



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 complaint's performance and service improvement report on their website. The governing body's response to the report must be published alongside this.

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

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

Section 1: Definition of a complaint

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
1.2	A complaint must be defined as: <i>'an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the landlord, its own staff, or those acting on its behalf, affecting a resident or group of residents.'</i>	Yes	Complaints Policy Section 3 – definition sub section 3.1 https://www.hhal.org.uk/wp-content/uploads/2024/10/Customer-Complaints-and-Feedback-Policy-2024.pdf	Harrogate Flower Fund Homes(HFFH) follow all the same policies of the managing agent – Harrogate Housing Association (HHA).



Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
1.3	A resident does not have to use the word 'complaint' for it to be treated as such. Whenever a resident expresses dissatisfaction landlords must give them the choice to make complaint. A complaint that is submitted via a third party or representative must be handled in line with the landlord's complaints policy.	Yes	Complaints Policy Section 4, sub section 4.1 Complaints are accepted in various different ways.	
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	Complaints Policy Section 3 sub Section 3.1 Definitions. Service Requests are recorded on a spreadsheet, progress is updated and is monitored by the Operations Manager.	
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	Section 5.1 advises that we aim for a right first time approach and provides for the escalation from dissatisfaction to complaint process. There is an example of where a service request has been escalated to a complaint.	



Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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	Complaints policy Section 3 sub section 3.2 Survey outcomes where a dissatisfaction has been noted by the Housing management team for resolution.	This will be made explicit in the residents meeting with the Board (Summer and Winter) Annual Tenancy Visits with the Board member, and in the Newsletter. These contacts will encourage residents to contact HHA if they are unhappy with anything

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	Section 3, subsection 3.2, defines what will not be registered as a complaint	We have not refused a complaint in the last 12 months.
2.2	A complaints policy must set out the circumstances in which a matter will not be considered as a complaint or escalated, and these circumstances must be fair and reasonable to residents. Acceptable exclusions	Yes	Section 3.2 identifies what the Association will not consider a complaint and the reasons why this would be excluded from the process. This would always be explained to the customer.	Residents will be advised to look at the Complaints Policy on HHA's website in the Summer Newsletter

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	<p>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. 			
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 contained section 4.3. The timescale is quoted as 6 months but gives consideration to the circumstances and enables discretion by treating each situation on an individual basis.	<p>A complaint in the year was a matter over 6 months and was investigated. We have never refused a complaint due to age of issue.</p> <p>The policy will be reviewed in July 2024 and the extension to 12 months will be included.</p>
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	Yes	Section 3.2 The reasons for refusing would be sent out to the customer as per the policy. To date the Association has accepted all complaints received.	



Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	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.			
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Yes	Section 2.1 and 4.3 It is clear in the policy that each individual complaint is treated as a unique issue.	

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	Section 4.0 and sub section 4.2 A range of options for people to make a complaint are provided and the Association will if required make reasonable adjustments to allow this to happen. All customers making a complaint are sent an easy to read flowchart on the process, as per 5.6.1 and 5.6.2.	
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	Section 4.0 This has been re iterated at staff training sessions. Induction of new staff also empowers them to take on the actions to resolve the problem or proceed through the complaints process.	Residents have access to officers' direct email as well as info@hhal.org.uk



Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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	Section 1.0 and Section 2.0 Complaints are encouraged as a way to learn to improve the services we deliver. We promote this through our Newsletters and HHA Facebook posts.	
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 is available on the website. Copies of the flowcharts (5.6.1 and 5.6.2) are sent out to the complainant and hard copies are available.	
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 current policy does not say how the landlord will publicise details of the policy, including information about the Ombudsman and the Code. Details about the Ombudsman have been published in the Newsletters. All formal letters on complaints have details on how to contact the Ombudsman.	
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	Section 4.0 Customers are able to have a person of support with them at any meeting with us around the resolution and review of the complaint. We have an example of where this has happened.	We have worked with CAB as an advocate
3.7	Landlords must provide residents with	Yes	Section 5.0 This is advised to	This will be explicit in the



Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	information on their right to access the Ombudsman service and how the individual can engage with the Ombudsman about their complaint.		customers throughout the process of the complaint and contained in the formal responses through the complaint process. Complaints check list also covers the requirement when quality checking complaints and training of staff reenforces the message.	policy in July 2024

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	The Operations Manager is the Association's person responsible for complaint handling including liaison with the Ombudsman and responsible to the governing body.	Complaints are reported to HFFH Board quarterly as well as annually
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	Yes	The Operations Manager has the necessary access to all staff to facilitate a prompt resolution and the authority and autonomy to act and resolve disputes	



	promptly and fairly.		promptly and fairly.	
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	Staff Training is undertaken on complaints and their role in it. Promotion of the Ombudsman's e learning to staff and in the induction of new staff also cover a detailed understanding of complaints.	

