

# **Lincolnshire Rural Housing Association Ltd (LRHA)**

## **Self-Assessment of Compliance with the Complaints Handling Code**

### **May 2024**

#### **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	<a href="#">Complaints Policy available on LRHA website.</a>	The wording is contained in the 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	<a href="#">Complaints Policy available on LRHA website.</a>	This is contained in the complaints policy. All staff members have received training on this policy and procedures.
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.	Yes	<a href="#">Complaints Policy available on LRHA website.</a>	A Service Recovery Process is in place.

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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	<a href="#">Complaints Policy available on LRHA website.</a>	The service recovery issues and complaints are reviewed at a fortnightly complaints meeting. The Complaints Policy states following a service recovery issue, <i>'if further problems occur or the resident requests it then the issue will be logged as a complaint'</i> .
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.	No		A standard wording has been drafted for all surveys and will be included from 15/05/2024.

## 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	<a href="#">Complaints Policy</a>	<p>All staff are trained to accept a complaint, this is included in the Complaints Policy upon which all operational staff complete training annually.</p> <p>Where a complaint is not accepted, a detailed explanation is provided to the resident, and they are advised of the right to take this decision to the Housing Ombudsman.</p> <p>The Complaints Policy sets out the circumstances when a complaint will not be accepted.</p>

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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	<a href="#">Complaints Policy</a>	As above
2.3	<p>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.</p>	No	<a href="#">Complaints Policy</a>	<p>The Complaints Policy now states that ‘a report will not be treated as a complaint...where the issues occurred over twelve months ago;’ but ‘the exclusion of twelve months will not apply for issues regarding health and safety or safeguarding of residents’.</p>

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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	<a href="#">Complaints Policy</a>	
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Yes	<a href="#">Complaints Policy</a>	Each complaint is considered on its merits.

### 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	<a href="#">Residents Handbook Complaints Policy available on LRHA website.</a>	The routes for logging a complaint have been published to residents and include email, website, telephone, letter, face to face, WhatsApp and social media. We have a Resident's Handbook, Tenant Matters magazine and the website which detail how a complaint can be lodged.
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	<a href="#">Complaints Procedure Flow Chart</a>	All staff are trained on how to handle complaints and the point of contact person.
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	<a href="#">Lincs Rural   Complaints (lrha.co.uk)</a>	The Complaints Policy and other relevant documents are available on the website.

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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	<a href="https://www.lincs-rural.co.uk/Complaints">Lincs Rural   Complaints (lrha.co.uk)</a>	The Complaints Policy and other relevant documents are available on the website.
3.5	The policy must explain how the landlord will publicise details of the complaints policy, including information about the Ombudsman and this Code.	Yes	<a href="#">Complaints Policy</a>	The wording is contained within the Complaints Policy.
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.	No	<a href="#">Complaints Policy</a>	Any reasonable request with an appropriate representative would be considered. The Complaints Policy has been updated to reflect this.
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	<a href="https://www.lincs-rural.co.uk/Complaints">Lincs Rural   Complaints (lrha.co.uk)</a>	The Housing Ombudsman Service details are included in all standard letters for dissatisfaction registered, the LRHA website.



## Section 4: Complaint Handling Staff

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
4.1	Landlords must have a person or team assigned to take responsibility for complaint handling, including liaison with the Ombudsman and ensuring complaints are reported to the governing body (or equivalent). This Code will refer to that person or team as the 'complaints officer'. This role may be in addition to other duties.	Yes	<a href="#">Complaints Procedure Flow Chart</a>	The Resident Engagement Manager acts as the 'complaints officer'.
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	<a href="#">Complaints Procedure Flow Chart</a>	The complaints officer (Resident Engagement Manager) is supported by the Head of Operations and Chief Executive.
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		There are four members of staff trained to undertake complaints investigations.

## 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	<a href="#">Complaints Policy</a>	
5.2	The early and local resolution of issues between landlords and residents is key to effective complaint handling. It is not appropriate to have extra named stages (such as 'stage 0' or 'informal complaint') as this causes unnecessary confusion.	Yes	<a href="#">Complaints Policy</a>	LRHA have a two stage complaints policy in place.
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	<a href="#">Complaints Policy</a>	LRHA have a two stage complaints policy in place.
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		LRHA do not have a third party handling any part of our complaints process.

