



The Housing Ombudsman  
Complaint Handling Code Self-assessment

St Basils; June 2024

## Section 1: Definition of a complaint

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
1.2	1.1 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	St Basils Comments, Complaints and Compliments Policy Definitions section, page 2	Our policy definition matches the HOS definition.
1.3	1.2 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	St Basils Comments, Complaints and Compliments Policy - General Principles page 4  Complaints procedure, section 2.1.1	Colleagues recognise customer dissatisfaction and investigate and will ask them if they wish to make a complaint. Complaints submitted by a third party on behalf of our young people are accepted provided we have the young persons (or for under 18 years the person who holds PC) authority to do so.
1.4	Landlords must recognise the difference between a service request and a complaint. This must be set out in their complaints policy. A service request is a request from a resident to the landlord requiring action to be taken to put something right. Service requests are not complaints, but must be recorded, monitored and reviewed regularly.	Yes	St Basils Complaints procedure, section 1.2	We've made a distinction in our policy between service requests and complaints.
1.5	1.3 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	Yes	St Basils Complaints procedure, section 1.2	Where a tenant expresses dissatisfaction with the response to a service request we will raise a complaint and still work towards

	address the service request if the resident complains.			addressing the service request whilst also investigating the complaint.
1.6	1.4 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	Young person's survey	The young person's survey has details of how to make a complaint – so that if they wish to pursue a complaint, they have all the details for doing this.

## 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	St Basils Comments, Complaints and Compliments Policy: general principles – page 4	How we accept complaint and reasons why we would not accept a complaint are explained in our policy: General Principles. We provide a full explanation if a complaint isn't accepted.

2.2	<p>1.5 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"> <li>• The issue giving rise to the complaint occurred over twelve months ago.</li> <li>• Legal proceedings have started. This is defined as details of the claim, such as the Claim Form and Particulars of Claim, having been filed at court.</li> <li>• Matters that have previously been considered under the complaints policy.</li> </ul>	Yes	St Basils Comments, Complaints and Compliments Policy: general principles – page 4	How we accept complaints and reasons why we would not accept a complaint are explained in our policy: General Principles
2.3	<p>1.6 Landlords must accept complaints referred to them within 12 months of the issue occurring or the resident becoming aware of the issue, unless they are excluded on other grounds. Landlords must consider whether to apply discretion to accept complaints made outside this time limit where there are good reasons to do so.</p>	Yes	St Basils Comments, Complaints and Compliments Policy: general principles – page 4	We are amending our procedure to reflect this point.
2.4	<p>1.7 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.</p>	Yes	St Basils Comments, Complaints and Compliments Policy: general principles – page 4	If a complaint is not accepted, we will give a detailed written explanation of this.

2.5	1.8 Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Yes	St Basils Comments, Complaints and Compliments Policy: general principles – page 4	St Basils treats each complaint individually and will consider the circumstances of each complaint before making a decision
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### Section 3: Accessibility and Awareness

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
3.1	1.9 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	St Basils Comments, Complaints and Compliments Policy: general principles – page 4 Roles & Responsibilities – page 6  Complaints procedure section 2.3.1	We accept complaints in a variety of different ways including verbally, on the telephone, written forms, email and online form on the website. We will make reasonable adjustments to accommodate an individual's needs and our Equality, Diversity and Inclusion policy also explains this in full.
3.2	1.10 Residents must be able to raise their complaints in any way and with any member of staff. All staff must be aware of the complaints process and be able to pass details of the complaint to the appropriate person within the landlord.	Yes	St Basils Complaints procedure section 2.3.3	All colleagues are aware of the complaints policy and procedure and pass all complaints to the Complaints Manager.
3.3	1.11 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	St Basils Comments, Complaints and Compliments Policy  Complaints leaflet	St Basils aims to provide a high-quality, responsive, young person led service. We want to know when we get things wrong or when service users are unhappy with the service, they have received from us. To ensure this, we need to take account of the views and wishes of those we are here to support. We welcome every opportunity to monitor and improve our service and having a Comments, Complaints and Compliments policy and a clear

