

Appendix A: Self-assessment form

This self-assessment form should be completed by the complaints officer and it must be reviewed and approved by the landlord's governing body at least annually.

Once approved, landlords must publish the self-assessment as part of the annual complaints performance and service improvement report on their website. The governing body's response to the report must be published alongside this.

Landlords are required to complete the self-assessment in full and support all statements with evidence, with additional commentary as necessary.

We recognise that there may be a small number of circumstances where landlords are unable to meet the requirements, for example, if they do not have a website. In these circumstances, we expect landlords to deliver the intentions of the Code in an alternative way, for example by publishing information in a public area so that it is easily accessible.

Section 1: Definition of a complaint

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
1.2	A complaint must be defined as: <i>‘an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the landlord, its own staff, or those acting on its behalf, affecting a resident or group of residents.’</i>	YES	We have adopted the definition of a complaint as set out in the Complaint Handling Code. This is set out in part 3 of our Complaints Policy. Evidence: Complaints Policy Training Log	This definition of a complaint has been reflected in our Complaints Policy since the Code’s inception in 2020. Colleagues have received training on the definition of a complaint and receive regular training on the wider principles of good approaches to complaint handling.
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	Part 3 of our policy reflects the fact that the word ‘complaint’ does not have to be used for a complaint to be identified and treated as such. The requirement to give residents the choice as to whether to make a complaint is also set out in part 3 of our Complaints Policy underneath the complaint definition.	We have provided training on these aspects of our policy to colleagues at our contact centre and in our Complaints Team. Customers are made aware that the opportunity to raise a formal complaint is there from the outset and they are reminded of this in any subsequent communications until an issue is resolved.

			<p>Part 4 of our Complaints Policy explains that we will accept complaints via third party advocates. It sets out the requirements around ensuring any third party has legitimate authority to bring a complaint on someone else's behalf.</p> <p>Evidence: Complaints Policy</p>	<p>We have processes in place to ensure that resident's choices around how they would like issues progressed are being managed appropriately through the correct channels.</p>
1.4	<p>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.</p>	YES	<p>Section 3 of our Complaints Policy sets out the need to recognise the difference between a complaint and a service request and provides examples.</p> <p>Evidence: Complaints Policy</p>	<p>Recognising the difference between a service request and a complaint forms part of the regular training that we provide our Complaints Team.</p>
1.5	<p>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.</p>		<p>Section 4 of our Complaints Policy makes it clear that complaint responses will not be placed on hold due to outstanding actions and that any actions agreed in the response will be monitored to completion.</p>	<p>Colleagues are aware that complaints should be addressed at the time they are raised and not placed on hold pending completion of an outstanding action.</p>

			Evidence: Complaints Policy	Similarly, colleagues are aware that outstanding tasks should not be placed on hold if they are subject to a complaint, instead, every effort should continue to be made to fulfil any obligations and deliver a service.
1.6	An expression of dissatisfaction with services made through a survey is not defined as a complaint, though wherever possible, the person completing the survey should be made aware of how they can pursue a complaint if they wish to. Where landlords ask for wider feedback about their services, they also must provide details of how residents can complain.	YES	<p>We have an external partner that carries out customer satisfaction surveys covering a number of different service areas such as antisocial behaviour.</p> <p>We have provided our external partner with a verbal and written script setting out what advice to provide customers in the event that they may wish to raise a complaint.</p> <p>Evidence: External Survey Script</p>	

Section 2: Exclusions

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
2.1	Landlords must accept a complaint unless there is a valid reason not to do so. If landlords decide not to accept a complaint they must be able to evidence their reasoning. Each complaint must be considered on its own merits	YES	<p>Circumstances under which we may decide not to accept a complaint are minimal - as set out in part 3 of our Complaints Policy.</p> <p>The policy stipulates that we will exercise our discretion appropriately and make sure that any decision to exclude a complaint is fair and valid and that the reasons for the decision are clearly explained to the resident.</p> <p>In such cases the resident will be provided contact details for the Ombudsman so that any decision taken to exclude a complaint can be challenged.</p> <p>Evidence: Complaints Policy</p>	

