



# Southdown's Complaints Handling Self-Assessment 2024 against the Housing Ombudsman Code.

## 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	Included in Comments, Compliments & Complaints Policy ('Complaints Policy') wording	
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 define a complaint as per the wording in 1.2 above. We log tenants' dissatisfaction on our Housing Management System, residents are given the choice to make a complaint if they raise dissatisfaction with our service  Third party complaints are handled as per our policy and procedure. Consent from the resident is required	
1.4	Landlords must recognise the difference between a service request and a complaint. This must be set out	Yes	Service requests are recorded on our Housing Management	

	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 recorded, monitored and reviewed regularly.		System, are monitored and will be reviewed at least annually.	
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	This is standard practice but has been added to our complaints policy in order to spell this out explicitly.	
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.	In progress	This has not been our previous practice but we recognise the value of learning from complaints, and will include this communication alongside future surveys	

## Section 2: Exclusions

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
2.1	Landlords must accept a complaint unless there is a valid reason not to do so. If landlords decide not to accept a complaint they must be able to evidence their reasoning. Each complaint must be considered on its own merits	Yes	<p>Excerpts from our policy:</p> <p>“If we decide not to accept a complaint, a detailed explanation must be provided to the complainant explaining the reasons why the matter is not suitable for the complaints process and the right for tenants to take that decision to the Housing Ombudsman.”</p> <p>“the Investigating Officer will: deal with the complaint on its own merits”</p>	
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	<p>Policy wording:</p> <p>In some limited circumstances we may not deal with a complaint via our Complaints Procedure. These circumstances include but are not limited to:</p>	

	<ul style="list-style-type: none"> <li>• The issue giving rise to the complaint occurred over twelve months ago.</li> <li>• Legal proceedings have started. This is defined as details of the claim, such as the Claim Form and Particulars of Claim, having been filed at court.</li> <li>• Matters that have previously been considered under the complaints policy.</li> </ul>		<ul style="list-style-type: none"> <li>• Where the issue being complained about happened more than 12 months ago (unless the complaint is about a recurring issue and some instances occurred more recently than 12 months ago)</li> <li>• Where the complainant has already started legal proceedings to address the issues being complained of, the issue will be dealt with as part of the legal process.</li> <li>• Where the issue being complained about has already been dealt with via our Complaints Procedure.</li> <li>• Where the complaint is the first report of anti-social behaviour relating to a Southdown property or tenant.</li> </ul> <p>Complaints which relate to Southdown's handling of previous reports of anti-social behaviour <i>are</i> deemed to be within scope of the complaints process, subject to the above exclusions.</p>	
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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	Our policy has been updated to 12 months.	
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	Our policy wording: “If we decide not to accept a complaint, a detailed explanation must be provided to the complainant explaining the reasons why the matter is not suitable for the complaints process and the right for tenants to take that decision to the Housing Ombudsman. “	
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Yes	Policy wording: “When dealing with a complaint, the Investigating Officer will: <ul style="list-style-type: none"> <li>• Deal with the complaint on its own merits</li> <li>• Act independently and with an open mind</li> </ul>	

			<ul style="list-style-type: none"> <li>• Take measures to address actual or perceived conflict of interest</li> <li>• Consider all information and evidence carefully”</li> </ul>	
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### Section 3: Accessibility and Awareness

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
3.1	Landlords must make it easy for residents to complain by providing different channels through which they can make a complaint. Landlords must consider their duties under the Equality Act 2010 and anticipate the needs and reasonable adjustments of residents who may need to access the complaints process.	Yes	<p>Policy wording:</p> <p>“Feedback will be accepted from anyone, including external individuals and organisations, in person, by telephone, letter, email, via our website and social media.”</p> <p>“We will make all reasonable adjustments to meet clients’/tenants’ specific needs where possible. If a translator or a sign-language interpreter is needed to assist in making a complaint, we will make reasonable attempts to help with this.</p> <p>Clients/tenants may be supported by advocates, interpreters or other</p>	We will update our standard templates to ensure reasonable adjustments and communication preferences are captured and catered for.