				procedure for dealing with them is one way of doing this.
3.4	1.12 Landlords must make their complaint policy available in a clear and accessible format for all residents. This will detail the two stage process, what will happen at each stage, and the timeframes for responding. The policy must also be published on the landlord's website.	Yes	<ul style="list-style-type: none"> <li>• Website</li> <li>• Complaints Policy</li> <li>• Posters</li> <li>• Leaflets</li> <li>• Young Persons induction pack</li> <li>• Social media</li> </ul>	We make our policy and the complaint process available via hard copies of leaflets and posters at services, verbally during induction and it can also be accessed via our website. We will also make it accessible via the young person website and social media pages when they are up and running.
3.5	1.13 The policy must explain how the landlord will publicise details of the complaints policy, including information about the Ombudsman and this Code.	Yes	St Basils Complaints procedure section 4.4	We have published our complaints policy and the HOS complaint handling code within our website and young people Workplace (online communication platform for young people) and in the posters/leaflets.
3.6	1.14 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	St Basils Complaints procedure section 2.1.5	Where permission has been granted by the tenant (or those that have PC) we will liaise with representatives, and we always try to accommodate any reasonable request to be accompanied at meetings.
3.7	1.15 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	St Basils Complaints procedure section 2.1.6 <ul style="list-style-type: none"> <li>• Website</li> <li>• Rent letters</li> <li>• Posters/Leaflets</li> <li>• Young persons induction pack</li> </ul> Verbally during induction to the service	We outline the ways to contact the HOS in our outcome letters at stage one but will now also be including this information in our acknowledgement letters as well. Information is also within our policy and on our website

## Section 4: Complaint Handling Staff

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
4.1	<p>1.16 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.</p> <p>1.17</p>	Yes	<p>St Basils Complaints procedure section 2.3.2</p> <p>Complaints Officer job role and responsibilities.</p>	<p>St Basils complaints officer is in place and co-ordinates and oversees the complaint process. Complaint data is received by the Senior Leadership Team monthly and a report produced by the Complaints Officer is produced annually for the Board</p>
4.2	<p>1.18 The complaints officer must have access to staff at all levels to facilitate the prompt resolution of complaints. They must also have the authority and autonomy to act to resolve disputes promptly and fairly.</p> <p>1.19</p>	Yes	<p>Complaints Officer job role and responsibilities.</p>	<p>The Complaints Officer is independent from any other service area and has access to staff at all levels with the required level of autonomy.</p>
4.3	<p>1.20 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>	Yes	<p>Quarterly complaint monitoring meetings</p> <p>Training records</p>	<p>In the main the complaint investigators are Youth Service Managers or Departmental Managers who are trained in a variety of different areas including how to manage complaints / grievances and have the authority and autonomy to resolve disputes quickly and fairly.</p>

## Section 5: The Complaint Handling Process

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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5.1	1.21 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	St Basils Comments, Complaints and Compliments Policy & Procedure	We have a single policy dealing with complaints which conforms to the Code. We do not treat any person differently if they have made a complaint.
5.2	1.22 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	St Basils Complaints procedure section 1	We always encourage our young people to talk to a member of staff straight away if they have a problem so that a local resolution can be found
5.3	1.23 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	St Basils Complaints procedure section 2.1.2	Our complaints process only has 2 stages
5.4	1.24 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. 1.25	Yes		We have not had any third-party handling any of our complaint stages, but if this were the case we would ensure that it would form part of our complaints process.
5.5	1.26 Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Yes		We have not had any third-party handling any of our complaint stages. The Complaints Manager would oversee any third-party handling of a complaint.
5.6	1.27 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	<ul style="list-style-type: none"> <li>• Online feedback form</li> <li>• Paper form</li> <li>• Feedback app</li> <li>• Communication with complainant</li> <li>• Acknowledgement email</li> </ul>	Within the acknowledgement email we set out our understanding of the complaint that has been made and if stated any outcome the resident is seeking. We do ask for clarification where the complaint is unclear.
5.7	1.28 When a complaint is acknowledged at either stage, landlords must be clear which aspects of the complaint they are, and are not,	Yes	<ul style="list-style-type: none"> <li>• Acknowledgement email</li> </ul>	We acknowledge complaints as soon as we get them however, sometimes when we receive the complaint it is not always clear what