2.2	<p>A complaints policy must set out the circumstances in which a matter will not be considered as a complaint or escalated, and these circumstances must be fair and reasonable to residents. Acceptable exclusions include:</p> <ul style="list-style-type: none"> • The issue giving rise to the complaint occurred over twelve months ago. • Legal proceedings have started. This is defined as details of the claim, such as the Claim Form and Particulars of Claim, having been filed at court. • Matters that have previously been considered under the complaints policy. 	YES	<p>As set out in section 2.1 above, the Circumstances under which we may decide not to accept or escalate a complaint are set out in part 3 of our Complaints Policy and include the examples given in the Complaint Handling Code.</p> <p>Our exclusions are minimal, and the policy stipulates that we will exercise our discretion appropriately to make sure that any decision to exclude or not to escalate a complaint are fair, valid and clearly explained to the resident.</p> <p>Should we exclude or decline to escalate a complaint, residents will always be provided contact details for the Ombudsman so that our decision can be challenged.</p> <p>Evidence: Complaints Policy</p>	<p>At our regular training, we reinforced the message to colleagues about the importance of exercising discretion fairly and appropriately in all aspects of complaint management. As part of this approach, the focus should always be on accepting and escalating complaints as far as possible.</p>
2.3	<p>Landlords must accept complaints referred to them within 12 months of the issue occurring or the resident becoming aware of the issue, unless they are excluded on other grounds.</p>	YES	<p>Our Complaints Policy has been updated to reflect the new requirement to accept complaints within 12 months of the issues</p>	<p>Colleagues are aware that we do not apply a blanket ban on accepting complaints received outside the 12-month timeframe and</p>

	Landlords must consider whether to apply discretion to accept complaints made outside this time limit where there are good reasons to do so.		<p>occurring (rather than 6 months as it previously stood).</p> <p>The policy also emphasizes that we do not take a blanket approach and will apply discretion to cases received outside of this timeframe.</p> <p>Evidence: Complaints Policy</p>	have received training on the types of situations where it would be appropriate to exercise discretion.
2.4	If a landlord decides not to accept a complaint, an explanation must be provided to the resident setting out the reasons why the matter is not suitable for the complaints process and the right to take that decision to the Ombudsman. If the Ombudsman does not agree that the exclusion has been fairly applied, the Ombudsman may tell the landlord to take on the complaint.	YES	<p>As set out above, any decision taken to exclude a complaint will be clearly explained to the resident – as set out in our Complaints Policy. They will also be recorded on our CRM system.</p> <p>Evidence: Complaints Policy</p>	If we exclude a complaint and the Ombudsman disagrees with our decision, we will make sure it is progressed in line with the Ombudsman's instructions. Any such examples will also be picked up as a training issue.
2.5	landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	YES	<p>The need to consider each case on its merits and to not take a blanket approach to excluding complaints is set out in part 3 of our Complaints Policy.</p> <p>Evidence: Complaints Policy Internal Guidance</p>	Colleagues are aware that we do not apply a blanket ban on not accepting complaints, including those received outside the 12-month timeframe. Our Complaints Team has received training on the types of situations where it would be appropriate to exercise discretion.

				We have also published some internal guidance around accepting complaints raised belatedly to help colleagues make fair decisions when deciding how far back to go in investigating a complaint.
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Section 3: Accessibility and Awareness

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
3.1	Landlords must make it easy for residents to complain by providing different channels through which they can make a complaint. Landlords must consider their duties under the Equality Act 2010 and anticipate the needs and reasonable adjustments of residents who may need to access the complaints process.	YES	<p>Complaints can be raised via our contact centre and the dedicated complaint handling area on our website. Complaints can also be raised with us in person, social media and in writing.</p> <p>We published a Reasonable Adjustment Policy in March 2023 which sets out how we will adjust our normal approaches and practices to meet individual customer needs. Where any such arrangements are in place this is flagged on our CRM system.</p> <p>Evidence: Peabody website Reasonable Adjustment Policy</p>	Our Head of Diversity and Inclusion is the contact point for any queries on how to apply the Reasonable Adjustment Policy should colleagues require advice.
3.2	Residents must be able to raise their complaints in any way and with any	YES	Part 4 of our Complaints Policy makes it clear that residents can	We have done a lot of work internally to raise awareness

	<p>member of staff. All staff must be aware of the complaints process and be able to pass details of the complaint to the appropriate person within the landlord.</p>		<p>raise a complaint via any means with any member of staff.</p> <p>Evidence: Complaints Policy Engagement Events</p>	<p>(as well as the profile) of the centralised, specialist complaints handling team since the merger between Peabody and Catalyst completed.</p> <p>We are also raising the profile of complaints so that colleagues understand the importance of making sure they are dealt with quickly as well as the value that they bring to the organisation in terms of learning and improving the service.</p> <p>This has included:</p> <ul style="list-style-type: none"> • the Complaints Team hosting events for our regional teams which focus on complaints. • Our Chief Executive raising awareness of complaints during whole staff engagement sessions
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				<ul style="list-style-type: none">• Engaging teams across the organisation to self-assess against the Ombudsman's Spotlight Reports.• A dedicated page on our internal website informing colleagues how we manage complaints and how to raise complaints. <p>Colleagues in the wider business have been advised where to direct a complaint to ensure that it is registered and managed promptly.</p> <p>Complaints are high profile in the organisation throughout all levels of management up to Board level. It is recognised as a key service in the business that we must provide for our residents in accordance with regulatory requirements and best practice.</p>
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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	<p>Complaint volumes have increased significantly since the publication of the Complaint Handling Code in 2020. In 2024 they increased by 85% from the previous year.</p> <p>The increase in complaints shows that we have improved accessibility to the complaints procedure and raised awareness of complaints in general, in line with the aspirations of the Complaint Handling Code.</p> <p>Complaint volumes are set out in the Annual Complaints Performance and Service Improvement Report which accompanies this self-assessment.</p> <p>Evidence: Annual complaints performance & service improvement report Learning Strategy</p>	<p>We have reacted positively to these new demands through significantly increasing the resources available for managing and responding to complaints.</p> <p>This has included expanding the head count of our contact centre as well as our specialist complaints handling team.</p> <p>Our positive approach is further demonstrated through our recently launched new strategy for learning from complaints. This strategy has been implemented to ensure that we capture the important lessons and use this to implement improvements.</p> <p>Further details of this new strategy are provided in section 4.3 of this self-assessment.</p>
3.4	Landlords must make their complaint policy available in a clear and accessible format for all residents. This	YES	Our Complaints Policy is available electronically on our website and via email. It is also	

