

**Vivere Living Limited – Housing Ombudsman Complaint Handling Code
self-assessment form 2023-24**

Section 1: Definition of a complaint

Code provision	Code requirement	Comply: Yes / No	Commentary / explanation
1.2	<p>A complaint must be defined as:</p> <p><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></p>	Yes	<p>The Ombudsman's definition of a complaint is included in the Vivere Living policy and procedure (4.1.6). It has also been used within training delivery provided to staff at the Company.</p>
1.3	<p>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.</p>	Yes	<p>All expressions of dissatisfaction are logged, including when the word ‘complaint’ is not used by the customer. Service requests are logged and given to the relevant team to action within 15 working days.</p> <p>Contacts are triaged by the team to ensure the issue is logged accordingly. This is also overseen by the Complaints Officer. The Company accept complaints from advocates acting on behalf of customers.</p>

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	The difference between a service request and complaint is outlined in the policy. Staff receive ongoing training to recognise the difference and respond to accordingly within the given timescales.
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	All expressions of dissatisfaction are logged, including when the word 'complaint' is not used by the customer.. Staff receive ongoing training to recognise the difference and respond to accordingly within the given timescales.
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	The Complaints team contact every customer that has expressed dissatisfaction with how their complaint has been handled to ascertain if the issue can be corrected or use the feedback for learning – this also applies to feedback from the Tenant Satisfaction Measures (TSM) survey. Negative feedback is viewed as an opportunity to improve services and we promote our complaints process to ensure that customers know how to make a complaint.

Section 2: Exclusions

Code provision	Code requirement	Comply: Yes / No	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	All complaints will be accepted unless the issue does not meet the agreed definition, which is covered in the complaints policy. We will advise customers in writing of the reasons why we have refused to escalate a complaint. Customers can also discuss this with the Complaints Officer.
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. 	Yes	These exclusions are clearly set out within the complaints policy. The Complaints Officer will advise customers in writing of the reasons why we have refused to escalate a complaint. Customers can also discuss any enquiries with the team.

	<ul style="list-style-type: none"> Matters that have previously been considered under the 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.	Yes	This is stipulated in the complaints policy. We will advise customers in writing of the reasons why we have refused to escalate a complaint but will use discretion on a case by case approach when making a decision. Customers can also discuss their case with the Complaints Officer.
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	This is detailed in the complaints policy. We will advise customers in writing of the reasons why we have refused to escalate a complaint. Customers can also discuss their case with the Complaints Officer.
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Yes	Staff receive ongoing training to handle each complaint individual to the circumstances of each complaint. The decision to decline a complaint is discussed between the team and the Complaints Officer.

Section 3: Accessibility and Awareness

Code provision	Code requirement	Comply: Yes / No	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	<p>Customers can make a complaint via their preferred channel:</p> <ul style="list-style-type: none"> • Face to face, • Telephone, • E-mail, • Letter, • Company's website, <p>This is explained in the Complaints Policy.</p> <p>When a complaint is raised, staff have received training to ask if there are any adjustments that are required to be made for the complaint to be handled for them, including any needs or duties under the Equality Act.</p>
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	<p>Staff and Managers receive complaints training, which is supported by the guidance provided in the complaints policy. Mandatory training is undertaken by all new staff. Staff are encouraged to take online courses by the Housing Ombudsman or ARLA.</p>

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	The Company encourage customers to let us know when something is not right. Feedback is welcomed by the Company and recognise that this empowers customers to feel involved in improving services.
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	The complaints policy and procedure is available on our website. Customers may request a hard copy, large print or translation of the policy which the team will arrange.
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	The Company publish the policy and code on our website. Information about the Complaints process is published online. The Company issue a complaints process leaflet with every complaint acknowledgement communication.
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	The Company accept complaints from customer representatives providing we can confirm authority is in place to discuss personal information relevant to the case. Customers are advised that they can be accompanied or have a representative with them when meeting them to discuss a case.

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	This is detailed in the Company's complaints policy and also included in every complaint acknowledgement and also our response letters. It is also on the complaints section of the Company website and staff are aware of the Ombudsman's contact details.
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Section 4: Complaint Handling Staff

Code provision	Code requirement	Comply: Yes / No	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	The complaints team comprises of a Complaints Officer who works closely with all teams to ensure a detailed investigation and response to the customer.
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	The Complaints Officer has access to staff at all levels to facilitate the prompt resolution of complaints and the authority and autonomy to act to resolve disputes promptly and fairly. The Complaints Officer is a senior manager and is fully equipped to handle all complaints in the correct way. They are empowered to work with staff at all levels to ensure timely responses. If there is a need to escalate any issues, this is done via the Executive Director.

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 have been embedded as a core service within the Company. Any complaints and their outcomes are discussed quarterly with the Chief Executive and the staff team for service improvements.
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Section 5: The Complaint Handling Process

Code provision	Code requirement	Comply: Yes / No	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	The Company have one policy in place for the complaints service. All customers will be treated with respect and not treated differently following any complaint made and can still access all other services with no prejudice.
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	Initially the team will seek to resolve issues as a service request. The Complaints Officer deals with all initial complaints. If this complaint is not resolved, this is then reviewed by the Chief Executive. Finally Customers may contact the Ombudsman if they are still not satisfied.