	responsible for and clarify any areas where this is not clear.			the complaint is and we sometimes have to clarify points before we can decipher whether we are responsible.
5.8	At each stage of the complaints process, complaint handlers must: <ul style="list-style-type: none"> <li>a. deal with complaints on their merits, act independently, and have an open mind;</li> <li>b. give the resident a fair chance to set out their position;</li> <li>c. take measures to address any actual or perceived conflict of interest; and</li> <li>d. consider all relevant information and evidence carefully.</li> </ul> 1.29	Yes	St Basils Procedure section 2.4.4	The Complaints Officer is impartial to any service or department. The Investigating Officers will always look at any complaint with an open mind, listen carefully to what a complainant has to say, and consider all the evidence before making a decision of outcome.
5.9	1.30 Where a response to a complaint will fall outside the timescales set out in this Code, the landlord must agree with the resident suitable intervals for keeping them informed about their complaint.	Yes	<ul style="list-style-type: none"> <li>• Emails</li> <li>• Phone calls</li> </ul> Procedure section 2.5.3	Either the Complaints Manager of the Investigating Officer will keep in touch with the complainant to keep them informed
5.10	1.31 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	St Basils Complaints procedure section 2.3.2 EDI Policy – Appendix 5	We understand that some customers may have difficulty communicating a complaint and/or participating in the complaint process, as such we will always make reasonable adjustments, enabling customers to report their concerns and engage in the process.
5.11	1.32 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	St Basils Complaints procedure section 2.6	We do not refuse to escalate a complaint unless we have a valid reason which will comply with section 2 of the code
5.12	1.33 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,	Yes	St Basils Complaints procedure section 2.7.7 St Basils feedback app Files in Complaints folder on S:Drive	All complaints are logged on the feedback app and all relevant documentation for the complaint is

	correspondence with other parties, and any relevant supporting documentation such as reports or surveys.			saved in a file in our S:Drive for those that have access.
5.13	1.34 Landlords must have processes in place to ensure a complaint can be remedied at any stage of its complaints process. Landlords must ensure appropriate remedies can be provided at any stage of the complaints process without the need for escalation.	Yes	St Basils Complaints Policy Feedback App Outcome letters	We ensure that the most appropriate person is appointed as the investigating officer in order to be able to resolve or find solutions to the complaint at any stage.
5.14	1.35 Landlords must have policies and procedures in place for managing unacceptable behaviour from residents and/or their representatives. Landlords must be able to evidence reasons for putting any restrictions in place and must keep restrictions under regular review.	Yes	<ul style="list-style-type: none"> <li>• Incident management policy</li> <li>• Behaviour Management Policy</li> <li>• Anti-social Behaviour Policy</li> <li>• Prevention &amp; Management of Conflict, Violence &amp; Aggression Policy</li> </ul>	St Basils has several policies in place for managing unacceptable behaviour.
5.15	1.36 Any restrictions placed on contact due to unacceptable behaviour must be proportionate and demonstrate regard for the provisions of the Equality Act 2010.	Yes	<ul style="list-style-type: none"> <li>• Behaviour Management Policy</li> <li>• EDI Policy</li> <li>• PIE Training</li> </ul>	All staff are trained in Psychologically Informed Environment (PIE) techniques.

