

Appendix A: Housing Ombudsman Complaint Handling Code Self-assessment

Twenty11 – 2024/2025

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	Our Feedback Policy was republished in March 2021 and our definition was updated to match the Housing Ombudsman definition. This has been maintained in subsequent policy reviews. Our most recent policy can always be found on our website at https://www.twenty11.co.uk/policies	
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	We have training for staff on recognising a complaint. We make it clear that the word complaint does not need to be used for it to be recognised as a complaint. Our Feedback Policy has a section on Accessibility and Confidentiality (6.10.1 – 6.10.4) which makes it clear that feedback can be given on behalf of a tenant by another person acting on their authority. This is further supported in our Feedback Leaflet.	
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	Yes	This is a key part of our induction training for staff which they can refer to post training on our internal knowledge base.	

	request is a request from a resident to the landlord requiring action to be taken to put something right. Service requests are not complaints, but must be recorded, monitored and reviewed regularly.		We also cover this through our formal training which all our staff members complete which includes examples of each.	
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 received regarding service request responses where the handling of the service request is ongoing are investigated alongside the efforts to address the service request. The completion of service request actions are not delayed by our investigation, and where possible we aim to have these completed before the end of the investigation, though they may form part of our proposed actions if this is not possible.	
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	Our surveys are conducted by an independent company. All survey responses are reviewed so that we can determine if any follow up is required with the tenant. This includes where a tenant may ask for contact or where the tenant has expressed dissatisfaction. Where a tenant has expressed dissatisfaction, we will make contact with them to and where appropriate or requested by the tenant we will open a complaint.	

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	Our Feedback Policy details the circumstances where we would not accept a complaint (see 2.2 below). We have template letters for communicating where complaints have not been accepted which are recorded on our system when used.	
2.2	<p>A complaints policy must set out the circumstances in which a matter will not be considered as a complaint or escalated, and these circumstances must be fair and reasonable to residents. Acceptable exclusions include:</p> <ul style="list-style-type: none"> • The issue giving rise to the complaint occurred over twelve months ago. • Legal proceedings have started. This is defined as details of the claim, such as the Claim Form and Particulars of Claim, having been filed at court. • Matters that have previously been considered under the complaints policy. 	Yes	<p>Our Feedback Policy details when we would not normally accept a complaint.</p> <p>Our Policy states that we will not normally investigate a complaint that relates to any of the following:</p> <ul style="list-style-type: none"> • matters which occurred over 12 months ago. In these cases, authority from the Head of Feedback or a Head of Service in their absence will be sought to exclude these complaints • matters which are subject to legal proceedings, insurance or personal injury claims • matters which have been considered under a separate appeal process • matters which are not within our jurisdiction to change or influence. • matters that have previously been 	

			<p>considered under the complaints policy.</p> <p>We reserve the right to conclude our internal process at any time if we deem that continuing through the process will be of no benefit to the tenant, for example where the contact from the tenant is deemed to be unacceptable in line with our unacceptable behaviour procedure.</p>	
2.3	<p>Landlords must accept complaints referred to them within 12 months of the issue occurring or the resident becoming aware of the issue, unless they are excluded on other grounds. Landlords must consider whether to apply discretion to accept complaints made outside this time limit where there are good reasons to do so.</p>	Yes	<p>Our Feedback Policy details when we would not normally accept a complaint.</p> <p>Our Policy states that we will not normally investigate a complaint that relates to something that happened more than 12 months ago (although this is assessed on a case-by-case basis and authority from the Head of Feedback or a Head of Service in their absence is required).</p>	
2.4	<p>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.</p>	Yes	<p>Our Feedback Policy details the circumstances where we would not accept a complaint (see 2.2 above). We have template letters for communicating where complaints have not been accepted which are recorded on our system when used.</p>	
2.5	<p>Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.</p>	Yes	<p>Our Feedback Policy details when we would not normally accept a complaint and this is considered and applied on a case by case basis for each complaint.</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	Multiple accessible routes are available for tenants to make a complaint. Supported channels include by email, online, in person, by letter, by telephone. Complaints can be made to any member of staff and can be made on a tenant's behalf if there are appropriate permissions in place.	
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	Multiple accessible routes are available for tenants to make a complaint. Supported channels include by email, online, in person, by letter, by telephone. Complaints can be made to any member of staff and can be made on a tenant's behalf if there are appropriate permissions in place. All staff are trained on complaint handling and made aware of the Feedback team and their ability to support them.	
3.3	High volumes of complaints must not be seen as a negative, as they can be indicative of a well-publicised and accessible complaints process. Low complaint volumes are potentially a sign that residents are unable to complain.	Yes	Complaint volumes are monitored and reported regularly and we fully comply with our responsibilities to ensure tenants are informed of how they can make a complaint.	
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	Yes	We have our policy and clear information on our website about how to make a complaint. This includes details of how to submit a complaint as well as links to our policy.	