	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.		<p>available in printed form and by post.</p> <p>We can also make it available in other formats, such as braille, when required.</p> <p>The policy clearly sets out the two-stage process, including the timeframes for responding.</p> <p>Evidence: Peabody website</p>	
3.5	The policy must explain how the landlord will publicise details of the complaints policy, including information about the Ombudsman and this Code.	YES	<p>Part 4 of our Complaints Policy explains that we publicise details of the policy on the dedicated complaints page on our website. It also explains how that page includes links to the Housing Ombudsman Service as well as the Complaints Handling Code.</p> <p>Evidence: Peabody Website</p>	<p>We also provide contact details for the Ombudsman Service in any relevant correspondence with residents.</p> <p>We have a template that we use for all relevant correspondence advising residents of their right to contact the Ombudsman Service at any point during the complaints process.</p> <p>We provide the Ombudsman's details when acknowledging and responding at Stages 1 and Stage 2.</p>

3.6	Landlords must give residents the opportunity to have a representative deal with their complaint on their behalf, and to be represented or accompanied at any meeting with the landlord.	YES	<p>Part 4 of our Complaints Policy makes it clear that residents should have the opportunity to be accompanied at meetings and represented in bringing a complaint where any such reasonable request is made.</p> <p>Evidence: Complaints Policy</p>	
3.7	Landlords must provide residents with information on their right to access the Ombudsman service and how the individual can engage with the Ombudsman about their complaint.	YES	<p>As formally mentioned, we have a template that we use for all relevant correspondence advising residents of their right to contact the Ombudsman Service at any point during the complaints process.</p> <p>The dedicated complaints handling page of our website also includes a link to the Ombudsman Service.</p> <p>Our website also explains that a resident can contact the Ombudsman at any stage.</p> <p>Evidence: Template Peabody Website</p>	

Section 4: Complaint Handling Staff

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
4.1	Landlords must have a person or team assigned to take responsibility for complaint handling, including liaison with the Ombudsman and ensuring complaints are reported to the governing body (or equivalent). This Code will refer to that person or team as the 'complaints officer'. This role may be in addition to other duties.	YES	<p>We have a specialist, centralised complaint handling team which takes responsibility for managing 68% of Stage 1 complaints (the remaining 32% are managed by trained individuals in other service areas) and 100% of Stage 2 complaints.</p> <p>The Complaints Team includes a Compliance Team which is dedicated to managing and responding to correspondence with the Ombudsman Service. This team has also increase in resources by two extra members in the last six months.</p> <p>Senior leaders in the Complaints Team are responsible for the regular reporting of complaints to the governing body and for overseeing the annual self-assessment and producing the</p>	<p>Complaints are overseen by Complaint Managers and Heads of Service to ensure quality and consistency.</p> <p>Our overall approach to complaints is overseen by:</p> <ul style="list-style-type: none"> • Customer Complaints Panel. The Panel provides feedback and suggests improvements. Meetings have focused on things such as considering the needs of the customer, being fair and human in our approach and making our process as efficient as possible. • Executive Committee, which

			<p>Annual Complaints Performance & Service Improvement Report.</p> <p>Our complaints team expanded considerably as part of the merger process between Catalyst and Peabody, and we have continued to increase our resources in this area ever since.</p> <p>The long-term plan is to bring 100% of complaints under the stewardship of the centralised complaint handling team within the next 12 months.</p> <p>Evidence: Organisational structure Chart Complaints allocation list</p>	<p>receives weekly information on complaints volumes and Housing Ombudsman cases, and regular reports on the work of the Complaints team and</p> <ul style="list-style-type: none"> Resident Experience Committee, which is a Board level Committee, chaired by a resident Board member, which meets quarterly and reviews quantitative and qualitative information on complaints and Housing Ombudsman findings, and reports to the Peabody Trust Board.
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	YES	Our team of complaint leads works closely with colleagues of all levels of seniority across the organisation to facilitate the prompt resolution of complaints.	