## Section 6: Complaints Stages

### Stage 1

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
6.1	1.37 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	Emails with managers Logs on feedback Apps	Where we can, we will always try to meet the timeframes. However, the complaints officer will always talk to the appropriate manager to find out the complexity of the complaint prior to the complainant being informed.
6.2	1.38 Complaints must be acknowledged, defined and logged at stage 1 of the complaints	Yes	<ul style="list-style-type: none"> <li>• Formal feedback App</li> <li>• KPI reports</li> </ul>	We acknowledge complaints within the 5 working day timeframe.

	procedure <b><u>within five working days of the complaint being received.</u></b>			
6.3	1.39 Landlords must issue a full response to stage 1 complaints <b><u>within 10 working days</u></b> of the complaint being acknowledged.	Yes	St Basils Complaints procedure Feedback App Outcome letters	We have improved our response timeframes but unfortunately do not always meet the 10 working days target as a lot of our customers have complex needs. However, we are exploring ways on how we can improve.
6.4	1.40 Landlords must decide whether an extension to this timescale is needed when considering the complexity of the complaint and then inform the resident of the expected timescale for response. Any extension must be no more than 10 working days without good reason, and the reason(s) must be clearly explained to the resident.	Yes	Logged communications	We have now started assessing the complexity of the complaint during the initial stage of receiving the complaint and acknowledging the complaint and then inform the tenant of the expected timescale. The investigating officer will liaise with and agree a new timeframe with the complainant if there is a need to extend the timeframe further.
6.5	1.41 When an organisation informs a resident about an extension to these timescales, they must be provided with the contact details of the Ombudsman.	No	Logged communications	We will now start to do this and will form part of our procedures moving forward
6.6	1.42 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	Outcome letters Feedback app	We send response to the complainant informing them of what action will be taken when we know. We will make changes to our process on how we track outstanding actions and update the complainant.
6.7	1.43 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	Formal feedback app: Investigation details page Outcome letters	We use our feedback app to breakdown the points raised in the complaint and reference them all in our outcome letters providing clear reasons for our decisions.
6.8	1.44 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	Yes	Formal feedback app: Investigation details page Investigating Officers Report Communications	Where a resident has raised a related, additional complaint and an outcome letter has not been sent, we

	been issued. Where the stage 1 response has been issued, the new issues are unrelated to the issues already being investigated or it would unreasonably delay the response, the new issues must be logged as a new complaint.			have included this into the original 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"> <li>a. the complaint stage;</li> <li>b. the complaint definition;</li> <li>c. the decision on the complaint;</li> <li>d. the reasons for any decisions made;</li> <li>e. the details of any remedy offered to put things right;</li> <li>f. details of any outstanding actions; and</li> <li>g. details of how to escalate the matter to stage 2 if the individual is not satisfied with the response.</li> </ul>	Yes	Outcome Letter	All outcome letters provide the required information.

## 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	Stage 1 outcome letter Complaints Procedure Formal feedback App	We inform all residents that they have the option to escalate the complaint to stage 2 if they are not satisfied with the outcome via the stage 1 outcome letter.
6.11	Requests for stage 2 must be acknowledged, defined and logged at stage 2 of the complaints procedure within five working days of the escalation request being received.	Yes	Stage 2 acknowledgement email Complaints Procedure Formal feedback App	All stage 2 requests are acknowledged within 5 working days of the escalation request being received.
6.12	Residents must not be required to explain their reasons for requesting a stage 2 consideration. Landlords are expected to make reasonable efforts to understand why a resident remains unhappy as part of its stage 2 response.		Complaints procedure Communications with complainant Feedback app	We will always try to make reasonable efforts to understand why a tenant has requesting an escalation. This is normally done through a meeting with the resident.
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Yes	Complaints Procedure Formal Feedback App Stage 2 Outcome Letter	Stage 2 complaints are dealt with by a different person to the one that investigated the stage 1 complaint.

