

1. Introduction and background

Papworth Trust always aim to provide the highest possible quality of service to our customers, but we also understand that there are times when things go wrong, or where customers' expectations are not met. We welcome feedback from all customers and recognise the value of lessons that can be learned from complaints as they provide us with an opportunity to continually improve what we do and how we do it. All feedback received from customers or other stakeholders are managed through the Trusts Complaints Policy and associated policies and procedures.

This year the Complaints Policy and associated policies and procedures were reviewed externally and updated to reflect both the Housing Ombudsman Service's Complaint Handling Code and the Social Housing (Regulation) Act, which came into force in July 2023. Together, these form part of the Governments approach to deliver the aims of the 2021 Social Housing White Paper around strengthening consumer standards, improving resident involvement and tackling poor performing landlords. In compliance with the 'Code' we have moved to a two-stage complaints process to ensure complaints are thoroughly investigated and, where required, findings reviewed. Following this, if the complainant remains dissatisfied the policy supports customers to escalate their complaint to the Housing Ombudsman Service, or other relevant body, such as the Local Government and Social Care Ombudsman or the Care Quality Commission.

This paper provides a summary and analysis of complaints, service requests and compliments received in 2023/24, as well as an overview of service improvements made as a result. The recent self-assessment undertaken after our external review is also provided. We have continued our focus on how we can engage with and improve our services for customers. We have made significant steps on our journey to connect better with our customers, and this learning will help us continually improve our services to customers in 2024/25.

2. Board of Trustees response

'On behalf of Papworth Trust and as the nominated Board Member responsible for overseeing Complaints, I am pleased to share our Annual Complaints Performance and Service Improvement Report for the financial year 2023/2024 with our residents, colleagues, and key partners. We're committed to promote a culture which invites customers to tell us when things have gone wrong, so we can put matters right and learn from the insight complaints provide. I am pleased to see we've been honest and transparent in our assessment against the Ombudsman Code and we have reaffirmed our commitment to improving our services and the experiences of our customers. The Board will monitor progress and lessons learned from complaints and insight from other sources.'

Vannesa Stanislas, Trustee and MRC

3. Summary

There has been an increase in the volume of feedback from customers over the past year. This is representative of the investment in centralising customer engagement alongside an organisational priority to focus on obtaining customer feedback across all service areas.

Most complaints continue to be received from our tenants in the housing service. In care, work and day opportunities complaint levels have increased (with the exception of care), but remain low overall.

1 complaint was received from CQC and no further action was taken. No complaints were escalated to the Housing Ombudsman Service or any other regulatory body.

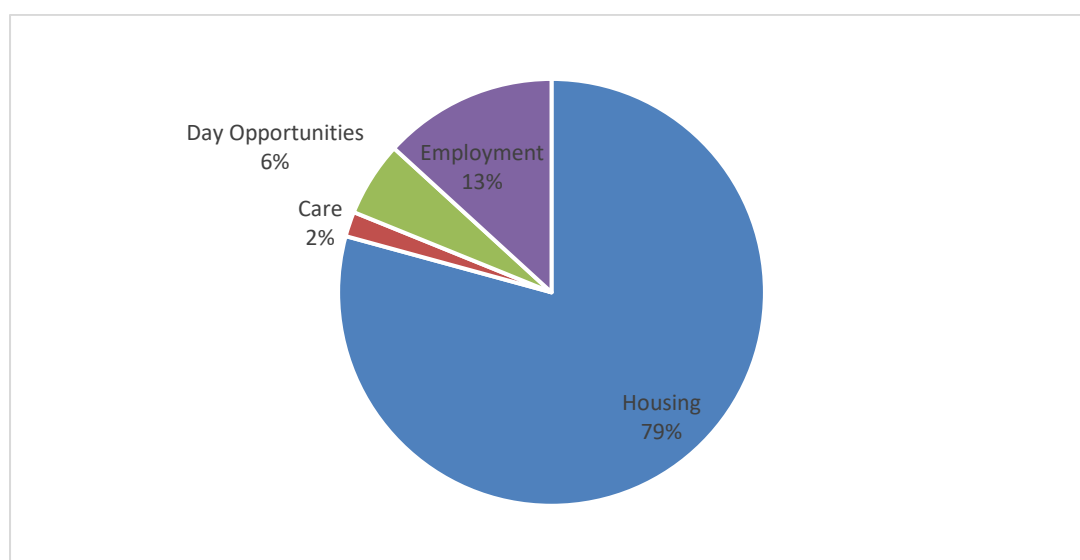
Although service requests have been collected and monitored in the housing service, in non-housing services it is evident that queries that would meet the definition of service requests are received and not currently logged. This represents an opportunity lost in terms of learning from our non-housing customers. The collection of service request in all other service areas has been recommended by the external complaints review and is being implemented for 2024/25.

