

Self-Assessment Form

This self-assessment form has been reviewed and approved by our WHA Board.

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>	Yes	The Housing Ombudsman's definition of a complaint has been incorporated within Warrington Housing Association's Complaints Policy and is embedded within our complaint handling procedures.
1.3	The resident does not have to use the word 'complaint' for it to be treated as such. A complaint that is submitted via a third party or representative must still be handled in line with the landlord's complaints policy.	Yes	Our procedures are designed to ensure that customer enquiries are triaged in a manner which determines whether an enquiry constitutes a complaint, and what course of action we should take. In some instances, the customer may request that their concern is handled informally, in others it may be deemed more appropriate to automatically escalate the matter to a complaint stage. Our Complaints policy has been updated in December 2022 to ensure that all complaints, however received, are handled consistently and in line with our complaints policy.

Section 1 - Definition of a complaint

Mandatory 'must' requirements

1.6	...if further enquiries are needed to resolve the matter, or if the resident requests it, the issue must be logged as a complaint.	Yes	Where appropriate we would aim to resolve complaints at the first point of contact. Where this is not the case, or should the customer require us to do so, we would log
			the complaint as a Stage 1 complaint and the complaint would be investigated in line with our complaints policy.
1.7	A landlord must accept a complaint unless there is a valid reason not to do so.	Yes	We will adhere to our complaints policy and log all complaints. Issues not recorded through our complaints process eg anti-social behaviour reports, are outlined in the policy. These issues are dealt with under a separate policy.
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.	Yes	Details of the exclusions are detailed within our Complaints policy. Our exclusions are driven by factual circumstances, thus preventing inconsistency and/or subjectivity in the event of a complaint being refused. This ensures maximum fairness and consistency for complainants. We continually review our Complaints Policy to ensure that all elements of the policy are clear, concise, and easy for our customers to understand. This includes the section regarding policy exclusions (Section 2)
1.9	If a landlord decides not to accept a complaint, a detailed explanation must be provided to the resident setting out the reasons why the matter is not suitable for the complaints process and the right to take that decision to the Ombudsman.	Yes	A detailed explanation outlining why a complaint has not been accepted is always provided to the complainant. The explanation is issued in writing and in line with our Complaints Policy. All complaint correspondence includes details of the Housing Ombudsman Service

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.	Yes	As part of our training for all staff we ensure staff can identify, record and process customer feedback. This includes the difference between a service request and a complaint.
1.5	Survey feedback may not necessarily need to be treated as a complaint, though, where possible, the person completing the survey should be made aware of how they can pursue their dissatisfaction as a complaint if they wish to.	Yes	We use all customer feedback to improve service delivery and staff are empowered to take appropriate action. We will ensure all surveys include a statement outlining how a customer can make a complaint if they are dissatisfied with our service.

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.	Yes	Our Complaints Policy outlines the multiple ways in which customers can make a complaint. WHA offers multiple channels to report a complaint. See Complaints Policy (5.2)
2.3	Landlords must make their complaint policy available in a clear and accessible format for all residents. This will detail the number of stages involved, what will happen at each stage and the timeframes for responding.	Yes	Our Complaints Policy is available on our website. The policy explains all aspects of the process in a clear, concise, and customer friendly manner. The policy can be provided in different formats on request.
2.4	Landlord websites, if they exist, must include information on how to raise a complaint. The complaints policy and process must be easy to find on the website.	Yes	In addition to the above, the website includes contact details and a link to a web-form which can be used to submit a complaint directly to us is also available.
2.5	Landlords must comply with the Equality Act 2010 and may need to adapt normal policies, procedures, or processes to accommodate an individual's needs. Landlords must satisfy themselves that their policy sets out how they will respond to reasonable adjustments requests in line with the Equality Act and that complaints handlers have had appropriate training to deal with such requests.	Yes	Warrington Housing Association maintains compliance with the Equality Act 2010. We do not have a stand-alone Reasonable Adjustments policy; however, the following policies contain details of the reasonable adjustments available to customers: • Repairs handbook (adaptations to homes) • Equality and Diversity policy (our equality objectives) • Customer Services Charter (tailoring our services)

2.6	Landlords must publicise the complaints policy and process, the Complaint Handling Code and the Housing Ombudsman Scheme in leaflets, posters, newsletters, online and as part of regular correspondence with residents	Yes	Our residents right to complain are publicised in a variety of ways. Our complaints policy published on our website includes the Complaint Handling Code and Housing Ombudsman Scheme. Link here We also use other communications to promote our complaints service, such as our newsletters and Annual Report, both of which are issued to customers and published on our website.
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2.7	Landlords must provide residents with contact information for the Ombudsman as part of its regular correspondence with residents.	Yes	We publicise the Ombudsman's contact information in all our complaint's correspondence, on our website, and in general correspondence with customers.
2.8	Landlords must provide early advice to residents regarding their right to access the Housing Ombudsman Service throughout their complaint, not only when the landlord's complaints process is exhausted.	Yes	The Housing Ombudsman Service and its contact details are promoted to customers prior to, and throughout each stage of the complaint process. The Complaints policy advises that complainants may contact the Ombudsman for help and independent advice at any stage during the complaints process.

