

St. Arthur Homes Ltd

Complaints self-assessment 2022-2023

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

Mandatory ‘must’ requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary, and any explanations
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 organisation, its own staff, or those acting on its behalf, affecting an individual resident or group of residents.</i>	Y	Confirmed. This definition has been adopted in the Complaints Policy (“the policy”) section two and in the Complaints Policy Leaflet (“the leaflet”) which is publicly available on the St Arthur Homes website
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.	Y	Confirmed. St Arthur will receive and log complaints from third parties. See guidance in the Policy under ‘Key Principles’. Complaints do not need to be identified using the word ‘complaint’, as is set out in the policy under ‘Key Principles’.
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.	Y	Confirmed. St Arthur operates a complaints log where all complaints are logged. Complaints may be defined as ‘service requests’ however the policy is clear on the difference between this, and a true complaint.
1.7	A landlord must accept a complaint unless there is a valid reason not to do so.	Y	Confirmed. The complaints log identifies which complaints were accepted and which ones were not.
1.8	A complaints policy must clearly set out the circumstances in which a matter will not be considered, and these circumstances should be fair and reasonable to residents.	Y	Confirmed. Section two of the policy covers this point, under the heading ‘What is not a complaint’.

Code section	Code requirement	Comply: Yes/No	Evidence, commentary, and any explanations
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.	Y	Confirmed. Reasons for not accepting a complaint are set out in section two of the policy. The leaflet for residents contains information on contacting the Ombudsman at any stage for advice, and after stage two (or three) if the complainant is still unhappy.

Best practice 'should' Requirements

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.	Y	Confirmed. Section two of the policy covers this point, under the heading 'What is not a complaint'. Also, the complaints log differentiates between these two for record keeping.
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.	Y	Confirmed. Surveys have not been issued to residents to date, but will start when the Tenant Satisfaction Measures are rolled out in April 2023. When ST Arthur Homes begins to survey its residents it will ensure there is clarity that completion of the survey is not the appropriate way to make complaints and reference the appropriate procedure for making a complaint.

Section 2 - Accessibility and awareness

Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
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.	Y	Confirmed. The complaints leaflet details complaints can be made by post, email, or telephone. Staff are told how complaints may be received under section three of the policy.
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.	Y	Confirmed. The policy is available on the St Arthur website here: Complaints - St Arthur Homes The policy sets out the stages and timeframes in sections four and five.
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.	Y	Confirmed. See above.
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.	Y	Confirmed. The complaints officer has received e-learning on the Equality Act. The policy, under section three, outlines St Arthur's commitment to making the adjustments for service users of protected (and combined) characteristics.
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.	Y	Confirmed. The policy is publicised on the leaflet, and available in print and online via the St Arthur website. See here: Complaints - St Arthur Homes
2.7	Landlords must provide residents with contact information for the Ombudsman as part of its regular correspondence with residents.	Y	Confirmed. The complaints leaflet is issued to all residents requesting (implicitly or explicitly) the rectification of a service failure. This contains the Ombudsman's contact details. This is also easily found on the website here: Complaints - St Arthur Homes ⁴ for the public.

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
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.	Y	Confirmed. The leaflet contains a note to the reader under the heading 'The Housing Ombudsman Service', that residents have a right to contact the Ombudsman at any time. Also, each complaint letter includes in its template: <i>"Please be aware that you have the right to access the Housing Ombudsman Service throughout your complaint, not only when our complaints process is exhausted. This affords you the opportunity to engage with the Ombudsman's dispute support advisors for impartial advice."</i>

Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any 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 confidentiality and privacy will be maintained.	Y	Confirmed. Section three of the policy outlines how St Arthur Homes will deal with complaints made via social media. Broadly this directs staff to take the complaint onto a secure channel such as email, letter, or telephone.