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	Section 2.0 "HHA listens to individuals, treat them fairly."	
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	Section 3.0 and Section 5.0 At all stages the customer is advised that they can seek support/help from the Ombudsman	
5.3	A process with more than two stages is not acceptable under any	Yes	There are 2 formal stages in the complaints process. Advice to	See flow charts Sections 5.6.1 and 5.6.2



Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	circumstances as this will make the complaint process unduly long and delay access to the Ombudsman.		the customer is always provided to contact the Ombudsman	
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 complaints process is handled solely by the Association.	
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	N/A		
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	Section 5 On initial receipt of the complaint the issue is noted repeated back to the customer to ensure understanding and then in acknowledgement of the complaint this is also contained in the letter and requested if this is incorrect to contact the association.	
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	Yes	Section 5 The letters are headed at what stage of complaint and points addressed are clearly set out. The association closely follows the	

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	clear.		Ombudsman's suggested format. We are clear what we will respond to and what is not our responsibility and why.	
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	Section 5 Complaints are discussed individually to clearly understand the issues from the customers point of view. Resolutions of what the customer would consider appropriate is also taken into account before a formal response is provided.	
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	At the earliest opportunity if a delay is identified, which is reasonable, this is agreed with the customer once the explanation is provided or if a delay that fits in with the customers, then a response date is agreed to maximum of 10 working days.	We are committed to responding to complaints within the timescales. Extensions are used in exceptional circumstances or that fit in with the customer requirements.
5.10	Landlords must make reasonable adjustments for residents where appropriate under the Equality Act 2010. Landlords must keep a record	Yes	Section 4.0 Where this is identified by the customer or representative then the Association will respond and	We log any vulnerabilities that we are aware of on the CRM system but always consider what the customer requests.



Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	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.		make what reasonable adjustments are required by the customer.	
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	Section 5.0 provides the exceptions where the Association may refuse to take the complaint through the stages. The association has to date not refused any escalation of the complaints process.	Stage 1 response clearly sets out how the complaint can be escalated.
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 communication, letters and outcomes are stored on the Association's computer shared drive system. These are stored and accessible for staff. Conversations are updated on the Housing Management system Customer Relations Module (CRM).	All complaints are given a unique reference number and recorded on a spreadsheet.
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	Yes	We seek to remedy complaints at the earliest possible opportunity, keeping an ongoing dialogue with the customer. Section 6.0 identifies service recovery and Goodwill gesture	Our policy allows for early resolution and our staff are able to make decisions to do this to achieve the outcomes the resident wants.



Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	complaints process without the need for escalation.		system applied at discretion in response to the complaints escalation.	
5.14	Landlords must have policies and procedures in place for managing unacceptable behaviour from residents and/or their representatives. Landlords must be able to evidence reasons for putting any restrictions in place and must keep restrictions under regular review.	Yes	Section 4.6 advises how unacceptable behaviour will be managed.	
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	Section 4.6 The decision is provided on why and what the Association can restrict and are specific to each individual case.	No one has had any restrictions placed on them whilst in the Complaints process.

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	Yes	Section 2.0 and section 5.0 The Operations Manager will have an overview of the complaint and will discuss the action to be taken in respect of each individual complaint	We update our CRM system on vulnerabilities to inform staff but as we are a small local association we are also able to discuss with customers directly and manage swift responses to



	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.			their complaint.
6.2	Complaints must be acknowledged, defined and logged at stage 1 of the complaint's procedure <u>within five working days of the complaint being received</u> .	Yes	Section 6.0 The Association acknowledgement is within this requirement and a check list monitors performance of this.	Checklist and response quality are monitored by the Operations Manager.
6.3	Landlords must issue a full response to stage 1 complaints <u>within 10 working days</u> of the complaint being acknowledged.	Yes	Section 6.0 The Association monitors response to be delivered with the timescale.	
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	The Association does not make unnecessary delays but if required this is done in conjunction with the customer	
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	This is part of the letter response, and complaints check list contains all processes to follow including information on Ombudsman	
6.6	A complaint response must be	Yes	Section 5.0 Information of any	