We have considered both quantitative and qualitative data when reviewing performance.

4. Complaints

Service	Customers (March 2024)	Complaints by year			Complaints not taken on
		21/22	22/23	23/24	23/24
Housing	669	29	44	42	1
Care	26	0	1	1	0
Day Opportunities	248	0	0	3	0
Employment	360	3	3	4	0
Total	1303	32	48	50	1

Complaints by service area – three year comparison



Complaints in 2023/24 by service area

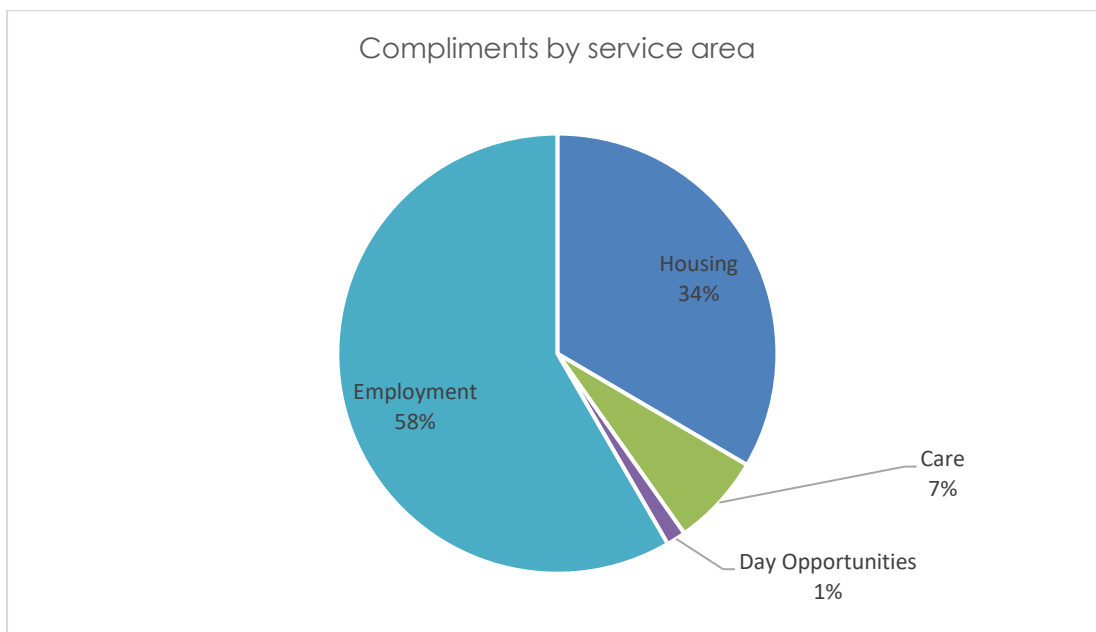
Service	Stage 1	Stage 2	Stage 3	External (HOS, CQC)
Housing	34	6	2	0
Care	1	0	n/a	0
Day Opportunities	2	1	n/a	0
Employment	4	0	n/a	0

Complaints in 2023/24 by stage

5. Compliments

Service	Customers (Mar 23)	Compliments in Year		
Year		21/22	22/23	23/24
Housing	669	105	132	96
Care	26	0	1	19
Day Opportunities	248	2	5	5
Employment	360	116	15	164
	1303	223	153	284

Compliments by service area – three year comparison



Compliments in 2023/24 by service

6. Service Area Performance 2023/24

6.1 Housing

The number of housing complaints has reduced marginally by 5% to 42 in 2023/24 (44 and 29 in the previous 2 years). Whilst the number has decreased, we do receive comparatively more

complaints than other smaller housing providers with 50.8 complaints per 1000 homes, against an average of 23.5 complaints per 1000 homes.