Section 3 - Complaint handling personnel

Mandatory 'must' requirements

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".	Y	Confirmed. St Arthur has appointed a complaints officer who is a senior member of staff and regular reports on complaints are provided to the Board.
3.2	...the complaint handler appointed must have appropriate complaint handling skills and no conflicts of interest.	Y	Confirmed. St Arthur Homes appointed complaint officer is suitable experienced and have the correct skills to manage complaints and enact the Complaint's Policy. Where a conflict of interest arises the complaints officer will pass the complaint handling to an unconflicted member of staff and there is a clear escalation route.

Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
3.3	Complaint handlers should: <ul style="list-style-type: none"> • 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. 	Y	Confirmed. The Complaints Officer has been trained in complaint handling and has experience across housing management, development, management.

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 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 .	Y	Confirmed. All stages of the complaints process and relevant engagement will be logged in the St Arthur Homes Complaints Log. All complaints are acknowledged uniformly within five days, as per the policy and the Ombudsman’s Code. Complaint stages and processes are clearly set out in St Arthur Homes Complaints Policy and in the Complaints Policy Leaflet
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.	Y	Confirmed. St Arthur has created templates for responding to complaints. There are clear checklists which the Complaint Handler must adhere to before finalising a response which includes reiterating the particulars of the complaint and the Complaints Officer reviews all letters before they are issued. If there is any ambiguity in the complaint the Complaint Respondent will ask the complainant to clarify.
4.6	A complaint investigation must be conducted in an impartial manner.	Y	Confirmed. The Complaints Officer will ensure impartiality and if there are any conflict issues complaint will be passed to an unconflicted member of staff to complete.
	The complaint handler must: <ul style="list-style-type: none"> • deal with complaints on their merits • act independently and have an open mind • take measures to address any actual or perceived conflict of 	Y	Confirmed. St Arthur Homes has a clear process for addressing each complaint on its merits outlined in the policy and the support checklist of how to manage and investigate complaints. The Complaints Officer will

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
4.7	<p>interest</p> <ul style="list-style-type: none"> consider all information and evidence carefully keep the complaint confidential as far as possible, with information only disclosed if necessary to properly investigate the matter. 		oversee any investigation to ensure that steps are taken to complete a robust and fair process.
4.11	Landlords must adhere to any reasonable arrangements agreed with residents in terms of frequency and method of communication	Y	Confirmed. St Arthur sets out its complaints process in its Complaints policies and will communicate these to complainants. St Arthur Homes is committed to ensure that it accommodates any reasonable adjustments that are required to expedite addressing the complaint in collaboration with the complainant. The Complaints Log will also record any agreements made with complainants, and actions are recorded in the 'notes' section.
4.12	<p>The resident, and if applicable any staff member who is the subject of the complaint, must also be given a fair chance to:</p> <ul style="list-style-type: none"> set out their position <p>comment on any adverse findings before a final decision is made.</p>	Y	Confirmed. The Policy (section four) sets out how the process for ensuring that residents and if applicable any staff who are subject to the complaint to provide relevant information and feedback on the facts of the complaint. Before making a final decision all parties will be given the opportunity to comment on the findings and this will be recorded in final decision. Any points of contention will be recorded.
4.13	A landlord must include in its complaints policy its timescales for a resident to request escalation of a complaint	Y	Confirmed. This is set out in Section 4 of the Complaints Policy
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.	Y	Confirmed. Section two of the Complaints Policy sets out the process 'What is not a complaint' addresses what is not considered a complaint. Under the Policy complainants are asked provide a "detailed explanation must be provided to the Complainant setting out the reasons why the matter is not suitable for the complaints process and the right to take that the Housing

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
			Ombudsman.” If St Arthur Homes will also set out any reason for declining to escalate a 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.	Y	Confirmed. The complaint log contains the complaint content, and all stage letters/outcomes are saved to file. Any letters will refer to any interim communication (which will be recorded in the log) made to the complainant.
4.18	Landlords must have policies and procedures in place for managing unacceptable behavior from residents and/or their representatives when pursuing a complaint.	Y	Confirmed. Section seven of the Complaints Policy sets out how Vexatious and frivolous complaints or complaints will be managed.

