

## HOUSING OMBUDSMAN COMPLAINTS SELF-ASSESSMENT – 2024/25

### Section 1: Definition of a complaint

| Code provision | Code requirement                                                                                                                                                                                                                                                                                                                                     | Comply: Yes / No | Evidence                                 | Commentary / explanation                                                                                                                                                                                                                                                  |
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| 1.2            | A complaint must be defined as:<br><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              | Complaints Policy                        | Complaint definition in section 2.1 of the policy ( <a href="#">Complaints Policy</a> )                                                                                                                                                                                   |
| 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              | Complaints Policy<br>Complaints Register | All expressions of dissatisfaction are logged and are escalated through the complaints process as necessary, in line with agreed policy and procedures. Section 2 of the complaints policy identifies how complaints can be made and the process for handling complaints. |
| 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              | Complaints Policy                        | Section 2.4 of the complaints policy defines the difference between complaints and service request. Service requests such as repairs requests, requests for application forms etc are logged on the internal housing management system and the resident file.             |
| 1.5            | A complaint must be raised when the resident expresses dissatisfaction with the response to their service request, even if the handling of the service request remains ongoing. Landlords must not stop their efforts to address the service request if the resident complains.                                                                      | Yes              | Complaint Policy<br>Complaints register  | Section 2.2 and 3.5 of the complaints policy reconfirm English Rural's commitment to resolving any dissatisfaction or complaints with services as quickly as possible. The complaints register                                                                            |

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|     |                                                                                                                                                                                                                                                                                                                                                                    |     |                                                                                         | logs all actions taken to resolve complaints.                                                                                                                                                                                                                                                                                                                       |
| 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 | Repairs Completion Surveys<br>Resident Satisfaction Surveys, and other resident surveys | All surveys already include information on how to make a complaint and in the case of the annual satisfaction survey, includes the following: <i>If you are in anyway dissatisfied with the service provided by English Rural you can access the complaints policy and procedure and submit a complaint on our website or by calling the Customer Services Team</i> |

## Section 2: Exclusions

| Code provision | Code requirement                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | Comply: Yes / No | Evidence                                 | Commentary / explanation                                                                                             |
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| 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              | Complaints Policy<br>Complaints Register | Section 2.8 and 2.9 of the complaints policy details the expected timeframe for reporting complaints and exclusions. |
| 2.2            | 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: <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> </ul> | Yes              | Complaints Policy                        | As above                                                                                                             |

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|     | <ul style="list-style-type: none"> <li>Matters that have previously been considered under the complaints policy.</li> </ul>                                                                                                                                                                                                                                                        |     |                   |          |
| 2.3 | Landlords must accept complaints referred to them within 12 months of the issue occurring or the resident becoming aware of the issue, unless they are excluded on other grounds. Landlords must consider whether to apply discretion to accept complaints made outside this time limit where there are good reasons to do so.                                                     | Yes | Complaints Policy | As above |
| 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 | Complaints Policy | As above |
| 2.5 | Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.                                                                                                                                                                                                                                             | Yes | Complaints Policy | As above |

### Section 3: Accessibility and Awareness

| Code provision | Code requirement                                                                                                                                                                                                                                                                                                | Comply: Yes / No | Evidence                                        | Commentary / explanation                                                                                                                                                                                                                       |
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| 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              | Complaints Policy<br>Website<br>Resident Portal | Complaints Policy is published on the website and gives clear guidance on how to make a complaint with a dedicated complaints area ( <a href="#">Make A Complaint</a> )<br>Residents can access complaint information via the resident portal. |

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|     |                                                                                                                                                                                                                                                                                  |     |                                                 | <p>Reasonable adjustments and accessibility guidance details in section 4 of the complaints policy. Section 2.5 of the complaints policy gives further guidance on assistance in making a complaint.</p> <p>Review of complaints process completed by resident focus group during 2024</p> |
| 3.2 | Residents must be able to raise their complaints in any way and with any member of staff. All staff must be aware of the complaints process and be able to pass details of the complaint to the appropriate person within the landlord.                                          | Yes | Complaints Policy<br>Website<br>Resident Portal | Complaints are accepted in any format, detailed in section 2.5 of the complaints policy. All residents services staff are trained to accept complaints and are regularly briefed on the complaints policy and changes to procedure.                                                        |
| 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 | Website<br>Portal<br>Newsletters                | Complaints policy is published on the website ( <a href="#">Complaints Policy</a> ) as well as the residents portals and promoted through residents newsletters. The services team are trained to direct residents to the complaints policy when service dissatisfaction is raised.        |
| 3.4 | Landlords must make their complaint policy available in a clear and accessible format for all residents. This will detail the two stage process, what will happen at each stage, and the timeframes for responding. The policy must also be published on the landlord's website. | Yes | Complaints Policy – website, portal             | Section 3.2 of the policy details a two stage process for complaints. The policy is published widely on the website with a dedicated website page with complaints information ( <a href="#">Make A Complaint</a> )                                                                         |
| 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 | Complaints Policy                               | Section 1.3 of complaints policy advises of compliance with the Complaint Handling Code and other relevant legislation. Section 3.12 of the complaints policy gives details on the Housing Ombudsman and how to raise a complaint with the Ombudsman                                       |