Other areas of note are that 82.4% of stage 1 complaints were responded within timescales defined in the complaints policy, against an average of 92.3%. In comparison 100% of stage 2 complaints were responded within required timescales which is in line with the sector average.

Themes and trends

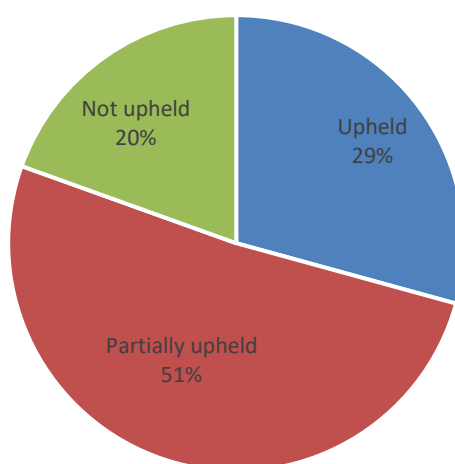
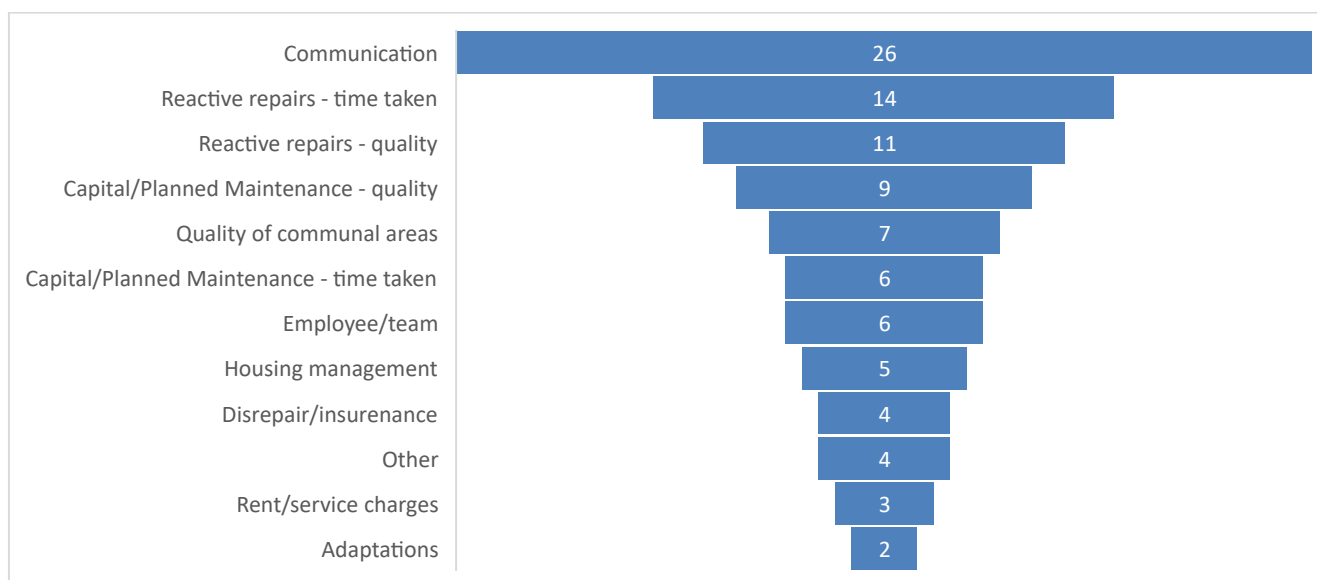
In reviewing the complaints that we received, each complaint has been analysed and the themes from each have been categorised accordingly. Each complaint may cover a number of different themes.

The most common theme across complaints is communication which appeared in 26 out of 42 complaints that could be improved to avoid complaints. This is in terms of both clear and transparent communication to tenants in a format that they understand and ensuring that it is delivered at the right time and is achievable

Our reactive repairs service remains a common cause for complaint with 25 complaints raised in relation to the time taken to complete a repair or the quality of service they received.

