

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	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	Paragraphs 1.5 and 3.6 in complaints policy	
1.3	A resident does not have to use the word 'complaint' for it to be treated as such. Whenever a resident expresses dissatisfaction landlords must give them the choice to make complaint. A complaint that is submitted via a third party or representative must be handled in line with the landlord's complaints policy.	Yes	Paragraph 3.7 in complaints policy	SHAL actively encourages complaints where people express dissatisfaction so that we can explore and learn. This proactive approach is reflected in the high number of complaints when compared to our local benchmark partners in the South West.
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	Yes	Paragraph 3.8 in complaints policy	We are keeping this under review as we know that this can sometimes be confusing to colleagues. This is a key part of our training.

	are not complaints, but must be recorded, monitored and reviewed regularly.			
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	Paragraph 3.9 in complaints policy	This is something that we ensure we monitor in our monthly complaints committee meetings where this is appropriate.
1.6	An expression of dissatisfaction with services made through a survey is not defined as a complaint, though wherever possible, the person completing the survey should be made aware of how they can pursue a complaint if they wish to. Where landlords ask for wider feedback about their services, they also must provide details of how residents can complain.	Yes	Paragraph 3.10 in complaints policy	We have now stopped including the 'no' responses to our texts about repairs which are sent out after each repair. We do follow up the 'no' responses by phone and ask people if they wish to make a complaint. We are looking at how we can ensure that we include complaints information in all our surveys.

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	Paragraph 3.11 in complaints policy	We accept this and keep it under review at the monthly complaint committee meetings.
2.2	<p>A complaints policy must set out the circumstances in which a matter will not be considered as a complaint or escalated, and these circumstances must be fair and reasonable to residents. Acceptable exclusions include:</p> <ul style="list-style-type: none"> • The issue giving rise to the complaint occurred over twelve months ago. • Legal proceedings have started. This is defined as details of the claim, such as the Claim Form and Particulars of Claim, having been filed at court. 	Yes	Paragraph 3.16 in complaints policy	This is monitored and verified at the Complaints Committee meetings. It is a rare occurrence but we will also ensure it is reviewed by our internal auditors where appropriate.

	<ul style="list-style-type: none"> Matters that have previously been considered under the complaints policy. 			
2.3	Landlords must accept complaints referred to them within 12 months of the issue occurring or the resident becoming aware of the issue, unless they are excluded on other grounds. Landlords must consider whether to apply discretion to accept complaints made outside this time limit where there are good reasons to do so.	Yes	Paragraphs 3.7 – 3.16 in complaints policy	We will ensure that we are doing this at the monthly Complaints Committee. It is rare occurrence.
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	Paragraph 3.15 in complaints policy	The responses will be monitored by the Complaints Committee every month.
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Yes	Paragraph 3.14 in complaints policy	We look at the tenant's circumstances as well as the complaint time. This includes looking through the tenant history and the information we hold on the tenant to ensure that we are aware of any reasonable

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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	Paragraphs 3.21 and 3.22 in complaints policy	We accept complaints through any channel at all in line with our approach of encouraging complaints as a way of learning and improving what we do.
3.2	Residents must be able to raise their complaints in any way and with any member of staff. All staff must be aware of the complaints process and be able to pass details of the complaint to the appropriate person within the landlord.	Yes	Paragraphs 3.20 – 3.24 in complaints policy	Training on the new Code has been undertaken and will be repeated on an annual basis. All our trades staff and contractors know that any feedback from tenants is to be referred back to the Maintenance Manager.
Manager	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	Paragraph 1.1 in complaints policy	We were at first concerned that we have a much higher number of complaints than our benchmark partners in the South West. However, we are committed to receiving this feedback and acting on it under the Code and learning from it to

