

## **Appendix 1: Draft Self-assessment form Rochdale Boroughwide Housing April 2024**

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

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

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

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

## Section 1: Definition of a complaint

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
1.2	A complaint must be defined as: <i>‘an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the landlord, its own staff, or those acting on its behalf, affecting a resident or group of residents.’</i>	Yes	Complaints Policy 4.1 The Housing Ombudsman’s (HO’s) definition is included in Section 4.1 in our revised complaints policy and will be published on our website along this self-assessment.	RBH ensure that all employees and contractors working on behalf of RBH understand the definition of a complaint and how to raise complaints via training, team briefs and it will be written into our contracts with contractors from April 2024.
1.3	A resident does not have to use the word ‘complaint’ for it to be treated as such. Whenever a resident expresses dissatisfaction landlords must give them the choice to make complaint. A complaint that is submitted via a third party or representative must be handled in line with the landlord’s complaints policy.	Yes	Complaints Policy 4.1 & 4.2	This is explained clearly in our complaints Policy
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	Yes	Complaints Policy 4.3 A service request is “a request from a customer requiring action to put something right”. This will usually be the first time that you have made us aware of your dissatisfaction with our service.	A service request for example could be: New reports about noise / anti-social behaviour, or an initial enquiry about the level of service charges and the service provided.

	recorded, monitored and reviewed regularly.		Service requests are not considered as complaints.	RBH record, monitor and regularly review service requests.
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	Complaints Policy 4.3	This is clearly set out in our complaints 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 their services, they also must provide details of how residents can complain.	Yes	Complaints Policy 4.2	RBH follow up on all surveys where dissatisfaction is reported. Initially RBH will endeavour to respond to resolve the issue and escalate to a complaint if our customer wishes to do so.

## 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	Complaints Policy 4.1, 4.2 & 4.5	Our policy sets out the reasons for which we would refuse to accept a complaint. Each complaint will be considered on its own merits. When refusing we will clearly set out the reasons why.
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"> <li>• The issue giving rise to the complaint occurred over twelve months ago.</li> <li>• 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.</li> </ul>	Yes	Complaints Policy 4.2	Our policy clearly sets out when we will not consider a complaint.

	<ul style="list-style-type: none"> <li>Matters that have previously been considered under the complaints policy.</li> </ul>			
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	Complaints Policy 4.2	We may accept complaints outside this time limit when there are good reasons to do so, for example if the complaint relates to safeguarding or health and safety.
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	Complaints Policy 4.2, 4.4, 4.7 & 5.3	Our policy clearly states the reasons for excluding a complaint.
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Yes	Complaints Policy 4.4 & 4.5	RBH will consider the individuals circumstances for each complaint made and will not take a blanket approach to exclusions.

### 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	<p>Complaints Policy 2.3, 4.2, 4.4</p> <p>Reasonable Adjustments Policy 4.2 (Link below) <a href="https://www.rbh.org.uk/media/4dynkzkz/reasonable-adjustments-policy-dec-23.pdf">https://www.rbh.org.uk/media/4dynkzkz/reasonable-adjustments-policy-dec-23.pdf</a></p> <p>Customers can complain on-line, via email, through social media, by phone or by writing to RBH. Details are set out in our website. Follow the link here <a href="#">Feedback and Complaints   RBH</a></p>	Complaints handlers have regular and appropriate training that includes dealing with requests with respect, empathy, and equality. We will communicate with our customers in line with their preferences.
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	Complaints Policy 4.4	All RBH team members have received training and reminders via team briefs about how to refer a complaint for a customer.
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	Yes	Complaints Policy 4.4	RBH welcomes complaints and the opportunities to learn from them.

	complaint volumes are potentially a sign that residents are unable to complain.			
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 on the RBH website. Link to added once policy is approved. Two-step process is set out at 4.4 and 4.5 of the policy.	Policy available on our website with a policy summary for improved accessibility. The policy is available in other formats on request.
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	Complaints Policy 1.3 & 1.4 The complaints Policy is on RBH's website as well as a guide about how to forward a complaint and how to contact the Housing Ombudsman. (Add link) <a href="#">Feedback and Complaints   RBH</a>	RBH will include regular updates in our customer newsletter about how to make a complaint.
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	Complaints Policy 4.4	RBH will accept representatives dealing with complaints on behalf of our customer, as set out in our Complaints Policy.
3.7	Landlords must provide residents with information	Yes	Complaints Policy 1.3, 4.5 & 4.6	RBH provides customers with

