

Appendix A: Self-assessment form

This self-assessment form should be completed by the complaints officer and it must be reviewed and approved by the landlord's governing body at least annually.

Once approved, landlords must publish the self-assessment as part of the annual complaints performance and service improvement report on their website. The governing body's response to the report must be published alongside this.

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

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

Section 1: Definition of a complaint

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
1.2	<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>Definition is in the current policy.</p> <p>As at 2.1 definitions contained within the policy - Complaint – will be defined as ‘An expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the organisation, its own staff, or those acting on its behalf, affecting an individual resident or group of residents’.</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>Contained within policy and procedure</p> <p>6.3 Adullam will also work with our partners/external agencies and engage with other third parties where relevant to achieve a desirable outcome. We will accept complaints from our tenants, residents and service users or anyone who has a clear link to us, such as using a service we provide. Where an individual asks a third party to act on</p>	<p>Action – policy amended see insert at 6.3 of current policy</p>

			their behalf, we will ask for appropriate permissions from that individual before we will do this.	
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	Contained within policy and procedure	Action - policy amended see insert at page 4 of policy
1.5	A complaint must be raised when the resident expresses dissatisfaction with the response to their service request, even if the handling of the service request remains ongoing. Landlords must not stop their efforts to address the service request if the resident complains.	Yes	Contained within policy and procedure	Action – policy amended see insert at page 4 of policy
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	Yes	Contained within policy and procedure	Action – policy amended see insert at page 4 of policy

	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>As at 2.3 contained within the policy - Adullam Homes may not deal with any of the following as a complaint under this policy:</p> <ul style="list-style-type: none"> • An initial request for a repair/service • Reports of neighbour nuisance or anti-social behaviour • Complaints about services that are not provided or contracted by Adullam Homes • An Insurance claim that is made through Adullam Homes Insurance providers • A complaint which relates to alleged failure to comply with the General Data Protection Regulation (GDPR) 	

			<ul style="list-style-type: none">• A complaint relating to an executive or non-executive Director of Adullam Homes (separate procedures will apply in both circumstances)• A complaint which relates to an event more than six months before the date that we receive the complaint (exceptions considered where safeguarding or Health & Safety is a factor)• Any issue which is subject to ongoing legal proceedings or investigation.• A complaint that is repeated and has already been completed under this policy.• Disagreement with an Adullam policy or procedure. We encourage comments and feedback on our policies and procedures through our co-production structures, involvement and engagement.• Appeals against decisions such as issuing a warning or an allocation decision. These will be dealt with under the relevant appeals process.	
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			<ul style="list-style-type: none"> • Complaints or concerns that relate to a safeguarding issue such as abuse or neglect. This will be dealt with through our safeguarding process. 	
2.2	<p>A complaints policy must set out the circumstances in which a matter will not be considered as a complaint or escalated, and these circumstances must be fair and reasonable to residents. Acceptable exclusions include:</p> <ul style="list-style-type: none"> • The issue giving rise to the complaint occurred over twelve months ago. • Legal proceedings have started. This is defined as details of the claim, such as the Claim Form and Particulars of Claim, having been filed at court. • Matters that have previously been considered under the complaints policy. 	Yes	<p>As at 7.5 - It is outlined within the Policy that "We will only usually investigate complaints which were made within 12 months of the event which caused the complaint"</p>	
2.3	<p>Landlords must accept complaints referred to them within 12 months of the issue occurring or the resident becoming aware of the issue, unless they are excluded on other grounds.</p>	Yes	<p>It is outlined within the Policy that Adullam may not deal with complaints or concerns that relate to a safeguarding issue such as abuse or neglect as a</p>	