				improve services. We do not feel overwhelmed by the number of complaints and we value the opportunity to gain deeper understanding and to improve our services.
3.4	Landlords must make their complaint policy available in a clear and accessible format for all residents. This will detail the two stage process, what will happen at each stage, and the timeframes for responding. The policy must also be published on the landlord's website.	Yes	Complaints policy is published on SHAL's website, sent to every complainant with the complaint response and can be sent directly via the post if requested.	We feel that we need to keep this under review as we know that communication can always be improved.
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	Paragraph 2.1.9 and section 5 in the complaints policy	We have publicised this on our website https://www.shal.org/resident-area/complaints/ Our last newsletter reported on the effective handling of complaints https://www.shal.org/wp-content/uploads/2024/05/Spring-Summer-2024.pdf We will continue to look at how we communicate at the monthly Complaints Committee meetings.
3.6	Landlords must give residents the opportunity to have a representative deal with their complaint on their	Yes	Paragraph 3.7 in complaints policy	We are happy to do this and encourage people to have

	behalf, and to be represented or accompanied at any meeting with the landlord.			others with them if this makes them more comfortable.
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	Template documents are used to acknowledge and respond to all complaints, ensuring the Ombudsman's contact information is shared in the same way every time.	This information is on the website as well as in the letters to tenants in response to complaints. https://www.shal.org/resident-area/complaints/ We are holding a 'meet the ombudsman' event in October 2024 to which we will invite tenants.

Section 4: Complaint Handling Staff

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
4.1	Landlords must have a person or team assigned to take responsibility for complaint handling, including liaison with the Ombudsman and ensuring complaints are reported to the governing body (or equivalent). This Code will refer to that person or team as the 'complaints officer'. This role may be in addition to other duties.	Yes	The Housing Manager is SHAL's Complaints Officer.	Our Housing Manager is trained in restorative process and uses this practice in dealing with complaints.
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	Paragraph 3.3 – 3.4 in complaints policy	As a member of the Senior Leadership Team with direct access to the CEO the Housing Manager is well placed and committed to ensuring prompt and effective resolution of complaints.
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	Annual training completed in complaint handling (next date 26/04/24) Paragraph 3.31 in complaints policy	We encourage complaints and ensure that people understand they are an opportunity to learn and improve. We support people to not be defensive about complaints and we understand that this is

				sometimes difficult and may need space and support to achieve.
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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	Complaints policy in place. Paragraph 1.3 in complaints policy	This is very important to us. We have invited people who have complained to a focus group on repairs to give us more input. This was well received. We felt really good about getting this email recently which I think illustrates the fear that people have about complaining and how we can show that we won't treat people differently: 'Prior to your help, I felt I was being misunderstood and "deemed" as a crap tenant. I'm hoping since the move shal have noticed the change. Since having space for me and the little ones it's like u lifted a massive weight of me and I hope that shows in how I've changed since the move.

				(I'm rubbish with my wording, so hope that makes sense) Thanks again
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	Paragraph 2.1.1 in complaints policy	
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	SHAL have a 2 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 two stage complaints process set out in this Code. Residents must not be expected to go through two complaints processes.	N/A		SHAL responds to all complaints directly
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	N/A		SHAL responds to all complaints directly
5.6	When a complaint is logged at Stage 1 or escalated to Stage 2, landlords must set out their understanding of the	Yes	Paragraph 3.27 in complaints policy	We have created template letters to ensure that this happens which have been

	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.			welcomed by colleagues and creates a consistency for tenants.
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	Paragraph 3.28 in complaints policy	The structure of the letters helps us to do this and we are continuing to learn what works in making this clear.
5.8	At each stage of the complaints process, complaint handlers must: <ul style="list-style-type: none"> a. deal with complaints on their merits, act independently, and have an open mind; b. give the resident a fair chance to set out their position; c. take measures to address any actual or perceived conflict of interest; and d. consider all relevant information and evidence carefully. 	Yes	Paragraph 3.29.5 in complaints policy	We are seeking feedback from tenants about the way we handled the complaint. This is almost always positive. Where it is not we seek to understand why and what we could have done differently.
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	Paragraph 3.29 in complaints policy.	We are aware that where complaints have progressed to the Ombudsman this is often because communication was poor. We are looking at how we