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Yes		We do not have third parties taking care of any part of the complaints process. If a third party such as an approved contractor is involved the Resident Engagement Manager still manages the process to hit the target dates.
5.6	When a complaint is logged at Stage 1 or escalated to Stage 2, landlords must set out their understanding of the complaint and the outcomes the resident is seeking. The Code will refer to this as “the complaint definition”. If any aspect of the complaint is unclear, the resident must be asked for clarification.	Yes	<a href="#">Complaints Policy</a>	
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	<a href="#">Complaints Policy</a>	Standard letter formats are used to ensure that a clear definition of the complaint is provided to the resident to clarify understanding of the issues.

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
5.8	<p>At each stage of the complaints process, complaint handlers must:</p> <ul style="list-style-type: none"> <li>a. deal with complaints on their merits, act independently, and have an open mind;</li> <li>b. give the resident a fair chance to set out their position;</li> <li>c. take measures to address any actual or perceived conflict of interest; and</li> <li>d. consider all relevant information and evidence carefully.</li> </ul>	Yes	<a href="#">Complaints Policy</a>	All complaints and responses are reviewed at the fortnightly complaints meeting with the Chief Executive, Head of Operations and Resident Engagement Manager present.
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	<a href="#">Complaints Policy</a>	If required, discussions would be undertaken with the resident and a reasonable agreement achieved.
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	<a href="#">Complaints Policy</a>	As required, reasonable adjustments will be made to accommodate the resident and the necessary investigation.

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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	<a href="#">Complaints Policy</a>	
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 are logged on the housing management system. All documents relating to complaints are retained.	The Resident Engagement Manager is responsible for compiling all documents relating to a complaint and managing the process of the complaint, monitoring target deadlines to ensure key dates are met.
5.13	Landlords must have processes in place to ensure a complaint can be remedied at any stage of its complaints process. Landlords must ensure appropriate remedies can be provided at any stage of the complaints process without the need for escalation.	Yes	<a href="#">Complaints Policy available on LRHA website.</a>	The complaint will be resolved as soon as it can be that is in the interest of all parties as long as the resident is assured that they are listened to and that their concerns are taken seriously.

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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	Unacceptable Behaviour Policy	There is a policy in place for any examples of unacceptable behaviour.
5.15	Any restrictions placed on contact due to unacceptable behaviour must be proportionate and demonstrate regard for the provisions of the Equality Act 2010.	Yes	Unacceptable Behaviour Policy	The policy document has been reviewed and approved by the Management Team and approved by the Operations Committee.

## Section 6: Complaints Stages

### Stage 1

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
6.1	Landlords must have processes in place to consider which complaints can be responded to as early as possible, and which require further investigation. Landlords must consider factors such as the complexity of the complaint and whether the resident is vulnerable or at risk. Most stage 1 complaints can be resolved promptly, and an explanation, apology or resolution provided to the resident.	Yes	<a href="#">Complaints Procedure Flow Chart</a>  <a href="#">Complaints Policy</a>	<p>The aim is to resolve complaints as soon as is possible. To take account for any mistakes made and to put matters right with each resident.</p> <p>The complexity of the complaint and the vulnerability of the resident are factors considered by the complaints officer managing the issue.</p>
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	<a href="#">Complaints Procedure Flow Chart</a>  <a href="#">Complaints Policy</a>	<p>This is included in the Complaints Process Flowchart and Complaints Policy.</p> <p>The LRHA Complaints Policy acknowledges complaints within three working days.</p>
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	<a href="#">Complaints Procedure Flow Chart</a>  <a href="#">Complaints Policy</a>	<p>This is included in the Complaints Process Flowchart and Complaints Policy.</p>

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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	<a href="#">Complaints Policy</a>	Any extension is discussed with the resident and then confirmed in writing. An update is provided on the stage of the investigation to explain why the extension is necessary.
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	<a href="#">Complaints Policy</a>	The details are provided at every stage of the complaints process.
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	<a href="#">Complaints Policy</a>	All records are retained and a tracked document for complaints breaks down each complaint into component issue to track the progress with each one.
6.7	Landlords must address all points raised in the complaint definition and provide clear reasons for any decisions, referencing the relevant policy, law and good practice where appropriate.	Yes	<a href="#">Complaints Policy</a>	



Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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		Each complaint is broken down into any individual issues and detailed at each stage. Any additional complaints are dealt during the process to ensure that the resident feels all issues have been fully discussed and dealt with, and to control staff time on investigation and management of the complaint.
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	Remedy and Compensation Policy is in place.  <a href="#">Complaints Policy available on LRHA website.</a>	

