

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	Complaints Policy Section: 8.1.1 The definition of a complaint	The complaint definition is included within our policy and published on our website.
1.3	A resident does not have to use the word 'complaint' for it to be treated as such. Whenever a resident expresses dissatisfaction landlords must give them the choice to make complaint. A complaint that is submitted via a third party or representative must be handled in line with the landlord's complaints policy.	Yes	Complaints Policy Section: 8.1.1 The definition of a complaint Section: 8.1.4 Making a complaint from or on behalf of, residents	Employees are aware of this through our internal communication channels (our organisational news bulletin and complaints training process) and our website.
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 Section 8.1.2 Housing Complaint Stages	Training is provided to employees and we have internal communication to this effect as per section 1.3.

	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	Complaints Policy Section 8.1.2 Housing Complaint Stages	Anything which we are unable to resolve or put a plan in place to resolve is escalated to a Stage 1 complaint.
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	<p>At all Locations residents can give feedback through a system called 'We're Listening'.</p> <p>Advice in relation to how to pursue a complaint is defined in our policy, which is referenced in the Annual Landlord Survey.</p> <p>Annual Landlord Survey is also completed and then shared with Locations to help improve performance.</p>	<p>ExtraCare give our residents an opportunity to express their feedback using an internal survey system called 'We're Listening'.</p> <p>Low scoring survey feedback submitted via 'We're Listening' referencing how we have delivered a service will result in a discussion to understand the residents concerns. Where necessary a complaint is registered through the formal complaint handling process.</p> <p>In the event of an anonymous survey</p>

				response the detail will be reviewed and internal investigation/fact finding process followed to identify any evidence of a service failure followed by any necessary improvement.
--	--	--	--	------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

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 Section: 8.1.4 Making a complaint from or on behalf of, resident's and 8.1.5 Exclusions.	The Complaints Officer will conduct an initial evaluation of the complaint recording and acknowledging. All complaints are assessed on there on individual circumstances.
2.2	A complaints policy must set out the circumstances in which a matter will not be considered as a complaint or escalated, and these circumstances must be fair and reasonable to residents. Acceptable exclusions include:	Yes	Complaints Policy Section: 8.1.5 Exclusions	Our policy details this and we will provide justification if not accepting a complaint.

	<ul style="list-style-type: none"> • The issue giving rise to the complaint occurred over twelve months ago. • Legal proceedings have started. This is defined as details of the claim, such as the Claim Form and Particulars of Claim, having been filed at court. • Matters that have previously been considered under the complaints policy. 			
2.3	Landlords must accept complaints referred to them within 12 months of the issue occurring or the resident becoming aware of the issue, unless they are excluded on other grounds. Landlords must consider whether to apply discretion to accept complaints made outside this time limit where there are good reasons to do so.	Yes	Complaints Policy Section: 8.1.5 Exclusions	We will provide justification if we do not accept a complaint.
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 Section: 8.1.5 Exclusions	We will provide justification if we do not accept a complaint.

2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Yes	<p>The detail of any complaint received, will be reviewed to identify its validity in accordance with our policy in particular the sections of the policy:</p> <p>Complaints Policy</p> <p>Section: 8.1.1 The definition of a complaint and Section: 8.1.5 Exclusions</p>	<p>The Complaints Officer will conduct an initial evaluation of the complaint recording and acknowledging.</p> <p>All complaints are assessed on there on individual circumstances.</p>
-----	----------------------------------------------------------------------------------------------------------------------------------------	-----	-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

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>The Complaints Policy defines the formats in which a complaint can be made</p> <p>Complaints Policy</p> <p>Section: 8.1.7 How to raise a complaint</p> <p>An Equality Impact Assessment which is completed alongside the policy considers the requirements of the Equality Act 2010.</p>	<p>As defined in the policy a complaint can be made via:</p> <ul style="list-style-type: none"> • phone; • letter; • social media; • in person to a staff member; and • our website. <p>A complainant can request the complaint in a format which suits their communication preferences.</p>