				Normally this will be a member of the Senior Leadership Team.
6.14	Landlords must issue a final response to the stage 2 <b>within 20 working days</b> of the complaint being acknowledged.	Yes	Complaints Procedure Formal Feedback App Stage 2 Outcome Letter	Where possible we try to investigate and respond within the 20 day period.
6.15	Landlords must decide whether an extension to this timescale is needed when considering the complexity of the complaint and then inform the resident of the expected timescale for response. Any extension must be no more than 20 working days without good reason, and the reason(s) must be clearly explained to the resident.	Yes	Emails with managers Logs on feedback Apps	Where we can, we will always try to meet the timeframes. However, the complaints officer will always talk to the appropriate manager to find out the complexity of the complaint prior to the complainant being informed.
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	Acknowledgement emails and extension emails	Contact details for the Ombudsman are at the bottom of all acknowledgement emails and extension emails
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	Outcome letters Feedback app	We send response to the complainant informing them of what action will be taken when we know. We will make changes to our process on how we track outstanding actions and update the complainant.
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	Formal feedback app: Investigation details page Outcome letters	We use our feedback app to breakdown the points raised in the complaint and reference them all in our outcome letters providing clear reasons for our decisions.
6.19	Landlords must confirm the following in writing to the resident at the completion of stage 2 in clear, plain language: a. the complaint stage; b. the complaint definition; c. the decision on the complaint; d. the reasons for any decisions made; e. the details of any remedy offered to put things right; f. details of any outstanding actions; and	Yes	Outcome Letter	All outcome letters provide the required information.

	g. details of how to escalate the matter to the Ombudsman Service if the individual remains dissatisfied.			
6.20	Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.	Yes	Complaints Procedure	Where a complaint is being dealt with at stage 2 a Senior Leadership Team member will normally be involved who has the authority to involve any staff members needed to respond to the complaint.

## Section 7: Putting things right

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
7.1	<p>Where something has gone wrong a landlord must acknowledge this and set out the actions it has already taken, or intends to take, to put things right. These can include:</p> <ul style="list-style-type: none"> <li>• Apologising;</li> <li>• Acknowledging where things have gone wrong;</li> <li>• Providing an explanation, assistance or reasons;</li> <li>• Taking action if there has been delay;</li> <li>• Reconsidering or changing a decision;</li> <li>• Amending a record or adding a correction or addendum;</li> <li>• Providing a financial remedy;</li> <li>• Changing policies, procedures or practices.</li> </ul>	Yes	<p>Complaints procedure Outcome letters Formal Feedback App Communications</p>	Where something has gone wrong, we will acknowledge this and ensure action is taken to remedy this. We will put all of this into the outcome letter.
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Yes	Outcome letter	We always look at the impact our service failure may have had on the resident as a result of this

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	Outcome letter	The remedy offer is set out in our outcome letters and followed through where necessary
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes	HOS website and guidance documents	The investigation officers and Complaints Officer will refer to the website/guidance documents where necessary.

## Section 8: Self-assessment, reporting and compliance

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
8.1	Landlords must produce an annual complaints performance and service improvement report for scrutiny and challenge, which must include: <ul style="list-style-type: none"> <li>a. the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements.</li> <li>b. a qualitative and quantitative analysis of the landlord's complaint handling performance. This must also include a summary of the types of complaints the landlord has refused to accept;</li> <li>c. any findings of non-compliance with this Code by the Ombudsman;</li> <li>d. the service improvements made as a result of the learning from complaints;</li> <li>e. any annual report about the landlord's performance from the Ombudsman; and</li> <li>f. any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord.</li> </ul>	Yes	St Basils Annual Complaints Performance and Service Improvement Report 2024	The report is produced annually and sent to the June Board for approval and comment. The report is then published on the St Basils website. And now, will also be uploaded to the HOS portal.
8.2	The annual complaints performance and service improvement report must be reported to the landlord's governing body (or equivalent) and published on the section of its website relating	Yes	Website	As above

	to complaints. The governing body's response to the report must be published alongside this.			
8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	Yes	N/A	This has not been needed up to now
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	Yes	N/A	This has not been needed up to now
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	St Basils Business Continuity Policy – Appendix 6	If St Basils is unable to comply with the Code, we will inform the Ombudsman, provide information to residents who may be affected and publish this on our website.