	on their right to access the Ombudsman service and how the individual can engage with the Ombudsman about their complaint.		RBH's website advises how a customer can contact the Housing Ombudsman. Follow the link here <a href="#">Feedback and Complaints   RBH</a>	information on how to access the Ombudsman Service throughout the complaints process.
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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	Complaints Policy 4.3, 4.5 & 4.6	RBH have a dedicated complaints handling team. RBH report complaints performance to the Customer Services Committee (CSC).
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	Complaints Policy 4.5	Complaints Resolution Officers have access to staff at all levels in order to thoroughly investigate mistakes.
4.3	Landlords are expected to prioritise complaint handling and a culture of	Yes	Complaints Policy 4.4 and Section 5	Trends are now analysed and shared with RBH teams



	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		The Customer Service Committee (CSC) and Board receive regular reports about complaints and learning.	so they can build these into the Service Improvement Plans. Staff have undergone extensive formal training and mentoring for Complaints Handling that meet the requirements of the CHC. Resources are monitored regularly to ensure that we maintain an effective complaint handling service.
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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 April is on our website along with the CHC self-assessment for 2024. Complaints Policy 3.1	This self-assessment and the policy have been reviewed by the Board Champion and by the CSC.
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	Complaints Policy 4.1 – 4.3	RBH will always try to find an early resolution for customers, but where a complaint is made, we will acknowledge in full within 5 working days.

				There is no Stage 0 or informal complaints.
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	Complaints Policy 4.3 - 4.6	RBH has only a two stages. We outline how to escalate the matter to the Housing Ombudsman Service if our customer is not satisfied after Stage 2.
5.4	Where a landlord's complaint response is handled by a third party (e.g. a contractor or independent adjudicator) at any stage, it must form part of the two stage complaints process set out in this Code. Residents must not be expected to go through two complaints processes.	Yes	Complaints Policy 1.4, 3.2	RBH will lead on complaints that involve third parties, such as contractors in line with the Code. Customers will not need to go through two separate complaints processes.
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Yes		As CHC 5.4 RBH will lead on all complaints that involve third parties.
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	Complaints Policy 4.4 & 4.5	The complaint definition is clearly set out in our complaint acknowledgement at both stages of the complaints process.
5.7	When a complaint is acknowledged at either stage, landlords must be clear which aspects of the complaint they	Yes	Complaints Policy 4.4 & 4.5	We will be clear about which aspects of the complaint we

	are, and are not, responsible for and clarify any areas where this is not clear.			are and are not responsible for.
5.8	<p>At each stage of the complaints process, complaint handlers must:</p> <ul style="list-style-type: none"> <li>a. deal with complaints on their merits, act independently, and have an open mind;</li> <li>b. give the resident a fair chance to set out their position;</li> <li>c. take measures to address any actual or perceived conflict of interest; and</li> <li>d. consider all relevant information and evidence carefully.</li> </ul>	Yes	Complaints Policy 4.5	Complaints Resolution Officers will handle the complaint in a way that covers point a-d and this is set out in our Complaints Policy.
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	Complaints Policy 4.5 & 4.6	RBH commit to CROs updating customers throughout the complaint's investigation.
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	Reasonable Adjustments Policy Complaints Policy 2.3	At RBH we are unwavering in our commitment to ensure equal access to our services for everyone including those with registered and unregistered disabilities. We recognise the importance of making reasonable adjustments to accommodate all individuals.

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	Complaints Policy 4.1, 4.4 & 4.5	Our policy explains the timeframes we adhere to when a customer wishes to escalate a complaint. Our complaints policy explains why we may refuse to escalate a complaint. We would always communicate this with our customer.
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	Complaints Policy 4.2	All interactions with customers are recorded on our Customer Relationship Management (CRM) system and the Complaints team are fully trained in the use of CRM
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	Complaints Policy 4.3, 4.4 & 4.5	The CRO will always contact customers at the start of the complaint to discuss it in more detail. This conversation could lead to early resolution or highlight actions that need to be handled urgently. For example, where there is a health and safety risk, our priority is to our resident and the safety of the building.
5.14	Landlords must have policies and procedures in place for managing	Yes	Complaints Policy 4.9	RBH's Complaints Policy sets out how we manage