				Staff support and advice can be provided to anyone wishing to make a formal complaint.
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	<p>Complaints Policy</p> <p>Our complaints policy clearly defines how someone can make a complaint – this is accessible to all staff via our internal SharePoint system and on our website. Internal communication briefings will be shared with staff when there is amends to the policy and supporting guidance.</p> <p>The Complaints Officer completes the staff training on ‘handling complaints’ either as part of the induction process for new staff and as an ongoing support function for existing complaints handlers.</p>	<p>Once a complaint has been received via the complaints department this will be recorded and allocated to a suitably trained member of staff (complaints handler).</p> <p>The complaints handler will be the point of contact with the resident throughout the course of the complaint journey, however, should the resident wish to express dissatisfaction with the complaints handling experience or wishes to make any other specific enquiries they can also contact the complaints department.</p>
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	Yes	The complaints policy is accessible on our company website and is actively discussed at our resident forums and other location meetings.	Transparent messaging in relation to our complaint volumes is communicated to our residents via our Annual Landlord Report and published on our website.

	sign that residents are unable to complain.		We offer drop-in sessions for our residents, with Regional Operations Managers, our Maintenance teams and also hold 'Street Meetings' led by the Location Managers which give residents an opportunity to discuss any potential concerns or complaints.	We actively promote our complaints process and encourage people to utilise this route should they be dissatisfied.
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	A paper copy of our Complaints Policy is available on request. Complaints Policy Section: 8.1.13 Reasonable adjustments	Our Complaints Policy is available to residents via our website which provides accessible ways to review the information including a 'browse aloud' function. Copies are also available via a QR code and paper copies upon 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 Section: 5. Monitoring & Review	Our Complaints Policy is available on our website and details can be found in our 'Tell Us Your Concerns' leaflet. This information is included in our resident handbook. We are members of the Housing Ombudsman Scheme, and we review

				information shared as an ongoing external reference point, to align our existing processes, seek opportunities for improvement and lessons learned/best practice.
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 Section: 8.1.4 Making a complaint from or on behalf of, residents	Our Complaints Policy includes that complainants have a choice to appoint a representative to manage their complaint if they wish.
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	Details of how to contact the Ombudsman are included within all our responses throughout the complaint journey.	Information regarding access to the Housing Ombudsman is provided to the customer in our acknowledgement of their complaint, and also upon resolution of a Stage 1 or Stage 2 complaint.

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	We have a Complaints Officer who is responsible for complaint handling.	Our Complaints Officer is assigned to take responsibility for complaints including the coordinating of any investigation.
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	<p>Complaints Policy Section: 4. Responsibilities / Complaints Officer</p> <p>In order to identify a suitable subject matter expert, the Complaints Officer will review the complaint detail and will then refer to the ExtraCare internal 'Complaint Handling Allocation Matrix' to ensure this is suitable assigned for investigation and response.</p>	<p>This is included in our Complaints Policy.</p> <p>We have an internal complaints allocation matrix to guide the Complaints Officer when allocating a complaint to an appropriate complaint handler.</p>
4.3	Landlords are expected to prioritise complaint handling and a culture of learning from complaints. All relevant	Yes	The Complaints Officer will complete analysis on the	Our Complaints Officer undertakes complaints handling training in line with

	<p>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</p>		<p>complaints received data collated monthly, quarterly, and annually. This is presented to our Executive Leadership Team and is reviewed to identify any potential concerns, trends, or learnings through the complaints process.</p> <p>We have a Learning and Improvement Group which takes place monthly, and learnings are discussed at this forum and cascades by the members for organisational information sharing, best practice, and opportunities for improvement.</p>	<p>our policy requirements, this is either completed as part of the staff induction or as an ongoing support function.</p> <p>In the event of a policy change refresher training will be delivered to the existing complaints handlers.</p>
--	--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--	-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

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	We have one policy which applies to all.