			<p>appropriate facility or person they choose, to help give their feedback. We will assist clients/tenants to make a complaint in a way easiest for them. We will not insist on complaints being made in writing but will record complaints as dictated by clients where needed. We will consider requests from clients/tenants for more time to comply with our complaints procedure if they feel they would otherwise be unfairly disadvantaged as a result of their disability.”</p>	
3.2	<p>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.</p>	Yes	<p>Policy wording:  “Feedback will be accepted from anyone, including external individuals and organisations, in person, by telephone, letter, email, via our website and social media.”</p> <p>Our complaints procedure is easily accessible to staff on our Intranet and clearly explains who to pass details of the complaint to.</p>	
3.3	<p>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</p>	Yes	<p>Wording from our policy:</p>	



	complaint volumes are potentially a sign that residents are unable to complain.		<p>“Southdown encourages feedback and sees this as essential as a learning organisation. Feedback will be viewed positively, be part of monitoring and improving service quality, and will be dealt with promptly, efficiently and in a fair manner and take into account all relevant circumstances including contradictory views.”</p> <p>Our process is well publicised: Our complaints policy, procedure and leaflet are on our website; the complaints process is included in Tenants’ Handbook, tenancy sign-up packs and the annual report to tenants.</p>	
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	<p>Full policy and procedure on our website. They explain the two-stage process, what will happen at each stage, and the timeframes for responding.</p> <p>Our complaints leaflet is available in standard and ‘easy read’ formats, in paper and on our website. It details the two-stage process, what will</p>	

			happen at each stage, and the timeframes for responding	
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	<p>Our Policy now explains how we publicise details of the complaints policy and allow clients and tenants to provide feedback.</p> <p>We do include details of our Complaint Code self-assessment:</p> <p><i>“In line with the Housing Ombudsman’s Complaint Handling Code, we will complete a self-assessment of our Housing complaints policy, procedure and complaints statistics annually. This will also be presented to the board.”</i></p>	
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	<p>Extract from our complaints Leaflet:</p> <p><b>Client / tenant consent</b></p> <p>If you are making a complaint on behalf of a Southdown client, we will write to them and ask for their consent for Southdown to share their personal information. If they do not consent to Southdown sharing their personal information, we will not be able to process the complaint.</p> <p>Wording from our policy:</p> <p>Feedback will be accepted from anyone, including external</p>	

			<p>individuals and organisations, in person, by telephone, letter, email, via our website and social media.</p> <p>Clients/tenants may be supported by advocates, interpreters or other appropriate facility or person they choose, to help give their feedback.</p>	
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	Ombudsman contact details are included in our complaints leaflet and complaint response letters (stage 1 and 2) and explains they can contact the Ombudsman at any time during a 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	Senior operational managers are assigned to handle complaints, including liaison with the Ombudsman, with a central admin officer who reports complaints to the Executive team.	
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	Officers handling complaints are at a leadership level and have access to staff at all levels to facilitate the prompt resolution of complaints.  They have the authority and autonomy to act to resolve disputes promptly and fairly.	
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	Yes	Wording from our policy:  "Southdown encourages feedback and sees this as	All relevant staff receive training on our 'Beacon' culture and best practice framework, which details how to work in a

	<p>is important that complaints are seen as a core service and must be resourced to handle complaints effectively</p>		<p>essential as a learning organisation.</p> <p>Feedback will be viewed positively, be part of monitoring and improving service quality, and will be dealt with promptly, efficiently and in a fair manner and take into account all relevant circumstances including contradictory views.”</p> <p>“Complaints will be investigated by Managers skilled in dealing with complaints.”</p>	<p>psychologically informed and person-centred way, as well as training in dealing with difficult conversations and behaviour that challenges.</p> <p>As all managers receive this training, we are always resourced to deal with complaints effectively.</p> <p>Individual complaints, and Southdown’s response are overseen by Senior Managers as a standard agenda item of the Organisational Performance Group and, going forwards, a summary of complaints is reviewed at the Service Quality Committee</p>
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## Section 5: The Complaint Handling Process

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
5.1	Landlords must have a single policy in place for dealing with complaints covered by this Code. Residents must not be treated differently if they complain.	Yes	We have one policy for all clients and resident; residents are not treated differently.	
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 strive to resolve issues early & locally. Our process consists of stages 1 and 2; there are no other named stages	
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 procedure consists of 2 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	Yes	It would form part of our 2 stage complaints process. A third party has never handled a complaint response of ours.	

