

Richmond Fellowship Complaints Self-assessment June 2024

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	<i>Our feedback policy defines a complaint as ‘an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the organisation, its own staff, or those acting on its behalf, affecting an individual in receipt of services provided by the Group.’</i>	As an organisation Richmond Fellowship (RF) supports diverse groups of people who are not always our residents/ RF is not their landlord. We have replaced “landlord” with organisation and “resident” with “individual” to better reflect variety of services we provide. We have also not included “group of “.
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	People do not have to use a word “complaint”. Extract from feedback policy <i>“There is no requirement for it to be a written complaint nor for the word ‘complaint’ to be used as part of the contact, for it to be treated as such.”</i> RF feedback policy lists examples of third parties that can complaints including <i>“Anyone currently or recently using one of our services, or someone acting for them</i> <ul style="list-style-type: none"> <i>Relatives, carers or anyone else concerned with the welfare of people we support</i> <i>An individual or agency wishing to</i> 	n/a

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
			<p><i>use a service provided by the group</i></p> <ul style="list-style-type: none"> <i>An organisation acting for a person or group of people currently accessing or recently having accessed a service which the group is involved with providing.”</i> <p>Where a complaint is made on behalf of a person their consent must be obtained for the complaint to be fully considered.</p>	
1.4	Landlords must recognise the difference between a service request and a complaint. This must be set out in their complaints policy. A service request is a request from a resident to the landlord requiring action to be taken to put something right. Service requests are not complaints, but must be recorded, monitored and reviewed regularly.	No	At present our policy/procedure does not have service requests but informal complaints. Although there is no precise definition informal complaint is something that can be resolved quickly. The policy/procedure needs updating to meet this requirement. Informal complaints are recorded in person's case notes/events for external informal complaints. Procedure stipulates that these should be regularly reviewed and discussed as part of a service continuous improvement. Extract from policy and associated documents "Tier 5/6 manager will regularly review the records of all internal and external informal complaints as part of their monitoring of the service and to ensure that appropriate action was taken to address the issue. These findings should also be discussed with the team in the monthly team meetings to inform	The policy/procedure needs updating to meet this requirement. Although recording and reporting exists for informal complaints, the way they are currently captured does not provide a required level of assurance that concerns have been dealt with. This is because of unclear start-end process. The process should be reviewed to make it more robust and easier to report on and evidence resolution. RFC naming convention and feedback leaflet as well as RF website needs updating to replace informal complaint with service request.

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
			any required actions and any learning shared". Informal complaints are monitored through quarterly reporting in service assurance group.	
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.	No	This is not as clear in the policy as should be to evidence the requirement. Extract from the policy "If it is not possible to resolve the complaint informally it will be necessary to use the formal complaints process."	To meet this requirement it would need to be made more explicit in the policy that a complaint can be raised whilst the service request (informal complaint) is being investigated.
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.	No		Include information on how to make a complaint in the footer of the survey (speak to staff or service management, dedicated email).

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	Extract from feedback policy "There may occasionally be circumstances in which a complaint will or cannot be considered. This decision may only be made by a Tier 3 manager or above. A formal record should be kept of the reason(s) and this will be communicated to the individual giving the feedback. Such examples of where this might occur are when the complaint has previously been	At the moment there is no central system for recording complaints that have not been accepted. Records would usually be kept by individual managers. We need to create a process which would best evidence this.