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	We do not have informal complaints or stage zero.
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 Section: 8.1.2 Housing / Complaints Stage 1 & Stage 2	We have a two-stage complaint 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.	Yes	Complaints Policy Section: 8.1.6 Scope of complaints	We will process complaints provided on our behalf by one of our third-party contractors (for example, repairs or catering).
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Yes	We have one complaint policy and a two-stage complaint process, all complaints including third party complaints are handled in line with this. Any third-party complaint will be recorded on our complaints system, allocated a reference and our complaint handlers will	We have internal reporting processes in place to track and open complaints during the complaints journey, including where a complaint may go outside of the SLA outlined in our policy, to ensure the resident has been kept informed of the

			<p>then make enquiries in to the concerns raised with the third party point of contact. Any recommended action will be discussed and agreed with the third party including costs associated with any damages.</p> <p>Complaints Policy Section: 8.1.6 Scope of complaints</p>	<p>progress of the complaint and we have adhered to the extension protocol outlined in section: 8.1.6 of our complaints policy.</p> <p>All complaints are logged on our internal complaint system and are regularly progress chased with anyone handling a complaint to ensure we are on track and if we perceive any issues with compliance to our SLA response timescales that we discuss and agree an approach with the resident as the earliest possible opportunity. Records are held centrally for any complaint received.</p>
5.6	<p>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.</p>	Yes	<p>Our acknowledgement letter details the points which the complainant has raised. If any further clarification is required in relation to the outstanding complaint points a meeting is arranged with the resident to obtain clarification. Meetings can be arranged in person, over the phone or via an appropriate link dependant on the resident’s</p>	<p>This is included in our Complaints Policy.</p>

			<p>preference and to avoid delays in managing the complaint.</p> <p>Complaints Policy</p>	
5.7	<p>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.</p>	Yes	<p>Our Acknowledgement letter details the aspects of a complaint we are dealing with and those that fall outside of our remit.</p> <p>Complaints Policy</p>	<p>Our acknowledgement letter details the complaints points that will be reviewed as part of the complaint.</p> <p>Where there is any aspect of the complaint, we are not responsible for we will clarify this and support the resident in taking alternative steps.</p>
5.8	<p>At each stage of the complaints process, complaint handlers must:</p> <ol style="list-style-type: none"> deal with complaints on their merits, act independently, and have an open mind; give the resident a fair chance to set out their position; take measures to address any actual or perceived conflict of interest; and consider all relevant information and evidence carefully. 	Yes	<p>Complaints Policy</p> <p>Section: 4. Responsibilities / Complaints officer</p> <p>Complaints training/ Internal work instructions</p>	<p>Our Complaints Officer and other complaint handlers are supported and receive regular training.</p>
5.9	<p>Where a response to a complaint will fall outside the timescales set out in this Code, the landlord must agree with the</p>	Yes	<p>The resident receives a holding letter that confirms the reason for</p>	<p>Our complainants are kept up to date by phone call, email or in person based</p>

	resident suitable intervals for keeping them informed about their complaint.		<p>the extension request and sets closing expectations.</p> <p>Complaints Policy Section: 8.1.10 Timescales:/ b. Complaint (Housing & all Care related complaints)</p>	<p>upon their preferred method of contact, however extension request is completed via a formal written response by the tenth working day from receipt of complaint.</p>
5.10	<p>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.</p>	Yes	<p>Complaints Policy Section: 8.1.13 Reasonable adjustments</p> <p>We capture on our complaint recording system if an individual has disclosed if they are in receipt a regulated care activity, if this has not been disclosed we will check our internal portal system for clarity of whether they are in receipt of care to allow us to categorise and allocate the complaint effectively.</p> <p>Should a resident disclose a disability in their original complaint details this would be retained on file along with all other associated documentation relevant to that complaint. This is at the resident's discretion.</p>	<p>Our Equality Diversity and Inclusion Policy seeks to ensure that we actively promote a person-centred approach to our residents, and to ensure that their specific needs are understood and met.</p>

			In the event of a resident requesting information in an accessible format this would be accommodated where possible at the earliest opportunity.	
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 Section: 8.1.8 Exclusions	The Stage of the complaint process is clearly outlined in the acknowledgement and the response letter along with the next steps should resident which to take this further.
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 logged and allocated an individual reference number upon receipt, details of the complaint are saved in a permission-controlled folder which is identified by the complaint reference and all associated documentation throughout the complaint process is stored within this folder for future reference. There is also a digital record held in our complaint recording system, which covers the basic information such as the ID, date received, and closed, the basic detail of the concerns being raised and the outcome.	Our complaints handlers are trained to complete a comprehensive complaint review. All evidence related to the complaint is retained centrally for future reference purposes. The correspondence will include the original complaint date/ID/date closed and the outcome. The Complaints Officer provides work instructions to all complaint handlers to ensure quality is assured in line with our complaints policy and procedures.