				can keep this under constant review. The Complaints Committee meetings are useful in making sure that communication is timely and effective.
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	Paragraph 6.3 in complaints policy	We have just carried out an EDI review and are systematically going through the data we hold on tenants to ensure that it is as complete as possible. We know that it is not possible to get the data we hold 100% right 100% of the time so we use open questions about what people need from us to address whether we need to make reasonable adjustments. We are exploring the use of a model similar to the police THRIVE model to ensure that we gain information about vulnerability and make an appropriate risk assessment on the impact of the vulnerability in any given circumstance. We are also going to develop a

				Vulnerabilities Policy which makes this clear to all tenants and colleagues in a consistent way.
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	Paragraphs 3.13 – 3.16 in complaints policy	We have template letters which support positive communication on this.
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	Paragraph 3.30 in complaints policy	Over the last year we have improved the way we hold these records, what we hold and how we hold them. We will continue to learn the best way to do this.
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	Paragraph 3.26 in complaints policy	We have this in place and have cases where for example compensation has been paid by a Housing Officer appropriately under the Compensation Policy without needing to get authorisation from a senior executive.
5.14	Landlords must have policies and procedures in place for managing	Yes	Paragraph 3.45 in complaints policy	We have this in place and at the same time we are

	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.			learning how we can prevent unacceptable behaviour or prevent the escalation of unacceptable behaviour. This isn't always possible but we know that trauma can impact behaviour and we seek to ensure that we minimise this in the way we work with people.
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	Paragraph 3.45 in complaints policy	We have this in place and we consider what is best for the individual. We make sure this is time limited and reviewed periodically and we remove these restrictions as soon as we can.

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	Paragraphs 3.29 and 3.29.1 in complaints policy.	Most stage 1 complaints are resolved quickly. Where we consider this may not be possible we visit the tenant to discuss and agree a suitable way forward.
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	Paragraph 3.29 in complaints policy.	We do this as quickly as possible so that the tenant knows that their complaint has been received and is being actioned.
6.3	Landlords must issue a full response to stage 1 complaints <u>within 10 working days</u> of the complaint being acknowledged.	Yes	Paragraph 3.29 in complaints policy.	We do this most of the time. We have in the past been guilty of not meeting the deadline but the Complaint Committee meeting monthly will reduce the number of times we fail in this regard and will ensure that

				appropriate compensation is given if we do fail.
6.4	Landlords must decide whether an extension to this timescale is needed when considering the complexity of the complaint and then inform the resident of the expected timescale for response. Any extension must be no more than 10 working days without good reason, and the reason(s) must be clearly explained to the resident.	Yes	Paragraph 3.29 in complaints policy.	We do this and have template letters to support it.
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	Paragraph 3.29 in complaints policy.	We do this and the information forms part of the template letter.
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	Paragraph 3.29 in complaints policy.	This is in place. The Complaints Committee ensures that the outstanding actions are recorded and completion is monitored until they are able to be signed off as complete.
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	Paragraph 3.29 in complaints policy.	We aim to do this and the template letter is structured to support this.
6.8	Where residents raise additional complaints during the investigation,	Yes	Paragraph 3.29 in complaints policy.	We do this and make clear within the letter to the tenant

	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.			how we are treating any new complaints and why. We log issues as new complaints if they are new complaints and unrelated to those we have already received. We also try hard to structure responses in a way which makes most sense to the tenant who is seeking to get issues resolved.
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	Paragraph 3.29 in complaints policy.	The template response letter is designed to cover all these areas.