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	Initially the team will seek to resolve issues as a service request. The Complaints Officer deals with all initial complaints. If this complaint is not resolved, this is then reviewed by the Chief Executive. Finally Customers may contact the Ombudsman if they are still not satisfied.
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	The Company takes full responsibility for all complaint responses regarding contractors and will treat all cases as per the policy.
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Yes	The Company takes full responsibility for all complaint responses and will treat all cases as outlined in the policy. The Company may seek information from third parties during an investigation but the matter will be conducted internally as per the policy.
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	The Complaints Officer has undergone training to write acknowledgement letters and to break down the reasons for the complaint – demonstrating understanding of the complaint and desired outcomes in writing. If the issues are not clear, the Officer will contact the customer to discuss in more detail.

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	The Complaints Officer acknowledges complaints and has undergone training to break down the reasons for the complaint and gain an understanding of how the complaint can be resolved. They will explain reasons if there any aspects of the complaint the Company may not be responsible for. The Complaints Officer will also contact the customer to discuss the complaint further as part of their investigation and to ensure clarity on each point raised.
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.	Yes	Staff use an evidence based approach where possible. If there are any areas where conflict of interest is believed to be present, steps are taken to ensure that this has no impact on the investigation. Staff undertake regular training and quality monitoring is undertaken to ensure that the investigation is conducted in the correct manner.
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 cases where an extension is required, the Complaints Officer will contact the customer to agree a new date and explain the reasons why there is a delay. The Housing Ombudsman contact details are also provided to customers in all complaint correspondence and on our website in

			cases where the customer does not accept the change in timescales.
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	When a complaint is made, staff ask if there are any reasonable adjustments we may need to be aware of in order to handle their complaint in the best way possible. Vulnerabilities are logged on the customer account.
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	This is covered in the complaints policy. We will advise customers in writing of the reasons why we have refused to escalate a complaint although it is rare that we will do so. The Company keep a record of any refusals.
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	All case records are held on our CRM and all relevant documentation regarding the case will be stored in online files.

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.		Staff receive ongoing training to ensure that a complaint is remedied at the earliest time with no delays to the customer where possible.
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	The Company has an Unacceptable Behaviour policy which is approved by Board and is published on our website. The policy clearly outlines our approach to managing 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	This approach is considered and detailed in the Unacceptable Behaviour policies and takes into account the provisions of the Equality Act.

Section 6: Complaints Stages

Stage 1

Code provision	Code requirement	Comply: Yes / No	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	Contacts are triaged by the Complaints officer to ensure the issue is logged accordingly. All staff are empowered to resolve complaints as early as possible.
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	All complaints are acknowledged within 3 working days of receiving the complaint by the Complaints Officer but usually much quicker than this timescale.
6.3	Landlords must issue a full response to stage 1 complaints <u>within 10 working days</u> of the complaint being acknowledged.	Yes	Our Review response timescale is 10 working days which is measured and reported to the board quarterly.
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	Yes	The Company aim to understand as quickly as possible whether a complaint is likely to require an extension beyond the 10 day target. In cases where an extension is required, the Complaints Officer will

	<p>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.</p>		<p>contact the customer to agree a new date and explain the reasons why. The Housing Ombudsman contact details are also provided to customers in all complaint correspondence and on our website in cases where the customer is not happy with the change in timescales.</p>
6.5	<p>When an organisation informs a resident about an extension to these timescales, they must be provided with the contact details of the Ombudsman.</p>	Yes	<p>The Complaints Officer includes the Ombudsman contacts details when advising of an extension of timescales. Customers are also regularly reminded of their right to approach the Housing Ombudsman at any stage of their complaint.</p>
6.6	<p>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.</p>	Yes	<p>Staff undertake regular training and are expected to provide the response letter once the investigation is complete within the given timescales. Outstanding actions are the responsibility of the Complaints Officer to monitor and action and keep the customer informed.</p>
6.7	<p>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.</p>	Yes	<p>We ensure that every aspect of a complaint is responded to accordingly. All points are covered in regular team meetings with staff.</p>

6.8	<p>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.</p>	Yes	<p>Should any new issues arise during the investigation, we aim to incorporate these into the original response. If matters are not related to the original complaint, or the deadline is very near, we will discuss with the customer about either extending the response due date or opening a separate case.</p>
6.9	<p>Landlords must confirm the following in writing to the resident at the completion of stage 1 in clear, plain language:</p> <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	<p>This is required as part of our Complaint Review. Staff have received training to ensure that every point is answered to. Letters have been structured to ensure all the requirements are included.</p> <p>All letters are quality checked before they are sent by the Complaints Officer.</p>

Stage 2

Code provision	Code requirement	Comply: Yes / No	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	Within the written response to the Investigation, customers are informed about their right to escalate to Review stage if they remain dissatisfied with the first response. The Company ask that the customer informs us within 28 days if they wish to escalate but we would consider requests outside of that time. We do not require a reason for the escalation as per the Housing Ombudsman code.
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	The Company will acknowledge the escalation request within 5 working days. Our Appeal response timescale is 15 working days.
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	The Company will not obstruct the customers right to progress the complaint because of the lack of clarity around why the customer remains dissatisfied but the Complaints Officer will contact the customer to aim to gain a better understanding of the desired outcome of the customer.
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Yes	Appeal complaints are allocated to a Director, normally the Chief Executive, that was not previously involved in the Investigation stage response.