	Landlords must consider whether to apply discretion to accept complaints made outside this time limit where there are good reasons to do so.		complaint under the Complaints policy, and instead they will be dealt with through Adullam's safeguarding process	
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	<p>"It is outlined in the Policy that Adullam may not deal with any of the following as a complaint under the complaints policy:</p> <ul style="list-style-type: none"> • ""An initial request for a repair/service • Reports of neighbour nuisance or anti-social behaviour • Complaints about services that are not provided or contracted by Adullam Homes • An Insurance claim that is made through Adullam Homes' insurance providers • A complaint which relates to alleged failure to comply with the General Data Protection Regulation (GDPR) • A complaint relating to an executive or non-executive director of Adullam Homes (separate procedures will apply in both circumstances) • A complaint which relates to an event more than six months before the date that we receive 	Policy (p.2-3)

			<p>the complaint (exceptions considered where safeguarding or Health & Safety is a factor)</p> <ul style="list-style-type: none"> • Any issue which is subject to ongoing legal proceedings or investigation. • A complaint that is repeated and has already been completed under this policy. • Disagreement with an Adullam policy or procedure. We encourage comments and feedback on our policies and procedures through our co-production structures, involvement and engagement. • Appeals against decisions such as issuing a warning or an allocation decision. These will be dealt with under the relevant appeals process. • Complaints or concerns that relate to a safeguarding issue such as abuse or neglect. This will be dealt with through our safeguarding process." (p.2-3)" 	
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Yes	"It is outlined within the Policy ""If Adullam Homes decides not to accept a complaint, a detailed explanation will be	RSM Review confirmed that the Housing Ombudsman's website, email, phone number and

			provided, setting out the reasons why the matter is not suitable for the complaints process and the right of the tenant, resident, or service user to contact the Housing Ombudsman Service." (p.3)	address (for written letter) are also subsequently outlined." Policy (p.3)
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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	It is outlined within the Policy that <i>"Complaints can be made by telephone, letter, e-mail or face to face, using a complaint form via our website, complaints leaflet, QR code and on social media."</i> (p.4)	RSM review - We confirmed that there is a section within the policy linking it to Equality, Diversity and Human rights (p.10); the policy also links the Equality Act 2010 (p.11). Policy (p.4, 10 and 11)
3.2	Residents must be able to raise their complaints in any way and with any member of staff. All staff must be aware	Yes	It is outlined within the Policy that <i>"All Adullam Homes staff have a responsibility for ensuring the effective</i>	Policy (p.11)

	of the complaints process and be able to pass details of the complaint to the appropriate person within the landlord.		<i>implementation of this policy and should take ownership of complaints, appeals and feedback handling. All staff will be expected to cooperate with any internal investigations and scrutiny/panel meetings as required."</i> (p.11)	
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	Contained within policy and procedure	Action – policy amended see insert at 13.1 of policy
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	As at 6.1 contained within the policy - 6.1 A leaflet outlining the Complaints Policy and procedure is available from our website and can be made available in different formats on request.	RSM review - We confirmed that the complaints policy is published and is easily accessible on Adullam's website. It can be located by following the make a complaint box on the main page of the Adullam website; a link to policy is then available on the main complaints page. The link is as followed: https://www.adullam.org.uk/make-a-complaint/

				https://www.adullam.org.uk/wp-content/uploads/2023/12/Adullam-Homes-Complaints-Policy_Dec-2023.pdf
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	<p>RSM review confirmed that there is a section titled 'Publishing the Policy' contained within the complaints policy that outlines Adullam will publicise the policy to tenants, residents, service users, staff and other stakeholders in several ways, including:</p> <ul style="list-style-type: none"> • Tenants, Residents and Service Users' handbook; • Licence and Tenancy documents; • Annual Report; • Adullam website; • Policy Hub; • Policy briefings and training; • Within routine communications; and • Annual Coproduction Involvement & Engagement week. <p>The Policy also links the Dispute Resolution Principles of the Housing Ombudsmen Service and the Regulatory Standards, as well as the</p>	Policy (p.10, 11)

			contact information for the Ombudsmen.	
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	<p>6.2 There are a number of scrutiny champions and trained peer mentors based across the Association, they can help TRS to make a complaint where they do not feel comfortable in doing so themselves.</p> <p>6.3 Adullam will also work with partners/external agencies and engage with other third parties where relevant to achieve a desirable outcome. We will accept complaints from our tenants, residents and service users or anyone who has a clear link to us, such as using a service we provide. Where an individual asks a third party to act on their behalf, we will ask for appropriate permissions from that individual before we will do this.</p>	
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	It is outlined within the Policy that <i>"If Adullam Homes decides not to accept a complaint, a detailed explanation will be provided, setting out the reasons why the matter is not suitable for the complaints</i>	RSM Review confirmed that the Policy also outlines how services users can contact the ombudsmen and provides contact details (website, phone, email, address for letters). Policy (p.3)