	will happen at each stage, and the timeframes for responding. The policy must also be published on the landlord's website.		<p>https://www.twenty11.co.uk/sharing-feedback</p> <p>You can use the search bar or click on a button on our front page titled 'Give us your feedback' which takes visitors straight to our feedback page.</p> <p>Our policy is also easily found by going straight to our policies page.</p> <p>All staff are trained on our policy and able to provide information on this to tenants.</p>	
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	We publicise details of the complaints policy, including information about the Ombudsman and its Complaint Handling Code on our website, in our reception area, in our Sheltered schemes, in newsletters and on our feedback correspondence.	
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	Our Feedback Policy has a section on Accessibility and Confidentiality (6.10.1 – 6.10.4) which makes it clear that feedback can be given on behalf of a tenant by another person acting on their authority. This is further supported in our Feedback Leaflet.	
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	<p>We publicise our Feedback Policy, the Complaint Handling Scheme and the Housing Ombudsman Scheme on our website and in our main reception. We also share information about our feedback process in our newsletters.</p> <p>We have developed posters and shared in our</p>	

			<p>sheltered schemes and have increased our coverage of feedback, the code and the Housing Ombudsman Scheme in our newsletters.</p> <p>Our feedback letters and communications including our Feedback leaflet, include details of how tenants can engage with the Ombudsman about their complaint.</p>	
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Section 4: Complaint Handling Staff

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
4.1	Landlords must have a person or team assigned to take responsibility for complaint handling, including liaison with the Ombudsman and ensuring complaints are reported to the governing body (or equivalent). This Code will refer to that person or team as the 'complaints officer'. This role may be in addition to other duties.	Yes	We have a dedicated Feedback Team led by our Head of Feedback. Within the team we have Feedback Champions who take responsibility for formal investigations and Senior Feedback Champions who work on Housing Ombudsman cases, overseen by the Head of Feedback. The team manage all feedback that comes into Twenty11 ensuring it is responded to in line with our policies.	
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	Our Head of Feedback is a member of the Senior Leadership Team, able to work with and influence staff at all levels, having the authority and autonomy to act to resolve disputes promptly and fairly. Our Feedback team all have access to and work with staff at all levels where required.	
4.3	Landlords are expected to prioritise complaint handling and a culture of learning from complaints. All relevant staff must be suitably trained in the importance of complaint handling. It is important that complaints are seen as a core service and must be resourced to handle complaints effectively	Yes	All staff are trained on complaint handling and its importance, and our dedicated team has been resourced up in terms of both staff numbers and now having a dedicated Head of Service. We also have a dedicated role for learning and improvement, with the importance of learning from our tenants promoted across the organisation.	

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	We have a single policy for all feedback which includes our approach to being fair: a constructive approach that applies consistent principles to all complaints, whilst ensuring each complaint is considered on the facts of the individual case. Treating each case justly and without favour or discrimination.	
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	We do offer a quick resolution route where a tenant is unhappy with a service and there is an opportunity for us put things right quickly and easily and aim to agree a resolution with the tenant within 2 working days in these instances. However, this is not a pre-requisite to making a formal complaint and won't always be an appropriate option. The decision on the best route for them is made by the tenant.	
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	Our process features two stages.	
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	Our complaint responses are not handled by third parties.	