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 Section: 7. Statement of Commitment	Our aim is to resolve or provide a solution at the earliest opportunity.
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	Policies referred to managing unacceptable behaviour: 1. Acceptable Behaviour Policy 2. Professional Boundaries policy (internal document).	<p>The policies referenced outline our expectations in terms of acceptable behaviour and anything which falls under unacceptable behaviour circumstances.</p> <p>In line with our internal policy - any cases which identify as unacceptable behaviour, or a breach of professional boundaries will continue to be reviewed every three months by the appropriate manager who will then determine any further action required.</p> <p>There is a right for Managers to escalate to the appropriate Regional Operations Manager/Senior Manager.</p>

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	Anti -Social Behaviour policy (internal document) Anti-Social Behaviour information for residents	
------	------------------------------------------------------------------------------------------------------------------------------------------------------------	-----	--------------------------------------------------------------------------------------------------------------------------	--

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>At the time of receiving a complaint, the complainant should define any element of vulnerability, or adjustments needed. This will be considered when allocating the complaint, in addition to our complaints logging system we also have an internal Customer Portal system which stores details of any health concerns or support needs the resident may have, however this is at the discretion of the resident.</p> <p>Stage One complaints are clearly defined in our policy, however if it is deemed appropriate given the nature of the concerns being raised an interim discussion may</p>	<p>Because our vulnerable residents are known to us through the information we have locally and on Customer Portal we tailor our approach to meet the needs of vulnerability where they are known.</p> <p>Our aim is to resolve or provide a solution at the earliest opportunity.</p> <p>In addition, with complex cases we agree with the customer the desired approach.</p>

			<p>be arranged with the resident to mitigate any further risk to them or other residents.</p> <p>Where appropriate to do so we will consult with the wellbeing advisor, or our internal safeguarding policy should we feel it is appropriate to do so.</p> <p>Safeguarding Adults and Children at Risk Policy</p>	
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	<p>Complaints Policy Section: 8.1.10 Timescales / b. Complaint (Housing & all Care related complaints) /Stage 1</p>	Our Complaints Policy defines our acknowledgement response time, we also have an outgoing message on our complaints email inbox to set the complainants expectations in terms of a response.
6.3	Landlords must issue a full response to stage 1 complaints <u>within 10 working days</u> of the complaint being acknowledged.	Yes	<p>Complaints Policy Section: 8.1.10 Timescales / b. Complaint (Housing & all Care related complaints) /Stage 1</p>	Complaints Policy
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	Yes	<p>Complaints Policy Section: 8.1.10 Timescales / b. Complaint (Housing & all</p>	Each complaint is reviewed on its individual merits and residents are consulted

	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.		Care related complaints) /Stage 1	with/informed at the earliest possible opportunity if we feel additional time (in excess of our policy) will be required. A confirmation of any agreed extension will be submitted in writing and recorded on the complaints system.
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 Section: 8.1.10 Timescales / b. Complaint (Housing & all Care related complaints) /Stage 1	This is included in all our letter templates.
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 complaints handling investigation, if it becomes clear to the complaint handler that the answer to the complaint is 'known' once we have established the facts and have an approach to move this forward. , we will close the complaint on a promise to complete the agreed actions.
6.7	Landlords must address all points raised in the complaint definition and	Yes	Our Internal letter template acts as guidance to respond in the	