	<p>autonomy to act to resolve disputes promptly and fairly.</p>		<p>They are encouraged to escalate any outstanding issues or concerns up to executive level if required.</p> <p>As previously mentioned, the complaints team receives monthly training and updates to keep it informed of current expectations and approaches in complaint handling.</p> <p>The team is trained to manage complaints with empathy and to reach fair outcomes for our residents at the earliest opportunity.</p> <p>Evidence: Training log</p>	
<p>4.3</p>	<p>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</p>	<p>YES</p>	<p>As previously mentioned in point 3.3. of this self-assessment, we have reacted positively to the ever-increasing volume of complaints through significantly increasing the resources available for managing and responding to complaints. The team now consists of 51 members of staff that manage complaints and compliance with the Housing Ombudsman.</p>	

			<p>Also, as explained in further detail in section 3.3 we recently launched a new strategy for learning from complaints to ensure that we capture the important lessons and use this to implement improvements.</p> <p>Evidence: Board Report</p>	
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Section 5: The Complaint Handling Process

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
5.1	Landlords must have a single policy in place for dealing with complaints covered by this Code. Residents must not be treated differently if they complain.	YES	<p>We have published an independent Complaints Policy which has recently been revised to reflect the expectations of the latest version of the Complaint Handling Code.</p> <p>Evidence: Complaints Policy</p>	We constantly keep the Complaints Policy under review and recently made amendments as part of the process of self-assessing against the Complaint Handling Code.
5.2	The early and local resolution of issues between landlords and residents is key to effective complaint handling. It is not appropriate to have extra named stages (such as 'stage 0' or 'informal complaint') as this causes unnecessary confusion.	YES	<p>We have a two-stage internal complaints procedure.</p> <p>We do not operate any additional (informal) stages, and none are set out in our Complaints Policy.</p> <p>Evidence: Complaints Policy</p>	

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	As above, we are Code compliant and operate a two stage internal complaints procedure. Evidence: Complaints Policy	
5.4	Where a landlord's complaint response is handled by a third party (e.g. a contractor or independent adjudicator) at any stage, it must form part of the two stage complaints process set out in this Code. Residents must not be expected to go through two complaints processes.	YES	N/A	
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	YES	N/A	
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	Colleagues are trained to define the complaint and to check their understanding with the resident before providing a response. Colleagues are also trained to understand and set out the desired outcomes sought as part of every written response to a complaint. Evidence:	A cross section of Stage 1 and Stage 2 responses from the last six months were scrutinised as part of this self-assessment and this is something that we generally do well. Learnings were identified however, and these will be addressed as part of our regular training.

			Sample of Stage 1 and Stage 2 responses Training log	
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	In our acknowledgements we reflect our understanding of what the complaint is regarding. If anything is identified as being something we cannot consider as a complaint we will inform the resident.	We are currently reviewing whether there is any further training and development that we can provide the team that acknowledges complaints to help them identify areas of exclusion that are clear at that point. This does not always become apparent until a Stage 1 investigation has been completed. Stage 1 and Stage 2 responses will always state any aspects of a complaint that we will not investigate and include the reasons why.
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 	YES	As previously noted, our team of complaint handlers receive regular training and updates to keep them informed of current expectations and approaches in complaint handling. They are trained to manage complaints with empathy and to	

	<p>d. consider all relevant information and evidence carefully.</p>		<p>reach fair outcomes for our customers at the earliest opportunity.</p> <p>Any investigation takes account of both points of view to ensure a fair and impartial approach is taken. Staff are trained to provide fair opportunity for customers to present their side of any case before a decision is reached.</p> <p>A part of this approach complaint handlers contact customers by telephone to encourage dialogue, build rapport and understand their circumstances and desired outcomes.</p>	
<p>5.9</p>	<p>c. 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.</p>		<p>Colleagues are trained to recognise the importance of regular communication and of keeping residents updated in the event of any extensions to timeframes.</p>	<p>Any training issues identified for team members will be picked up and addressed.</p>