			<i>process and the right of the tenant, resident, or service user to contact the Housing Ombudsman Service."(p.3)</i>	
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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	As part of Assistant Quality Assurance Manager role - 1.10 Monitor the Adullam Homes Complaints policy, procedure and process has been applied/ followed throughout Adullam Homes services per Ombudsman regulatory requirements: 1.10.1 Create individual Omniprint reports for each service 1.10.2 Produce a tracker for each service that will show whether letters have been recorded in Custom tab, and staff-proformas have been received.	Policy amended see insert at 13.1 of policy

			<p>1.10.3 Send weekly reports to managers with the data relating to their service, including information relating to letters missing from the Custom Tab, missing data from the Complaints details, staff proformas, complaints that are open passed the completion target, ensuring all compliments are closed the day of receipt, any central complaints have been recorded and the relevant manager notified etc.</p> <p>1.10.4. Continue to send a monthly report to all managers highlighting the main areas that need addressing.</p> <p>1.10.5 Meet with each service manager once a quarter to look at any issues that were not addressed, discuss any patterns of incorrect recording/not following the complaints procedure and highlighting any training needs for the service.</p> <p>1.10.6 Provide an overall quarterly report for SLT including any areas that need addressing and inform SLT of</p>	
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			<p>any complaints that have been forwarded to Housing Ombudsman.</p> <p>1.10.7 Continue to provide overall reports once a quarter to be discussed at the Complaints Group.</p> <p>1.10.8 Meet with Central Managers to ensure they are following the correct procedures with complaints assigned to their Cost Centres.</p> <p>1.10.9 Run 2 Complaints training sessions every 4-6 months for new staff/those that require refresher training.</p> <p>1.10.10 Completion of Annual Self-Assessment against Ombudsman code</p>	
4.2	<p>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.</p>	Yes	<p>See 4.1</p> <p>It is outlined in the policy that <i>"All Adullam Homes staff have a responsibility for ensuring the effective implementation of this policy and should take ownership of complaints, appeals and feedback handling. All staff will be expected to cooperate with any internal investigations and</i></p>	Policy (p.11)

			scrutiny/panel meetings as required" (p.11)	
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	<p>See policy as at point 14 Staff Training</p> <p>14.1 We will use a range of methods to provide training to colleagues and scrutiny panel members/ champions on the Policy and procedure. This will include:</p> <ul style="list-style-type: none"> • Face to face discussions at team meetings • Internal/External training courses for those colleagues who have a more detailed involvement in complaints handling. Appropriate e learning course and staff training pathways <p>17.1 All Adullam Homes staff have a responsibility for ensuring the effective implementation of this Policy and should take ownership of complaints, appeals and feedback handling. All staff will be expected to cooperate with any internal investigations and scrutiny/panel meetings as required.</p>	

			<p>2024 - Staff Training and engagement workshops will commence in line with changes to the self-assessment</p> <p>As part of Assistant Quality Assurance Manager role -</p> <p>1.10.5 Meet with each service manager once a quarter to look at any issues that were not addressed, discuss any patterns of incorrect recording/not following the complaints procedure and highlighting any training needs for the service.</p> <p>1.10.9 Run 2 Complaints training sessions every 4-6 months for new staff/those that require refresher training.</p> <p>1.10.10 Completion of Annual Self-Assessment against Ombudsman code</p>	
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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	Yes	It outlines within the purpose of the policy that:	Policy (p.1)