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| 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 | Complaints Policy | Section 2.6 of the complaints policy references acceptance of complaints from representatives acting on behalf of residents. Section 3.6 advises residents of their right to be accompanied. |
| 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 | Complaints Policy | Section 3.12 of the complaints policy gives details on the Housing Ombudsman and how to raise a complaint with the Ombudsman                                                                 |

#### Section 4: Complaint Handling Staff

| Code provision | Code requirement                                                                                                                                                                                                                                                                                                                     | Comply: Yes / No | Evidence                   | Commentary / explanation                                                                                                                                                                                                                               |
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| 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              | Complaints Policy          | Customer Services Manager appointed as the designated complaints officer, detailed at section 3.3 of the complaints policy. All relevant managers will be responsible for relevant complaint handling in consultation with the complaints officer.     |
| 4.2            | The complaints officer must have access to staff at all levels to facilitate the prompt resolution of complaints. They must also have the authority and autonomy to act to resolve disputes promptly and fairly.                                                                                                                     | Yes              | Complaints Policy          | Complaints Officer role and responsibilities detailed in section 3.3 to 3.5 of the Complaints Policy. Complaints Officer (Customer Services Manager) sits on the senior management team. English Rural promotes a culture of open access to all staff. |
| 4.3            | Landlords are expected to prioritise complaint handling and a culture of learning from complaints. All relevant staff must be suitably trained in the importance of complaint handling. It is important that complaints are seen as a core                                                                                           | Yes              | Staff Training and culture | All relevant staff receive regular complaint handling training and are updated on any changes to the complaints policy and procedure. The Customer Services Team are                                                                                   |

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|  | service and must be resourced to handle complaints effectively |  |  | supported by the Customer Services Manager to direct residents to the complaints policy when expressing any form of dissatisfaction. |
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## Section 5: The Complaint Handling Process

| Code provision | Code requirement                                                                                                                                                                                                                                                                  | Comply: Yes / No | Evidence          | Commentary / explanation                                                                                                                                                                                    |
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| 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              | Complaints Policy | Policy published widely on website and residents portal and promoted through newsletters and other resident interactions.<br><br>Review of complaints process completed by resident focus group during 2024 |
| 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              | Complaints Policy | Section 3.2 of the complaints policy details the two stage process aligning with Complaint Handling Code guidance.                                                                                          |
| 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              | Complaints Policy | As above                                                                                                                                                                                                    |
| 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              | Complaints Policy | All complaints regarding third parties are handled under the complaints policy and procedure and are investigated with third parties as necessary as part of standard complaint procedures.                 |

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| 5.5  | Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.                                                                                                                                                                                                                                                                    | Yes | Complaints Policy                        | As above                                                                                                                                                                                                                                                                       |
| 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 | Complaints Policy                        | Complaint response letters published as appendices to the policy and detail the required content of each complaint response.                                                                                                                                                   |
| 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 | Complaints Policy<br>Complaints Register | Detailed in the complaint response letters (templates included as appendices to policy)                                                                                                                                                                                        |
| 5.8  | At each stage of the complaints process, complaint handlers must:<br>a. deal with complaints on their merits, act independently, and have an open mind;<br>b. give the resident a fair chance to set out their position;<br>c. take measures to address any actual or perceived conflict of interest; and<br>d. consider all relevant information and evidence carefully. | Yes | Complaints Policy<br>Complaints Register | Detailed in the complaint response letters (templates included as appendices to policy)                                                                                                                                                                                        |
| 5.9  | Where a response to a complaint will fall outside the timescales set out in this Code, the landlord must agree with the resident suitable intervals for keeping them informed about their complaint.                                                                                                                                                                      | Yes | Complaints Policy<br>Complaints Register | Section 3.2 of the complaints policy details the approach to time extensions on complaint responses. These are agreed through ongoing communication with the resident and where necessary an action plan is agreed. Time extensions are also logged in the complaints register |
| 5.10 | Landlords must make reasonable adjustments for residents where appropriate under the Equality Act 2010. Landlords must keep a record of any                                                                                                                                                                                                                               | Yes | Complaints Policy<br>Complaints Register | Section 4 of the complaints policy gives guidance on accessibility and reasonable adjustments. Where                                                                                                                                                                           |

