# **Appendix B – Self-Assessment Form**

This self-assessment form should be completed by the complaints officer and discussed at the landlord's governing body annually.

Evidence should be included to support all statements with additional commentary as necessary.

Explanations must also be provided where a mandatory 'must' requirement is not met to set out the rationale for the alternative approach adopted and why this delivers a better outcome.

#### **Section 1 - Definition of a complaint**

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
1.2	A complaint must be defined as:  'an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the organisation, its own staff, or those acting on its behalf, affecting an individual resident or group of residents.	YES	We have adopted the definition of a complaint as set out in the Complaint Handling Code and this is set out in our Complaints Policy.
1.3	The resident does not have to use the word 'complaint' for it to be treated as such. A complaint that is submitted via a third party or representative must still be handled in line with the landlord's complaints policy.	YES	It is stipulated in our Complaints Policy that the word 'complaint' does not have to be used in order for a complaint to be identified and treated as one. The policy also makes it clear that complaints received via representatives will be considered in line with the policy, provided permission is given by the customer for the advocate to act on their behalf.
1.6	if further enquiries are needed to resolve the matter, or if the resident requests it, the issue must be logged as a complaint.	Yes	Our Complaints Policy is clear that customers are empowered to decide whether a concern is handled as a service recovery issue or formal complaint.

			If customers choose to log a service
			recovery, we communicate at the start and periodically throughout that process that they can raise a complaint at any time and provide them the option and information to enable them to do so.
			We have trained colleagues on this aspect of the Code to make sure customers are not unreasonably denied access to our formal complaints procedure. Further refresher training on this was provided in September 2023.
			We have a quality assurance process in place to check that cases are being correctly registered and managed through the service recovery process.
			The HOS reviewed our complaints management as part of its Paragraph 49 systemic investigation into Catalyst and expressed no concern with our approach.
1.7	A landlord must accept a complaint unless there is a valid reason not to do so.	YES	Circumstances under which we may decide not to accept a complaint are minimal - as set out in our Complaints Policy.
			The policy stipulates that we will exercise our discretion appropriately and make sure that any decision to exclude a complaint is fair and valid and that the reasons for the

1.8	A complaints policy must clearly set out the	YES	decision are clearly explained to the resident.  In such cases the resident will be provided contact details for the Ombudsman so that any decision taken to exclude a complaint can be challenged.  As part of our ongoing complaints training, we recently focused on factors to consider when complaints are submitted beyond the 6 months considered reasonable under the terms of our policy, the Ombudsman Scheme and the Code.  We reinforced the message to colleagues about the importance of exercising discretion appropriately to reach fair outcomes for residents.  This has been addressed in 1.7
1.0	circumstances in which a matter will not be considered, and these circumstances should be fair and reasonable to residents.		This has been addressed in 1.7
1.9	If a landlord decides not to accept a complaint, a detailed 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.	YES	This has been addressed in 1.7

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
1.4	Landlords should recognise the difference between a service request, where a resident may be unhappy with a situation that they wish to have rectified, and a complaint about the service they have/have not received.	YES	Colleagues are trained to recognise the difference between a service request and a complaint about the service. Our Complaints Policy is clear about the difference between the two.  Any training issues around this will be identified though our ongoing customer satisfaction surveys.
1.5	Survey feedback may not necessarily need to be treated as a complaint, though, where possible, the person completing the survey should be made aware of how they can pursue their dissatisfaction as a complaint if they wish to.	YES	We have an external provider that undertakes monthly surveys covering a number of different service areas such as antisocial behaviour. The provider has been asked to inform customers as to how they can raise a complaint in instances where this is appropriate.