	covered by this Code. Residents must not be treated differently if they complain.		<p><i>"The Regulator of Social Housing (RSH) Consumer standard "Tenant Involvement & Empowerment" states that: "a registered provider shall have an approach to complaints that is clear, simple and accessible that ensures that complaints are resolved promptly, politely and fairly".</i></p> <p><i>This policy sets out to ensure this requirement is met. In addition, the Housing Ombudsman Service complaint handling code sets out what it expects from the sector. This policy ensures that we comply with that code." (p.1)</i></p> <p>This is Adullam's sole Policy to deal with complaints</p>	
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	There is no 'stage 0' or 'informal complaint' stage in the complaints process	
5.3	A process with more than two stages is not acceptable under any	Yes	7.3 We will acknowledge all complaints within five working	

	<p>circumstances as this will make the complaint process unduly long and delay access to the Ombudsman.</p>		<p>days (Stage One) and aim to resolve your complaint within ten working days (Stage Two). If an investigation requires longer than this, we will contact the complainant and keep them fully informed of the progress of their complaint and when they can expect a full response. Escalation of any complaint stage should be done so within 10 working days of the decision response on whether their complaint is upheld or not. You have the right to contact the Housing Ombudsman Service at the response or outcome of Stage Two. Where only necessary and requested by the TRS a Stage Three response will be considered and dealt with in twenty working days.</p> <p><u>RSM findings at 6.1</u> state we are compliant - Review of the Policy confirms that it has a contains a three stage complaints process, which is summarised as followed:</p> <ul style="list-style-type: none">- Stage 1 - first response/putting it right	
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			<p>(within 5 working days); - Stage 2 - Investigation (within 10 working days if complaint not resolved in stage one); and - Stage 3 - Review (within 20 working days if complaint not resolved in stage two).</p> <p>Note: Stage One per the code is split into two stages at Adullam (stage 1 and 2 outlined above), and stage two per code (the review stage) is stage three at Adullam.</p> <p>It is outlined under stage one that "[Adullam] want to find a quick and effective solution to your complaint and we expect most complaints to be resolved at this stage. If we can resolve things for you at this stage we will class your complaint as resolved and no further action will be required" (p.5).</p>	
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	<u>As at 6.25 of RSM findings document</u> - It is stated within the policy that "Adullam will also work with	

	two stage complaints process set out in this Code. Residents must not be expected to go through two complaints processes.		partners/external agencies and engage with other third parties where relevant to achieve a desirable outcome" (p.4), however it does not state whether Adullam allow complaints to be handled by third parties on their behalf or whether third parties have to handle complaints in line with the code.	
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Yes	Contained within policy and procedure	Policy amended see insert at 6.3 second paragraph
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	See - GUIDANCE FOR HANDLING AND MANAGING COMPLAINTS	
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	See - GUIDANCE FOR HANDLING AND MANAGING COMPLAINTS	
5.8	At each stage of the complaints process, complaint handlers must:	Yes	As stated in policy and procedure	

	<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. 			
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	Policy and procedure set out timescales to this for the response	
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	As at 15.1 of the policy - 15.1 Adullam Homes is committed to ensuring that no person or group of persons will be treated less favourably than another person or group of persons and will carry out its duty with positive regard for the following core strands of equality; Age, Disability, Gender, Race, Gender Identity / Gender Expression, Sexual Orientation, Religion and/or Belief, Civil Partnership and	

			<p>Marriage, Pregnancy and Maternity. Adullam Homes also recognise that some people experience disadvantage due to their socio-economic circumstances, employment status, class, appearance, responsibility for dependants, unrelated criminal activities, being HIV positive or with AIDS, or any other matter which causes a person to be treated with injustice. We will also ensure that all services and actions are delivered within the context of current Human Rights legislation and will endeavour to ensure staff and others with whom it works, adhere to the central principles of the Human Rights Act (1998).</p>	
5.11	<p>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.</p>	Yes	<p>As part of the workflow. RSM review recorded against 5.9 of their findings - It is stated within the Policy that <i>"If Adullam Homes decides not to accept a complaint, a detailed explanation will be provided, setting out the reasons why the matter is not suitable for the complaints process and</i></p>	