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
			investigated without new evidence being provided.” This could include complaints that are repetitive, in some inappropriate or vexatious.	
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. 	No	<ul style="list-style-type: none"> • Extract from the feedback policy <i>“Some feedback forming a complaint may be considered to be “out of time” particularly if records no longer exist and cannot reasonably have been expected to be retained.</i> • Currently point 3 is addressed. Extract from policy <i>“There may occasionally be circumstances in which a complaint will or cannot be considered. (...) Such examples of where this might occur are when the complaint has previously been investigated without new evidence being provided.”</i> 	<p>For clarity we could include a more specific timeframe in our policy.</p> <p>Point two recording legal proceedings would need to be added to our policy</p>
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	Extract from the feedback policy <i>“Some feedback forming a complaint may be considered to be “out of time” particularly if records no longer exist and cannot reasonably have been expected to be retained.</i>	Update the policy to confirm the timeframes for considering complaints and if discretion will be applied when the complaint falls outside the defined timeframes.
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	No	Our policy does not include guidance on signposting the person to the Ombudsman where their complaint has not been accepted.	Update the policy and create a template letter

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	Ombudsman may tell the landlord to take on the complaint.			
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Yes	Although there is no evidence that there is a culture of a blanket approach to excluding complaints, we could state support this with a policy statement.	Update policy to add clarification on considering each complaint on its merit.

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	There are a range of options that people can utilise if they wished to make a complaint. These include in-person, over a telephone, an email, a letter.	
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	People can raise concerns directly with the staff members or service management. Familiarising themselves with the feedback policy is part of staff induction and the policy is freely available to all staff to access on organisations intranet.	
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	A volume and trends in complaints are monitored through the quarterly reporting. We are conscious that it is essential that people know of RF feedback policy/what they can raise a concern. In the 2023-24, 91% of people who use our services said they knew how to make a complaint. This is a 12% increase on a previous	

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
			year.	
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	There is a feedback leaflet made available in our services and our website outlines our complaints process.	Upload our policy to the website.
3.5	The policy must explain how the landlord will publicise details of the complaints policy, including information about the Ombudsman and this Code.	No		Policy needs to be updated to include this expectation.
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 policy welcomes complaints by a third party making a complaint on behalf of the person using the service providing they have their consent which we would need evidence of.	
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	Contact details for the Ombudsman are stated on the feedback leaflet. These details are also stated on the Stage 2 complaint outcome letter advising the complainant they can escalate their complaint to the Ombudsman if they are dissatisfied with the outcome and our process is exhausted.	

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	Yes	The Quality and Compliance team oversee the administration of complaints and any liaison with the Ombudsman.	

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	Code will refer to that person or team as the 'complaints officer'. This role may be in addition to other duties.			
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	A designated "complaints officer" will be senior enough to meet these requirements.	
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	No	RF does not provide any training at the moment.	Provide internal or external mandatory training for RF staff in complaints handling.

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	There is one Feedback policy that addresses the range of options for feedback, including formal complaints.	
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.	No	Our policy stipulates that people can choose to make an informal complaint.	Update the policy and replace informal complaint with service request for meeting the requirements of the code.
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 formal complaint process has two stages thus meeting this statutory requirement.	
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	Yes	We would handle complaint about services that we provide ourselves. If the complaint is about services that	

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	complaints process set out in this Code. Residents must not be expected to go through two complaints processes.		were delivered by a third-party residents would be encouraged/supported to make a complaint directly to the third party thus avoiding them to go through two separate processes.	
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	No		To be added to the Policy and Procedure
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	The template letters include expectations to clearly list all issues that the person wants to raise and the outcomes they are seeking.	
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	This will be confirmed at the acknowledgment stage.	
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	Extract from our policy <i>“To handle and manage all complaints fairly in an open and accountable way”</i> .	
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	Extract from the feedback policy and procedure – <i>“Should the complaint investigation take longer than 10 working days the investigating officer</i>	