5.10	Landlords must make reasonable adjustments for residents where appropriate under the Equality Act 2010. Landlords must keep a record of any reasonable adjustments agreed, as well as a record of any disabilities a resident has disclosed. Any agreed reasonable adjustments must be kept under active review.	YES	<p>We published a Reasonable Adjustment Policy in March 2023 which sets out how we will adjust our normal approaches and practices to meet individual customer needs.</p> <p>Where any such arrangements are in place this is flagged on our CRM system alongside any disabilities that a resident may have disclosed.</p> <p>We will be providing further training around the policy. Our Head of Diversity and Inclusion is the contact point for any queries on how to apply it.</p> <p>Evidence: Reasonable Adjustment Policy</p>	
5.11	Landlords must not refuse to escalate a complaint through all stages of the complaints procedure unless it has valid reasons to do so. Landlords must clearly set out these reasons, and they must comply with the provisions set out in section 2 of this Code.	YES	<p>Part 4 of our Complaints Policy makes it clear that declining to escalate complaints should be the exception, and that a fair and valid reason should be provided in instances where any such decision is taken.</p> <p>Our Policy also sets out that residents must be provided with contact details for the Housing</p>	Through the regular training that we provide, colleagues are reminded that declining to escalate complaints should be an exception. Should we identify any instances where discretion has been applied inappropriately it will be picked up as a training issue.

			<p>Ombudsman Service if a decision is taken not to escalate a complaint so that it can be challenged.</p> <p>Evidence: Complaints Policy</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>All information relating to each individual complaint is held in one place on our CRM system.</p> <p>We recognise the importance of good accurate record keeping and are aware that this is a high-profile issue with the Housing Ombudsman.</p> <p>Evidence: Self-Assessment against KIM Report</p>	<p>Good record keeping will continue to be a key focus for our complaints team.</p> <p>Our wider commitment to improve record keeping as an organisation includes initiating a self-assessment against the Housing Ombudsman's Knowledge and Information Management (KIM) Report.</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>Our Compensation and Remedies Policy sets out our approach to providing appropriate redress. Colleagues at every stage of the process are empowered to offer redress that is appropriate and proportionate to the shortfalls in service and impact on the resident.</p>	<p>We keep our Compensation and Remedies Policy under constant review to make sure it reflects current expectations and levels of compensation being awarded by the Housing Ombudsman Service.</p>

			<p>Evidence: Compensation and Remedies Policy</p>	<p>The most recent review of the policy was undertaken in conjunction with this self-assessment to reflect the Housing Ombudsman's own Remedies Guidance.</p> <p>Providing effective and appropriate remedies is an area that we always focus on in the regular training that we provide to the complaints team.</p>
5.14	<p>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.</p>	YES	<p>We have published an Unreasonable Communications Policy which sets out what we consider to be unreasonable communication as well as the steps we will take to manage any behaviour that falls within this category.</p> <p>Training has been provided on this policy and any decision to restrict contact is taken by a panel of senior colleagues, including a representative from our Legal Team.</p> <p>We have a register of residents and customers who we are engaging with under the policy.</p>	<p>Members of the Unreasonable Communications Panel meet monthly to review any cases currently being managed under the procedure. This includes looking at any current restrictions which may be coming to the end of a review period.</p> <p>The Panel also use these meetings to suggests any changes and modifications to the policy so that it is fit for purpose.</p>

			<p>This includes those currently on restrictions as well as those we are trying to manage to modify their contact.</p> <p>Any evidence, such as relevant correspondence, is stored on the register so that we have an audit trail relating to any decisions we may take.</p> <p>Evidence: Unreasonable Communications Policy</p>	<p>We are currently reviewing our approach to unreasonable communications received via social media and will be publishing an updated version of the policy in conjunction with this self-assessment.</p>
5.15	<p>Any restrictions placed on contact due to unacceptable behaviour must be proportionate and demonstrate regard for the provisions of the Equality Act 2010.</p>	YES	<p>The Unreasonable Communications Policy makes it clear that any restrictions should be proportionate to the behaviour being reported and appropriate to the individual - showing due regard for the Equality Act.</p> <p>Evidence: Unreasonable Communications Policy Unreasonable Communications Procedure</p>	<p>Any decision to restrict contact is taken jointly by a Panel comprising at least three senior members of staff. Having this high-level perspective and degree of experience ensures that decisions to restrict contact are fair, proportionate and appropriate to the person concerned.</p> <p>The panel includes a representative of our Legal Team and our Head of Equality and Diversity to ensure our adherence to equality legislation.</p>

Section 6: Complaints Stages

Stage 1

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
6.1	Landlords must have processes in place to consider which complaints can be responded to as early as possible, and which require further investigation. Landlords must consider factors such as the complexity of the complaint and whether the resident is vulnerable or at risk. Most stage 1 complaints can be resolved promptly, and an explanation, apology or resolution provided to the resident.	YES	The complaints team will always look to provide a resolution as quickly as possible within the timeframes set out in the Code. If they can provide a response sooner, they are trained to do so.	
6.2	Complaints must be acknowledged, defined and logged at stage 1 of the complaints procedure within five working days of the complaint being received.	YES	This requirement is reflected in Part 4 of our Complaints Policy. Evidence: Complaints Policy	Colleagues are reminded of this requirement at the regular training we provide.
6.3	Landlords must issue a full response to stage 1 complaints within 10 working days of the complaint being acknowledged.	YES	This requirement is reflected in Part 4 our Complaints Policy. Evidence: Complaint Policy	Colleagues are reminded of this requirement at the regular training we provide.
6.4	Landlords must decide whether an extension to this timescale is needed when considering the complexity of the complaint and then inform the resident	YES	This requirement is reflected in Part 4 of our Complaints Policy Evidence: Complaints Policy	Colleagues are reminded of this requirement at the regular training we provide.