			<i>the right of the tenant, resident, or service user to contact the Housing Ombudsman Service" (p.3).</i>	
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 complaints are recorded and stored on the Pyramid Management database	
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	Evidence - GUIDANCE FOR HANDLING AND MANAGING COMPLAINTS	<p>Recorded at 5.11 of RSM Review of the Policy confirmed that it is stated that "<i>mediation may be offered at any stage of the complaints process</i>" (p.7).</p> <p>It is stated that Mediation is "<i>a balanced, positive way of sorting things out before the conflict starts to affect people's quality of life. Mediation is impartial and fair for all parties involved and helps people to find a way to work out a solution to</i></p>

				<i>their problems. Mediation offers both parties the opportunity to help improve communication and look at resolutions."</i>
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	Vexatious Complaints and Unreasonable Persistent Contact Policy and Procedure in place	RSM Review recorded at 5.12 of their findings - of the Complaints Policy confirmed that section 11 outlines Adullams approach to Persistent or Repetitious Complaints and Unacceptable behaviour (p.8). As this is incorporated into the complaints policy, it is reviewed in line with the policy's annual review cycle
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	RSM review - The Persistent or Repetitious Complaints and Unacceptable behaviour procedure is included within the Complaints Policy which considers EDI and the Equality Act 2010	

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	<p>Review of the Policy confirms that it has a contains a three stage complaints process, which is summarised as followed:</p> <ul style="list-style-type: none"> - Stage 1 - first response/putting it right (within 5 working days); - Stage 2 - Investigation (within 10 working days if complaint not resolved in stage one); and - Stage 3 - Review (within 20 working days if complaint not resolved in stage two). <p>Note: Stage One per the code is split into two stages at Adullam (stage 1 and 2 outlined above), and stage two per code (the review stage) is stage three at Adullam.</p> <p>It is outlined under stage one that "[Adullam] want to find a quick and effective solution to your complaint and we expect most complaints to be</p>	Policy (p.5)

			<i>resolved at this stage. If we can resolve things for you at this stage we will class your complaint as resolved and no further action will be required" (p.5).</i>	
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	<i>It is outlined in the complaints process that "[Adullam] will acknowledge all complaints within five working days (Stage One) and aim to resolve your complaint within 10 working days (Stage Two). If an investigation requires longer than this, we will contact the complainant and keep them fully informed of the progress of their complaint and when they can expect a full response." (p.5)</i>	Policy (p.5)
6.3	Landlords must issue a full response to stage 1 complaints <u>within 10 working days</u> of the complaint being acknowledged.	Yes	See 6.2 above	Policy (p.5)
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,	Yes	Within policy and procedure	

	and the reason(s) must be clearly explained to the resident.			
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	<p>It is outlined within the complaints process that complainants "have the right to contact the Housing Ombudsmen Service at the response or outcome of stage two" (p.5).</p> <p>Confirmed that the contact details (website, phone, email and address) of the ombudsmen are provided within the Policy (p.3).</p>	Policy (p.3 and 5)
6.6	A complaint response must be provided to the resident when the answer to the complaint is known, not when the outstanding actions required to address the issue are completed. Outstanding actions must still be tracked and actioned promptly with appropriate updates provided to the resident.	Yes	As part of the policy and procedure and the process driven by the timeframes which would be explained	
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	Contained with appeal stage letters from guidance document	
6.8	Where residents raise additional complaints during the investigation,	Yes	Contained within policy and procedure	

	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.			
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	Contained with appeal stage letters from guidance document	

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	Yes	Note: Stage two per code (the review stage) is stage three at	Policy (p.6)

	stage 1, it must be progressed to stage 2 of the landlord's procedure. Stage 2 is the landlord's final response.		<p>Adullam.</p> <p>It is outlined that "A Senior Manager will carry out a review of your complaint if you can explain how you meet one or more of the following criteria:</p> <ul style="list-style-type: none"> • all or some of the points on your complaint have not been investigated; • all or some of the agreed actions have not been carried out or carried out to a less than satisfactory standard within the agreed timescales; and • Adullam have not responded to your complaint within the agreed timescales" (p.6). 	Note this is recorded at 6.12 of RSM assessment
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	As part of policy and procedure	
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	As part of policy and procedure. This would be made clear to the complainant during the process	