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
			<p><i>will write to the complainant to update them on the investigation using the holding letter template. The complainant will be provided with an update every 10 working days until the investigation is completed."</i></p>	
5.10	<p>Landlords must make reasonable adjustments for residents where appropriate under the Equality Act 2010. Landlords must keep a record of any reasonable adjustments agreed, as well as a record of any disabilities a resident has disclosed. Any agreed reasonable adjustments must be kept under active review.</p>	Yes	<p>Disclosed disabilities are recorded on RF Connect.</p>	<p>Need to record any adjustments made when handling a complaint.</p>
5.11	<p>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.</p>	No		<p>Need to review the current procedure as there are some restrictions on progressing to appeal.</p>
5.12	<p>A full record must be kept of the complaint, and the outcomes at each stage. This must include the original complaint and the date received, all correspondence with the resident, correspondence with other parties, and any relevant supporting documentation such as reports or surveys.</p>	Yes	<p>We have a system in place for recording complaints and all relevant communication/correspondence. Expectations on recording complaints are set out in the feedback procedure.</p>	
5.13	<p>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.</p>	Yes	<p>Following are two extracts from the feedback policy</p> <ul style="list-style-type: none"> • To facilitate the effective and early resolution of complaints using a "right first time" approach; • To empower our staff to resolve complaints quickly and take remedial action arising from the 	

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
			learning;	
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	Unacceptable behaviour is managed in line with our Anti-Social behaviour policy and procedures	
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	Unacceptable behaviour is managed in line with our Anti-Social behaviour policy	

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.	No		Need to review the Complaints Procedures to incorporate this.
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	Our process for Stage 1 is to acknowledge a complaint within three working days of receiving one.	
6.3	Landlords must issue a full response to stage 1 complaints <u>within 10 working days</u> of the complaint being acknowledged.	Yes	In line with the code requirements our policy states that the complainant will receive an outcome response to their complaint within 10 working days.	
6.4	Landlords must decide whether an extension to this timescale is needed when considering the complexity of	Yes	Should the complaint investigation take longer than 10 working days the	

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	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.		investigating officer will write to the complainant to update them on the investigation using a holding letter template. A template letter has a section on providing the reason(s) for the delay. The complainant will be provided with an update every 10 working days until the investigation is completed.	
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.	No	It is not yet a routine practice that people are provided with the details of the ombudsman if an extension to the complaint investigation is required.	Review all letter templates for the Complaints process to include the Ombudsmans contact 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.	No	Our template letters set out what action/s has been taken and further actions identified which we intend to take where applicable. However, there is no expectation defined in the policy that the person must be informed of completion of any of the actions after they have received their outcome letter.	Add this expectation to the policy/procedure. Consider reviewing the tracker so that completion of the actions and informing of the complainant can be evidenced.
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	Our template letter has a clear guidance/sections for including these points in the outcome response.	
6.8	Where residents raise additional complaints during the investigation, these must be incorporated into the stage 1 response if they are related and the stage 1 response has not been issued. Where the stage 1 response has been issued, the new issues are unrelated to the issues already being investigated or it would unreasonably delay the response, the new issues must be logged as a	No	This is not currently included in our policy/procedure.	Update policy/procedure to include these points.

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	new complaint.			
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	Stage 1 letter template includes all the relevant sections.	

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	We have a two stage complaint process and where the person is dissatisfied with the Stage 1 outcome they might lodge an appeal. They have 10 working days to do that and guidance on how to appeal is included on Stage 1 outcome letter.	
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 procedure is that the complainant receives acknowledgment of their appeal within three working days of receiving it.	
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	No		Our procedure requires the complainant to give grounds for the appeal. This will need

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	a resident remains unhappy as part of its stage 2 response.			a revision to meet the code.
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Yes	The staff member considering Stage 2 complaint will be different and more senior to the staff member who investigated Stage 1 complaint.	
6.14	Landlords must issue a final response to the stage 2 <u>within 20 working days</u> of the complaint being acknowledged.	Yes	In line with the code requirements our policy states that the complainant will receive an outcome response to their complaint within 10 working days.	
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	Should the complaint investigation take longer than 10 working days the investigating officer will write to the complainant to update them on the investigation using a holding letter template. A template letter has a section on providing the reason(s) for the delay. The complainant will be provided with an update every 10 working days until the investigation is completed.	
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.	No	It is not yet a routine practice that people are provided with the details of the ombudsman if an extension to the complaint investigation is required.	Review of the letter template is required.
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.	No	Our template letters set out what action/s has been taken and further actions identified which we intend to take where applicable. However, there is no expectation defined in the policy that the person must be	Add this expectation to the policy/procedure. Consider reviewing the tracker so that completion of the actions and informing of the complainant can be evidenced.