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|      | 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.                                                                                                                        |     |                                     | any reasonable adjustments have been agreed, these will be recorded on the complaints register.                                                                                                                            |
| 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 | Complaints Policy                   | As per section 2.1 above. Section 2.8 and 2.9 of the complaints policy details the expected timeframe for reporting complaints and exclusions.                                                                             |
| 5.12 | 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. | Yes | Complaints Register                 | An internal complaints register is held by the Complaints Officer and updated throughout the complaints process, including all relevant dates, information relating to the complaint and any outcomes and lessons learned. |
| 5.13 | 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 | Complaints Policy                   | Section 3 of the complaints policy.                                                                                                                                                                                        |
| 5.14 | Landlords must have policies and procedures in place for managing unacceptable behaviour from residents and/or their representatives. Landlords must be able to evidence reasons for putting any restrictions in place and must keep restrictions under regular review.                     | Yes | Relevant resident services policies | Relevant policies may include:<br>- anti-social behaviour policy<br>- Domestic Abuse Policy<br>- Safeguarding Policy                                                                                                       |
| 5.15 | Any restrictions placed on contact due to unacceptable behaviour must be proportionate and demonstrate regard for the provisions of the Equality Act 2010.                                                                                                                                  | Yes | Relevant resident services policies | Accessibility and reasonable adjustments considered in all services policies                                                                                                                                               |



## Section 6: Complaints Stages

### Stage 1

| Code provision | Code requirement                                                                                                                                                                                                                                                                                                                                                                                        | Comply: Yes / No | Evidence                                 | Commentary / explanation                                                                                                                                                                                              |
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| 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              | Complaints Policy<br>Complaints register | Section 3.5 of the complaints policy demonstrates a commitment to resolving complaints quickly at an early stage. During 2024/25 13 out of 17 complaints were resolved at stage one                                   |
| 6.2            | Complaints must be acknowledged, defined and logged at stage 1 of the complaints procedure <b><u>within five working days of the complaint being received.</u></b>                                                                                                                                                                                                                                      | Yes              | Complaints Policy<br>Complaints register | 100% of complaints in 2024/25 acknowledged within five working days of being received                                                                                                                                 |
| 6.3            | Landlords must issue a full response to stage 1 complaints <b><u>within 10 working days</u></b> of the complaint being acknowledged.                                                                                                                                                                                                                                                                    | Yes              | Complaints Policy<br>Complaints register | Out of 13 stage one resident complaints, 10 received a full response within 10 working days, three were extended to either accommodate a home visit to the resident or investigate further with external contractors. |
| 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 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              | Complaints Policy<br>Complaints register | 100% of complaints that were extended beyond the standard 10 working day response time were responded to within 10 working day extension                                                                              |
| 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              | Complaints Policy                        | Complaints policy provided to the resident which details contact information for the Housing Ombudsman                                                                                                                |

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| 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 | Complaints Policy                        | Complaints are responded to within agreed timeframes. The complaint response can include an action plan which details any outstanding actions and when these will be completed.                                                                                                               |
| 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 | Complaints Policy<br>Complaints Register | Full response issued at the close of each stage of the process in line with the template response letters in the policy appendices.                                                                                                                                                           |
| 6.8 | Where residents raise additional complaints during the investigation, these must be incorporated into the stage 1 response if they are related and the stage 1 response has not been issued. Where the stage 1 response has been issued, the new issues are unrelated to the issues already being investigated or it would unreasonably delay the response, the new issues must be logged as a new complaint.                                                                                                                                                               | Yes | Complaints Policy<br>Complaints Register | Any additional issues raised are investigated during the complaint investigation process if raised prior to a complaint response being issued.                                                                                                                                                |
| 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 | Complaints Policy<br>Complaints Register | A full and detailed response is issued at the conclusion of each stage of the complaints process in line with the template letters within the complaints policy, including how to escalate to stage 2 of the process if the resident remains dissatisfied with the stage 1 complaint outcome. |

