

Self-assessment Against The Complaints Handling Code

May 2025

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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	<p>The definition is included in our policy and all relevant materials relating to complaints and training. It has been discussed with the resident complaint panel.</p> <p>The statement is included and explained on pages two and four of our Complaints and Compliments Policy and Procedure complaints-policy-and-procedure-june-2024.pdf</p>	<p>Website definition Housing 21 - Housing 21 will manage complaints as per the Housing Ombudsman's Complaint Handling Code</p> <p>Residents complaint leaflet https://tinyurl.com/2p9m3uhm</p>
1.3	A resident does not have to use the word ‘complaint’ for it to be treated as such. Whenever a	Yes	Section three of the Complaints and Compliments Policy and Procedure explains that whenever a resident expressed dissatisfaction, they should be offered the opportunity to make a complaint.	The resident facing ‘Guide to making a suggestion, comment, compliment or complaint’ includes this.

	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>The policy includes getting representation to make a complaint in section four.</p> <p>All awareness raising and training specifically focuses on the fact that residents do not have to say the word 'complaint' for us to offer the opportunity to make a formal complaint.</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	<p>The difference between a service request and a complaint is set out in section three of the complaints policy. <i>'a request from a resident to the landlord requiring action to be taken to put something right'</i></p> <p>Further guidance has been developed for employees within a Housing 21 context to ensure understanding. We record service requests in different ways and on different systems such as repairs and an incident recording system for safeguarding and ASB. Service requests outside of these systems will be logged on our complaints system and be monitored and reviewed regularly.</p> <p>Stage one complaint logs are reviewed by the complaints team and also triaged to ensure they have been correctly recorded as a complaint.</p>	<p>Resident Complaint Video on the 2024 code</p> <p>housing21.org.uk/media/17003/the-social-housing-regulation-act-resident-video-1.mp4</p>

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	Housing 21 has an ethos to make right all service requests irrespective of whether these turn into complaints and all service requests will be dealt with promptly whether the resident has made a complaint or not.	
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	Yes	How to complain information is included on all surveys undertaken throughout Housing 21. The external agency undertaking surveys makes us aware of any comments which may be seen as a complaint for follow up.	

	about their services, they also must provide details of how residents can complain.			
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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	<p>Each complaint is accepted as default unless a valid reason is detailed and accepted by a Head of Service. Each complaint is considered on its own merits and we do not take a blanket approach.</p> <p>Section 3.2 of the Complaints Policy states that the issue may be dealt with through other procedures such as repairs or ASB. Appendix A contains a flow chart to support this decision-making process.</p> <p>Section 4 details the reasons for the complaint being dealt with in an alternative way, the Head of Service is responsible for this decision</p>	
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			

	<p>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	<p>Section 5.1 of the policy explains the 12 month timescale although we will still consider each complaint on its own merit.</p> <p>Section 4 of the policy 'are all complaints dealt with under this procedure?' includes the exclusion where legal proceedings have started.</p> <p>Section 4.1 of the policy also references where matters have previously been considered.</p>	
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	Section 5.1 of the policy explains that all complaints occurring within 12 months of the resident becoming aware of the issues will be accepted. However, each complaint will be dealt with on its own merit, so discretion after this time will be applied	
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	Yes	Section 4.2 of our policy explains that if Housing 21 does not accept a complaint, the complainant is informed in writing, including the rationale as to why this is the case. Details of	

	not agree that the exclusion has been fairly applied, the Ombudsman may tell the landlord to take on the complaint.		the Ombudsman are included in all correspondence.	
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Yes	Each complaint is considered on its own merit and is dealt with on an individual basis with investigations carried out by the most appropriate person following a complaint	

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	Housing 21 aspires to embed diversity and inclusion within all our organisational activities and section 6 of the complaints policy states that we accept complaints through a number of different channels. A number of potential adjustments are available including large print, translations and other formats as requested as part of our Reasonable Adjustments / Alternative Formats Policy, alongside the website accessibility tools when viewed on our website. The policy has an Equality Impact Assessment in place.	
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	Yes	Section 6 of the complaints policy details the various ways in which a complaint can be raised and the process for getting it to the most appropriate person to respond.	