6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Yes	The complaints process outlines that the stage 1 investigation is undertaken by a manager and the stage 2 review is undertaken by a senior manager. As these are different roles they cannot be done by the same person (p5 - 6).	Policy (p.5 and 6)
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 complaint policy states that a stage two response will be considered and dealt with in 20 working days .	
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	Stage Two - Review Within twenty working days A Senior Manager will carry out a review of your complaint if you can explain how you meet one or more of the following criteria: <ul style="list-style-type: none"> • all or some of the points on your complaint have not been investigated • all or some of the agreed actions have not been carried out or carried out to a less than satisfactory standard within the agreed timescales 	

			<ul style="list-style-type: none"> • Adullam have not responded to your complaint within the agreed timescales 	
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	<p>This is contained within the guidance and on the website. Stage Three - Appeal Review Stage</p> <p>See also - 9.0 Tenants, Residents and Service Users Scrutiny Panel and additional complaint solutions</p> <p>9.1 If a complaint has been through Adullam's internal complaints procedure and still not been resolved to the complainant satisfaction, Tenants, Residents and Service Users have the right to ask their complaint to be looked at by a scrutiny panel. The panel is made up of a number of Adullam Tenants, Residents and Service Users who have had special training to enable them to consider complaints under this process.</p>	

6.17	A complaint response must be provided to the resident when the answer to the complaint is known, not when the outstanding actions required to address the issue are completed. Outstanding actions must still be tracked and actioned promptly with appropriate updates provided to the resident.	Yes	Within policy procedure and guidance	
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	Contained within policy and procedure	
6.19	Landlords must confirm the following in writing to the resident at the completion of stage 2 in clear, plain language: a. the complaint stage; b. the complaint definition; c. the decision on the complaint; 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	Contained within policy and procedure	

6.20	Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.	Yes	Contained within policy and procedure	
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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	<p>Section 13 of policy – Regular monitoring will take place by the Complaints Handling Officer and members of the Senior Leadership Team to ensure that procedures are being followed. Reports will be provided to the Executive Director of Housing and Support, Senior Leadership Team (SLT) and to the Operations Committee / Board every year. The report will highlight:</p> <ul style="list-style-type: none"> • The number of complaints • The nature of complaints • Process and resolution timeframes • Trends in the numbers and types of complaints and 	

			<p>action taken or proposed to improve these areas of service</p> <ul style="list-style-type: none">• Areas of concern• Any compensation paid• <p>Performance indicators on complaints will also be provided to the Board and they will be notified immediately of any major complaints.</p> <p>The number and type of complaints will be published in the Tenants, Residents and Service Users Annual Report.</p> <p>Random or specific satisfaction checks will be undertaken to ascertain whether complainants are satisfied with the way that their complaints have been handled.</p> <p>Managers/complaints officer will review complaints report from pyramid on a monthly basis and consider any trends or lessons that can be learned from the complaints that have been submitted. As part of this process, they should also check that the information on pyramid is complete, and that</p>	
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			<p>the administration of the complaint is up to date and that the quality of the information recorded is of an acceptable standard.</p> <p>The complaints handling officer regional managers will report on any trends in their monthly report and lessons learned will be discussed at the regional managers meetings on a quarterly basis at the complaints working group. The Complaints Tracker Working Group (who meet quarterly) will submit action and minutes from the meeting to SLT.</p> <p>An annual report to all TRS showing the following information will be submitted to Operations Committee:</p> <ul style="list-style-type: none">• The number of complaints• The nature of complaints• Process and resolution timeframes	
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			<ul style="list-style-type: none"> • Trends in the numbers and types of complaints and action taken or proposed to improve these areas of service • Areas of concern • Any compensation paid • Self-assessment against the complaints handling code <p>Action for 2024 - Establish TRS annual reporting identifying learning and feedback quarterly to the website/via Scrutiny Champions</p>	
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Yes	It is outlined within the compensations section of the policy that <i>"Compensation payments may be paid at the discretion of the investigating manager, in line with this policy and reflect the circumstances of each case"</i> (p.7).	
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.	Partial	Link to the Asset Strategy and any amendments to the Compensation policy	

