 10, 'Equality and Diversity'. From the 1st April 2024 we capture any reasonable adjustments as part of the Home Master Complaint policy. Impairments such as mental health issues, restricted mobility or learning difficulties are recorded on Home Master.
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.	*		See CP5 Complaint and Feedback policy, section 6.0, page 7, 'Exclusions'. We will allow all complaints to progress to Stage 2 of our Complaints policy, see Section 7.4, page 9, 'Stage 2 - Complaint Review'.
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.	*		See Home Master Complaint case management module and 'The Complaint Handling Code April 2024 - Team Member Training' material in support of the complaint policy.

No.	Area	Со	mply	Evidence, commentary and any explanations
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.	*		See CP5 Complaint and Feedback policy, section 7.0, pages 8-10, 'Complaint handling framework'.
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.	*		See CP5 Complaint and Feedback policy, section 8.0, page 10 'Unreasonable or repetitive complaints'. This includes an hyperlink to the Housing Ombudsman Unacceptable User Policy that we will use as a guide. Based on our historic relationships with our residents It is highly unlikely that we would need to refer to this and the reason we have not developed a separate policy. We do have a separate Violence at Work policy, under our health and safety function.
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.	*		See CP5 Complaint and Feedback policy, section 8.0, page 10, 'Unreasonable or repetitive complaints'.
6	Complaint stages	Yes	No	
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.	*		See CP5 Complaint and Feedback policy, section 7.0, pages 8-10, 'Complaint handling framework'. See 'The Complaint Handling Code April 2024 - Team Member Training' material available for front line team members on the new complaint policy.
6.2	Complaints must be acknowledged, defined and logged at stage 1 of the complaints procedure within five working days of the complaint being received.	*		See CP5 Complaint and Feedback policy, section 7.2, page 8 'Complaint Timescales'. See complaint handling performance results, to be reported quarterly to the Audit and Compliance Sub-committee and annually to the Board.

No.	Area	Comply	Evidence, commentary and any explanations
6.3	Landlords must issue a full response to stage 1 complaints within 10 working days of the complaint being acknowledged.	*	See CP5 Complaint and Feedback policy, section 7.2, page 8 'Complaint Timescales'. See complaint handling performance results, to be reported quarterly to the Audit and Compliance Sub-committee and annually to the Board.
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.	*	See CP5 Complaint and Feedback policy, section 7.2 'Complaint Timescales'. See complaint handling performance results, to be reported quarterly to the Audit and Compliance Sub-committee and annually to the Board.
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.	*	See CP5 Complaint and Feedback policy, section 7.1, page 8 'Formal complaint framework'. See Home Master case management records.
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.	*	See CP5 Complaint and Feedback policy, section 7.1, page 8, 'Formal Complaint framework'. See 'The Complaint Handling Code April 2024 - Team Member Training' material available for front line team members in support of this policy.
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.	*	See CP5 Complaint and Feedback policy, section 7.1, page 8 'Formal complaint response'. See Home Master case management records and 'The Complaint Handling Code April 2024 - Team Member Training' material for front line team members in support of this policy.

No.	Area	Con	nply	Evidence, commentary and any explanations
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	*		See CP5 Complaint and Feedback policy, section 7.3, page 9, 'Stage one complaint - formal investigation'.
6.9	Landlords must confirm the following in writing to the resident at the completion of stage 1 in clear, plain language: a. the complaint stage; b. the complaint definition; c. the decision on the complaint; d. the reasons for any decisions made; e. the details of any remedy offered to put things right; f. details of any outstanding actions; and g. details of how to escalate the matter to stage 2 if the individual is not satisfied with the response.	*		See CP5 Complaint and Feedback policy, section 7.1 'Formal complaint framework'. See Home Master case management records and 'The Complaint Handling Code April 2024 - Team Member Training' material available for front line team members in support of this policy.
	Stage 2			
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.	*		See CP5 Complaint and Feedback policy, section 7.4, pages 9-10 'Stage 2 Review'.
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.	*		See CP5 Complaint and Feedback policy, section 7.2, page 9 'Complaint timescales'. See complaint handling performance results, to be reported quarterly to the Audit and Compliance Sub-committee and annually to the Board.
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.	*		See CP5 Complaint and Feedback policy, section 7.4 page 9-10 'Stage 2 review' and 'The Complaint Handling Code April 2024 - Team Member Training' material available for front line team members in support of this policy.

No.	Area	Cor	mply	Evidence, commentary and any explanations
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	*		See CP5 Complaint and Feedback policy, section 7.4, pages 9-10, 'Stage 2 review'.
6.14	Landlords must issue a final response to the stage 2 within 20 working days of the complaint being acknowledged.	*		See CP5 Complaint and Feedback policy, section 7.2, page 8, 'Complaint timescales'. See complaint handling performance results, to be reported quarterly to the Audit and Compliance Sub-committee and annually to the Board.
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 <u>no</u> <u>more than 20 working days without good reason</u> , and the reason(s) must be clearly explained to the resident.	*		See CP5 Complaint and Feedback policy, section 7.2, page 8 'Complaint timescales'. See standard letter templates in Home Master Case Management module.
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.	*		See CP5 Complaint and Feedback policy, section 7.1, page 8 'Formal complaint framework'. See standard letter templates in Home Master Case Management module.
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.	*		See CP5 Complaint and Feedback policy, section 7.1, page 8 'Formal complaint framework'. 'The Complaint Handling Code April 2024 - Team Member Training' material available for front line team members in support of this policy.
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.	*		See CP5 Complaint and Feedback policy, section 7.1, page 8 ' Formal complaint framework'. See Home Master case management module for standard letter templates.