	to the appropriate person within the landlord.		Training is provided to operational employees and those who have contact with residents or their advocates. All complaints are recorded centrally to ensure oversight.	
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	We foster a positive complaint handling culture and encourage residents to complain. Work is undertaken on those areas of the organisation which receive a low volume to ascertain the reason and ensure that barriers are not in place.	Contact Housing 21 about feedback, complaints, compliments or repairs
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 policy is available on our website and the two-stage process is explained, it has been agreed by the residents complaint panel in terms of accessibility. Information on how to complain is displayed at each scheme, published in scheme newsletters, the resident handbook and a resident complaints leaflet.	complaints-policy-and-procedure-june-2024.pdf Information on complaints is included in scheme newsletters Residents complaint leaflet https://tinyurl.com/2p9m3uhm
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	Section 9 of the policy explains where and how we provide information about the Ombudsman and the code.	

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 5 of the complaints policy details who can make a complaint and section 5.3 states their right to be accompanied or represented.	
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	The Ombudsman details are included in all complaints materials as well as any other materials such as surveys, newsletters and the resident handbook which are received by residents.	<p>The Ombudsman information is contained on page 20 of the Residents Handbook</p> <p>The resident facing 'Guide to making a suggestion, comment, compliment or complaint' includes this.</p>

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	Housing 21 has complaints officers in both its business streams of Extra Care and Retirement Living to oversee the complaints process. However, they are handled at a local level in line with our devolved model. Complaints are regularly reported to Board and Committees as part of the KPI reporting and an in-depth report submitted on an annual basis.	
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 officers in both Retirement Living and Extra Care have access to employees at all levels to ensure the prompt resolution of complaints. This is in section 8.4 of the 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	Yes	Housing 21 fosters a positive complaint handling process and reinforces the importance of complaints and the lessons we learn from them. Training around complaints is provided to operational colleagues.	

	core service and must be resourced to handle complaints effectively			
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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	There is a single policy in place which clearly states that residents will not be treated differently if they complain. Section 5.4 states that residents must not be treated differently as a result of making a complaint.	Resident literature is being updated to include this
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	Early resolution remains key to our service delivery. We do not have an informal complaints stage.	
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	Housing 21 has a two stage complaints process.	
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	Yes	No complaints are handled by a third party. Where a complaint involves a third party, we will approach them on behalf of the	

	two stage complaints process set out in this Code. Residents must not be expected to go through two complaints processes.		complainant and provide their response as part of our own formal response.	
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Yes	Complaints are not handled by a third party.	
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 eight of the complaints and compliments policy outlines the procedure including gaining clarity about the understanding of the complaint. At both stage one and stage two, the resident is contacted to ensure a joint understanding of the complaint by both the resident and Housing 21 and confirmed via the acknowledgement letter with an invite to let us know if any aspect is unclear or incorrect. They are also asked what outcomes they are seeking.	
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	We would confirm as part of our policy where a service was not our responsibility (see section four of the complaints policy) and therefore excluded from our complaints process. Our suite of complaint literature and guidance	

			supports an explanation of this as part of the acknowledgement where it forms part of a wider complaint	
5.8	<p>At each stage of the complaints process, complaint handlers must:</p> <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	<p>Housing 21's suite of guidance, investigation forms and management guidance support complaint handlers to address these areas of the code.</p> <p>Stage one responses are reviewed by line managers to ensure a full and fair response.</p> <p>Any training issues would be addressed by the line manager.</p>	
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	<p>Housing 21's aim is to always respond with within the specified timescales or the specified extensions. Should a response fall outside of these, the advice of the Complaints Officer would be sought and contact arrangements put into place in agreement with the complainant.</p>	
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	Yes	<p>Housing 21's investigation process requires complaint handlers to identify and discuss any disabilities, vulnerabilities or reasonable adjustments, all of</p>	