## Stage 2

| Code provision | Code requirement | Comply: Yes / No | Evidence | Commentary / explanation |
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| 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 | Complaints Policy | Four complaints reached stage 2 during 2024/25                                                                                                                                                                                                |
| 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 | Complaints Policy | 100% of stage 2 complaints in 2024 acknowledged within five working days of 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.                                                                                                   | Yes | Complaints Policy | Template complaint response letter invites residents to confirm if they would like to escalate their complaint to stage 2 but does not request a reason for doing so.                                                                         |
| 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 Policy | A clear process of escalation, including named person responsible for a response is detailed within the complaints policy at section 3.6 & 3.7                                                                                                |
| 6.14 | Landlords must issue a final response to the stage 2 <b><u>within 20 working days</u></b> of the complaint being acknowledged.                                                                                                                                                                                                    | Yes | Complaints Policy | Out of four stage 2 complaints during 2024/25 two were responded to without an extension applied to final response deadline.                                                                                                                  |
| 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 | Complaints Policy | Two stage 2 complaint response times extended, one of which to accommodate a home visit to the resident, the second to allow additional time for the resident to supply further information. Full responses issued within extension deadline. |
| 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 | Complaints Policy | Complaints policy provided to the resident which details contact details of the Housing Ombudsman                                                                                                                                             |
| 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                                                                                             | Yes | Complaints Policy | Complaints are responded to within agreed timeframes. The complaint response can include in action plan which details any outstanding action and when these will be completed.                                                                |

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|      | promptly with appropriate updates provided to the resident.                                                                                                                                                                                                                                                                                                                                                                                                                              |     |                   |                                                                                                                                                                                                        |
| 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 | Complaints Policy | Full response issued at the close of each stage of the process in line with the template response letters in the policy appendices.                                                                    |
| 6.19 | Landlords must confirm the following in writing to the resident at the completion of stage 2 in clear, plain language:<br>a. the complaint stage;<br>b. the complaint definition;<br>c. the decision on the complaint;<br>d. the reasons for any decisions made;<br>e. the details of any remedy offered to put things right;<br>f. details of any outstanding actions; and<br>g. details of how to escalate the matter to the Ombudsman Service if the individual remains dissatisfied. | Yes | Complaints Policy | A full and detailed response is issued at the conclusion of each stage of the complaints process. All stage 2 conclusion letters will include details of how to escalate a complaint to the Ombudsman. |
| 6.20 | Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.                                                                                                                                                                                                                                                                                                                                                                    | Yes | Complaints Policy | Section 3.6 and 3.7 determine that a stage 2 response will be considered as the Associations final judgement.                                                                                          |

## Section 7: Putting things right

| Code provision | Code requirement                                                                                                                                                                                                                                                                                                                                           | Comply: Yes / No | Evidence                                                                                       | Commentary / explanation                                                                                                                                                                                                             |
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| 7.1            | Where something has gone wrong a landlord must acknowledge this and set out the actions it has already taken, or intends to take, to put things right. These can include:<br><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> </ul> | Yes              | Complaints Policy<br>Complaint response<br>Complaints register<br>Resident Compensation Policy | Details of agreed actions to be taken or already taken to ensure things are put right are included in the complaints closure letter. Any offer of compensation will be in line with the Residents Compensation Policy and Procedure. |

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|     | <ul style="list-style-type: none"> <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> |     |                                          |                                                                                                                                                                                                                                                                                           |
| 7.2 | Any remedy offered must reflect the impact on the resident as a result of any fault identified.                                                                                                                                                                                                              | Yes | Resident Compensation Policy             | Remedies are reviewed and offered on a case-by-case basis, taking into consideration all available information and will reflect the individual circumstances.                                                                                                                             |
| 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 | Complaints Policy<br>Complaints Register | Section 3.5 of the complaints policy advises Managers will seek to resolve the matter quickly advising the complainant accordingly. Details of timescales and remedies are provided within the Complaints Response letter and monitored through the complaints register until completion. |
| 7.4 | Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.                                                                                                                                                                                                   | Yes | Complaints Policy                        | Section 1.3 of the Complaints Policy                                                                                                                                                                                                                                                      |

## Section 8: Putting things right

| Code provision | Code requirement                                                                                                                                                                                                                                                                                                                                                                                                          | Comply: Yes / No | Evidence                                                            | Commentary / explanation                                                                                                                                                                                                                                                     |
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| 8.1            | Landlords must produce an annual complaints performance and service improvement report for scrutiny and challenge, which must include: <ol style="list-style-type: none"> <li>the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements.</li> <li>a qualitative and quantitative analysis of the landlord's complaint handling performance.</li> </ol> | Yes              | Annual self assessment on website and complaint report to residents | The annual Housing Ombudsman self assessment is clearly published on the complaints section of the website. A separate complaint report is issued to residents following the publication of the self assessment which includes details of all complaints across the relevant |