5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Yes	Our complaint responses are not handled by third parties.	
5.6	When a complaint is logged at Stage 1 or escalated to Stage 2, landlords must set out their understanding of the complaint and the outcomes the resident is seeking. The Code will refer to this as “the complaint definition”. If any aspect of the complaint is unclear, the resident must be asked for clarification.	Yes	Complaint scopes are discussed with tenants at all stages of our process, and these are confirmed in writing in scoping letters. The complainant is further given the opportunity to clarify if our understanding of the scope is not accurate.	
5.7	When a complaint is acknowledged at either stage, landlords must be clear which aspects of the complaint they are, and are not, responsible for and clarify any areas where this is not clear.	Yes	Complaint scopes are discussed with tenants at all stages of our process, and these are confirmed in writing in scoping letters, clarifying responsibility where relevant.	
5.8	At each stage of the complaints process, complaint handlers must: <ul style="list-style-type: none"> a. deal with complaints on their merits, act independently, and have an open mind; b. give the resident a fair chance to set out their position; c. take measures to address any actual or perceived conflict of interest; and d. consider all relevant information and evidence carefully. 	Yes	Our Feedback Policy includes our approach to being fair: a constructive approach that applies consistent principles to all complaints, whilst ensuring each complaint is considered on the facts of the individual case. Treating each case justly and without favour or discrimination. Complaint scopes are discussed with tenants at all stages of our process, and these are confirmed in writing in scoping letters. The complainant is further given the opportunity to clarify if our understanding of the scope is not	

			<p>accurate.</p> <p>Complaints will not be allocated to staff members where there is an actual or perceived conflict of interest which concerns the complainant.</p> <p>Our trained staff obtain and consider all relevant information and evidence during their investigations.</p>	
5.9	Where a response to a complaint will fall outside the timescales set out in this Code, the landlord must agree with the resident suitable intervals for keeping them informed about their complaint.	Yes	Our process includes provision for extending investigations with the agreement of the tenant, with template letters for use in confirming the new due date and any agreed contact points.	
5.10	Landlords must make reasonable adjustments for residents where appropriate under the Equality Act 2010. Landlords must keep a record of any reasonable adjustments agreed, as well as a record of any disabilities a resident has disclosed. Any agreed reasonable adjustments must be kept under active review.	Yes	Our Feedback Policy (paragraph 6.10.3) reflects our commitment to ensuring the accessibility of our services and makes it clear that we will consider any reasonable adjustments that may be required.	
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	<p>Our Feedback Policy clearly outlines when we would not normally escalate a complaint, in line with the Code.</p> <p>If we are not going to escalate a complaint we will advise the tenant why. For consistency we have a template letter for this situation.</p>	
5.12	A full record must be kept of the	Yes	All details relating to complaints are recorded on	

	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.		our CRM system.	
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	We aim to remedy complaints at the earliest opportunity, with a key principle of our policy being that we should manage complaints at the first stage it comes in where possible, aiming to investigate and address concerns thoroughly enough that we are confident that, where possible, our first response will be our last response.	
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	We have an Unacceptable Behaviour Policy in place which can be found on our website and which details how we will communicate, evidence and review any restrictions.	
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	Our Unacceptable Behaviour Policy is based on proportionality and also takes into account reasonable adjustments (section 4.4).	