### Section 9: Scrutiny & oversight: continuous learning and improvement

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
9.1	Landlords must look beyond the circumstances of the individual complaint and consider whether service improvements can be made as a result of any learning from the complaint.	Yes	Quarterly Complaints meeting	Relevant members of staff attend quarterly meetings to go through the complaints that have been raised and look at whether actions have been completed and if any learning needs to be disseminated across the organisation
9.2	A positive complaint handling culture is integral to the effectiveness with which landlords resolve disputes. Landlords must use complaints as a source of intelligence to identify issues and introduce positive changes in service delivery.	Yes	Quarterly meetings Annual reports to Board Managers meetings feedback Communications	Where complaints identify that changes to practice, policy or service delivery we will introduce these changes across the organisation via communications, meetings and new processes.
9.3	Accountability and transparency are also integral to a positive complaint handling culture. Landlords must report back on wider learning and improvements from complaints to stakeholders, such as residents' panels, staff and relevant committees.	Yes	Annual Complaints Performance and Service Improvement Report	The annual report is presented to the May Senior Leadership Team meeting and the June Board meeting. Moving forward we will now be reporting our findings to the St Basils Youth Advisory Board and Youth Service Managers for dissemination to all staff.



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	The Complaints Manager	The Complaints Manager collates all statistical data from the complaints and assesses any themes/trends to identify potential systemic issues or serious risks and is also the Custodian of the Complaints policy and procedure. The Complaints Manager reports directly to the Senior Leadership Team.
9.5	In addition to this a member of the governing body (or equivalent) must be appointed to have lead responsibility for complaints to support a positive complaint handling culture. This person is referred to as the Member Responsible for Complaints ('the MRC').	Yes	Board minutes Dec 2023	We have appointed our Vice Chair of the Board, who is also the Chair of our Service Delivery and Development Committee to be the member responsible for complaints handling.
9.6	The MRC will be responsible for ensuring the governing body receives regular information on complaints that provides insight on the landlord's complaint handling performance. This person must have access to suitable information and staff to perform this role and report on their findings.	Yes	Data presented at quarterly SDDC meetings – KPI report SDDC minutes	The MRC has the opportunity at the meeting to scrutinise a KPI dashboard of complaints data and will ask for information where necessary. The MRC has access to staff as needed.
9.7	As a minimum, the MRC and the governing body (or equivalent) must receive: a. regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance; b. regular reviews of issues and trends arising from complaint handling; c. regular updates on the outcomes of the Ombudsman's investigations and progress made in complying with orders related to severe maladministration findings; and d. annual complaints performance and service improvement report.	Yes/No	Data presented at quarterly SDDC meetings – KPI report Annual complaints performance and service improvement report Quarterly complaints meeting data and report	The MRC and Board members received quarterly updates on volume and outcomes, which we will now be including categories, issues and trends into to meet this point. They also received an annual report which does include all complaint performance and service improvements. The quarterly review meetings will now generate a quarterly report with updates to be taken to the next SDDC meeting.

9.8	Landlords must have a standard objective in relation to complaint handling for all relevant employees or third parties that reflects the need to: a. have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments; b. take collective responsibility for any shortfalls identified through complaints, rather than blaming others; and c. act within the professional standards for engaging with complaints as set by any relevant professional body.	Yes	St Basils Complaints Policy	St Basils is committed to ensuring feedback of any nature is dealt with promptly in the most appropriate way.
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