Best practice ‘should’ requirements

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	Y	Confirmed. St Arthur Homes will clearly set out the process for managing complaints and at the earliest opportunity will set out where the required outcome for any complainant is considered unreasonable and unrealistic and endeavour to understand and reach a suitable outcome for complainants/
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.	Y	Confirmed. St Arthur Homes will clearly set out the process and timing for managing complaints and at the earliest opportunity will set out where the required outcome for any complainant is considered unreasonable and unrealistic and endeavour to understand and reach a suitable outcome for complainants/

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
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.	Y	Confirmed. St Arthur Homes Complaints Policy Leaflet contains guidance on using an advocate for making complaints. Correspondence with complainants will set out the right to be represented and/or accompanied at any meetings.
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.	Y	Confirmed. St Arthur Homes will always set out the legal obligations of the parties and this will be set out in all correspondence. There have been no such instances to date but to ensure that this is always completed the standard complaint templates and checklist have referenced this requirement.
4.9	Communication with the resident should not generally identify individual members of staff or contractors.	Y	Confirmed. The relevant templates and internal processes are such that they ensure that the St Arthur Homes adheres to all relevant Data Protection requirements and to protect organisations and individuals identities. In the event that this is unavoidable because it is necessary for addressing the complaint all parties will be contacted and approval sought for such disclosures.
4.10	Landlords should keep residents regularly updated about the progress of the investigation.	Y	Confirmed. St Arthur Homes regularly communicate with its residents who make complaints and adheres to its Complaints Leaflet and keeps log of each communication in the Complaints Log.
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.	Y	Confirmed. Following the closure of each complaint St Arthur Homes actively seeks to understand how complainants found the process. This feedback will be logged and reported to the Audit & Risk Committee.

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
4.17	Landlords should recognize 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.	Y	Confirmed. The Executive Team will regularly review complaints and ensure that key learning is used to develop services and support for its staff. St Arthur will take a collaborative approach with staff effective change.
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.	Y	Confirmed. St Arthur will respect the Equality Act. An adjustment of standard practice has not happened at the time of completing this self-assessment however any reasonable adjustments will be made to support complainants.

Section 5 - Complaint stages

Mandatory 'must' requirements

Stage 1

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
5.1	Landlords must respond to the complaint <u>within 10 working days</u> 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.	Y	Confirmed. To date St Arthur Homes has adhered to the timeframes set out in its Complaints Policy and is complaint with the 10 working days timeframe. To ensure that all complaints are in line with the required response timeframe the Complaints Log tracks the time between receipt of the complaint and sending out final response.
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.	Y	Confirmed. St Arthur Homes is committed to maintaining good communication with complainants and all responses are sent within the required timeframe. Responses will set out the actions that will be taken to redress the issue and the complaint log will track the progress for completing these actions as they relate to the complaint.
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.	Y	Confirmed. This is demonstrated in letters and correspondence saved to file. It is also a requirement of completing the checklist before finalising a complaint response letter.
5.8	Landlords must confirm the following in writing to the resident at the completion of stage one in clear, plain language: <ul style="list-style-type: none"> • 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 	Y	Confirmed. This is demonstrated in letters and correspondence saved to file. It is also a requirement of completing the checklist before finalising a complaint response letter.

Stage 2

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any 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.	Y	Confirmed. Whilst there have been no complaints requiring escalation to stage two of the process the process is clearly articulated in St Arthur Homes Complaints Policy
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.	Y	Confirmed. St Arthur Homes will always see clarification on their understanding of the issues raised and outcomes required by the resident as detailed above and as part of the acknowledgement process.
5.11	Landlords must only escalate a complaint to stage two once it has completed stage one and at the request of the resident.	Y	Confirmed. St Arthur Homes will always adhere to the steps out line in the Complaints Policy and would only deviate from such only if required and in agreement with the complainant.
5.12	The person considering the complaint at stage two, must not be the same person that considered the complaint at stage one.	Y	Confirmed. Section four of the Complaints Policy states that the person that considers the complaint at safe one will not be the same person that conducts the review at stage two.
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.	Y	Confirmed. Section four of the Complaints Policy sets out the timeframe for stage two reviews.
5.16	Landlords must confirm the following in writing to the resident at the completion of stage two in clear, plain language:	Y	Confirmed. All correspondence to complaints will set out the complainants rights and possible next stages for