Capital and planned maintenance is the next trend with 9 complaints, followed by quality of communal areas, which along with rent/service charge indicate some dissatisfaction around the cost associated with shared and communal areas.

Overarching many complaints there appears to a perception from customers that we do not deliver on what we say we will do or that the customer expectation is unclear.



Only one in five complaints is not upheld in some part, so most indicate some form of service delivery failure and offer a real learning opportunity to improve our delivery.

Complaints not taken forward

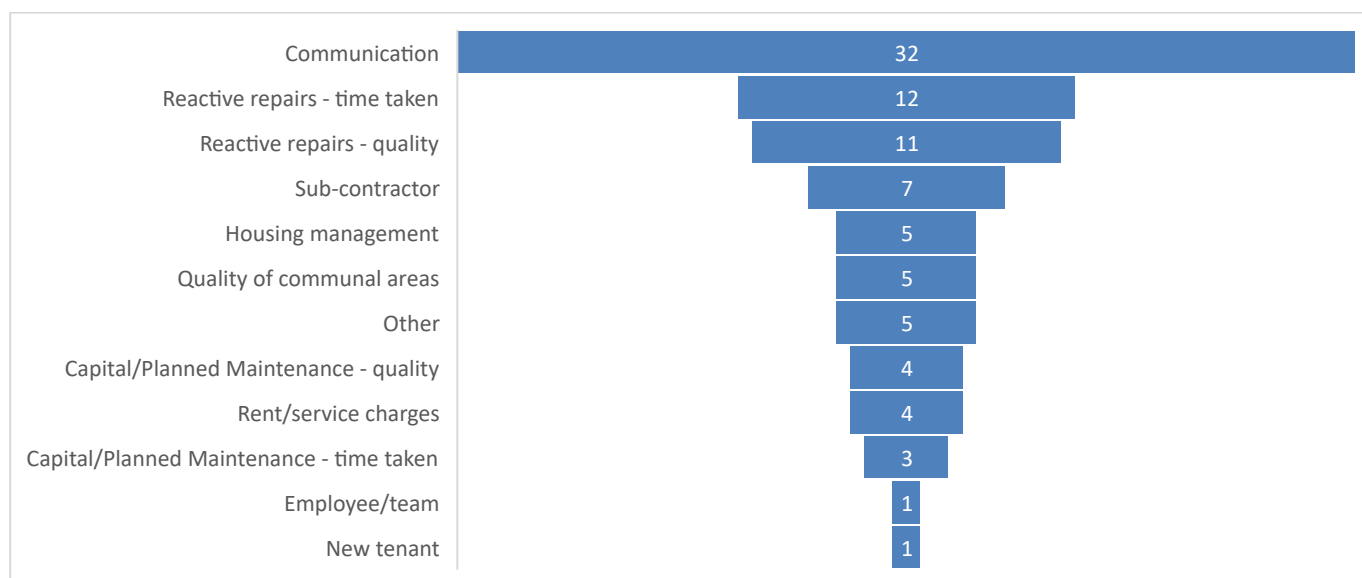
1 complaint received was not taken forward through to stage 3 of the complaints process. On this occasion it was a complaint not appropriate for the Tenant Scrutiny Panel to review and the complainant was offered support to refer their case if they wished to the Housing Ombudsman Service.

Service requests

A complaint is different to a service request. If a customer is asking us to do something or telling us about something for the first time, we will do what we can to fix it as soon as possible without opening a formal complaint case. This is what is known as a service request.

The trends around service requests are very similar to complaints, with communication (32 out of 48 service requests) being the main theme, followed by reactive repairs in

terms of both time taken (12) and quality of service (11) received. An additional theme of 'sub-contractor' has been added to reflect 7 service requests have been about third party organisations that complete maintenance tasks on behalf of the Trust.



Satisfaction with complaints

One of the Regulator of Social Tenant Satisfaction Measures collected via perception survey is 'satisfaction with the landlord's approach to handling complaints'. This is currently 36% against a sector comparative benchmark of 41%. As this is obtained from perception survey of all tenants it is limited in being effective in establishing satisfaction with the complaints process.