7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Partial	As above. Link to the Asset Strategy and Compensation policy	
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Section 8: Putting things right

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
8.1	Landlords must produce an annual complaints performance and service improvement report for scrutiny and challenge, which must include: a. the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements. b. a qualitative and quantitative analysis of the landlord's complaint handling performance. This must also include a summary of the types of complaints the landlord has refused to accept; c. any findings of non-compliance with this Code by the Ombudsman; d. the service improvements made as a result of the learning from complaints; e. any annual report about the landlord's performance from the Ombudsman; and	Yes	Review of the Policy confirmed that it is outlined under the Monitoring and Learning from complaints section that <i>"Reports will be provided to the Executive Director of Housing and Support, Senior Leadership Team (SLT) and to the Operations Committee / Board every year. The report will highlight:</i> <ul style="list-style-type: none"> • <i>The number of complaints;</i> • <i>The nature of complaints;</i> • <i>Process and resolution timeframes;</i> • <i>Trends in the numbers and types of complaints and action taken or proposed to improve these areas of service;</i> • <i>Areas of concern;</i> • <i>Any compensation paid; and</i> • <i>Self-assessment reporting</i> 	Policy (p.9)

	f. any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord.		<i>against the complaints handling code." (p.9)</i> It is outlined that performance indicators on complaints will also be provided to the Board and they will be notified immediately of any major complaints, and that the number and type of complaints will be published in the Tenants, Residents and Service Users Annual Report.	
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	See 8.1	
8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	Yes	Contained within policy and procedure	Action – policy amended see new section 13.6
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	Yes	Contained within policy and procedure	Action – policy amended see new section 13.7
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	Yes	Contained within policy and procedure	Action – policy amended see new section 13.8

	Ombudsman, provide information to residents who may be affected, and publish this on their website Landlords must provide a timescale for returning to compliance with the Code.			
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Section 9: Scrutiny & oversight: continuous learning and improvement

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
9.1	Landlords must look beyond the circumstances of the individual complaint and consider whether service improvements can be made as a result of any learning from the complaint.	Yes	It is outlined within the policy under section three that Adullam will <i>"Learn from the outcomes of complaints - feedback to service users including the complainant on lessons learnt and actions taken to improve service delivery"</i> (p.3).	Policy (p.3)
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	It is outlined within the purpose section of the policy that <i>"The policy will ensure that feedback from complaints is used to improve the service, deliver high levels of satisfaction, and identify learning that supports process improvements."</i> (p.1)	Policy (p.1)
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	Yes	The Policy outlines that Reports will be provided to the Executive Director of Housing and Support, Senior Leadership Team (SLT) and to	Policy (p.9)