	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.			unacceptable behaviour from customers and/or their representatives when pursuing a complaint.
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	Complaints Policy 4.9	Any restrictions on contact will be proportionate and we will demonstrate regard for the provisions of 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	Complaints Policy 4.3	RBH will respond to complaints as early as possible. This is clearly set out in our Complaints Policy.
6.2	Complaints must be acknowledged, defined and logged at stage 1 of the complaint's procedure <b><u>within five working days of the complaint being received.</u></b>	Yes	Complaints Policy 4.5	RBH will acknowledge complaints in line with the CHC's timescales.
6.3	Landlords must issue a full response to stage 1 complaints <b><u>within 10 working days</u></b> of the complaint being acknowledged.	Yes	Complaints Policy 4.5	RBH will respond to complaints within 10 working days unless due to the complexity of the complaint, more time is required.
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.	Yes	Complaints Policy 4.5	Where a complaint is more complex and RBH require more time to respond we

	Any extension must be no more than 10 working days without good reason, and the reason(s) must be clearly explained to the resident.			will liaise with the Customer as set out in our policy.
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	Complaints Policy 4.5	We will always supply the Ombudsman's contact details when extending the timescale for a complaint.
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	Complaints Policy 4.8	RBH will track outstanding actions and follow up with a call to confirm with the customer once completed.
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	Complaints Policy 4.5	We will address all points raised in our response with clear reasons for our decisions.
6.8	Where residents raise additional complaints during the investigation, these must be incorporated into the stage 1 response if they are related, and the stage 1 response has not been issued.  Where the stage 1 response has been issued, the new issues are unrelated to the issues already being investigated or it would unreasonably delay the	Yes	Complaints Policy 4.5	Where Customers need to raise further relevant concerns to an ongoing complaint, this will be considered when they are related. Where outside of the existing complaint, a new complaint will be raised.

	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"> <li>a. the complaint stage;</li> <li>b. the complaint definition;</li> <li>c. the decision on the complaint;</li> <li>d. the reasons for any decisions made;</li> <li>e. the details of any remedy offered to put things right;</li> <li>f. details of any outstanding actions; and</li> <li>g. details of how to escalate the matter to stage 2 if the individual is not satisfied with the response.</li> </ul>	Yes	Complaints Policy 4.5	A response will be sent to all customers following the completion of an investigation at Stage 1 with details of how to escalate to Stage 2 if not satisfied.

## Stage 2

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
6.10	If all or part of the complaint is not resolved to the resident's satisfaction at stage 1, it must be progressed to stage 2 of the landlord's procedure. Stage 2 is the landlord's final response.	Yes	Policy 4.5	This is clearly set out in our Policy.
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	Complaints Policy 4.5 - 4.6 (reference back to 4.5)	We will follow the guidelines of the CHC when acknowledging Stage 2 complaints.



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	Complaints Policy 4.5 & 4.6	This is clearly set out in our Complaints Policy.
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Yes	Complaints Policy 4.6	At Stage 2, a Senior CRO or equivalent will investigate the complaint and respond. The CRO's will handle customers Stage 1 responses.
6.14	Landlords must issue a final response to the stage 2 <b><u>within 20 working days</u></b> of the complaint being acknowledged.	Yes	Complaints Policy 4.6	This is clearly set out in our Complaints Policy.
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	Complaints Policy 4.6	This is clearly set out in our Complaints Policy
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	Complaints Policy 4.6	We will always supply the Ombudsman's contact details when extending the timescale for a complaint
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	Yes	Complaints Policy 4.5 & 4.6	We will not delay responses to complaints because of outstanding actions. We will monitor all actions that we

	the issue are completed. Outstanding actions must still be tracked and actioned promptly with appropriate updates provided to the resident.			commit to carrying out in our complaints response.
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	Complaints Policy 4.5 & 4.6	We will respond to all points raised in the complaints definition and give clear reasons for our decisions.
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	Complaints Policy 4.5 & 4.6	We will confirm all points a-g in our complaints responses.
6.20	Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.	Yes	Complaints Policy 4.6	RBH are committed to involve all appropriate team members to ensure the best possible response for our customer.