	resident has disclosed. Any agreed reasonable adjustments must be kept under active review.		which are included for line manager review. Any reasonable adjustments or vulnerabilities are recorded on our complaints handling system.	
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	Housing 21 will not refuse to escalate a complaint through the stages of the complaints process, unless there are valid reasons which will be identified and explored - this will only be in exceptional cases and are defined within the policy for not accepting a complaint	
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 elements of the complaint and any related correspondence are kept on ERICA (the complaints reporting system). This ensures there is a full picture of the complaint and responses.	
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	Housing 21 seeks to find a resolution to a complaint as soon as is practicable. The stage of the complaint doesn't impact on any issues being resolved. Remedies can be applied both within or outside of the complaints policy and at any	

			stage within the complaints process.	
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	<p>An Unacceptable Behaviour Policy was approved in June 2024. This replaced the previous persistent complainant policy previously in place.</p> <p>The reasons for putting any restrictions in place are stated on the website and in section 4 of the policy.</p>	Housing 21 - Types of Unreasonable and 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	Any restrictions are considered with regard for the Equality Act 2010. The policy approval process requires the completion of an Equality Impact Assessment.	

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	Each complaint is considered at stage one, and this identifies the level of complexity of a complaint as well as taking into account other factors such as the vulnerability of the resident and whether they are in any risk. Should an extension be required, we would always seek to agree this with the complainant initially.	
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	The process for this is in place, it is outlined in the policy and template letters are supplied containing all the necessary information and is logged on our complaints system, ERICA. Our target is to acknowledge 100% of stage one complaints within five working days	
6.3	Landlords must issue a full response to stage 1 complaints <u>within 10 working days</u> of the complaint being acknowledged.	Yes	The policy states that a response should be issued within 10 working days, but earlier if the investigation has been undertaken. We have template	

			<p>letters in place to support this.</p> <p>Our target is to acknowledge 100% of stage one complaints within 10 days.</p>	
6.4	<p>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.</p>	Yes	<p>Each complaint is assessed and this includes the level of complexity. The triage stage also identifies whether there are any other factors which impact on the ability to provide a response within 10 working days. The resident is always consulted if an extension is required as outlines in section 8 of the policy.</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 process for this is in place, section 8 of the policy outlines the process and response times and template letters are provided on the intranet for complaint handlers and they contain all of the necessary information.</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>Section 8 of the policy makes it clear that a response must be provided to the resident when the answer to the complaint is known with timelines and action plans included. This is included in our training around complaints</p>	
6.7	<p>Landlords must address all points raised in the complaint definition and provide clear reasons for any</p>	Yes	<p>Our training, management guidance and letter templates support the complaint handler to</p>	

	decisions, referencing the relevant policy, law and good practice where appropriate.		do this. The complaint definition and desired outcomes are included within the complaint acknowledgement. The line manager is required to sign off all stage one responses.	
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 8 of the policy and the management guidance outlines this approach which is reinforced by training.	
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	The process for this is in place, it is outlined in the management guidance and template letters are supplied containing all the necessary information and prompts for inclusion of this information.	

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 the response letter for stage 1 the complainant is given the option of progressing to stage two which is the final stage of the process and the stage 2 response letter makes this clear.	
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 process for this is in place, section 8 of the policy outlines the process and response times and template letters are provided on the intranet for complaint handlers and they contain all of the necessary information.	
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	Residents escalating to stage two are offered a stage two conversation to help understand why the resident is unhappy with their stage one complaint response, but they are informed that it is not compulsory as they are not required to give a reason, but that this may help inform the stage two investigation. This information is contained in section 7 of 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	As per section 8 of our policy, stage one complaints are handled by employees who are more local to the residents and stage two are handled by the Managing Directors with support from their deputies to ensure an impartial review of the stage one investigation and response, and stage two investigation	
6.14	Landlords must issue a final response to the stage 2 <u>within 20 working days</u> of the complaint being acknowledged.	Yes	This guidance is contained in section 8.7 of the complaints policy and also within the management guidance. We also have template letters in place to support this. Our target is 100%	
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	The stage two handler identifies whether there are any factors which impact on the ability to provide a response within 20 working days. The resident is always consulted if an extension is required.	
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 information is included in the relevant templates used as part of the complaints process.	
6.17	A complaint response must be provided to the resident when the answer to the complaint is known, not when the	Yes	This approach is contained within the policy and	