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>Our policy and process offers a choice of options to the tenant to find a resolution to their issue.</p> <p>During a complaint investigation if actions are identified to help resolve the matter these could start during the investigation, however, we will not delay a response for these to be completed. Our response to complaints will also include any proposed actions such as outstanding works where relevant. Investigations and resolution actions are prioritised as appropriate to account for any vulnerabilities or risks.</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>Our policy states that we aim to acknowledge complaints at this stage within two working days of receiving contact confirming the complaint, scope within five working days of receiving contact confirming the complaint. This ensures that complaints are acknowledged, defined and logged at stage 1 of the complaints procedure within five working days of the complaint being received. We refer to acknowledging the contact after two working days so that complainants can be confident the contact has been received without having to wait for five working days for any contact, however the scoping completes the acknowledgement phase no later than five working days after the contact confirming the</p>	

			complaint, meeting the Code.	
6.3	Landlords must issue a full response to stage 1 complaints <u>within 10 working days</u> of the complaint being acknowledged.	Yes	Our policy states that we aim to provide a formal response within ten working days of the scoping. Scoping completes the acknowledgement phase of the complaint no later than five working days after the contact confirming the complaint, as above, meeting the Code.	
6.4	Landlords must decide whether an extension to this timescale is needed when considering the complexity of the complaint and then inform the resident of the expected timescale for response. Any extension must be no more than 10 working days without good reason, and the reason(s) must be clearly explained to the resident.	Yes	We have introduced an additional template into our suite of letters for supporting complaints. This confirms any extension of up to 10 working days, the reasons why and whether or not the tenant has agreed to this. Where the tenant has not agreed we make it clear to them that they can seek advice from the Housing Ombudsman and provide their details.	
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	We have introduced an additional template into our suite of letters for supporting complaints. We make it clear to complainants that they can seek advice from the Housing Ombudsman and provide their details.	
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	During a complaint investigation if actions are identified to help resolve the matter these could start during the investigation, however, we will not delay a response for these to be completed. Our response to complaints will also include any proposed actions such as outstanding works where relevant.	
6.7	Landlords must address all points raised in the complaint definition and provide	Yes	We take a structured approach in clarifying the scope of the complaint at the start of the	

	clear reasons for any decisions, referencing the relevant policy, law and good practice where appropriate.		investigation and use this to ensure we respond to all elements. We will also explain our decision and how we have arrived at this making necessary references.	
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	Where a tenant raises additional complaints, we will make a judgement as to whether to combine this with the original complaint or to open this as a separate complaint. Dependent on what stage this is introduced we may need to extend the complaint response time to allow us to investigate the matter fully.	
6.9	Landlords must confirm the following in writing to the resident at the completion of stage 1 in clear, plain language: <ul style="list-style-type: none"> a. the complaint stage; b. the complaint definition; c. the decision on the complaint; d. the reasons for any decisions made; e. the details of any remedy offered to put things right; f. details of any outstanding actions; and g. details of how to escalate the matter to stage 2 if the individual is not satisfied with the response. 	Yes	Our complaint responses address all these key areas, and this is reflected in our suite of templates which support our feedback process.	

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	Our procedure features an appeal stage as stage 2, whereby a tenant can request an appeal if all or part of the complaint is not resolved to their satisfaction at stage 1. Stage 2 is our final response.	
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	Our policy states that we aim to acknowledge complaints at this stage within two working days of receiving contact confirming the complaint, scope within five working days of receiving contact confirming the complaint. This ensures that complaints are acknowledged, defined and logged at stage 2 of the complaints procedure within five working days of the complaint being received. We refer to acknowledging the contact after two working days so that complainants can be confident the contact has been received without having to wait for five working days for any contact, however the scoping completes the acknowledgement phase no later than five working days after the contact confirming the complaint, meeting the Code.	
6.12	Residents must not be required to explain their reasons for requesting a stage 2 consideration. Landlords are expected to make reasonable efforts to understand why a resident remains unhappy as part of its stage 2 response.	Yes	When a complainant requests an appeal and we will work with them to understand the scope of their appeal if possible, but generate and share a 'scope of understanding' based on their request where this is not possible.	
6.13	The person considering the complaint at	Yes	Stage 2 complaint appeals are investigated by a	