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|     | <p>This must also include a summary of the types of complaints the landlord has refused to accept;</p> <p>c. any findings of non-compliance with this Code by the Ombudsman;</p> <p>d. the service improvements made as a result of the learning from complaints;</p> <p>e. any annual report about the landlord's performance from the Ombudsman; and</p> <p>f. any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord.</p> |     |                                                      | <p>year, outcomes of the complaints and action taken in response to the complaint outcomes, including lessons learned and service improvements.</p>                                                                                          |
| 8.2 | <p>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.</p>                                                                                                                                                                                 | Yes | Audit and Risk Committee/Board of Management reports | <p>The annual self assessment is reported to the Board of Management via the Audit and Risk Committee. The response from the Board is published on the website and included in the annual resident complaint report issued to residents.</p> |
| 8.3 | <p>Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.</p>                                                                                                                                                                                                                                                                                                                                                    | N/A | No evidence necessary                                | <p>No restructures, mergers or change in procedures have occurred that would require an additional self-assessment. Should this change across the next 12 months a further assessments will be completed.</p>                                |
| 8.4 | <p>Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.</p>                                                                                                                                                                                                                                                                                                                                                                       | N/A | No evidence necessary                                | <p>Not required as no Ombudsman investigations or determinations requesting this.</p>                                                                                                                                                        |
| 8.5 | <p>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</p> <p>Landlords must provide a timescale for returning to compliance with the Code.</p>                                                                                                                                                    | N/A | No evidence necessary                                | <p>English Rural is fully compliant with the code.</p>                                                                                                                                                                                       |

## 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              | Complaints Register                                                                                             | Internal complaints register logs the outcomes of complaints and any lessons learned, enabling trends to be monitored and necessary improvements made beyond the immediate complaint response.                                                                                                                                                |
| 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              | Complaints Register                                                                                             | As above                                                                                                                                                                                                                                                                                                                                      |
| 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              | Audit and Risk Committee Complaints Reports<br>Annual Complaints Report to residents<br>Residents Annual Report | Complaints reports considered by the Audit and Risk Committee now include detailed information on lessons learned and learning and service improvements.<br>Annual complaints report to residents includes outcomes of complaints and service improvements.<br><br>Review of complaints process completed by resident focus group during 2024 |
| 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              | Complaints Policy                                                                                               | Customer Services Manager named as the Complaints Officer and person responsible for complaint handling, detailed at section 3.3 of the complaints policy                                                                                                                                                                                     |
| 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                                              | Yes              | Chair of Audit and Risk Committee (ARC)                                                                         | Due to the delegated responsibility for complaint oversight to the ARC the Chair of the Committee has been appointed as the MRC.                                                                                                                                                                                                              |

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|     | to as the Member Responsible for Complaints ('the MRC').                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |     |                                                           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| 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 | ARC Complaints Reports                                    | All residents complaints are reported to the ARC at each meeting, along with full details of the complaint, any lessons learned and resulting service improvements.                                                                                                                                                                                                                                                                                                                                                                             |
| 9.7 | As a minimum, the MRC and the governing body (or equivalent) must receive: <ul style="list-style-type: none"> <li>a. regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance;</li> <li>b. regular reviews of issues and trends arising from complaint handling;</li> <li>c. regular updates on the outcomes of the Ombudsman's investigations and progress made in complying with orders related to severe maladministration findings; and</li> <li>d. annual complaints performance and service improvement report.</li> </ul>          | Yes | ARC Complaints Reports<br>Board Business Health Dashboard | As above, all complaints reports to ARC include details of every resident complaint received, including performance around complaint handling and lessons learned.<br><br>Complaint numbers are reported to the Board of Management through Business Dashboard KPI reporting.                                                                                                                                                                                                                                                                   |
| 9.8 | Landlords must have a standard objective in relation to complaint handling for all relevant employees or third parties that reflects the need to: <ul style="list-style-type: none"> <li>a. have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments;</li> <li>b. take collective responsibility for any shortfalls identified through complaints, rather than blaming others; and</li> <li>c. act within the professional standards for engaging with complaints as set by any relevant professional body.</li> </ul> | Yes | Staff Training and positive complaint culture             | All services staff receive regular complaint handling training. complaints are reviewed as part of internal team meetings at both departmental level and escalated to senior management level. A positive and supportive complaint culture is adopted by all staff, with the dedicated complaints officer working closely with relevant managers to respond to complaints and manage outcomes and lessons learned.<br><br>Relevant staff are trained or working towards CIH qualifications to align with the professional competency standards. |