	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.			
6.5	When an organisation informs a resident about an extension to these timescales, they must be provided with the contact details of the Ombudsman.	YES	As above, this requirement is set out in Part 4 of our Complaints Policy. Evidence: Complaints Policy	Colleagues are reminded of this requirement at the regular training we provide.
6.6	A complaint response must be provided to the resident when the answer to the complaint is known, not when the outstanding actions required to address the issue are completed. Outstanding actions must still be tracked and actioned promptly with appropriate updates provided to the resident.	YES	Part 4 of our Complaints Policy explains that complaint responses will not be delayed due to outstanding actions. Rather, our responses will set out a plan for resolving outstanding issues and fulfilling any commitment e.g. to complete repairs. All actions that are agreed to be completed within a complaint's response will be monitored and followed through to resolution with updates to the complainant provided as and when needed. Evidence: Complaints Policy	This is another aspect of complaints management that colleagues are reminded of at the regular training we provide. Any deviation from this will be picked up through the quality checks that we perform and will be addressed as a training issue. We have separate processes in place to monitor any agreed actions following the complaint response being issued. Following a Stage 1 or Stage 2 response, we monitor any agreed actions through to a conclusion and

				do not close a case until any agreed actions have been met.
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	<p>Colleagues in the Complaints Team are trained to provide clear explanations for decisions with reference to relevant policy, law and best practice.</p> <p>Evidence: Cross section of Stage 1 responses</p>	<p>We examined a cross section of stage 1 complaints from the previous six months as part of this self-assessment exercise and this is something that, for the most part, we get right.</p> <p>There were some training needs identified which have been addressed with the complaint leads.</p> <p>We also have a schedule of further training lined up to enhance caseworkers' knowledge of aspects of housing law and best practice.</p>
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	YES	<p>This is reflected in Part 4 of our Complaints Policy.</p> <p>Evidence: Complaints Policy</p>	<p>Colleagues are trained to use their discretion to make sure that any additional complaint raised is handled in the most efficient and pragmatic way for the customer.</p>

	unrelated to the issues already being investigated or it would unreasonably delay the response, the new issues must be logged as a 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	We examined a cross section of Stage 1 complaints from the last six months as part of this self-assessment exercise, and this is something that we do based on a template that we use for all Stage 1 responses. Evidence: Sample of Stage 1 responses	We will continue to reinforce these requirements at the regular training we provide to colleagues. Any failure to comply with these aspects of the Code will be picked up and addressed through the regular quality checks that we provide.

Stage 2

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
6.10	If all or part of the complaint is not resolved to the resident's satisfaction at stage 1, it must be progressed to stage 2 of the landlord's procedure. Stage 2 is the landlord's final response.	YES	This requirement is set out in Part 4 of our Complaints Policy Evidence: Complaints Policy	Colleagues are reminded of this requirement at the regular training we provide
6.11	Requests for stage 2 must be acknowledged, defined and logged at stage 2 of the complaints procedure		This requirement is set out in Part 4 of our Complaints Policy	Colleagues are reminded of this requirement at the regular training we provide

	within five working days of the escalation request being received.		Evidence: Complaints Policy	
6.12	Residents must not be required to explain their reasons for requesting a stage 2 consideration. Landlords are expected to make reasonable efforts to understand why a resident remains unhappy as part of its stage 2 response.	YES	This is set out in Part 4 of our Complaints Policy. Evidence: Complaints Policy	Colleagues have received training on the new requirements set out in the latest version of the Complaints Handling Code and are aware that residents are not required to provide a reason for wishing to escalate their complaint. We have also adapted our Complaints Policy to reflect any changes as part of the self-assessment process.
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	YES	We have separate teams dealing with complaints at Stage 1 and Stage 2 of our complaints procedure. Our team structure and process are designed so that no complaint will be considered by the same person at both stages.	
6.14	Landlords must issue a final response to the stage 2 within 20 working days of the complaint being acknowledged.	YES	This requirement is set out in Part 4 of our Complaints Policy. Evidence: Complaints Policy	Colleagues are reminded of this requirement at the regular training we provide
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.	YES	This requirement is set out in Part 4 of our Complaints Policy. Evidence: Complaints Policy	Colleagues are reminded of this requirement at the regular training we provide