	stage 2 must not be the same person that considered the complaint at stage 1.		member of the Senior Leadership Team (SLT). Should a member of SLT have carried out the stage 1 complaint investigation, we ensure a different member will investigate at stage 2.	
6.14	Landlords must issue a final response to the stage 2 <u>within 20 working days</u> of the complaint being acknowledged.	Yes	Our policy states that we aim to provide a formal response within twenty working days of the scoping. Scoping completes the acknowledgement phase no later than five working days after the contact confirming the complaint appeal, as above, meeting the Code.	
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	We have introduced an additional template into our suite of letters for supporting complaints. This confirms any extension of up to 20 working days, the reasons why and whether or not the tenant has agreed to this. Where the tenant has not agreed we make it clear to them that they can seek advice from the Housing Ombudsman and provide their details.	
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	We have introduced an additional template into our suite of letters for supporting complaints. We make it clear to complainants that they can seek advice from the Housing Ombudsman and provide their details.	
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	During a complaint investigation if actions are identified to help resolve the matter these could start during the investigation, however, we will not delay a response for these to be completed. Our response to complaints will also include any proposed actions such as outstanding works where relevant.	

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	We take a structured approach in clarifying the scope of the complaint at the start of the investigation and use this to ensure we respond to all elements. We will also explain our decision and how we have arrived at this making necessary references.	
6.19	Landlords must confirm the following in writing to the resident at the completion of stage 2 in clear, plain language: a. the complaint stage; b. the complaint definition; c. the decision on the complaint; d. the reasons for any decisions made; e. the details of any remedy offered to put things right; f. details of any outstanding actions; and g. details of how to escalate the matter to the Ombudsman Service if the individual remains dissatisfied.	Yes	Our complaint responses address all these key areas, and this is reflected in our suite of templates which support our feedback process.	
6.20	Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.	Yes	We do not have a third stage in our complaints process.	

Section 7: Putting things right

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
7.1	<p>Where something has gone wrong a landlord must acknowledge this and set out the actions it has already taken, or intends to take, to put things right. These can include:</p> <ul style="list-style-type: none"> • Apologising; • Acknowledging where things have gone wrong; • Providing an explanation, assistance or reasons; • Taking action if there has been delay; • Reconsidering or changing a decision; • Amending a record or adding a correction or addendum; • Providing a financial remedy; • Changing policies, procedures or practices. 	Yes	<p>Our complaint responses address all these key areas, and this is reflected in our suite of templates which support our feedback process.</p> <p>As well as delivering the proposed actions, we record, prioritise and deliver improvements based on learning from our complaints which may include changes to policies, procedures and practices.</p>	
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Yes	Any proposed actions to put things right will be in line with our relevant policies, including our Compensation Policy. Our Compensation Policy is due to be reviewed in the near future as part of our usual cycle of policy reviews, and furthermore is changing ownership to the Head of Feedback role to ensure a strong link for its use in our complaint handling approach.	
7.3	The remedy offer must clearly set out	Yes	Where a remedy has been agreed with the	

	what will happen and by when, in agreement with the resident where appropriate. Any remedy proposed must be followed through to completion.		tenant, we will confirm this. Where we have not been able to speak to the tenant, we will outline our proposed remedy. Usually, we will have already agreed this with the tenant.	
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes	We regularly seek guidance and precedent from cases published by the Ombudsman, and follow guidance shared in best practice reporting.	

Section 8: Self-assessment, reporting and compliance

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
8.1	<p>Landlords must produce an annual complaints performance and service improvement report for scrutiny and challenge, which must include:</p> <ul style="list-style-type: none"> a. the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements. b. a qualitative and quantitative analysis of the landlord's complaint handling performance. This must also include a summary of the types of complaints the landlord has refused to accept; c. any findings of non-compliance with this Code by the Ombudsman; d. the service improvements made as a result of the learning from complaints; e. any annual report about the landlord's performance from the Ombudsman; and f. any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord. 	Yes	<p>This self-assessment is being published as part of the Annual Complaints Performance and Service Improvement Report, to be shared with the Ombudsman and on our website following Board approval.</p>	
8.2	<p>The annual complaints performance and service improvement report must be</p>	Yes	<p>This self-assessment is being published as part of the Annual Complaints Performance and</p>	