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	<a href="#">Complaints Procedure Flow Chart</a> <a href="#">Complaints Policy</a>	The Stage 2 complaints are investigated by the Chief Executive.
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	<a href="#">Complaints Policy</a>	The LRHA Complaints Policy has been updated to include timescale
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	<a href="#">Complaints Policy</a>	
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Yes	<a href="#">Complaints Procedure Flow Chart</a> <a href="#">Complaints Policy</a>	Stage 2 complaints are considered by a member of the Executive Team.
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	<a href="#">Complaints Policy</a>	

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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	<a href="#">Complaints Procedure Flow Chart</a>	Any extension is discussed with the resident and then confirmed in writing. An update is provided on the stage of the investigation to explain why the extension is necessary.
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		Any extension is discussed with the resident and then confirmed in writing. An update is provided on the stage of the investigation to explain why the extension is necessary. Contact details for the Housing Ombudsman are included on correspondence.
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	<a href="#">Complaints Policy available on LRHA website.</a>	All records are retained and a tracked document for complaints breaks down each complaint into component issue to track the progress with each one.

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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	<a href="#">Complaints Policy available on LRHA website.</a>	
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	<a href="#">Complaints Procedure Flow Chart</a>  <a href="#">Complaints Policy</a>	
6.20	Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.	Yes	<a href="#">Complaints Procedure Flow Chart</a>  <a href="#">Complaints Policy</a>	

## 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	<a href="#">Complaints Policy</a>	<p>The Complaints Policy states:          'Where things have gone wrong, LRHA will:          Acknowledge that something has gone wrong, provide an explanation, assistance or reasons;          Apologise;          Take action if there has been a delay;          Recognise or change a decision;          Amend a record;          Provide a financial remedy;          and / or          Change policies, procedures, or practices.'</p>
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Yes	Remedy and Compensation Policy is in place.	
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	Remedy and Compensation Policy is in place.	

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes	Remedy and Compensation Policy is in place.	

## 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> <p>a. the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements.</p> <p>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;</p> <p>c. any findings of non-compliance with this Code by the Ombudsman;</p> <p>d. the service improvements made as a result of the learning from complaints;</p> <p>e. any annual report about the landlord's performance from the Ombudsman; and</p> <p>f. any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord.</p>	Yes		<p>A monthly report on complaints, compliments and service recovery issues are made to the Management Team; The Operations Committee three times per year; and the Board of Management.</p>

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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	<a href="#">Annual Complaints Breakdown</a>	Reported to Board The complaints received each year are analysed and reported to residents via Tenant Matters magazine and the website.
8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	Yes		Will be completed if required.
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	Yes		Will be completed if required.
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		This has not been needed but will be done if the need arises.



## 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	A Complaints Analysis document is produced.	The circumstances of all complaints are considered individually and as a whole to identify, themes / common causes or situations that could identify improvements to prevent re-occurrence.
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	A Complaints Analysis document is produced.	The information gained from complaints is used to improve the operational policies and procedures to improve service to residents.
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	A Complaints Analysis document is produced. <a href="#">Annual Complaints Breakdown</a>	The breakdown of complaints received and what has been changed as a result is published in the Tenant Matters magazine; the website and reviewed at Resident Representatives Meetings and circulated to all staff.

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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	The Head of Operations is delegated with the responsibility of analysing complaints received.	
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		A Board Member experienced in this area has been appointed as the Member Responsible for Complaints.
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.	No	The MRC has been appointed and regular reporting will be provided via the Operations Committee to the Board.	A Board Member experienced in this area has been appointed the Member Responsible for Complaints on the Board of Management

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
9.7	<p>As a minimum, the MRC and the governing body (or equivalent) must receive:</p> <ul style="list-style-type: none"> <li>a. regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance;</li> <li>b. regular reviews of issues and trends arising from complaint handling;</li> <li>c. regular updates on the outcomes of the Ombudsman’s investigations and progress made in complying with orders related to severe maladministration findings; and</li> <li>d. annual complaints performance and service improvement report.</li> </ul>	No	<p>The MRC has been appointed and regular reporting will be provided via the Operations Committee to the Board.</p>	<p>A Board Member experienced in this area has been appointed the Member Responsible for Complaints on the Board of Management</p>

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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> <ul style="list-style-type: none"> <li>a. have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments;</li> <li>b. take collective responsibility for any shortfalls identified through complaints, rather than blaming others; and</li> <li>c. act within the professional standards for engaging with complaints as set by any relevant professional body.</li> </ul>	Yes		<p>Complaints Meetings are held fortnightly; Management Team Meetings are held monthly.</p> <p>The stated aim is to resolve complaints promptly and within the appropriate timeframe depending on the complexity and circumstances of each complaint.</p>