We do not currently proactively contact complaints at the end of their complaint to obtain satisfaction and feedback, however this is something that we will implement in 2024.

Compliments

Positive feedback reduced over the year by 27% to 96 compliments. Whilst there is no benchmarking available to compare with other providers, compliments tend to be made about face-to-face staff interactions. This suggests that customers value in-person contact and this is something that needs to be considered as part of service improvements.

5.2 Care

We have supported 26 Customers through our Care services in the last 12 months. The service received one complaint in the period through CQC relating to a customer's property and support. The complaint was anonymous from an ex-employee and full response sent to CQC no further action taken. There were 19 compliments received from family, professionals and carers services all relating to the positive service received from staff and management team.

5.3 Day Opportunities

We have supported 248 Customers through our Day services in the last 12 months. There were 3 complaints raised in the period. All 3 complaints were regarding individual staff.

There were 5 compliments received in the period relating to the positive service delivery. The feedback was received from visiting professionals and example:

- I am assured there are robust systems in place to help ensure people's preferences and interests are considered when planning their days. I can see this is continually monitored to capture when people change their minds about what they want to do.

5.4 Employment

We have supported 360 customers through our employment programmes in the last 12 months. The service received 4 complaints during this period. Three were regarding lack of privacy in the office and as a result larger new office space was sourced.

There were 164 compliments captured from our regular quarterly customer feedback surveys. The compliments received were all relating to the work of our staff team and their proactive, positive, and caring approach in supporting the customers. Here are a couple of examples:

- My support manager is very patient and supportive, keeping me focussed and motivated when I get bogged down and overwhelmed when looking for job opportunities or doubt my abilities and employability. I find this type of support a great help to me as I continue to try to get back into work.
- They the staff go above and beyond to help the client, they deserve an award for the most cared company with helping clients to find work I rate them the maximum I am able to which is 10/10 I know I could give more
- I am very grateful for the support that I get and I don't know where I would be if I didn't have the help

7. How the Housing Ombudsman Service and other regulatory bodies have considered our complaints

No complaints were escalated to the Housing Ombudsman Service in 2023/24. The HOS publish all determinations on social housing providers, it is possible view these online <https://www.housing-ombudsman.org.uk/landlords/>.

1. Changes we have made as a result of complaints

When customers have taken the time to provide us with feedback on their experience, it is important that we value this feedback and use it to inform changes to improve the service.

The below table highlights themes and trends from feedback 2023/24 and changes that we implemented as a result.

Theme or trend	Service change or improvement
Communication – a common theme in complaints and service requests show that teams are working to resolve issues, but do not always communicate this effectively and quickly	<ul style="list-style-type: none"> • We have commenced project to review our core processes in housing through to 2024/25. We have already reviewed template letters for capital/planned works to ensure they are accessible, relevant and communicate to customers what they want to know. We are engaging with tenants with design and testing. • Implementation of an upgraded housing management and maintenance CRM system

	<p>to improve access and flow of information between teams</p> <ul style="list-style-type: none"> • Made our communication more accessible – a new landing page on our website with accessibility features, rolling out more easy-read versions of our communications, including the customer service standards and lettable standard. We recognise there is more still to do and are undertaking work in 2024/25 to understand all of customers communication needs and preferences
The perception from tenants that the Trust do not do what they say they will do	<ul style="list-style-type: none"> • Introduction of new customer service standards across the organisation so that customers know what to expect from the services they access • Monthly Time for Tenants events for housing customers to speak one to one to a member of our Executive Team about things that are important to them. • Introduction of telephone transactional surveys to get better feedback from tenants that have recently had a repair carried out in their home • Improvement plans and weekly meetings with poor performing contractors to ensure service improvement for both capital programmes and heating contract.
The perception from customer that the Trust do not handle complaints are not handled effectively and a lack of data on transactional complaints satisfaction across all service areas	<ul style="list-style-type: none"> • An external review of our service-specific complaints policies and processes leading a new organisational approach that is much easier for customers to understand and navigate through • The implementation of specific complaints handling training for complaint handlers to ensure the position is valued and staff have the right knowledge and skills to fully investigate complaints for customers.