	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.		Service Improvement Report, to be shared with the Ombudsman and on our website following Board approval and with their response.	
8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	Yes	We have not had a significant restructure, merger and/or change in procedures.	
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	Yes	We have not been asked to update the self-assessment following an Ombudsman investigation.	
8.5	If a landlord is unable to comply with the Code due to exceptional circumstances, such as a cyber incident, they must inform the Ombudsman, provide information to residents who may be affected, and publish this on their website Landlords must provide a timescale for returning to compliance with the Code.	Yes	We have not been unable to comply with the Code due to exceptional circumstances.	

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	As well as delivering the proposed actions, we record, prioritise and deliver improvements based on learning from our complaints which may include changes to policies, procedures and practices.	
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	Our complaint handling work and our improvement work both involve teams across the organisation and promote a positive culture, driving improvements and emphasising the importance of and opportunities enabled by listening to our tenants, for each case and at an overall strategic level. We record, prioritise and deliver improvements based on learning from our complaints.	
9.3	Accountability and transparency are also integral to a positive complaint handling culture. Landlords must report back on wider learning and improvements from complaints to stakeholders, such as residents' panels, staff and relevant committees.	Yes	We report on learning and improvements to OneTeam on a monthly basis, share details of improvements with our tenants on our website, to our Resident Representation Team and added a dedicated section for learning and improvements in our annual report last year. Our recently appointed Board Member Responsible for Complaints will also be monitoring learning and improvements.	
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	Yes	We have recently restructured to enable a Head of Feedback position, a member of our Senior Leadership Team dedicated to this area of work.	

	potential systemic issues, serious risks, or policies and procedures that require revision.			
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	Board have appointed a member to have lead responsibility for complaints to support a positive complaint handling culture.	
9.6	The MRC will be responsible for ensuring the governing body receives regular information on complaints that provides insight on the landlord's complaint handling performance. This person must have access to suitable information and staff to perform this role and report on their findings.	Yes	Board have appointed a member to have lead responsibility for complaints who has been inducted to our policy and processes, met with team members and had access to our underlying data and reporting. The MRC is also a member of our Operational Performance and Tenant Services Committee, where KPIs related to the Feedback service are reported and scrutinised.	
9.7	As a minimum, the MRC and the governing body (or equivalent) must receive: a. regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance; b. regular reviews of issues and trends arising from complaint handling; c. regular updates on the outcomes	Yes	The MRC receives this information via our Board reading room, committee and Board reporting, and will be further strengthening this working with the dedicated Head of Service. The MRC has reviewed and scrutinised the Annual Complaints Performance and Service Improvement Report, working with the operational team.	

	<p>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>			
9.8	<p>Landlords must have a standard objective in relation to complaint handling for all relevant employees or third parties that reflects the need to:</p> <p>a. have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments;</p> <p>b. take collective responsibility for any shortfalls identified through complaints, rather than blaming others; and</p> <p>c. act within the professional standards for engaging with complaints as set by any relevant professional body.</p>	Yes	<p>All staff members are trained on our complaints handling approach, culture and behaviours, promoting a positive, collaborative approach to resolutions, where members of all teams take ownership as appropriate. Our Feedback team lead by example and provide support across the business to ensure consistency of approach whilst maintaining our ethos of collective responsibility. Our contracts with third parties deliver services in partnership with us include expectations on tenant approach and culture, referencing our Feedback Policy.</p> <p>We follow the Professional Standards for engaging with complaints as set by the Chartered Institute of Housing. The standards as are based on seven characteristics: Integrity; Inclusive; Ethical; Knowledgeable; Skilled; Advocate; Leadership.</p> <p>https://www.twenty11.co.uk/professional-standards</p>	