## **Section 2 - Accessibility and awareness**

manually made regimented				
Code section	Code requirement	Comply:	Evidence, commentary and any	
		Yes/No	explanations	
		1		

2.1	Landlords must make it easy for residents to complain by providing different channels through which residents can make a complaint such as in person, over the telephone, in writing, by email and digitally. While the Ombudsman recognises that it may not be feasible for a landlord to use all of the potential channels, there must be more than one route of access into the complaints system.	YES	Complaints can be raised with us through a number of channels including via email, online, in person, social media and in writing.
2.3	Landlords must make their complaint policy available in a clear and accessible format for all residents. This will detail the number of stages involved, what will happen at each stage and the timeframes for responding.	YES	Our Complaints policy is available electronically on our website and via email. It is also available in printed form and by post. We can also make it available in other formats, such as braille, when required.
2.4	Landlord websites, if they exist, must include information on how to raise a complaint. The complaints policy and process must be easy to find on the website.	YES	The complaints policy and procedure are easily accessed on our website. There is a 'contact us' link on our home page that leads to a link for 'Make a complaint.' There are links here to both our complaints policy and procedure. Typing 'complaints' into the search function of the home page also takes you straight to this information.
2.5	Landlords must comply with the Equality Act 2010 and may need to adapt normal policies, procedures, or processes to accommodate an individual's needs. Landlords must satisfy themselves that their policy sets out how they will respond to reasonable adjustments requests in line with the Equality Act and that complaints handlers have had appropriate training to deal with such requests.	YES	We published a Reasonable Adjustment Policy in March 2023 which sets out how we will adjust our normal approaches and practices to meet individual customer needs. Where any such arrangements are in place this is flagged on our CRM system.  We will be providing further training around the policy and are aware of where to find the document. Our Head of

			Diversity and Inclusion is the contact point for any queries on how to apply the policy.
2.6	Landlords must publicise the complaints policy and process, the Complaint Handling Code and the Housing Ombudsman Scheme in leaflets, posters, newsletters, online and as part of regular correspondence with residents.	YES	There is a complaints information page on our website which includes a link to the Ombudsman Service as well as the Complaint Handling Code. We also provide contact details for the Ombudsman Service in any relevant correspondence.
2.7	Landlords must provide residents with contact information for the Ombudsman as part of its regular correspondence with residents.	YES	We have a template that we use for all relevant correspondence advising residents of their right to contact the Ombudsman Service at any point during the complaints process.
2.8	Landlords must provide early advice to residents regarding their right to access the Housing Ombudsman Service throughout their complaint, not only when the landlord's complaints process is exhausted.	YES	As above

Code section	Code requirement	Comply:	Evidence, commentary and any
		Yes/No	explanations

2.2	Where a landlord has set up channels to communicate with its residents via social media, then it should expect to receive complaints via those channels. Policies should contain details of the steps that will be taken when a complaint is received via social media and how	YES	We accept complaints received via social media and our Complaints Policy sets out our approach as to how these will be managed.
	confidentiality and privacy will be maintained.		

# **Section 3 - Complaint handling personnel**

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
3.1	Landlords must have a person or team assigned to take responsibility for complaint handling to ensure complaints receive the necessary attention, and that these are reported to the governing body. This Code will refer to that person or team as the "complaints officer".	YES	We have a specialist, centralised complaint handling team which takes responsibility for managing 80% of complaints. The remaining 20% are managed by trained individuals in other service areas.  Our complaints team has grown considerably as part of the merger process between Catalyst and Peabody to increase our resources in this area.  We hold regular office days which include learning from HOS investigations as well as training and updates on relevant changes of approaches.  Ongoing training ensures complaint handlers are kept up to date with changes in relevant policy and best practice.

Complaints are also overseen by Complaint Managers and Heads of Service to ensure quality and consistency. Our overall approach to complaints is overseen by: • Customer Complaints Panel, which has been set up to scrutinise the work we are doing following the Ombudsman's Paragraph 49 investigation into Catalyst's complaint handling. The Panel provides feedback and suggests improvements. The first three meetings of 2023 focussed on considering the needs of the customer, being fair and human in our approach and making our process as efficient as possible. Executive Committee, which receives weekly information on complaints volumes and Housing Ombudsman cases, and regular reports on the work of the Complaints team and • Customer Experience Committee, which is a Board level Committee, chaired by a resident Board member, which meets quarterly and reviews quantitative and

			qualitative information on complaints and Housing Ombudsman findings, and reports to the Peabody Trust Board.
3.2	the complaint handler appointed must have appropriate complaint handling skills and no conflicts of interest.	YES	As above

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
3.3	Complaint handlers should:  be able to act sensitively and fairly  be trained to handle complaints and deal with distressed and upset residents  have access to staff at all levels to facilitate quick resolution of complaints  have the authority and autonomy to act to resolve disputes quickly and fairly.	YES	As set out in 3.1, our team of experienced complaint handlers receive regular training and updates to keep them informed of current expectations and approaches in complaint handling.  They are trained to manage complaints with empathy and to reach fair outcomes for our customers at the earliest opportunity.