6.14	Landlords must issue a final response to the stage 2 <u>within 20 working days</u> of the complaint being acknowledged.	Yes	Investigations and the response letter will be concluded within 15 working days. Where this is not possible, the customer will be advised and informed about the reason why.
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 cases where an extension is required, the Complaints Officer will contact the customer to agree a new date and explain the reasons why. We will endeavour to let the customer know well in advance of the due date where possible.
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 cases where an extension is required, the Complaints Officer will contact the customer to agree a new date and explain the reasons why. The Housing Ombudsman contact details are also provided to customers in all complaint correspondence and on our website in cases where the customer is dissatisfied with the change in timescales.
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	Yes	Review stage complaints may be closed with outstanding actions which are not able to be closed ahead of the response due date. Staff are responsible for remaining in contact with the customer about any outstanding actions.

	actioned promptly with appropriate updates provided to the resident.		
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	All information is provided in the Review stage response. Letters ensure all the requirements are included. All staff responsible for dealing with complaints have received.
6.19	Landlords must confirm the following in writing to the resident at the completion of stage 2 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 the Ombudsman Service if the individual remains dissatisfied. 	Yes	Letters have been structured using the Housing Ombudsman's template which ensures all the requirements are included. All letters are quality checked prior to being sent to the customer by the Complaints Officer.
6.20	Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.	Yes	The Complaints Officer allocate Appeal stage complaints to a Director. The Director is supported by the Complaints Officer to respond to the customer.

Section 7: Putting things right

Code provision	Code requirement	Comply: Yes / No	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	<p>The Company recognise that it is important to offer an apology early on in the process when something has gone wrong.</p> <p>There are a number of ways in which the Company will offer an apology and remedy including:</p> <ul style="list-style-type: none"> • Acknowledging when we have made errors • Providing the reasons as to why they happened • Saying sorry • Taking action where needed • Changing a decision • Updating records • Compensation • Changing policies or procedures
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Yes	Training has been provided to staff to ensure that they take in to consideration the impact of any fault/s on the customer. The Ombudsman's remedies guide is considered to decide on relevant amounts for monetary amounts.

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	Where possible, the Company will provide dates to complete any actions within the response letter. If this is not possible, it is the responsibility of the Complaints Officer to monitor and keep in touch with the customer.
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes	The Company's policy takes account of the guidance issued by the Ombudsman and is used when considering remedies. The Company also use the 'Remedies and Compensation guidance' issued by the Ombudsman.

Section 8: Self-assessment, reporting and compliance

Code provision	Code requirement	Comply: Yes / No	Commentary / explanation
8.1	<p>Landlords must produce an annual complaints performance and service improvement report for scrutiny and challenge, which must include:</p> <ul style="list-style-type: none"> 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	<p>The Company produces quarterly and annual reports that are shared with the Board and the staff team.</p>

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	The Company produces quarterly and annual reports that are shared with the Board and the staff team.
8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	Yes	The Company have completed the self-assessment annually. In the case of significant changes, we will review and publish the re-assessed version.
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	Yes	The Company will review and update the form following any request from the Ombudsman.
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	The Complaints team will notify the Ombudsman if any exceptional circumstances occur.

Section 9: Scrutiny & oversight: continuous learning and improvement

Code provision	Code requirement	Comply: Yes / No	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	Staff and Managers receive complaints training, which is supported by the guidance provided in the complaints policy. Complaints are used as a tool to identify learning opportunities. Trends of root causes of complaints are shared with Senior Management on a quarterly basis.
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	Staff and Managers receive complaints training, which is supported by the guidance provided in the complaints policy, procedure and compensation policy. Learning processes are delivered with the support of the Complaints Officer which includes driving a positive culture around complaints and making changes where necessary.
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	Updates are provided to Board and staff regularly and our annual report to tenants.

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 Complaints Officer is a Senior Manager within the organisation. They are responsible for identifying any themes or trends which pin point potential systemic issues, serious risks, or policies and procedures that require revision.
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	The MCR is the Chief Executive Officer. The MCR meets with the Complaints Officer quarterly or as required.
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	All complaints performance including Ombudsman determinations are reported to the MRC and the Board.

9.7	<p>As a minimum, the MRC and the governing body (or equivalent) must receive:</p> <ul style="list-style-type: none"> 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	<p>All complaints performance including Ombudsman determinations are reported to the MRC and the Board on a regular basis throughout the year.</p>
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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"> a. have a collaborative and cooperative 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	<p>We uphold the highest standards in complaint handling and amend our approach to reflect best practice. All staff are responsible for their awareness of the complaints policy and procedure and have received training. All staff have consideration for Customer Service, including complaints as part of their annual performance review.</p>
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