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
	<ul style="list-style-type: none"> • 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 <p>and</p> <ul style="list-style-type: none"> • if the landlord has a third stage, details of how to escalate the matter to stage three if this was the final stage, details of how to escalate the matter to the Housing Ombudsman Service if the resident remains dissatisfied. 		escalation including raising issues with the Housing Ombudsman Service.

Stage 3

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.	Y	St Arthur does employ a third stage which is voluntary. Should this offer be taken up by the complainant, a non-executive member of the Board of Directors will respond to the complaint. This is set out in the policy (section four), and the leaflet.
5.20	Landlords must confirm the following in writing to the resident at the completion of stage three in clear, plain language: <ul style="list-style-type: none"> • 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 	Y	Confirmed. All correspondence to complaints will set out the complainants rights and possible next stages for escalation including raising issues with the Housing Ombudsman Service.

Best practice 'should' requirements

Stage 1

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.	Y	Confirmed. Section 5 of the Complaints Policy directs staff to the Complaints Handling Code section 5.1-5.3 (stage one), 5.13-5.14 (stage two), and 5.18-5.19 (stage three) on the process and requirements before agreeing any extensions and necessitate that all limits and conditions are to be observed.
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.	Y	Confirmed. All correspondence to complaints will set out the complainants rights and possible next stages for escalation including raising issues with the Housing Ombudsman Service.
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.	Y	Confirmed. Whilst there have been no such instances St Arthur Homes Complaints Management Procedure Checklist details the requirement to review previous reports related to similar or like issues previously raised.
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.	Y	Confirmed. Section four of the Complaints Policy sets out how additional complaints will be managed which meets with the requirements set out in the code.

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.	Y	Confirmed. Section 5 of the Complaints Policy directs staff to the Complaints Handling Code section 5.1-5.3 (stage one), 5.13-5.14 (stage two), and 5.18-5.19 (stage three) on the process and requirements before agreeing any extensions and necessitate that all limits and conditions are to be observed.
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	Y	Confirmed. All correspondence to complaints will set out the complainants rights and possible next stages for escalation including raising issues with the Housing Ombudsman Service.

Stage 3

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.	Y	Confirmed. All correspondence to complaints will set out the complainants rights and possible next stages for escalation including raising issues with the Housing Ombudsman Service.
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.	Y	Confirmed. Section 5 of the Complaints Policy directs staff to the Complaints Handling Code section 5.1-5.3 (stage one), 5.13-5.14 (stage two), and 5.18-5.19 (stage three) on the process and requirements before agreeing any extensions and necessitate that all limits and conditions are to be observed. All correspondence details how complainants can contact the Housing Ombudsman Services.

Section 6 - Putting things right

Mandatory 'must' requirements

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.	Y	Confirmed. This requirement is set out in section six of the Complaints Policy and St Arthur Homes as a culture of openness and transparency which supports delivering this requirement. All staff have been made of this requirement and the Complaints Officer will ensure that is enacted.
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.	Y	Confirmed. St Arthur Homes will be ensure that complainants are made aware of its compensation policy and protocols in the event that this relevant to issues raise. All correspondence to the residents will be clear and transparent about actions and timeframes that it will and is able to take. Evidence of this is in previous responses.
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.	Y	Confirmed. St Arthur Homes will be ensure that complainants are made aware of its compensation policy and protocols in the event that this relevant to issues raise. All correspondence to the residents will be clear and transparent about actions and timeframes that it will and is able to take. Evidence of this is in previous responses.
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.	Y	Confirmed. St Arthur Homes will be ensure that complainants are made aware of its compensation policy and protocols in the event that this relevant to issues raise. All correspondence to the residents will be clear and transparent about actions and timeframes that it will and is able to take. Evidence of this is in previous responses.