# Section 4 - Complaint handling principles Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
4.1	Any decision to try and resolve a concern must be taken in agreement with the resident and a landlord's	YES	This has already been addressed in 1.6 of this self-assessment.

	audit trail/records should be able to demonstrate this. Landlords must ensure that efforts to resolve a resident's concerns do not obstruct access to the complaints procedure or result in any unreasonable delay. It is not appropriate to have extra named stages (such as 'stage 0' or 'pre-complaint stage') as this causes unnecessary confusion for residents. When a complaint is made, it must be acknowledged and logged at stage one of the complaints procedure within five days of receipt.		Our Complaints Policy makes it clear that customers can ask for any issues to be resolved as a service recovery request and that any such decision must be taken by (and in agreement) with the customer.  Customers are made aware that the opportunity to raise a formal complaint is there from the outset and they are remined of this in any subsequent communications until an issue is resolved.  We have delivered training to colleagues on this aspect of complaint management to make sure that customers are not unreasonably denied access to our formal complaints procedure.  We also have a quality assurance process in place so we can identify any instances where this element of our complaint handling may not be being managed appropriately.
4.2	Within the complaint acknowledgement, landlords must set out their understanding of the complaint and the outcomes the resident is seeking. If any aspect of the complaint is unclear, the resident must be asked for clarification and the full definition agreed between both parties.	YES	We examined a cross section of Stage 1 and Stage 2 complaints that have been registered between May and September 2023 as part of this self-assessment exercise.

			These show that we clarify the complaint and outcomes sought as standard practice.
4.6	A complaint investigation must be conducted in an impartial manner.	YES	See comments for 3.3
4.7	<ul> <li>The complaint handler must:</li> <li>deal with complaints on their merits</li> <li>act independently and have an open mind</li> <li>take measures to address any actual or perceived conflict of interest</li> <li>consider all information and evidence carefully</li> <li>keep the complaint confidential as far as possible, with information only disclosed if necessary to properly investigate the matter.</li> </ul>	YES	See comments for 3.3
4.11	Landlords must adhere to any reasonable arrangements agreed with residents in terms of frequency and method of communication	YES	Colleagues are trained to recognise the importance of regular communication and the value of communicating via the customer's preferred means as far as possible. Any training issues around this will be identified though our customer satisfaction surveys.
4.12	The resident, and if applicable any staff member who is the subject of the complaint, must also be given a fair chance to:  • set out their position  • comment on any adverse findings before a final decision is made.	YES	Any investigation takes account of both points of view to ensure a fair and impartial approach is taken. Staff are trained to provide fair opportunity for customers to present their side of any case before a decision is reached.  A part of this approach complaint handlers contact customers by telephone to encourage dialogue, build rapport and

			understand their circumstances and desired outcomes.  Any training issues around this will be identified though our customer satisfaction surveys.
4.13	A landlord must include in its complaints policy its timescales for a resident to request escalation of a complaint	YES	Our Complaints Policy asks that customers request escalation of their complaint within 10 days whilst recognising that we will apply discretion to requests received outside of that timeframe.
4.14	A landlord must not unreasonably refuse to escalate a complaint through all stages of the complaints procedure and must have clear and valid reasons for taking that course of action. Reasons for declining to escalate a complaint must be clearly set out in a landlord's complaints policy and must be the same as the reasons for not accepting a complaint.	YES	Our Complaints Policy states we have discretion to not escalate a complaint where we consider this to be appropriate. For example, if a resident significantly delays in requesting escalation following a Stage 1 reponse.  The circumstances under which we may take this decision are minimal and set out in our policy.  The emphasis is on taking complaints through all stages of the complaints procedure and any decision not to should be valid, fair and clearly explained to the customer.  Colleagues are aware that in such instances, customers must be provided with contact details for the Ombudsman Service so that they can challenge our decision not to progress their complaint.