Appendix 1 – Self-assessment against the Housing Ombudsman Complaint Handling Code

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	In 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	In complaints policy	
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	In complaints policy	
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	Yes	In complaints policy	

	the service request if the resident complains.			
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	In complaints procedure	

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	In complaints policy	
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"> 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. 	Yes	In complaints policy	
2.3	Landlords must accept complaints referred to them within 12 months of the issue occurring or the resident	Yes	In complaints policy	

	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.			
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	In complaints procedure	
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Yes	In complaints procedure	

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	In complaints policy	
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	In complaints policy	
3.3	High volumes of complaints must not be seen as a negative, as they can be indicative of a well-	Yes	In complaints procedure	

	publicised and accessible complaints process. Low complaint volumes are potentially a sign that residents are unable to complain.			
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	In complaints policy	
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	In 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.	Yes	In complaints policy	
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	In complaints policy and letter templates where relevant.	

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	CEO, in complaints policy.	

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	In complaints policy	
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 handling delivered to all relevant staff and complaint handlers	

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	In complaints 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.	Yes	In complaints policy and procedure	
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	In complaints policy	
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	Yes	In complaints procedure	

	expected to go through two complaints processes.			
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Yes	In complaints procedure	
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	In complaints procedure	
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	In complaints procedure	
5.8	At each stage of the complaints process, complaint handlers must: <ul style="list-style-type: none"> 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. 	Yes	In complaints procedure at 4.2	
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	In complaints procedure	
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	Yes	In complaints procedure	

	disabilities a resident has disclosed. Any agreed reasonable adjustments must be kept under active review.			
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	In complaints procedure	
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	In complaints procedure at 4.3	
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	In complaints procedure at 4.4	
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	In complaints procedure at 4.7 and in UB 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	In complaints procedure at 4.7 and in UB Policy	

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	In complaints procedure	
6.2	Complaints must be acknowledged, defined and logged at stage 1 of the complaints procedure <u>within five working days of the complaint being received.</u>	Yes	In complaints policy and procedure	
6.3	Landlords must issue a full response to stage 1 complaints <u>within 10 working days</u> of the complaint being acknowledged.	Yes	In complaints policy and procedure	
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	In policy and procedure (5.7)	
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	In complaints procedure	
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	In complaints procedure	

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	In complaints procedure	
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	In complaints procedure	
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"> 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. 	Yes	In complaints procedure	

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	In complaints policy and procedure	
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	In 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	In complaints procedure	
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Yes	In complaints policy and procedure	
6.14	Landlords must issue a final response to the stage 2 <u>within 20 working days</u> of the complaint being acknowledged.	Yes	In complaints policy	
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	In complaints policy and procedure	
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	In complaints procedure	
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	In complaints procedure	
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	In complaints procedure	
6.19	Landlords must confirm the following in writing to the resident at the completion of stage 2 in clear, plain language: a. the complaint stage; b. the complaint definition; c. the decision on the complaint;	Yes	In complaints procedure	

	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.			
6.20	Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.	Yes	In complaints procedure	

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"> • 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. 	Yes	In complaints policy	
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Yes	In complaints procedure	
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	In complaints procedure	
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes	In complaints procedure	

Section 8: Self-assessment, reporting and compliance

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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.	Yes	In complaints policy and procedure Self-assessment and performance report published on website and link submitted to HOS	
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	In complaints policy and procedure, with report published on website	
8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	Yes	In complaints procedure	
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	Yes	In complaints procedure	
8.5	If a landlord is unable to comply with the Code due to exceptional circumstances, such as a cyber	Yes	In complaints policy	

	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.			
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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	In complaints procedure and annual performance report	
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	Complaints are discussed at Housing Leadership and standard agenda item at team meetings	
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	In complaints procedure Complaints are reported to Tenants Scrutiny Panel and to wider tenants in annual performance report	
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	CEO is accountable for complaint handling	
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	Yes	Trustee Complaints Champion is MRC	

	referred to as the Member Responsible for Complaints ('the 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	In complaints procedure and MRC has contact details of heads of service overseeing 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.	Yes	In complaints procedure	
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.	Yes	In complaints procedure	