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.		

ection 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".		Complaints can be taken from any colleague and will record it promptly with our Customer Support Team. (CST) The CST will track and log all complaints and responses. The Head of Customer Services is responsible for monitoring all complaints, identifying trends and lessons learnt.

3.2	...the complaint handler appointed must have appropriate complaint handling skills and no conflicts of interest.		Yes All colleagues receive full training and are competent in our complaint handling procedures and are regularly monitored. All
			colleagues complete a declaration of interest form upon appointment in their role. Declarations of interest are updated annually. Where a conflict of interest may arise, an alternative colleague will be designated to investigate and respond to the complaint.

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. 		All colleagues are trained in complaints handling. Regular refresher training takes place to ensure colleagues are kept up to date with changes. Investigating Officers are at a senior level and have autonomy to access relevant areas to resolve complaints quickly and fairly.

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 .		Attempts to resolve complaints informally are managed via our early resolution process. Care is taken throughout the process to ensure that complainants are aware of their right to have their concerns investigated formally. Cases handled via this route are recorded in our housing management system and reported centrally. Early resolution cases must be resolved within 1 business day, after which the matter is automatically escalated to Stage 1 of our complaints process, unless otherwise agreed with the complainant.

4.2	Within the complaint acknowledgement, landlords must set out their understanding of the complaint and the outcomes the resident is seeking. If any aspect of the complaint is unclear, the resident must be asked for clarification and the full definition agreed between both parties.	Yes	Upon receipt of a complaint our case handlers contact complainants via telephone to acknowledge receipt of the complaint, formally introduce themselves, establish a relationship and explain their role. During the introductory call the case handler will aim to clarify the grounds for complaint, gather further information required to aid the investigation and agree the desired outcome. The complainant will be kept up to date with the process and timeline.
4.6	A complaint investigation must be conducted in an impartial manner.	Yes	Stage 1 complaints will be investigated by a Head of Service. Where there is a potential conflict, the complaint will be redirected to a colleague of a similar level of seniority.
4.7	<p>The complaint handler must:</p> <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 interest • 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. 	Yes	<p>Through colleague training, process and system controls, our complaint handlers gather the information and evidence required to resolve complaints in a structured and methodical manner, ensuring a balanced and consistent approach to case investigations.</p> <p>Customer confidentiality is central to our approach and we would make the customer aware if we needed to disclose information to investigate the complaint thoroughly.</p>
4.11	Landlords must adhere to any reasonable arrangements agreed with residents in terms of frequency and method of communication	Yes	We keep the complainant informed of all stages of the process alongside timescales. We can agree how to communicate with the customer which meets their expectations.
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 • comment on any adverse findings before a final decision is made. 	Yes	Our introductory acknowledgement and internal investigation processes provide all interested parties with the opportunity to set out their position and/or submit evidence.

4.13	A landlord must include in its complaints policy its timescales for a resident to request escalation of a complaint	Yes	The timescales associated with each complaint stage are detailed within our 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.	Yes	We would not refuse to escalate a complaint unless it was deemed that the complaint was vexatious or covered by the exclusions within the Complaints policy.(Section 2)

4.15	A full record must be kept of the complaint, any review and the outcomes at each stage. This must include the original complaint and the date received, all correspondence with the resident, correspondence with other parties and any reports or surveys prepared.	Yes	All information, correspondence and evidence pertaining to complaints is stored within our housing management system.
4.18	Landlords must have policies and procedures in place for managing unacceptable behaviour from residents and/or their representatives when pursuing a complaint.	Yes	WHA has a Customer Services Charter which outlines our standards of service and what we expect from our customers. We also reference dealing with unacceptable behaviour or persistent complainants in Section 10 of the Complaints Policy.

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	Yes	Setting expectations and agreeing the desired outcome with complainants takes place during the introductory acknowledgement process. The case handlers maintain regular contact with complainants and provide progress updates as and when the circumstances may change. Any likely delay to the resolution is communicated as soon as possible
4.4	A complaint should be resolved at the earliest possible opportunity, having assessed what evidence is needed to fully consider the issues, what outcome would resolve the matter for the resident and whether there are any urgent actions required.	Yes	Complaints are always resolved at the earliest opportunity. If it is likely that a complaint may not be resolved within the timescales outlined in our Complaints policy, our case handlers will inform the complainant as soon as they become aware of any likely delay.