4.15	A full record must be kept of the complaint, any review 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 reports or surveys prepared.	YES	All information relating to each individual complaint is held in one place on our CRM system.  We recognise the importance of good accurate record keeping and are aware that this is a high-profile issue with the Housing Ombudsman.  Record keeping will continue to be a key focus for our complaints team.
4.18	Landlords must have policies and procedures in place for managing unacceptable behaviour from residents and/or their representatives when pursuing a complaint.	YES	We have published an Unreasonable Communications Policy which sets out what we consider to be unreasonable communication as well as the steps we will take to manage any behaviour that falls within this category.  Training has been provided on this policy and any decision to restrict contact is taken by a panel of senior colleagues.  We have a register of customers who we are engaging with under that policy, including those currently on restrictions as well as those we are trying to manage to modify their contact.

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
4.3	Landlords should manage residents' expectations from the outset, being clear where a desired outcome is unreasonable or unrealistic	YES	This is monitored as part of our ongoing surveys and training is provided where it is considered necessary.
4.4	A complaint should be resolved at the earliest possible opportunity, having assessed what evidence is needed to fully consider the issues, what outcome would resolve the matter for the resident and whether there are any urgent actions required.	YES	This is set out in our Complaints Policy aims.
4.5	Landlords should 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 where this is reasonable.	YES	Under our Complaints Policy, complaints received by advocates will be treated in line with the normal process. Customers will also not unreasonably be denied any request to be accompanied at a meeting, including at a Panel.
4.8	Where a key issue of a complaint relates to the parties' legal obligations landlords should clearly set out their understanding of the obligations of both parties.	YES	This is monitored as part of our ongoing customer satisfaction surveys and training provided where necessary.
4.9	Communication with the resident should not generally identify individual members of staff or contractors.	YES	Colleagues are trained not to apportion blame to individuals when things go wrong and to take collective responsibility.
4.10	Landlords should keep residents regularly updated about the progress of the investigation.	YES	Colleagues are aware of the importance of providing regular updates. This is monitored as part of our ongoing customer Satisfaction surveys and training provided where necessary.

4.16	Landlords should seek feedback from residents in relation to the landlord's complaint handling as part of the drive to encourage a positive complaint and learning culture.	YES	We have an external provider which undertakes monthly surveys on 40% of complaints we receive. We use information from these surveys to identify any specific training needs.
4.17	Landlords should recognise the impact that being complained about can have on future service delivery. Landlords should ensure that staff are supported and engaged in the complaints process, including the learning that can be gained.	YES	We have an internal 'lessons learnt' framework in place. We have a dedicated area on our website where, we share any improvements implemented as a result of complaints.
4.19	Any restrictions placed on a resident's contact due to unacceptable behaviour should be appropriate to their needs and should demonstrate regard for the provisions of the Equality Act 2010.	YES	Our Unreasonable Communication Policy identifies the need to comply with the Equality Act and ensure that any restriction put in place are appropriate to the individual.  As stated in 4.18, any decision taken to restrict contact is taken by a panel of at least three senior members of staff who will ensure any decision is fair and proportionate and appropriate to the individual needs of the customer.

# **Section 5 - Complaint stages**

# Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
5.1	Landlords must respond to the complaint within 10 working days of the complaint being logged. Exceptionally, landlords may provide an explanation to the resident containing a clear timeframe for when the response will be received. This should not exceed a further 10 days without good reason.	YES	The target response times set out in our Complaints Policy are aligned to the Code. This includes the need to keep customers updated if further time is needed.