	Code. Residents must not be expected to go through two complaints processes.			
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Yes	It is standard practice that we will ensure third parties handle complaints in line with the Code	
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	This requirement is set out in our Complaints Procedure and relevant wording in our acknowledgement letter template.	
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	All aspects of a complaint we are responsible for are clarified using our acknowledgement and response letter templates.	
5.8	At each stage of the complaints process, complaint handlers must: <ul style="list-style-type: none"> <li>a. deal with complaints on their merits, act independently, and have an open mind;</li> </ul>	Yes	Wording from our policy: “When dealing with a complaint, the Investigating Officer will:	

	<p>b. give the resident a fair chance to set out their position;</p> <p>c. take measures to address any actual or perceived conflict of interest; and</p> <p>d. consider all relevant information and evidence carefully.</p>		<ul style="list-style-type: none"> <li>•Deal with the complaint on its own merits</li> <li>•Act independently and with an open mind</li> <li>•Take measures to address 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 or to resolve issues raised. “</li> </ul>	
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	We send a letter informing them the response will be late, the reason for this and when they will receive a response.	We will update our template to advise the resident to contact us if they would like to discuss suitable intervals.
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.	Partial – improvement in progress	<p>Reasonable adjustment is included as section 7 of our policy.</p> <p>We record disabilities &amp; reasonable adjustments on our</p>	Room for improvement – we will include reasonable adjustments in the complaints monitoring template and in ongoing training



	Any agreed reasonable adjustments must be kept under active review.		<p>client and tenant record systems.</p> <p>We do make reasonable adjustments when we are aware but need to more formally identify these adjustments through the process.</p>	
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>We would not unreasonably refuse to escalate a complaint. We list valid reasons where we would refuse to escalate a complaint within our policy. These are in line with the HO code.</p> <p>We previously excluded complaints where the issue happened more than 6 months ago. This has now been amended to 12 months.</p>	
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	Yes	A record is created on our client database for each complaint, and given a unique ID number. The complaint, letters and all related documents are saved to this record. Date received is	

	supporting documentation such as reports or surveys.		logged, along with deadlines and dates letters sent.	
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	This is standard practice – now clarified in our policy.	
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 Acceptable Behaviour Policy and Procedure – this specifies the need for keeping any restrictions under review.  We keep clear records of contacts with all parties involved, including partner agencies to clearly evidence our reasons for putting restrictions in place. Cases and restrictions are monitored regularly	
5.15	Any restrictions placed on contact due to unacceptable behaviour must be proportionate and demonstrate	Yes	We have an Acceptable Behaviour Policy and Procedure – this specifies the need for keeping any restrictions under review.	

	<p>regard for the provisions of the Equality Act 2010.</p>		<p>– We will seek to understand the people involved in our cases as individuals, thinking about how adverse previous experiences might be impacting on current behaviour.</p> <p>We will be mindful of sudden deteriorations in behaviour and try to build rapport with perpetrators to understand what might be going on in their life at this time.</p> <p>We have an Acceptable Behaviour Policy and Procedure – this specifies the need for keeping any restrictions under review.</p>	
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## 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 procedure requires all stage 1 complaints to be responded to within 10 days of receipt and stage 2 complaints within 20 days.</p> <p>If the investigation needs more time due to complexity, the officer will inform the complainant in writing, explaining the reasons and expected timescale.</p> <p>Wording from our policy regarding reasonable adjustments:                      “We will consider requests from clients/tenants for more time to comply with our complaints procedure if they feel they would otherwise be unfairly disadvantaged as a result of their disability.”</p>	<p>We have developed a ‘service request’ contact category within our housing management system.</p> <p>We seek to identify what would resolve the issue to the tenants satisfaction as a key factor of our complaints handling process.</p>

6.2	Complaints must be acknowledged, defined and logged at stage 1 of the complaints procedure <b><u>within five working days of the complaint being received.</u></b>	Yes	Our procedure states 3 working days	
6.3	Landlords must issue a full response to stage 1 complaints <b><u>within 10 working days</u></b> of the complaint being acknowledged.	Yes	Our procedure states within 10 working days of complaint receipt	
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	This is set out in our Complaints Procedure.  We have a standard 'Delay in Response Letter' template to inform the complainant of the extension, which includes a new timescale.  We have amended our template to include clear reasons for this delay.	
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 added the Ombudsman contact details to our 'Delay in response' letter template.	
6.6	A complaint response must be provided to the resident when the	Yes	Standard practice is to respond when the answer is known.	