Stage 2

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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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	Paragraph 3.29 in complaints policy.	This is within the design of the complaint handling process at SHAL. As a small organisation there are sometimes challenges with regards to a fresh pair of eyes particularly where the complaint is complex but we do challenge ourselves at this stage to ensure that we ask questions of ourselves with regards to the way we responded at Stage 1.
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	Paragraph 3.29 in complaints policy.	We do this as soon as we can so that the tenant knows that the stage 2 complaint has been received and is being actioned.
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	Paragraph 3.29.1 in complaints policy.	We have amended the way we work so that we don't ask tenants to explain why they are going to stage 2. However, we make seek to understand this when we visit them at home so that we are able to properly understand their expectations and needs.
6.13	The person considering the complaint at stage 2 must not be the same person	Yes	Paragraph 3.29.1 in complaints policy.	As a small organisation it is sometimes difficult to ensure that the person

	that considered the complaint at stage 1.			considering the complaint at stage 2 has no knowledge of the stage 1 complaint but we do try to effect this in the spirit of the Code.
6.14	Landlords must issue a final response to the stage 2 <u>within 20 working days</u> of the complaint being acknowledged.	Yes	Paragraph 3.29.1 in complaints policy.	We are seeking to improve our complaint handling with regards to meeting deadlines via the Complaint Committee monitoring and this has improved performance this financial year.
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	Paragraph 3.29.1 in complaints policy.	We seek to ensure that we do this and treat stage 2 complaints as a priority.
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	Paragraph 3.29.1 in complaints policy.	Any extension is confirmed in writing and the letter template includes the contact details for the Ombudsman.
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	Yes	Paragraph 3.29.1 in complaints policy.	We do this. The actions are registered against the complaint and the Complaints Committee

	actions must still be tracked and actioned promptly with appropriate updates provided to the resident.			monitors them to completion.
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	Paragraph 3.29.1 in complaints policy.	The stage 2 complaints letter template provides for this.
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	Paragraph 3.29.1 in complaints policy.	The Stage 2 Complaints Letter Template provides for this.
6.20	Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.	Yes	Paragraph 3.29.1 in complaints policy.	We ensure that the complaint at Stage 2 is properly reviewed and the Complaints Committee monitoring includes all those who need to be in attendance with regards to

				any complaint still open and being worked on as well as any complaints which have been closed to ensure that the committee members understand fully the complaint within the service and tenant context.
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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	Paragraph 3.29 in complaints policy.	<p>SHAL aims to be transparent and accountable. We co-created commitments to our tenants which are:</p> <ul style="list-style-type: none"> To create community To build relationship To deliver quality homes and services To include listen and understand To be transparent and accountable <p>We know that saying sorry goes some way to mending relationship and acknowledging when we got it wrong is important in creating community where</p>

				people know they can trust us and our expectations of each other are mutual. We have changed decisions, amended records, provided compensation or financial redress and changed policies, procedures and practices and we will continue to do this so that we get it right where we have got it wrong.
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Yes	Paragraph 3.29.1 in complaints policy.	We have a compensation policy that looks at impact and we know that impacts are felt differently by different people so we take this into account.
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	Paragraph 3.29 in complaints policy.	The remedy is recorded in the complaints register and the Complaints Committee monitors it to ensure that it is delivered.
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes	Paragraph 3.29.2 in complaints policy.	The information on the Ombudsman website is regularly reviewed and use in training.

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	Paragraph 3.41 in complaints policy.	<p>We will produce a report for 2024 in early 2025 that covers:</p> <ul style="list-style-type: none"> This self assessment The types of complaints we received at each stage and those which went to the Ombudsman and how we dealt with them including the few cases where we refused to accept a complaint Findings of non-compliance with this Code Service improvements made as a result of complaints (these are being monitored in the Complaints register by the Complaints Committee) Any Ombudsman reports about our performance The results of the internal audit into the complaint handling policy and process which is currently underway

				Outcomes of the Meet the Housing Ombudsman event on 24 October 2024
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	Paragraph 1.9 in complaints policy.	The report will go to the Board in February or May 2025 and then published in the complaints section of our website with the Board's response to it.
8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	Yes	Paragraph 3.43 in complaints policy.	Nothing of this nature is planned but this requirement is noted.
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	Yes	Paragraph 1.10 in complaints policy.	This requirement is noted
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	Paragraph 3.46 in complaints policy.	This requirement is noted