	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.		management guidance and reinforced by training.	
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	This approach is contained within the management guidance for complaint handlers. The stage two response is reviewed by the complaints team and Managing Director to ensure a full response.	
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	The process for this is in place, it is outlined in the management guidance and template letters are supplied containing all the necessary information. The stage two response is reviewed by the complaints team and Managing Director to ensure a full response.	
6.20	Stage 2 is the landlord's final response and must involve all suitable staff	Yes	Stage two is the final response stage, section 8.8 of the complaints policy clearly states	

	members needed to issue such a response.		this. The responses are handled by the Managing Directors of the relevant business streams	
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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	This is included in the policy and guidance. We also have a Compensation Policy in place.	
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Yes	The Compensation Policy provides guidance on the level based on the impact which the issue has had on the resident.	

			Any other remedy takes into account the resident's individual circumstances, including their vulnerability and the length of time the issue has impacted on them	
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	This is included in section 8 of the compensation policy and in the management guidance and logged on ERICA. Subsequent quality assurance checks confirm any financial redress has been paid	
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes	The Compensation Policy, and other remedy guidance have been developed in line with the guidance issued by the Ombudsman.	

Section 8: Putting things right

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
8.1	<p>Landlords must produce an annual complaints performance and service improvement report for scrutiny and challenge, which must include:</p> <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 complaints performance and service improvement report is available on our website for 2023/24 [insert weblink]. It contains the required information.</p> <p>The report is published on our website and shared with the Resident Complaint Panel and other resident groups.</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 annual complaints performance and service improvement report is published on Housing 21's website and includes the Board's response as a preface.	
8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	Yes	This will be undertaken if any major restructure or merger takes place	
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	Yes	Housing 21 would undertake a further self assessment in this circumstance.	
8.5	If a landlord is unable to comply with the Code due to exceptional circumstances, such as a cyber incident, they must inform the Ombudsman, provide information to residents who may be affected, and publish this on their website Landlords must provide a timescale for returning to compliance with the Code.	Yes	This is included within Housing 21's business continuity plan should a cyber incident occur or extended suspension to our complaint recording system, ERICA, for example	

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	When assessing lessons learnt, Housing 21 determines the extent of those lessons learnt and the parts of the organisation which these lessons need to be embedded in. Information on lessons learnt is available in various publications on the website	
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	Lessons learnt are captured and also discussed at the resident's complaint panel as well as the employee complaint panel. A centrally held record is maintained of lessons learnt and responsibility for implementing them.	
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	Lessons learnt and improvements are reported to Committees and Board on a regular basis. They are also presented to the employee and residents' complaints panel and included in the resident's newsletters.	

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 Managing Director of Retirement Living is the named Executive employee.	
9.5	In addition to this a member of the governing body (or equivalent) must be appointed to have lead responsibility for complaints to support a positive complaint handling culture. This person is referred to as the Member Responsible for Complaints ('the MRC').	Yes	A resident Board member is the appointed MRC. They have an open invitation to the lessons learnt employee group and the resident complaint panel.	
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	Information is regularly provided to the MRC, and they have access to the complaints team.	
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;	Yes	Performance reporting is provided to Board and Committee as well as individually to the MRC.	

	<p>b. regular reviews of issues and trends arising from complaint handling;</p> <p>c. regular updates on the outcomes of the Ombudsman's investigations and progress made in complying with orders related to severe maladministration findings; and</p> <p>d. annual complaints performance and service improvement report.</p>			
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> <p>a. have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments;</p> <p>b. take collective responsibility for any shortfalls identified through complaints, rather than blaming others; and</p> <p>c. act within the professional standards for engaging with complaints as set by any relevant professional body.</p>	Yes	<p>As per our policy, a standard objective is included in all employees' quarterly reviews which are undertaken by their line managers. An explanation of this is being rolled out and incorporated into the induction pathway for new employees. A positive complaints culture has been developed and we will continue to focus on that.</p>	