5.5	A complaint response must be sent 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 expeditiously with regular updates provided to the resident.	YES	Our Complaints Policy is clear that the complaints process will not be delayed due to outstanding actions.  We have separate processes in place to monitor any agreed actions following the complaint response being issued.  Following a Stage 1 or Stage 2 response, we monitor any agreed actions through to a conclusion and do not close a case until any agreed actions have been met.
5.6	Landlords must address all points raised in the complaint and provide clear reasons for any decisions, referencing the relevant policy, law and good practice where appropriate.	YES	We examined a cross section of complaints stage 1 and Stage 2 complaints from between May and September 2023 as part of this self-assessment exercise and this is something that, for the most part, we get right. Any training needs identified have been taken up directly with the caseworkers concerned.
5.8	Landlords must confirm the following in writing to the resident at the completion of stage one in clear, plain language:  • the complaint stage  • the decision on the complaint  • the reasons for any decisions made  • the details of any remedy offered to put things right  • details of any outstanding actions  • details of how to escalate the matter to stage two if the resident is not satisfied with the answer	YES	As above

Code section	Code requirement	Comply:	Evidence, commentary and any
		Yes/No	explanations

5.9	If all or part of the complaint is not resolved to the resident's satisfaction at stage one it must be progressed to stage two of the landlord's procedure, unless an exclusion ground now applies. In instances where a landlord declines to escalate a complaint it must clearly communicate in writing its reasons for not escalating as well as the resident's right to approach the Ombudsman about its decision.	YES	This is covered in 4.14
5.10	On receipt of the escalation request, landlords must set out their understanding of issues outstanding and the outcomes the resident is seeking. If any aspect of the complaint is unclear, the resident must be asked for clarification and the full definition agreed between both parties.	YES	We examined a cross section of complaints from between May and September 2023 as part of this self-assessment exercise, and this is something that we generally do well.
5.11	Landlords must only escalate a complaint to stage two once it has completed stage one and at the request of the resident.	YES	Our Complaints Policy stipulates that complaints will not be escalated to Stage Two unless a Stage One response has been provided.
5.12	The person considering the complaint at stage two, must not be the same person that considered the complaint at stage one.	YES	Stage One complaints are handled by a Case Manager. Stage Two complaints are escalated to our Customer Experience Team.
5.13	Landlords must respond to the stage two complaint within 20 working days of the complaint being escalated. Exceptionally, landlords may provide an explanation to the resident containing a clear timeframe for when the response will be received. This should not exceed a further 10 days without good reason.	YES	Our timeframes for responding to complaints are aligned to the Complaint Handling Code. This includes updating customers when any extensions are required and providing them with contact details for the Ombudsman Service where any extension cannot be agreed with them.
5.16	Landlords must confirm the following in writing to the resident at the completion of stage two in clear, plain language:  the complaint stage the complaint definition	YES	Same response as 5.10.

<ul> <li>the decision on the complaint</li> <li>the reasons for any decisions made</li> <li>the details of any remedy offered to put things right</li> <li>details of any outstanding actions</li> <li>and</li> <li>if the landlord has a third stage, details of how to escalate the matter to stage three</li> <li>if this was the final stage, details of how to escalate the matter to the Housing Ombudsman Service if the resident remains dissatisfied.</li> </ul>	
---	--

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
5.17	Two stage landlord complaint procedures are ideal. This ensures that the complaint process is not unduly long. If landlords strongly believe a third stage is necessary, they must set out their reasons for this as part of their self-assessment. A process with more than three stages is not acceptable under any circumstances.	YES	Our Complaints Policy consists of two stages.
5.20	Landlords must confirm the following in writing to the resident at the completion of stage three in clear, plain language: the complaint stage the complaint definition the decision on the complaint the reasons for any decisions made the details of any remedy offered to put things right details of any outstanding actions  • details of how to escalate the matter to the Housing Ombudsman Service if the resident remains dissatisfied	N/A	