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	Paragraph 3.31 in complaints policy.	The Complaints Committee oversees the complaints and the service improvements which arise from them and will seek further research or investigation if this is thought to be warranted. For example, all the complaints which went to the Housing Ombudsman from SHAL so far have involved tenants who have mutually exchanged into their homes so we are looking again at the information we give to people at this stage and the way we deal with them. The mutual exchange process and policy has been the subject of a great deal of continual improvement but we feel we need to continue to do this to ensure that we can prevent the levels of dissatisfaction being expressed so we need to

				gain a deeper understanding of what is happening here.
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	Paragraph 1.1 in complaints policy.	This is done and the Complaints Committee will continue to develop this approach.
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	Paragraph 2.1.4 in complaints policy.	This is an important commitment co-created with our tenants in 2021. We are continually looking at how we can improve transparency and accountability and we want to celebrate the learning we have gained from tenants. The invitation to those who had made complaints to us about repairs is a good illustration of this and the dialogue which has resulted has been fruitful and hopefully will lead to greater mutual understanding of the challenges faced and the opportunities to be explored by both SHAL and the tenants we serve.

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	<p>Paragraph 1.12 in complaints policy.</p> <p>Currently the CEO acts as the senior lead person and is a member of SHAL's Board. In our recruitment for the Board in 2024 we will specifically look for someone who will be our MRC.</p>	<p>At SHAL the CEO chairs the Health and Safety Committee and the Complaints Committee and takes a lead on both. This helps to ensure that defensiveness is minimised. Risk assessment is key in both areas of the business and is embedded in the way we work both strategically and operationally. We know that all of us have blind spots but we hope that we have created a culture where diversity of thought and opinion expressed in a respectful and positive way helps us to minimise those blind spots and therefore manages the risk that we inadvertently become the bad guys.</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	Paragraph 1.12 in complaints policy.	Currently this is the CEO who is also an Executive Board member. However, we are recruiting new Board members this year and are hopeful that we can recruit a non-executive board member who will be

				enthusiastic about taking on this role.
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	Paragraph 1.12 in complaints policy.	The Board have put in place an internal audit into the complaint handling at SHAL to ensure that what they are being told happens is in fact happening in practice. Board members are able to access the Complaints Committee and can contact the Complaints Officer directly if they wish to do so. We are also looking to re-design the website this year so that tenants can go directly to Board members if they wish to do so which opens up another access point to make complaints straight to the Governing Body.
9.7	As a minimum, the MRC and the governing body (or equivalent) must receive: a. regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance; b. regular reviews of issues and trends arising from complaint handling;	Yes	Paragraph 3.38 – 3.39 in complaints policy.	Our performance information to the Board and to the Finance, Audit and Risk Committee includes: Numbers, categories and outcomes of complaints as monitored by the Complaints Committee Any issues which are emerging as a result

	<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>			<p>Outcomes from the Ombudsman reviews and progress in compliance with orders – this is all orders not just severe maladministration.</p> <p>The Board receives annual complaints performance and service improvement reports. This also includes a summary of compliments.</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	Section 2 of the complaints policy.	<p>All colleagues receive training in restorative practice with the aim of making, maintaining and mending relationship. We see this as key to establishing mutual trust and effective collaboration in all areas of the business including the resolution of complaints. We actively seek as a senior leadership team to model collaboration and mutual respect with the aim of establishing a no blame culture which allows people to take responsibility, knowing they can say 'I got that wrong' and 'I can do that better' We have</p>

				<p>recently established a code of conduct collectively and we are looking at how we can extend this to working with tenants so that their insights, needs and expectations can be reflected and we are able to deeply understand what words like respect and trust mean in practice. We have undertaken an EDI review which will result in an action plan to include the exploration of a relevant 'badge' for our services. As a small organisation we are mindful that our resources including time is limited so we want to make best use. We do not have plans to introduce a professional standard as yet but we are seeking to further embed restorative processes.</p>
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