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	This is a repeat of 6.6		informed of completion of any of the actions after they have received their outcome letter.	
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	Our template letter has a clear guidance/ sections for including these points in the outcome response.	
6.19	Landlords must confirm the following in writing to the resident at the completion of stage 2 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 the Ombudsman Service if the individual remains dissatisfied. 	Yes	Stage 2 letter template includes all the relevant sections and contact details for the Ombudsman.	
6.20	Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.	Yes	At Stage 2 the complaint will be investigated by a suitably senior manager (Tier 4 or above)	

Section 7: Putting things right

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
7.1	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: <ul style="list-style-type: none"> • Apologising; 	Yes	The complainant will be informed of what actions we would take and this can include all the points raised in this section.	

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	<ul style="list-style-type: none"> 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. 			
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Yes	Any remedy will be commensurate with the impact on the person using the service and considered in line with Compensation to people we support policy.	
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.	No		This is not set out in the current Policy or Procedure. Need to review and include.
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	No		This is not set out in the current Policy or Procedure. Need to review and include.

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> <p>a. the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements.</p>	No	Although we produce quarterly analysis of complaints this is not done annually and the report does not yet include information on all the points mentioned in this section.	We do not currently have a system to capture complaints that we refused to accept. This is to be developed.

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	<ul style="list-style-type: none"> 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. 			
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 section of its website relating to complaints. The governing body's response to the report must be published alongside this.	No		An annual report will be presented at the board and published on our website with the Boards response.
8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	Yes		This has not been applicable but will need to be addressed with the merger with Humankind.
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	Yes	Until now RF has not been investigated by the Housing Ombudsman. Should this happen, we will update our self-assessment.	
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	Yes	We have not been in this position, however should anything significant happen that would affect our compliance with the code we would inform the ombudsman, residents	

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	to compliance with the Code.		and publish it on our website.	

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.	No		Need to identify the best forum and process for capturing learning and service improvement.
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	The feedback policy states that “Tier 5/6 managers will conduct a quarterly review of all feedback received (formal and informal) as part of their ongoing monitoring of the service quality and to ensure that appropriate action was taken where necessary, and learning has been implemented. The following RF Connect reports are available for the managers on the service reports tab to conduct periodic formal complaints reporting and learning reviews.”	
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.	No	Whilst this is reported on in the quarterly service governance there is less clarity whether trends, learning and improvements are consistently shared with other stakeholders such as people using the service and staff.	To meet this requirement organisation needs to establish a process for sharing learning from complaints with relevant group of stakeholders.
9.4	Landlords must appoint a suitably senior lead person as accountable for their complaint handling. This person	Yes	The Head of Quality and Compliance.	

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	must assess any themes or trends to identify 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').	No		Need to appoint a board member who will be Member Responsible for Complaints to meet this requirement.
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.	No		Need to appoint a board member who will be Member Responsible for Complaints to meet this requirement.
9.7	As a minimum, the MRC and the governing body (or equivalent) must receive: <ul style="list-style-type: none"> 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 of the Ombudsman's investigations and progress made in complying with orders related to severe maladministration findings; and d. annual complaints performance and service improvement report. 	No		Need to appoint a board member who will be Member Responsible for Complaints and then agree the mechanisms to meet this requirement.
9.8	Landlords must have a standard objective in relation to complaint handling for all relevant employees or third parties that reflects the need to: <ul style="list-style-type: none"> a. have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments; 	No		Need to develop the protocols so that this can be established.

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	<ul style="list-style-type: none"> b. take collective responsibility for any shortfalls identified through complaints, rather than blaming others; and c. act within the professional standards for engaging with complaints as set by any relevant professional body. 			