	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.		Actions are added to an individual Activity & Actions log for the complaint and to a main tracker covering all complaints.	
6.7	Landlords must address all points raised in the complaint definition and provide clear reasons for any decisions, referencing the relevant policy, law and good practice where appropriate.	Yes	Standard practice This is evidenced in our letter template.	We will add further details regarding policy & law
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	This is specified in our procedure	
6.9	Landlords must confirm the following in writing to the resident at the	Yes	This is included in our template response letter and evidenced	

	<p>completion of stage 1 in clear, plain language:</p> <ul style="list-style-type: none"> <li>a. the complaint stage;</li> <li>b. the complaint definition;</li> <li>c. the decision on the complaint;</li> <li>d. the reasons for any decisions made;</li> <li>e. the details of any remedy offered to put things right;</li> <li>f. details of any outstanding actions; and</li> <li>g. details of how to escalate the matter to stage 2 if the individual is not satisfied with the response.</li> </ul>		by our internal review of complaints responses.	
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## 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	This is covered by our procedure	
6.11	Requests for stage 2 must be acknowledged, defined and logged at stage 2 of the complaints procedure	Yes	Our procedure is to do this within 3 days of receipt	

	within five working days of the escalation request being received.			
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	We would do this in practice but is not detailed in our policy.  We have made our policy clearer to demonstrate this.	
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Yes	Our procedure states Snr manager at stage 1, Director at Stage 2	
6.14	Landlords must issue a final response to the stage 2 <b><u>within 20 working days</u></b> of the complaint being acknowledged.	Yes	Our procedure specifies 20 days of complaint receipt	
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 inform residents using our 'Delay in Response letter' template.  We have amended our template to include clear reasons.	
6.16	When an organisation informs a resident about an extension to these timescales, they must be provided	Yes	Contact details are included in our 'Delay in Response letter' template	



	with the contact details of the Ombudsman.			
6.17	A complaint response must be provided to the resident when the answer to the complaint is known, not when the outstanding actions required to address the issue are completed. Outstanding actions must still be tracked and actioned promptly with appropriate updates provided to the resident.	Yes – further action identified	This is our standard practice. Outstanding actions are added to our actions tracker to ensure completion.  Internal evidence indicates that we do inform the client/tenant of actions completed after the response letter is sent.	We will develop our action tracker to formalise this important stage.
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 our standard procedure.	
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;	Yes	Our stage 2 response letter template includes instruction to include these details.	

	<p>f. details of any outstanding actions; and</p> <p>g. details of how to escalate the matter to the Ombudsman Service if the individual remains dissatisfied.</p>			
6.20	Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.	Yes	This is our standard procedure.	

## Section 7: Putting things right

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
7.1	<p>Where something has gone wrong a landlord must acknowledge this and set out the actions it has already taken, or intends to take, to put things right. These can include:</p> <ul style="list-style-type: none"> <li>• Apologising;</li> <li>• Acknowledging where things have gone wrong;</li> <li>• Providing an explanation, assistance or reasons;</li> <li>• Taking action if there has been delay;</li> </ul>	Yes	This is standard practice and there are prompts in our response letter templates to include findings, reasons and further actions to be taken	

	<ul style="list-style-type: none"> <li>• Reconsidering or changing a decision;</li> <li>• Amending a record or adding a correction or addendum;</li> <li>• Providing a financial remedy;</li> <li>• Changing policies, procedures or practices.</li> </ul>			
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Yes	Using our psychologically informed and person-centred framework, the Beacon, we will work with the tenants to find remedies that are meaningful and impactful to the faults they have raised.	
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	Response letters set out what will happen and by when. Residents are met/telephoned where appropriate (depending on their request to/not to be contacted by phone)	
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes	We would always seek to use the guidance of the Ombudsman and use this to develop our best practice.	