Best practice 'should' requirements

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.	Y	Confirmed. The complaints log contains a space for learnings garnered from the complaint being made and/or resolved. These are discussed in internal staff meetings.
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.	Y	Confirmed. Section six of the Complaints Policy sets out the process for obtaining legal advice which includes engagement with the Complaints Officer and Chief Executive.

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.	Y	Confirmed. St Arthur does not have scrutiny panels. However, feedback on complaints from residents and the staff who are handling them are incorporated into internal meetings. St Arthur has a portfolio size under one thousand homes and as such is not producing an annual report. Complaint learnings will feature in the first annual report issued in the future.

Best practice ‘should’ requirements

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.	Y	Confirmed. St Arthur’s Board of Directors receive a quarterly update on complaints as part of a wider performance update. A member of that Board has not yet been designated as the lead for complaints, however this will be brought to board for decision in Q3/Q4 2022 (calendar year). The Board agreed on 26 October 2022 that Simon Devitt will be the lead Board member for complaints.
7.4	As a minimum, governing bodies should receive: <ul style="list-style-type: none"> Regular updates on the volume, categories and outcome of complaints, alongside complaint handling performance including compliance with the Ombudsman’s orders Regular reviews of issues and trends arising from complaint handling, The annual performance report produced by the Ombudsman, where applicable Individual complaint outcomes where necessary, including where the Ombudsman made findings of severe maladministration or referrals to regulatory bodies. The 	Y	Confirmed. The Board of Directors receive an update on complaints as part of a quarterly performance update. Here the volume, category and outcome of the complaints are given and discussed at the quarterly, regular, board meeting. A small number of complaints have been received to date and no clear trend has emerged. Trends, though, will be analysed by the executive and reported to the Board of Directors for each quarterly meeting in the future. No annual performance report is produced for St

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
	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.		Arthur by the Ombudsman. No complaints involving the Ombudsman have been received to date. The self-assessment will be presented to the Board of Directors after its October 2022 rollout.
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.	Y	Confirmed. There are regular reports to the Board on complaints and discussions take place at team meetings. No themes or trends have been identified in the small number of complaints received to date. If a complaint relates to services from contracts this information is shared to support development and learning.
7.6	Landlords should have a standard objective in relation to complaint handling for all employees that reflects the need to: <ul style="list-style-type: none"> • have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments • take collective responsibility for any shortfalls identified through complaints rather than blaming others • act within the Professional Standards for engaging with complaints as set by the Chartered Institute of Housing. 	Y	Confirmed. St Arthur has a collegiate culture and enjoys an excellent level of co-operation amongst its staff. Being particularly agile, any shortfalls or requirements for policy and procedural change are readily taken up.

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.	Y	Confirmed. This self-assessment will be updated and reviewed annual ahead of the 1 October 2022 before being published on St Arthur Homes website.
8.2	Landlords must also carry out a self-assessment following a significant restructure and/or change in procedures.	Y	Confirmed. The Complaints Officer is tasked with ensuring that St Arthur Homes remain complaint at all times with this code and should any changes be required the assessment will be updated and presented to the Board for endorsement.
8.3	<p>Following each self-assessment, a landlord must:</p> <ul style="list-style-type: none"> • 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 • publish the outcome of their assessment on their website if they have one, or otherwise make accessible to residents • include the self-assessment in their annual report section on complaints handling performance 	Y	<p>Confirmed. Due to its size St Arthur Homes is not required to publish an annual complaints report. It will however publish itself annual self-assessment each year following endorsement from the Board.</p> <p>The Board reviewed and endorsed this self-assessment on 26 October 2022 and agreed that this could be published on the St Arthur Homes website.</p>