	<p>stakeholders, such as residents' panels, staff and relevant committees.</p>		<p>the Operations Committee / Board every year, and that these reports should include trends in the numbers and types of complaints and action taken or proposed to improve these areas of service. 13. Monitoring and Learning from Complaints –</p> <p>13.1 Regular monitoring will take place by the Complaints Handling Officer and members of the Senior Leadership Team to ensure that procedures are being followed.</p> <p>13.2 Reports will be provided to the Executive Director of Housing and Support, Senior Leadership Team (SLT) and to the Operations Committee / Board every year. The report will highlight:</p> <ul style="list-style-type: none">• The number of complaints• The nature of complaints• Process and resolution timeframes• Trends in the numbers and types of complaints and action taken or proposed to improve these areas of service	
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			<ul style="list-style-type: none">• Areas of concern• Any compensation paid• Self-assessment <p>reporting against the complaints handling code</p> <p>13.3 Performance indicators on complaints will also be provided to the Board and they will be notified immediately of any major complaints.</p> <p>13.4 The number and type of complaints will be published in the Tenants, Residents and Service Users Annual Report.</p> <p>13.5 Random or specific satisfaction checks will be undertaken to ascertain whether complainants are satisfied with the way that their complaints have been handled.</p> <p>2024 - Establish TRS annual reporting identifying learning and feedback quarterly to the website/via Scrutiny Champions</p> <p>February 2024 – RSM review compliance against code from April 2024 with action plan</p>	
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<p>9.4</p>	<p>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.</p>	<p>Yes</p>	<p>As part of Assistant Quality Assurance Manager role - 1.10 Monitor the Adullam Homes Complaints policy, procedure and process has been applied/followed throughout Adullam Homes services per Ombudsman regulatory requirements: 1.10.1 Create individual Omniprint reports for each service 1.10.2 Produce a tracker for each service that will show whether letters have been recorded in Custom tab, and staff-proformas have been received. 1.10.3 Send weekly reports to managers with the data relating to their service, including information relating to letters missing from the Custom Tab, missing data from the Complaints details, staff proformas, complaints that are open passed the completion target, ensuring all compliments are closed the day of receipt, any central complaints have been</p>	<p>Policy (p.9)</p>
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			<p>recorded and the relevant manager notified etc.</p> <p>1.10.4. Continue to send a monthly report to all managers highlighting the main areas that need addressing.</p> <p>1.10.5 Meet with each service manager once a quarter to look at any issues that were not addressed, discuss any patterns of incorrect recording/not following the complaints procedure and highlighting any training needs for the service.</p> <p>1.10.6 Provide an overall quarterly report for SLT including any areas that need addressing and inform SLT of any complaints that have been forwarded to Housing Ombudsman.</p> <p>1.10.7 Continue to provide overall reports once a quarter to be discussed at the Complaints Group.</p> <p>1.10.8 Meet with Central Managers to ensure they are following the correct procedures with complaints assigned to their Cost Centres.</p>	
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			<p>1.10.9 Run 2 Complaints training sessions every 4-6 months for new staff/those that require refresher training.</p> <p>1.10.10 Completion of Annual Self-Assessment against Ombudsman code</p> <p>The Policy outlines that <i>"Regular monitoring will take place by the Complaints Handling Officer and members of the Senior Leadership Team to ensure that procedures are being followed."</i> (p.9)</p>	
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	This has recently been addressed and with an allocated board member to support our work in the coming months to deliver the complaints work/regulatory changes/new code.	Action – policy amended see 13.2
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	<p>13.1 Regular monitoring will take place by the Complaints Handling Officer and members of the Senior Leadership Team to ensure that procedures are being followed.</p> <p>13.2 Reports will be provided to the Executive Director of Housing and Support, Senior</p>	Action – policy amended see 13.2

			<p>Leadership Team (SLT) and to the Operations Committee / Board every year.</p> <p>This has recently been addressed and with an allocated board member to support our work in the coming months to deliver the complaints work/regulatory changes/new code.</p>	
9.7	<p>As a minimum, the MRC and the governing body (or equivalent) must receive:</p> <p>a. regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance.</p> <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>	Yes	<p>Complaints Reports are submitted to the Operations committee on a quarterly basis. The reports to the Executive Director of Housing and Support, Senior Leadership Team (SLT) and to the Operations Committee / Board every year are aligned with the code which stipulate that <i>"As a minimum, the Member and the governing body (or equivalent) must receive:</i></p> <p><i>a) regular updates on the volume, categories, and outcomes of complaints, alongside complaint handling performance.</i></p> <p><i>b) regular reviews of issues</i></p>	<p>Policy (p.9) Code (p.15)</p>

			<i>and trends arising from complaint handling; and c) the annual complaints performance and service improvement report." (Code, p.15)</i>	
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	Contained within policy and procedure	Action – policy amended see 17.2