## 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"> <li>• Apologising;</li> <li>• Acknowledging where things have gone wrong;</li> <li>• Providing an explanation, assistance or reasons;</li> <li>• Taking action if there has been delay;</li> <li>• Reconsidering or changing a decision;</li> <li>• Amending a record or adding a correction or addendum;</li> <li>• Providing a financial remedy;</li> <li>• Changing policies, procedures or practices.</li> </ul>	Yes	Complaints Policy 4.5	RBH are committed to working with customers resolve complaints and set out clearly what we are doing to put it right
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Yes	Compensation Policy 4.11 Add link once reviewed and approved.	RBH are committed to working with customers resolve complaints and set our clearly what we are doing to put it right. We have a detailed compensation policy which further breaks down what measure this may involve

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	Complaints Policy 4.5	We will clearly set out what will happen and by when in our response and with our customers agreement where possible.
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes	Complaints Policy 1.3	RBH have a clear compensation policy and commit to reviewing statutory obligations and any quantifiable losses

### 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: <ul style="list-style-type: none"> <li>a. the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements.</li> <li>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;</li> <li>c. any findings of non-compliance with this Code by the Ombudsman;</li> </ul>	Yes	The self-assessment against this code is published on our website.	The outcome of this self-assessment is referred to the CSC along with our performance and all points of the CHC requirement set out here a-f.

	<p>d. the service improvements made as a result of the learning from complaints;</p> <p>e. any annual report about the landlord's performance from the Ombudsman; and</p> <p>f. any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord.</p>			
8.2	The annual complaints performance and service improvement report must be reported to the landlord's governing body (or equivalent) and published on the on the section of its website relating to complaints. The governing body's response to the report must be published alongside this.	Yes		The annual complaints report to the CSC will be published along with the Committee's response to the report.
8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	Yes		RBH commit to a review of this self-assessment following any future restructure / merger or changes in procedures.
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	Yes		RBH commit to reviewing the self-assessment following an Ombudsman's investigation.
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	Yes		If we are unable to comply with the code due to exceptional circumstances will inform the Ombudsman, and provide information to our customers with

	publish this on their website Landlords must provide a timescale for returning to compliance with the Code.			timescales for returning to compliance.
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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	Complaints Policy 5.1 – 5.7	RBH is committed to learning and improving from our complaints. This is detailed in Section 5 of our Complaints Policy
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	Complaints Policy 5.1 – 5.7	<ul style="list-style-type: none"> <li>• RBH will survey customers around the performance of our Complaints Team and will use intelligence gleaned from complaints to inform service improvements.</li> <li>• We will contact each customer who expresses dissatisfaction and ask how we can put the issue right for each individual and make changes where appropriate.</li> <li>• Learning from individual complaints as well as trends are shared with teams and the required improvements feed into</li> </ul>

				service improvement plans.
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	Complaints Policy 5.1 – 5.7	RBH will publish performance of complaints. Further to this RBH will run quarterly complaint sessions for Customers to come and review/challenge learnings.
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		RBH's Director of Customer Experience and the Customer Experience Lead are accountable for complaints handling.
9.5	In addition to this a member of the governing body (or equivalent) must be appointed to have lead responsibility for complaints to support a positive complaint handling culture. This person is referred to as the Member Responsible for Complaints ('the MRC').	Yes		A key member of the Board and the CSC is RBH's MRC and supports a positive complaint handling culture.
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		RBH's MRC and RBH's CSC (which includes customers) receives regular complaints handling performance reports and has access to staff and information to perform this role and report on their findings.

9.7	<p>As a minimum, the MRC and the governing body (or equivalent) must receive:</p> <ul style="list-style-type: none"> <li>a. regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance.</li> <li>b. regular reviews of issues and trends arising from complaint handling.</li> <li>c. regular updates on the outcomes of the Ombudsman’s investigations and progress made in complying with orders related to severe maladministration findings; and</li> <li>d. annual complaints performance and service improvement report.</li> </ul>	Yes		<p>The CSC receives all information set out in points a-d and feeds back to board at each meeting cycle.</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> <ul style="list-style-type: none"> <li>a. have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments.</li> <li>b. take collective responsibility for any shortfalls identified through complaints, rather than blaming others; and</li> <li>c. act within the professional standards for engaging with complaints as set by any relevant professional body.</li> </ul>	Yes	<p>Complaints Policy 1.2</p> <p>RBH are committed to full compliance with the code and will act in accordance with the standards for engaging with complaints as set out by the HO Service</p>	<p>RBH has a new team structure and approach to resolve complaints with new CRO’s actively working in collaboration with teams and customers to resolve complaints. We take full responsibility for shortfalls and actively promote complaints learning across all teams.</p> <p>RBH’s corporate strategy 2024/2025, ‘Delivering for our customers and communities’ and values</p>



				<p>support compliance with the new CHC.</p> <p>Add link when strategy has been added to the website.</p> <p>Our values are:</p> <ul style="list-style-type: none"><li>• Putting People First</li><li>• Doing What We Say</li><li>• Open and Transparent</li><li>• Working As One</li><li>• Delivering Quality</li></ul>
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