No.	Area	Comply		Evidence, commentary and any explanations
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.	*		See CP5 Complaint and Feedback policy, section 7.1, page 8 'Formal complaint framework'. See Home Master case management module for standard letter templates.
6.20	Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.	*		See CP5 Complaint and Feedback policy, section 7.4, pages 9-10 'Stage 2 complaint review'.
7	Putting things right	Yes	No	
7.1	Where something has gone wrong a landlord must acknowledge this and set out the actions it has already taken, or intends to take, to put things right. These can include: • Apologising; • Acknowledging where things have gone wrong; • Providing an explanation, assistance or reasons; • Taking action if there has been delay; • Reconsidering or changing a decision; • Amending a record or adding a correction or addendum; • Providing a financial remedy; • Changing policies, procedures or practices.	*		See CP5 Complaint and Feedback policy, section 7.1, page 8 'Formal complaint framework'. See Home Master case management module for standard letter templates.
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	*		See CP5 Complaint and Feedback policy, sections 7.1. page 8, 'Formal complaint framework' and 7.5, page 10, 'Compensation'.

No.	Area		Comply		Evidence, commentary and any explanations
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.		*		See CP5 Complaint and Feedback policy, section 7.1, page 8, 'Formal complaint framework'.
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.		*		See CP5 Complaint and Feedback policy, section 7.5, page 10, 'Compensation'. This includes the HOS web based guidance as a hyperlink.
8	Self-assessment, reporting and compliance	ł	Yes	No	
8.1	Landlords must produce an annual complaints performance and service improvement report for scrutiny and challenge, which must include: a. the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements. b. a qualitative and quantitative analysis of the landlord's complaint handling performance. This must also include a summary of the types of complaints the landlord has refused to accept; c. any findings of non-compliance with this Code by the Ombudsman; d. the service improvements made as a result of the learning from complaints; e. any annual report about the landlord's performance from the Ombudsman; and f. any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord.		*		See CP5 Complaint and Feedback policy, section 2, page 3, 'Regulatory responsibilities' and Board policy schedule, where the review is tabled for May each year. Training on the draft Housing Ombudsman Code completed with Board members on the 18th January 2024. Progress with the self- assessment reported to the Board on the 7th of March and the 23rd of May 2024. Governance responsibilities set out in CP4 Code of Governance: Including Terms of Reference and Board Delegated Decision Matrix.
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.		*		See CP5 Complaint and Feedback policy, section 2, page 3, 'Regulatory responsibilities' and Board policy schedule, where the review is tabled for May each year. Content of the first report presented to the Board of Management on the 23rd May 2024 with delegated responsibility given to the MRC (CL) to give final approval on behalf of the Board of a customer friendly version of this approved report, including self-assessment.

No.	Area	Co	mply	Evidence, commentary and any explanations
8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	*		Noted.
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	*		Noted.
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.	*		Noted.
9	Scrutiny & oversight: continuous learning and improvement	Yes	No	
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.	*		See CP5 Complaint and Feedback policy, section 2, page 3, pages 'Regulatory responsibilities' and Section 3, pages 4-5, 'Responsibilities and accountabilities'. The Home Master complaint module includes capturing lessons learnt on closure of the case. The Audit and Compliance Sub-committee, review complaints quarterly and receive details of any lessons learnt. The Audit committee can request further information from officers. For serious cases or emerging themes, the Audit committee can escalate to the Member Responsible for Complaints or the Board Resident Champion or to the Board. The Board receives a complaint performance report annually in May.
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.	*		See CP5 Complaint and Feedback policy, section 2, page 3, 'Regulatory responsibilities' and Board policy schedule, where the annual review is tabled for May each year and forms part of governance reporting structures.

No.	Area	Comply	Evidence, commentary and any explanations	
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.	*	Learning outcomes reported quarterly to the Audit and Compliance Sub-committee and annually to the Board, including to the MRC.	
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.	*	See CP5 Complaint and Feedback policy, section 3.4, page 5 'Responsibilities and accountabilities - Director of Operations' who will take on this role 2024/25 with the aim of passing to the Head of Housing from 2025/26.	
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')	*	See CP5 Complaint and Feedback policy, section 3.2, page 4, 'Responsibilities and accountabilities - Member Responsible for Complaints'. This is currently Carol Liggins.	
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.	*	See CP5 Complaint and Feedback policy, section 3.2, page 4, 'Responsibilities and accountabilities - Member Responsible for Complaints'.	
9.7	As a minimum, the MRC and the governing body (or equivalent) must receive: a. regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance; b. regular reviews of issues and trends arising from complaint handling; c. regular updates on the outcomes of the Ombudsman's investigations and progress made in complying with orders related to severe maladministration findings; and d. annual complaints performance and service improvement report.	*	See CP5 Complaint and Feedback policy, section 3.2, page 4, 'Responsibilities and accountabilities - Member Responsible for Complaints'.	

No.	Area		Comply	Evidence, commentary and any explanations
9.8	Landlords must have a standard objective in relation to complaint handling for all relevant employees or third parties that reflects the need to: a. have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments; b. take collective responsibility for any shortfalls identified through complaints, rather than blaming others; and c. act within the professional standards for engaging with complaints as set by any relevant professional body.	k		See CP5 Complaint and Feedback policy, section 3.7, page 6, 'Employee responsibilities'.

Please note that all published versions of the HOS templates, start at 1.2.