	Any extension must be no more than 20 working days without good reason, and the reason(s) must be clearly explained to the resident.			
6.16	When an organisation informs a resident about an extension to these timescales, they must be provided with the contact details of the Ombudsman.	YES	This requirement is set out in Part 4 of our Complaints Policy. Evidence: Complaints Policy	Colleagues are reminded of this requirement at the regular training we provide
6.17	A complaint response must be provided to the resident when the answer to the complaint is known, not when the outstanding actions required to address the issue are completed. Outstanding actions must still be tracked and actioned promptly with appropriate updates provided to the resident.	YES	We have already addressed this in our response to section 6.6 above.	
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	Colleagues in the Complaints Team are trained to provide clear explanations for decisions with reference to relevant policy, law and best practice. Evidence: Cross section of Stage 2 responses	As per our answer to section 6.7, we examined a cross section of stage 1 complaints from the previous six months as part of this self-assessment exercise and this is something that, for the most part, we get right. Any training needs identified have been taken up directly with the caseworkers concerned. We also have a schedule of further training lined up to

				enhance caseworkers' knowledge of aspects of housing law and best practice.
6.19	<p>Landlords must confirm the following in writing to the resident at the completion of stage 2 in clear, plain language:</p> <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	<p>We examined a cross section of Stage 2 complaints from the last six months as part of this self-assessment exercise, and this is something that we generally do well.</p> <p>Evidence: Sample of Stage 2 responses</p>	<p>As per our response to section 6.9, we will continue to reinforce these requirements at the regular training we provide to colleagues. Any failure to comply with these aspects of the Code will be picked up and addressed through the regular quality checks that we provide.</p>
6.20	<p>Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.</p>	YES	<p>We have a separate team managing responses at Stage 2 of the complaints procedure.</p> <p>Evidence: Team structure chart Training log</p>	<p>Our Stage 2 complaint handlers receive regular training on all aspects of complaint handling good practice.</p> <p>This includes updates from any expected changes of approach highlighted by Housing Ombudsman</p>

				Spotlight Reports as well as any issues highlighted through Ombudsman determinations.
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Section 7: Putting things right

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
7.1	<p>Where something has gone wrong a landlord must acknowledge this and set out the actions it has already taken, or intends to take, to put things right. These can include:</p> <ul style="list-style-type: none"> • Apologising; • Acknowledging where things have gone wrong; • Providing an explanation, assistance or reasons; • Taking action if there has been delay; • Reconsidering or changing a decision; • Amending a record or adding a correction or addendum; • Providing a financial remedy; • Changing policies, procedures or practices. 	YES	<p>Our Compensation and Remedies Policy sets out our approach to providing appropriate redress.</p> <p>Part 4 of that policy specifies how an effective remedy should include several factors such as an apology, explanation and demonstration of learning. It also encourages colleagues to take a broader approach to remedies and consider whether there are any actions that can be taken instead of, or in conjunction with, an offer of compensation to put things right.</p> <p>Evidence: Compensation and Remedies Policy</p>	<p>As stated in part 5.13 of this self-assessment, we keep our Compensation and Remedies Policy under constant review to make sure it reflects current expectations and levels of compensation being awarded by the Housing Ombudsman Service.</p> <p>The most recent review of the policy was undertaken in conjunction with this self-assessment and the policy now mirrors the monetary awards set out in the Housing Ombudsman's own Remedies Guidance.</p> <p>Providing effective and appropriate remedies is an area that we always focus</p>

				on in the regular training that we provide to the complaints team.
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	YES	<p>One of the aims set out in the Compensation and Remedies Policy is to provide remedies that are fair and an accurate reflection of the shortfalls in service and detriment experienced by a resident.</p> <p>Evidence: Compensation and Remedies Policy</p>	We run exercises at our regular training events to emphasise the need to be fair and proportionate in our offers to put things right as well as to clearly explain our reasoning.
7.3	The remedy offer must clearly set out what will happen and by when, in agreement with the resident where appropriate. Any remedy proposed must be followed through to completion.	YES	<p>If the remedy involves completing a task or action, we will clearly set out a plan of action for completing what has been agreed.</p> <p>We have specific roles for colleagues who are responsible for the monitoring of any commitments that we make to ensure they are followed through to completion.</p>	
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	YES	As noted above, our current Remedies and Compensation Policy is based on the Ombudsman's own Remedies	

			<p>Guidance and the levels of compensation we have observed being awarded following formal investigations.</p> <p>Evidence: Compensation and Remedies Policy</p>	
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Section 8: Self-assessment, reporting and compliance

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

8.2	The annual complaints performance and service improvement report must be reported to the landlord's governing body (or equivalent) and published on the on the section of its website relating to complaints. The governing body's response to the report must be published alongside this.	YES	<p>Our Annual Complaints Performance and Service Improvement Report has been published on the dedicated complaints handling page of our website alongside the self-assessment.</p> <p>The report has been scrutinised by our governing body which has commented on the content as a pre-face to the report.</p> <p>Evidence: Peabody's website Annual Complaints Performance and Service Improvement Report</p>	
8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	YES	We completed a self-assessment following completion of the merger between Catalyst and Peabody in April 2023.	We are aware of this requirement and will undertake any self-assessments outside the annual requirement accordingly. We currently aim to complete a self-assessment every six months as a matter of good practice.