## Section 8: Putting things right

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
8.1	<p>Landlords must produce an annual complaints performance and service improvement report for scrutiny and challenge, which must include:</p> <ul style="list-style-type: none"> <li>a. the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements.</li> <li>b. a qualitative and quantitative analysis of the landlord's complaint handling performance. This must also include a summary of the types of complaints the landlord has refused to accept;</li> <li>c. any findings of non-compliance with this Code by the Ombudsman;</li> <li>d. the service improvements made as a result of the learning from complaints;</li> <li>e. any annual report about the landlord's performance from the Ombudsman; and</li> <li>f. any other relevant reports or publications produced by the</li> </ul>	Yes	<p>Our Annual Complaints Report includes a, b &amp; d, and will include c; e &amp; f if any findings</p> <p>We have adapted our processes within the 23/24 year to record issues not accepted as complaints or those service requests able to be resolved before such a point as they become a complaint.</p>	

	Ombudsman in relation to the work of the landlord.			
8.2	The annual complaints performance and service improvement report must be reported to the landlord's governing body (or equivalent) and published on the on the section of its website relating to complaints. The governing body's response to the report must be published alongside this.	Yes – further action identified	Annual complaints report is reviewed by the Executive Team and the Board.  The Tenants Complaints Review and Complaints Self-Assessment are published on our website.	Annual complaints report will be adapted for the website and hosted alongside the response from our Board lead on complaints handling.
8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	Yes	No restructure significant to complaints process has taken place. We would self-assess where required.	
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	Yes	We will comply should this happen	
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	Yes	We will comply should this happen.	

	for returning to compliance with the Code.			
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## Section 9: Scrutiny & oversight: continuous learning and improvement

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
9.1	Landlords must look beyond the circumstances of the individual complaint and consider whether service improvements can be made as a result of any learning from the complaint.	Yes	<p>This forms part of our continuous improvement culture.</p> <p>From our policy: “Southdown encourages feedback and sees this as essential as a learning organisation.</p> <p>Feedback will be viewed positively, be part of monitoring and improving service quality...”</p> <p>From our procedure: “Arrange a Lessons Learnt meeting with relevant staff members to discuss lessons learnt from the investigation, actions already identified/taken, and further</p>	

			actions required to improve Southdown services”	
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	<p>Extract from our Comments, Compliments and Complaints Policy. “Southdown encourages feedback and sees this as essential as a learning organisation. Feedback will be viewed positively, be part of monitoring and improving service quality”</p> <p>Complaints are reviewed monthly by the Operational Performance Group who identify, log and track actions in terms of organisational learning and improvements to procedure.</p>	
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 publish our findings in our Annual Tenant Report which all tenants receive and is on our website, to our board in our Annual Complaints Report.	We will look to explore our learnings with our tenants as we develop our tenant voice options.

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	Director of Housing & Assets has taken on this role and will oversee via the Organisational Performance Group.  A Client/Tenant Involvement Officer has been appointed to support with this work.	
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	We have now identified a Board Member Responsible for Complaints.  Proposed that complaints are reviewed through the Service Quality Committee	
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	A MRC has now been identified, the Client and Tenant Involvement Officer will support with this work.	The Service Quality Committee will receive regular oversight of complaints as well as service improvement steps identified.
9.7	As a minimum, the MRC and the governing body (or equivalent) must receive:	Yes – partial compliance: further	The Executive Team receive a monthly, and annual report,	The Service Quality Committee have agreed it will receive regular oversight of complaints as



	<ul style="list-style-type: none"> <li>a. regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance;</li> <li>b. regular reviews of issues and trends arising from complaint handling;</li> <li>c. regular updates on the outcomes of the Ombudsman’s investigations and progress made in complying with orders related to severe maladministration findings; and</li> <li>d. annual complaints performance and service improvement report.</li> </ul>	action identified	the latter of which is presented to the Board.	well as service improvement steps identified from complaints as a standard agenda item.
9.8	<p>Landlords must have a standard objective in relation to complaint handling for all relevant employees or third parties that reflects the need to:</p> <ul style="list-style-type: none"> <li>a. have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments;</li> </ul>	Yes	<p>These form part of Complaints Policy and Southdown’s values to be a force for good, brilliant with people, united, trustworthy, and responsive.</p> <p>The Southdown Beacon guides employees to build relationships that value working together. This means we adopt a collaborative</p>	

	<ul style="list-style-type: none"> <li>b. take collective responsibility for any shortfalls identified through complaints, rather than blaming others; and</li> <li>c. act within the professional standards for engaging with complaints as set by any relevant professional body.</li> </ul>		<p>approach, with both clients and colleagues, and value multiple perspectives and voices.</p> <p>We also advocate against a blame culture, instead adopting shared responsibility with a commitment to a Growth Mindset and continuous improvement to ensure we learn from complaints and provide the best service possible.</p>	
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