4.5	Landlords should give residents the opportunity to have a representative deal with their complaint on their behalf, and to be represented or accompanied at any meeting with the landlord where this is reasonable.	Yes	Complainants may nominate a representative to deal with the complaint on their behalf. All complaints however received are dealt with in line with our Complaints policy.
4.8	Where a key issue of a complaint relates to the parties' legal obligations landlords should clearly set out their understanding of the obligations of both parties.	Yes	The legal obligations of both parties are always set out to the complainants in our responses, and where necessary, an explanation of the obligation(s) is provided to ensure that the complainant has full understanding

4.9	Communication with the resident should not generally identify individual members of staff or contractors.	Yes	Colleague/representative confidentiality is always maintained
4.10	Landlords should keep residents regularly updated about the progress of the investigation.	Yes	Our case handlers regularly utilise several communication methods to ensure complainants remain informed about the progress of their complaint.
4.16	Landlords should seek feedback from residents in relation to the landlord's complaint handling as part of the drive to encourage a positive complaint and learning culture.	Yes	Upon closure of a complaint, a customer satisfaction survey is issued to the complainant and the feedback received is used to support colleague development and drive continuous learning and improvement activities.
4.17	Landlords should recognise the impact that being complained about can have on future service delivery. Landlords should ensure that staff are supported and engaged in the complaints process, including the learning that can be gained	Yes	Updates on complaint performance, themes, and learning and continuous improvement opportunities are regularly communicated to all colleagues.
4.19	Any restrictions placed on a resident's contact due to unacceptable behaviour should be appropriate to their needs and should demonstrate regard for the provisions of the Equality Act 2010.	Yes	We ensure our policies reflect that our customers are treated fairly and consistently, whilst at the same time protecting the health, safety and wellbeing of our colleagues.

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.	Yes	Our complaint response timescales are detailed within our Complaints policy. The policy also explains what action will be taken if it is anticipated that there may be a delay in resolving a complaint.
5.5	A complaint response must be sent to the resident when the answer to the complaint is known, not when the outstanding actions required to address the issue, are completed. Outstanding actions must still be tracked and actioned expeditiously with regular updates provided to the resident.	Yes	Complaint responses are issued to the complainant as soon as possible and in line with the timescales detailed in our Complaints policy. Our case handlers actively manage the progress of any outstanding actions and provide customers with updates as required.

5.6	Landlords must address all points raised in the complaint and provide clear reasons for any decisions, referencing the relevant policy, law and good practice where appropriate.	Yes	A structured acknowledgement process forms a fundamental part of the investigation process and ensures that all aspects of the complaint are understood at the outset, including the desired outcome. Case handlers utilise a repository of template email/letter responses to ensure that all information pertinent to a complaint is considered, and any written correspondence is structured to address the issues raised.
5.8	<p>Landlords must confirm the following in writing to the resident at the completion of stage one in clear, plain language:</p> <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 	Yes	Colleagues are trained and competent in the delivery of all of these principles. A complainants right to escalate their complaint is included in all complaint correspondence. Our templates cover all requirements of the Code.

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.	Yes	Our Complaints Policy outlines the escalation procedure. In circumstances where a complaint is rejected, an explanation in writing is always provided to the complainant. All complaint correspondence includes details of the Housing Ombudsman Service.
	On receipt of the escalation request, landlords must set out their		Upon receipt of a Stage 2 escalation, the

5.10	understanding of issues outstanding and the outcomes the resident is seeking. If any aspect of the complaint is unclear, the resident must be asked for clarification and the full definition agreed between both parties.	Yes	introductory acknowledgement procedure is initiated (as per Stage 1).
5.11	Landlords must only escalate a complaint to stage two once it has completed stage one and at the request of the resident.	Yes	Our Complaints policy details the escalation process.

5.12	The person considering the complaint at stage two, must not be the same person that considered the complaint at stage one.	Yes	Stage 2 complaints are investigated by a Director, or delegated individual who has not considered the complaint at Stage 1.
5.13	Landlords must respond to the stage two complaint <u>within 20 working days</u> of the complaint being escalated. Exceptionally, landlords may provide an explanation to the resident containing a clear timeframe for when the response will be received. This should not exceed a further 10 days without good reason.	Yes	Our complaint response timescales are detailed in our Complaints policy. The policy also explains what action we will take if the timescale may not be achieved.
5.16	<p>Landlords must confirm the following in writing to the resident at the completion of stage two in clear, plain language:</p> <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. 	Yes	Colleagues are trained to structure their written correspondence in a manner which adopts all of these principles. WHA operates a two-stage process. Details of the Housing Ombudsman service are included in all of our complaints correspondence

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	WHA have adopted a 2 stage complaints process.