	<p>provide clear reasons for any decisions, referencing the relevant policy, law and good practice where appropriate.</p>		<p>appropriate format to the complainant.</p>	<p>The complaint response follows a standard template approach which details the original points raised, and the response alongside these points following the investigation.</p> <p>The response will also detail if this is deemed upheld in any part or if it is not. The structure of the response correspondence also gives the complaint handler the appropriate links in terms of further steps in line with the policy and the Housing Ombudsman or Local Government & Social Care Ombudsman process.</p> <p>In the event of a complaint having legal involvement this is referred to at the beginning of the complaints journey – and the appropriate section in the policy referenced for clarity.</p> <p>Any actions which are identified as part of the complaints investigation will</p>
--	---------------------------------------------------------------------------------------------------------------------------	--	-----------------------------------------------	-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

				be clearly defined in the complaint response.
6.8	Where residents raise additional complaints during the investigation, these must be incorporated into the stage 1 response if they are related and the stage 1 response has not been issued. Where the stage 1 response has been issued, the new issues are unrelated to the issues already being investigated or it would unreasonably delay the response, the new issues must be logged as a new complaint.	Yes	<p>Our primary aim when we receive a complaint is to put the issue right at the earliest opportunity. Any unrelated concerns or further complaints would be treated as a separate complaint in line with our complaints policy.</p> <p>Complaints Policy Section: 7. Statement of Commitment</p>	<p>When a resident has additional complaint points to raise while already having an active complaint with ExtraCare and an ongoing complaints inquiry, we will not add the additional complaint points that are unrelated to the concerns being examined.</p> <p>Any additional points raised may cause delays in managing the ongoing complaint; instead, a separate complaint will be recorded to manage the additional points. A letter confirming details will be provided to the resident by the complaint's team.</p> <p>We will only add additional points to an existing complaint if they are relevant to the concerns being investigated and will not result in further delays; these will be detailed in our</p>

				<p>response letter as additional complaint points.</p> <p>The complaints officer will analyse the complaint points and the complaint path to make an informed conclusion about the best approach to take.</p>
6.9	<p>Landlords must confirm the following in writing to the resident at the completion of stage 1 in clear, plain language:</p> <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	<p>Our responses include the stage and definition of the complaint in all points referenced in section 6.9. Our standard template and policy approach follows these recommended steps.</p>	<p>We have a structured template letter ensuring all mandatory information is provided:</p> <ul style="list-style-type: none"> a) the complaint stage; b) the complaint definition; c) the decision on the complaint; d) the reasons for the decisions made; e) the details of any remedy offered; and f) next steps – escalation to stage 2. <p>We have a letter check mechanism that ensures all response letters have the necessary information.</p>

				<p>Once approved by the complaints team, the letter can be distributed.</p> <p>Next steps for the complainant are defined in the letter template.</p>
--	--	--	--	-------------------------------------------------------------------------------------------------------------------------------------------------------

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	Complaints Policy Section: 8.1.10 Timescales	In line with the Housing Ombudsman complaint handling guidelines, ExtraCare have a 2-stage complaint process and stage 2 is our final response to the complaint.
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 Section: 8.1.10 Timescales / b. Complaint (Housing & all Care related 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	Yes	Complaints Policy Section: 8.1.10 Timescales / b. Complaint (Housing & all Care related complaints)	

	understand why a resident remains unhappy as part of its stage 2 response.			
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 Section: 8.1.10 Timescales / b. Complaint (Housing & all Care related complaints) /Stage 2	Our policy ensures a different individual (not involved at stage 1) reviews the stage 2 complaint.
6.14	Landlords must issue a final response to the stage 2 <u>within 20 working days</u> of the complaint being acknowledged.	Yes	Complaints Policy Section: 8.1.10 Timescales / b. Complaint (Housing & all Care related complaints) /Stage 2	
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	Our aim is to ensure that we provide a full response as quickly as possible, confirming our findings. Complaints Policy Section:8.1.10 Timescales:	If additional time is required to investigate the concerns raised, gather evidence, and formulate our response verifying findings, we will work with the resident to agree an extension. The extension is granted when we can demonstrate why it is necessary; the request is assessed by the complaints team, and a holding letter is provided to the resident confirming the reason for the