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
5.2	If an extension beyond 20 working days is required to enable the landlord to respond to the complaint fully, this should be agreed by both parties.	YES	Our Complaints Policy specifies extensions (at any stage of the process) should be agreed with customers and that contact details for the Ombudsman should be provided to enable a customer to challenge our handling of a complaint if necessary.
5.3	Where agreement over an extension period cannot be reached, landlords should provide the Housing Ombudsman's contact details so the resident can challenge the landlord's plan for responding and/or the proposed timeliness of a landlord's response.	YES	As above
5.4	Where the problem is a recurring issue, the landlord should consider any older reports as part of the background to the complaint if this will help to resolve the issue for the resident.	YES	Our complaints handlers are trained to use their discretion to consider older reports and evidence when this is appropriate to the case.  We recently wrote some additional guidance on this issue and delivered some training to the complaints team based on some scenarios involving Ombudsman decisions.
5.7	Where residents raise additional complaints during the investigation, these should be incorporated into the stage one response if they are relevant and the stage one response has not been issued. Where the stage one response has been issued, or it would unreasonably delay the response, the complaint should be logged as a new complaint.	YES	Our Complaints Policy specifies that we will use our discretion to make sure that any additional complaint raised is handled in the most efficient and pragmatic way for the customer.

Stage 2

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
5.14	If an extension beyond 10 working days is required to enable the landlord to respond to the complaint fully, this should be agreed by both parties.	YES	Addressed in 5.2
5.15	Where agreement over an extension period cannot be reached, landlords should provide the Housing Ombudsman's contact details so the resident can challenge the landlord's plan for responding and/or the proposed timeliness of a landlord's response	YES	Addressed in 5.2

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
5.18	Complaints should only go to a third stage if the resident has actively requested a third stage review of their complaint. Where a third stage is in place and has been requested, landlords must respond to the stage three complaint within 20 working days of the complaint being escalated. Additional time will only be justified if related to convening a panel. An explanation and a date for when the stage three response will be received should be provided to the resident.	N/A	
5.19	Where agreement over an extension period cannot be reached, landlords should provide the Housing Ombudsman's contact details so the resident can challenge the landlord's plan for responding and/or the proposed timeliness of a landlord's response.	N/A	

# **Section 6 - Putting things right**

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
6.1	Effective dispute resolution requires a process designed to resolve complaints. 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.	YES	We have a Remedies and Compensation Policy which sets out Peabody's approach to 'putting things right' when they have gone wrong.  This includes taking ownership when mistakes have been made and providing a fair and proportionate remedy to reflect the extent of any failures and the impact on the customer.  This guidance is regularly reviewed and updated when appropriate to make sure that it is reflective of the Ombudsman's current expectations and approaches to offering compensation.
6.2	Any remedy offered must reflect the extent of any service failures and the level of detriment caused to the resident as a result. A landlord must carefully manage the expectations of residents and not promise anything that cannot be delivered or would cause unfairness to other residents.	YES	See 6.1 above
6.5	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	Our Complaints Policy and Remedies and Compensation Policy both highlight the importance of making sure that any proposals to resolve a complaint are followed through to completion.  As already stated, we have processes in place to ensure that any actions agreed

			to resolve a complaint are monitored through to a conclusion.
6.6	In awarding compensation, a landlord must consider whether any statutory payments are due, if any quantifiable losses have been incurred, the time and trouble a resident has been put to as well as any distress and inconvenience caused.	YES	These are all noted in our Remedies and Compensation Policy as factors to consider when offering a remedy to a complaint.
			We recently delivered training to colleagues reminding them of the importance of considering offers of compensation in line with that policy.

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
6.3	Landlords should look beyond the circumstances of the individual complaint and consider whether anything needs to be 'put right' in terms of process or systems to the benefit of all residents.	YES	Learning from complaints is recognised by Peabody as an important aspect of putting things right and ensuring the continuous improvement of the services that we offer.
			Sharing any learning with customer's is also noted in our Remedies and Compensation Policy as being part of any effective remedy to a complaint.
			All our responses at Stage 1 and Stage 2 include learnings that we have taken from any shortfalls in service identified.
			We publish our quarterly lessons learnt from complaints on our complaint

			information website page. We also report this to our Executive Team and Board on a quarterly basis.
6.7	In some cases, a resident may have a legal entitlement to redress. The landlord should still offer a resolution where possible, obtaining legal advice as to how any offer of resolution should be worded.	YES	We recognise that the complaints procedure can still play an effective role in resolving complaints (or part of a complaint) where a resident has a legal entitlement to compensation. We would always seek advice from our legal team in such cases.