	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.		outstanding work is detailed with what work is ordered and when this is due to be completed and monitored by the complaint handler and customer updated.	
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	Section 5.0 Each point is addressed and what response/action we are taking and why. Complaints checklist to ensure all points are covered.	
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	Section 5.0 Any additional issues raised are logged as a separate complaint if they can't be included without detriment to the current complaint.	
6.9	Landlords must confirm the following in writing to the resident at the completion of stage 1 in clear, plain language:	Yes	A standard format in responding to complaints is used covering all the elements. The Association has developed a	



	<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. 		<p>Check list to work both as an aide for staff and a review at the end of the complaints process which helps ensure the consistency of responses in respect of covering these requirements.</p>	
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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	Section 5.0 and Section 6.0 details how this will be delivered	This is also stated on the Stage 1 letter if they remain unhappy this can be progressed to stage 2
6.11	Requests for stage 2 must be acknowledged, defined and logged at stage 2 of the complaint's procedure within five working days of the escalation request being received.	Yes	Section 5.0 and Section 6.0 details how this will be delivered	
6.12	Residents must not be required to explain their reasons for requesting a stage 2 consideration. Landlords are	Yes	For successful review we ascertain why the resolution provided did not resolve their	



	expected to make reasonable efforts to understand why a resident remains unhappy as part of its stage 2 response.		complaint. This is contained in the Complaints Policy	
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Yes	This is in Section 5.0 of the Policy	
6.14	Landlords must issue a final response to the stage 2 <u>within 20 working days</u> of the complaint being acknowledged.	Yes	The time scales are contained within the Section 6.0	
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	We aim to resolve the complaint as soon as possible where an extension is needed the reasons are provided and agreed with the customer making, the complaint.	
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	This is part of the standard response. A check list for staff confirms what action to take. Example of this is available on request.	
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.	Yes	Details of action and completion dates are provided to customers. Examples of this are available on request.	

	Outstanding actions must still be tracked and 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	We achieve this by addressing each point in a clear way and what we are going to do about the complaint. We follow an Ombudsman letter template to do so.	
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	We achieve this by addressing each point in a clear way and what we are going to do about the complaint. We follow an Ombudsman letter template to do so. Section 5.0 and Section 6.0	
6.20	Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.	Yes	Section 5 and Section 6 This is set out in the letter and Reviews are dealt with by the Operations Manager	

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	Section 5 and Section 6 Check list on complaints provides a reminder to cover all points. All housing management staff are empowered to take ownership make appropriate outcomes and gestures that fairly put things right.	
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Yes	Section 6.0 Remedies are clearly set out in the letter.	
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	Yes	Section 6.0 Details of why it is offered, for an amount/ or other works and what that is in respect of.	



	completion.			
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes	Section 6.0 This is acknowledged in any correspondence back to the resident making the complaint.	

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;	Yes	Annual Self Assessment is available on the HFFH website. Section 8.0 HFFH Board are provided with themes and qualitative and quantitative information in respect of the complaints in the Annual Report on Complaints. Lessons Learnt are advise as well as any changes as a direct result of complaints resolutions. Board also receive this information on quarterly performance information, as well as an annual review of complaints, which includes any Ombudsman non- compliance	Annual Complaints Performance and Service Improvement Report provide to Board on 25 February 2025

	<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>		<p>reports if applicable.</p> <p>Board are advised of what service improvements that have been made.</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 Board receive the annual complaints performance and the Self-Assessment is published on the HFFH website. This is published alongside the governing bodies response	
8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	N/A	This is noted and will be done if such a process occurs.	
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.		This will be done as and when appropriate	
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.		This is noted and will be done if required.	



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	Section 7.0 and 8.0 states that we use complaints to make improvements to how we deliver our service to all residents.	HHA Customer Liaison Committee review trends and Lessons Learnt
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	Section 1.0, 2.0 and Section 7.0 and Section 8.0 all support a positive complaint handling culture. This is also achieved through training and a positive Lessons learnt culture.	Team Huddles promote a positive culture on complaints.
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	Section 7.0 and 8.0 The HFFH Board receive information on complaints and check responses are customer focussed. Staff training with residents on complaints will encourage a positive culture on complaints.	
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,	Yes	Section 8.0 The Operational Manager takes on this role and reports back to Board.	

	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	An MRC has been appointed who is a Board member.	
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	The MRC is provided with access to suitable information as a part of their role.	
9.7	As a minimum, the MRC, and the governing body (or equivalent) must receive: <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 	Yes	Section 8.0 This is provided in their role as part of the Board.	



	severe maladministration findings; and d. annual complaints performance and service improvement report.			
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	Section 2.0 and 8.0 This is reviewed at 121 and also in training providing a positive approach to resolving complaints and learning from them	