				postponement and sets closing expectations.
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 Section: 8.1.10 Timescales / b. Complaint (Housing & all Care related complaints) /Stage 2	This is included in our letter templates.
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	Our primary aim when we receive a complaint is to put the issue right at the earliest opportunity. Complaints Policy Section: 7. Statement of Commitment Internal complaint handling work instructions	Once we have a plan in place, we will close the complaint on a promise to complete the agreed work.
6.18	Landlords must address all points raised in the complaint definition and provide clear reasons for any decisions, referencing the relevant policy, law and good practice where appropriate.	Yes	This is outlined in our Complaints Policy and included in our letter templates. All letters are quality checked by the complaints team. Complaints Policy Internal letter templates	The complaint response follows a standard template approach which details the original points raised, and the response alongside these points following the investigation. The response will also detail if this is deemed upheld in any part or if it is not. The

				<p>structure of the response correspondence also gives the complaint handler the appropriate links in terms of further steps in line with the policy and the Housing Ombudsman or Local Government & Social Care Ombudsman process.</p> <p>Any actions which are identified as part of the complaint's investigation will be clearly defined in the complaint response.</p>
6.19	<p>Landlords must confirm the following in writing to the resident at the completion of stage 2 in clear, plain language:</p> <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	<p>Internal work instructions</p> <p>Internal letter templates</p>	<p>We have a structured template letter ensuring all mandatory information is provided to the customer.</p> <p>We have a letter check mechanism that ensures all answer letters have the necessary information. Once approved by the complaints team, the letter can be distributed.</p> <p>Our letter templates provide details for relevant Ombudsman if the complainants remain</p>

				unhappy and wish to escalate further or seek guidance.
6.20	Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.	Yes	Stage 2 complaints are allocated to a more senior position than the handler at Stage One. The escalation pathways are defined within our complaints policy.	Letters checked by Complaints Officer and any other staff member should this be required. Stage two complaints are escalated to a more senior role within the organisation.

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; 	Yes	<p>This is outlined in our Complaints policy and our letter templates provide reminders to address these elements.</p> <p>Complaints Policy Internal letter templates</p>	<p>Our response will contain ExtraCare's apologies for upheld complaints, as well as specifics about the concerns made, any service failures identified, lessons learned, prevention measures implemented, and compensation details if applicable.</p> <p>In the case of complaints that have not been upheld, we will fully explain our decision and advise on next steps.</p>

	<ul style="list-style-type: none"> Changing policies, procedures or practices. 			
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Yes	Complaints Policy Section:8.1.11 Complaint Resolution & 8.1.14 Compensation	Our Complaints policy provides guidance and remedy is based on the impact to the resident dependant on any failure identified. We do not take a blanket approach to remedying any complaints.
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 Section:8.1.11 Complaint Resolution & 8.1.14 Compensation Internal letter templates	Our remedy response will: <ul style="list-style-type: none"> identify service failure; state what we have or will do; confirm compensation amount; and clarify what this is awarded for.
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes	Ombudsman complaint handling code	We follow guidance and comply with the Ombudsman complaint handling code.

Section 8: Putting things right

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
----------------	------------------	------------------	----------	--------------------------

<p>8.1</p>	<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. 	<p>Yes</p>	<p>Self-Assessment is uploaded to our website, any non-compliance will be discussed with our Senior Management Team members, our Executive Leadership Team and Operations Committee</p> <p>Complaints data is analysed to produce an internal reporting to review any areas of non-compliance, our benchmarking in terms of complaints handling in line with our policy.</p> <p>Annual Landlord report is published on our website and shared with the locations and our Residents Forum. A presentation is delivered to the members of the Residents Forum to explain any trends, patterns or areas improvement captured in the complaint's statistics.</p> <p>We review any Ombudsman determinations and align with our own approaches and policy to identify any opportunities for improvement or sector wide learnings which will be discussed as the Learning and Improvement Group.</p>	<p>The self-assessment will be completed by the Complaints Officer and in collaboration with other key managers to ensure it is line with our policy. Once completed it will be reported to the Operations Committee and be available on the website.</p> <p>Any non-compliance or learnings will be reported and implemented.</p> <p>Complaint performance is provided to ELT and Board with a through breakdown including summary of the types of complaints received or refused.</p> <p>We will include an annual review of complaints performance in the Annual Report to residents.</p> <p>Closed complaint survey will be rolled out to customers in the first quarter next year.</p>
------------	----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	------------	-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