8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	YES	We will comply with any request to update the self-assessment as directed by the Housing Ombudsman.	
8.5	If a landlord is unable to comply with the Code due to exceptional circumstances, such as a cyber incident, they must inform the Ombudsman, provide information to residents who may be affected, and publish this on their website Landlords must provide a timescale for returning to compliance with the Code.	YES	We will comply with this requirement should such a situation arise.	The senior leadership team is aware of its obligations to comply with the Complaint Handling Code and will take responsibility for providing any such updates to residents and the Ombudsman Service should this situation arise.

Section 9: Scrutiny & oversight: continuous learning and improvement

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
9.1	Landlords must look beyond the circumstances of the individual complaint and consider whether service improvements can be made as a result of any learning from the complaint.	YES	<p>We recently strengthened our approach to learning from complains as part of our Complaints Improvement Plan. We have set up a new process to ensure that we capture learning opportunities and action them according to priority.</p> <p>Learning opportunities have already been identified from independent reviews of our processes as well as from Paragraph 54(f) reviews instructed by the Housing Ombudsman.</p> <p>Learning opportunities are also identified from several sources including Housing Ombudsman determinations, Housing Ombudsman Spotlight Reports and Housing Ombudsman Paragraph 49 investigations into other landlords.</p>	

			<p>All recommendations will be fed into a triage process to review, and we will add those that are both viable and most urgent to our Complaints Improvement Plan.</p> <p>A dedicated project team oversee the implementation of the improvements along with a working group of senior staff within the organisation.</p>	
9.2	<p>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.</p>	YES	<p>See response to section 9.1 above.</p>	
9.3	<p>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.</p>	YES	<p>Aside from our annual report to residents, we regularly share learning from complaints through our website as well as via our newsletter to residents.</p> <p>We currently have a resident complaint panel which scrutinises complaints and provides feedback on improvements we can make to our complaints handling.</p>	

9.4	Landlords must appoint a suitably senior lead person as accountable for their complaint handling. This person must assess any themes or trends to identify potential systemic issues, serious risks, or policies and procedures that require revision.	YES	<p>Our Director of Contact Centre and Complaints is accountable for Peabody's complaint handling.</p> <p>Complaints are regularly monitored with weekly and monthly reports on complaints performance and Ombudsman contact being provided to our Executive Team.</p> <p>We have a 'real time' complaints dashboard which is permanently visible. This highlights a number of areas including trends, volumes and escalation times. The information is presented weekly to the Executive Team and Managers.</p> <p>Any themes and trends identified inform the training that we regularly provide our complaints team as noted previously.</p>	
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	YES	We have appointed a member of the governing body who has lead responsibility for the regular	

	<p>complaint handling culture. This person is referred to as the Member Responsible for Complaints ('the MRC').</p>		<p>reporting of complaints. The current MRC is Peabody's Chair.</p>	
<p>9.6</p>	<p>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.</p>	<p>YES</p>	<p>We currently send quarterly reports on complaints to the Resident Experience Committee which includes Peabody Board members.</p> <p>We provide weekly reports on volumes, trends and emerging issues to our Executive Team.</p> <p>We also send a weekly report to Executive Team on determinations received and a monthly customer experience committee report providing an update on year to date determinations received and outcomes.</p> <p>We provide a quarterly audit and risk committee report showing progress on orders completed following determinations received.</p> <p>We regularly report on complaints to a high level within Peabody. This involves quarterly</p>	

			reports to our Resident Experience Committee (which includes members of our Board) and monthly and weekly operational reports monitoring active complaints.	
9.7	<p>As a minimum, the MRC and the governing body (or equivalent) must receive:</p> <p>a. regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance;</p> <p>b. regular reviews of issues and trends arising from complaint handling;</p> <p>c. regular updates on the outcomes of the Ombudsman’s investigations and progress made in complying with orders related to severe maladministration findings; and</p> <p>d. annual complaints performance and service improvement report.</p>	YES	The MRC and the Board receive quarterly updates on performance on complaints including all the requirements set out in b, c and d.	
9.8	<p>Landlords must have a standard objective in relation to complaint handling for all relevant employees or third parties that reflects the need to:</p> <p>a. have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments;</p>	YES	From 2024, all colleagues involved in managing complaints will have these objectives in place.	

	<p>b. take collective responsibility for any shortfalls identified through complaints, rather than blaming others; and</p> <p>c. act within the professional standards for engaging with complaints as set by any relevant professional body.</p>			
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