# Section 7 - Continuous learning and improvement Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
7.2	Accountability and transparency are integral to a positive complaint handling culture. Landlords must report back on wider learning and improvements from complaints in their annual report and more frequently to their residents, staff and scrutiny panels.	YES	Aside from our annual report to residents, we regularly share learning from complaints through our website as well as via our newsletter to residents.

	We currently have a resident complaint panel which scrutinises complaints and
	provides feedback on improvements we can make to our complaints handling.

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
7.3	A member of the governing body should be appointed to have lead responsibility for complaints to support a positive complaint handling culture. This role will be responsible for ensuring the governing body receives regular information on complaints that provides insight to the governing body on the landlord's complaint handling performance.		We have appointed a member of the governing body who has lead responsibility for the regular reporting of complaints.  We regularly report on complaints to a high level within Peabody. This involves quarterly reports to our Customer Experience Committee (which includes members of our Board) and monthly and weekly operational reports monitoring active complaints.
7.4	<ul> <li>As a minimum, governing bodies should receive:</li> <li>Regular updates on the volume, categories and outcome of complaints, alongside complaint handling performance including compliance with the Ombudsman's orders</li> <li>Regular reviews of issues and trends arising from complaint handling,</li> <li>The annual performance report produced by the Ombudsman, where applicable</li> <li>Individual complaint outcomes where necessary, including where the Ombudsman made findings of severe maladministration or referrals to regulatory bodies. The implementation of management responses should be tracked to ensure they are delivered to agreed timescales. The annual self-assessment against the Complaint Handling Code for scrutiny and challenge.</li> </ul>		We currently send quarterly reports on complaints to the Customer Experience Committee which includes Peabody Board members.  We will be including the self-assessment in our October 2023 report and will present the Ombudsman's annual performance report in the end of year submission to the Committee.  We provide weekly reports on volumes, trends and emerging issues to our Executive Team.

			We also send a weekly report to Executive Team on determinations received and a monthly customer experience committee report providing an update on year to date determinations received and outcomes.  We provide a quarterly audit and risk committee report showing progress on orders completed following determinations received.
7.5	Any themes or trends should be assessed by senior management to identify potential systemic issues, serious risks or policies and procedures that require revision. They should also be used to inform staff and contractor training.	YES	Complaints are regularly monitored with monthly reports on complaint handling being provided to our Executive Team  We have a 'real time' complaints dashboard which is permanently visible. This highlights a number of areas including trends, volumes and escalation times. The information is presented weekly to the Executive Team and Managers.  Any themes and trends identified inform the training that we regularly provide our complaints team as noted previously.
7.6	<ul> <li>Landlords should have a standard objective in relation to complaint handling for all employees that reflects the need to:         <ul> <li>have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments</li> <li>take collective responsibility for any shortfalls identified through complaints rather than blaming others</li> </ul> </li> </ul>	YES	These objectives are in place for the dedicated complaints handling staff.

act within the Professional Standards for engaging with	
complaints as set by the Chartered Institute of Housing.	

# Section 8 - Self-assessment and compliance Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
8.1	Landlords must carry out an annual self-assessment against the Code to ensure their complaint handling remains in line with its requirements.	YES	We review the self-assessment every six months rather than annually. The updated version is published on our website.
8.2	Landlords must also carry out a self-assessment following a significant restructure and/or change in procedures.	YES	Our previous self-assessment was completed in March 2023, to coincide with the completion of the merger between Peabody and Catalyst. We will be completing the self-assessment every six months as a matter of best practice.
8.3	<ul> <li>Following each self-assessment, a landlord must:</li> <li>report the outcome of their self-assessment to their governing body. In the case of local authorities, self-assessment outcomes should be reported to elected members</li> <li>publish the outcome of their assessment on their website if they have one, or otherwise make accessible to residents</li> <li>include the self-assessment in their annual report section on complaints handling performance</li> </ul>	YES	We follow this process each time the self-assessment is completed. A copy of the self-assessment is published on our website where it is easily accessed.