			<p>Learning through complaints forms part of our standard monthly Learning and Improvement Group meeting agenda.</p> <p>Internal reporting on our performance in complaints is reported to our Executive Leadership team and Operations Committee.</p> <p>HouseMark benchmarking reviewed periodically and shared internally with our Senior Management Team to discuss and agree areas for improvement.</p>	
8.2	<p>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.</p>	Yes	<p>Annual Summary report process in place and Self-Assessment published on website</p>	<p>Quarterly report to Operations Committee contains detail regarding complaint volumes per location, stage and categories. Escalated complaint through internal stages, ombudsman referrals/determinations and any compensation awarded.</p>

				<p>Housemark Monthly Pulse report is reviewed and shared with our Senior Management team</p> <p>Annual residents report includes the statistics in terms of complaints received, and the breakdown between Stage One and Stage Two. Also detailed in this report is the response % within timescales in the policy.</p>
8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	Yes	This is part of our internal procedures	
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	Yes		We will be having more focus on the Annual Housing Ombudsman Report and taking account of other provider Ombudsman referrals' and Determinations to learn from this.
8.5	If a landlord is unable to comply with the Code due to exceptional circumstances, such as a cyber	Yes	Part of the business continuity plan	Internal IT processes are in place to report 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.			incidents and data breaches.
--	-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--	--	------------------------------

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	Learning and improvement group	We pro-actively review internal complaints and those published on Housing Ombudsman website for reflection and guidance. Aim is to add prevention measures and improve complaint handling.
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	We have an internal we're listening system which allows our residents to raise 1 star feedback, which is deemed a negative comment, this information is reviewed/actioned and where the resident has disclosed their apartment number will be discussed further with them to explore the outcome required.	Proactively seek feedback review from our residents, using this intelligence against current process and make changes where required.

			<p>Closed complaint reviews are undertaken quarterly.</p> <p>Closed complaint survey to be issued to complainant Annual landlord surveys</p>	
9.3	<p>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.</p>	Yes	<p>Information is shared with our Executive Leadership Team, Board and the Resident forum for information sharing purposes and to allow an opportunity for engagement and discussion.</p>	<p>Quarterly report to Operations Committee contains detail in regard to complaint volumes per location, stage and categories. Escalated complaint through internal stages, ombudsman referrals/determinations and any compensation awarded.</p> <p>Housemark Monthly Pulse is shared with our Senior Management Team for review and discussion around any areas for improvement,</p> <p>Annual Resident Report is shared at our Resident Forum.</p> <p>We will focus on the Annual Housing Ombudsman Report and take account of other Registered Providers</p>

				Ombudsman referrals' and Determinations to learn from these.
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	Complaints Policy Section: 4. Responsibilities	Laura Davies – Head of Quality, Compliance and Performance is the policy owner, and line manager of the complaints officer.
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	ExtraCare have a nominated Member Responsible for Complaints (MRC)	
9.6	The MRC will be responsible for ensuring the governing body receives regular information on complaints that provides insight on the landlord's complaint handling performance. This person must have access to suitable information and staff to perform this role and report on their findings.	Yes	The MRC will receive regular information on complaints via our Operation's Committee and any will consider any complaints which require escalation to The Board.	
9.7	As a minimum, the MRC and the governing body (or equivalent) must receive:	Yes	The MRC will receive regular information on complaints via our Operation's Committee and any will consider any complaints	Complaints reporting published to the MRC via our Committee which includes:

	<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>		<p>which require escalation to The Board.</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>
<p>9.8</p>	<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</p>	<p>Yes</p>		<p>Policy in place with purpose and aims defined.</p> <p>All departments have involvement in the complaints handling process and learning through complaints is discussed as a standard agenda item in the learning and improvement group.</p>

	complaints, rather than blaming others; and c. act within the professional standards for engaging with complaints as set by any relevant professional body.			
--	----------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--	--	--