5.20	Landlords must confirm the following in writing to the resident at the completion of stage three in clear, plain language: <ul data-bbox="448 746 1243 1018" 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	WHA have adopted a 2 stage complaints process.
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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.	Yes	If it is likely that a complaint may not be resolved within the timescales outlined in our Complaints Policy, our case handlers will inform the complainant as soon as they become aware of any likely delay and any extension is agreed in consultation with the complainant.
5.3	Where agreement over an extension period cannot be reached, landlords should provide the Housing Ombudsman's contact details so the resident can challenge the landlord's plan for responding and/or the proposed timeliness of a landlord's response.	Yes	Where an extension cannot be agreed, this would be viewed as an unsatisfactory outcome to the complaint and the Housing Ombudsman referral process would be initiated.
5.4	Where the problem is a recurring issue, the landlord should consider any older reports as part of the background to the complaint if this will help to resolve the issue for the resident.	Yes	A comprehensive review of the resident's tenancy/case history is always conducted using our housing management system as standard practice. All available information is utilised when investigating a complaint.

5.7	Where residents raise additional complaints during the investigation, these should be incorporated into the stage one response if they are relevant and the stage one response has not been issued. Where the stage one response has been issued, or it would unreasonably delay the response, the complaint should be logged as a new complaint.	Yes	New/additional information or evidence may be submitted at any point during the process. The use of dedicated case handlers and robust communication methods ensures that any new information can be easily shared, reviewed, and considered as part of an open complaint.
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Stage 2

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
5.14	If an extension beyond 10 working days is required to enable the landlord to respond to the complaint fully, this should be agreed by both parties.	Yes	Should it be likely that a complaint may not be resolved within the timescales outlined in our Complaints policy, our case handlers will inform the complainant as soon as they become aware of any likely delay and any extension is agreed in consultation with the complainant.
5.15	Where agreement over an extension period cannot be reached, landlords should provide the Housing Ombudsman's contact details so the resident can challenge the landlord's plan for responding and/or the proposed timeliness of a landlord's response	Yes	Where an extension cannot be agreed, this would be viewed as an unsatisfactory outcome to the complaint and the Housing Ombudsman referral process would be initiated.

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	WHA have adopted a 2 stage process – N/A

5.19	Where agreement over an extension period cannot be reached, landlords should provide the Housing Ombudsman's contact details so the resident can challenge the landlord's plan for responding and/or the proposed timeliness of a landlord's response.	Y	WHA have adopted a 2 stage process – N/A
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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	We will acknowledge where we have got something wrong and the steps we have taken to resolve the issue or we intend to take.
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	Our Complaints Policy sets out our approach to remedies. (Section 7) To support Officers when assessing and awarding remedies we have incorporated the Housing Ombudsman guidance on remedies into our process.
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	Our staff training and guidance covers this element and the need to ensure remedies are followed through to completion.
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	We have incorporated the Housing Ombudsman guidance on remedies into our process.

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	It is a key requirement for our investigating officers to consider the actions required to put things right, for the individual and our wider customers. They must also put the actions in place to effectively monitor these through to completion.
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	We would seek legal advice around remedies and resolution where appropriate.

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	Our complaints performance, thematic complaint trends and continuous learning outputs are communicated to all colleagues. A variety of engagement methods are used to share our complaints information with residents such as our Annual Report and Scrutiny panel.

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	Our Board Member for neighbourhoods has lead responsibility for complaints and is a member of WHA Board.
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 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. 	Y	Quarterly and annual reports are provided to our Board. These reports include detail on the volume of complaints, learning outcomes and trend analysis. Additionally, all Housing Ombudsman determinations, case detail and orders are also reported. Where cases of severe maladministration are identified, more intensive reviews are conducted, and management actions are identified and tracked.

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	Senior management team receive the required information on a quarterly basis, through our reporting and governance work. This enables the organisation to identify trends and take action. We have implemented a framework that ensures learning outcomes are shared and inform action and training for both colleagues and contractors.
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	WHA has a performance management framework which helps drive the culture required to meet the standards set out in the Housing Ombudsman's code and set by the Chartered Institute of Housing

Section 8 - Self-assessment and compliance

Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
8.1	Landlords must carry out an annual self-assessment against the Code to ensure their complaint handling remains in line with its requirements.	Y	Our compliance with the Complaint Handling Code is evaluated annually and published on our website.
8.2	Landlords must also carry out a self-assessment following a significant restructure and/or change in procedures.	Y	The Code has been reviewed in 2022 following an update of our Complaints Policy and Customer Services Charter.
8.3	Following each self-assessment, a landlord must: <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	The WHA Board receives an update on the outcome of our self -assessment annually. We publish the self-assessment on our website.