Appendix A: Self-assessment form

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

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

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

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

Section 1: Definition of a complaint

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
1.2	A complaint must be defined as: '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.'	Yes	This is defined in the internal Complaint Handling Manual.	
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		 The word "complaint" does not have to be used. If a resident expresses dissatisfaction, inconvenience, or distress this will be logged as a complaint. All customer facing staff undertake Complaint Handling training through our e-leaning platform. This is designed to help our staff understand this concept.

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	No	Salesforce CRM system templates and flagging system	This is not specifically referenced in our Complaints Policy, will be factored into upcoming Complaint Policy review – to be complete by Nov '25
	something right. Service requests are not complaints, but must be recorded, monitored, and reviewed regularly.			However, interim processes are in place to identify and manage these appropriately.
				Currently all contacts are recorded into our customer relations management systems, in which they are categorised as either a Service Request or Complaint however it is referenced by the person making contact.

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		During the process of dealing with a service request, if the complainant is unhappy with the outcome of a service request it would be passed to our Customer Relations team and follow our Complaints process.
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	Records in 'Salesforce' are entered from any concerns raised in our customer surveys	Customer surveys are carried out by an external partner and we take the feedback they provide very seriously. Concerns directly raised during a survey are passed directly to our Customer Relations team to review and make contact where it is considered right to do so

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		The complaints policy has clear guidance and each complaint is considered on its own merits and is very reviewed by a member of the Customer Relations Team
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: The issue giving rise to the complaint occurred over twelve months ago. Legal proceedings have started. This is defined as details of the claim, such as the Claim Form and Particulars of Claim, having been filed at court. Matters that have previously been considered under the complaints policy. 	No		Current complaints policy states will not be considered if: • The issue giving rise to complaint occurred more than 6 months ago (this does not apply in instances relating to health and safety or safeguarding). • Legal proceedings have commenced, or a letter before action has been issued. • We have already provided a formal

			stage 2 response to the issue. However, as per the 2.1 all complaints are reviewed by a member of the McCarthy Stone Team before a decision is reached, however it is accepted this is reliant on intervention, rather than being governed by Policy. The complaint policy is due for review and update in Mid- 2025.
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.	No	As per above, but are planning for compliance by Nov 2025
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	Yes	A standardised response is currently sent to the complainant detailing why the

	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.		complaint is not being investigated
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	No	Considering Section 2, our current policy requires updating to ensure compliance, aiming for full compliance by Nov 2025

Section 3: Accessibility and Awareness

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
3.1	Landlords must make it easy for residents to complain by providing different channels through which they can make a complaint. Landlords must consider their duties under the Equality Act 2010 and anticipate the needs and reasonable adjustments of residents who may need to access the complaints process.	Yes		Residents, stakeholders and neighbours can contact us via phone, website, social media or email to express dissatisfaction. They are also able to raise a complaint face to face through one of our onsite House or Estate Managers. All routes will lead into the complaint management process
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		All customer facing colleagues receive customer complaint training and all employed colleagues are aware of the sole route for complaint management

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		Whilst complaint volumes are monitored and reported monthly, they are not subject to achieving a specific or indicative target
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	https://www.mccarthyandstone.co.uk/what- we-offer/services/advice-and- information/complaints-policy/	
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	https://www.mccarthyandstone.co.uk/what- we-offer/services/advice-and- information/complaints-policy/	
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		This is not currently referenced in the current policy but would be accepted as a reasonable request if needed

	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	https://www.mccarthyandstone.co.uk/what- we-offer/services/advice-and- information/complaints-policy/	
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Section 4: Complaint Handling Staff

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
4.1	Landlords must have a person or team assigned to take responsibility for complaint handling, including liaison with the Ombudsman and ensuring complaints are reported to the governing body (or equivalent). This Code will refer to that person or team as the 'complaints officer'. This role may be in addition to other duties.	Yes		A specific, dedicated team of highly trained and skilled customer relations managers are available to deal with complaints alongside a colleague of higher seniority to engage with the Ombudsman as appropriate.
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		The team, detailed in 4.1 have autonomy and authority to resolve complaints and disputes promptly, reasonably and fairly
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	Yes	99% of complaints are acknowledged with 3 days Guidance document for complaints requiring immediate	A specific, dedicated team of highly trained and skilled customer relations managers are available to deal with complaints alongside a colleague of higher seniority

core service and must be resourced to handle complaints effectively	attention – such as urgent health and safety matters	to engage with the Ombudsman as appropriate.

Section 5: The Complaint Handling Process

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
5.1	Landlords must have a single policy in place for dealing with complaints covered by this Code. Residents must not be treated differently if they complain.	Yes	https://www.mccarthyandstone.co.uk/what- we-offer/services/advice-and- information/complaints-policy/	
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		Once complaints are raised, every attempt is made to resolve as quickly and effectively as possible, however at no point is reference made to Stage 0 or informal complaints
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	https://www.mccarthyandstone.co.uk/what- we-offer/services/advice-and- information/complaints-policy/	

5.4	Where a landlord's complaint response is handled by a third party (e.g. a contractor or independent adjudicator) at any stage, it must form part of the two stage complaints process set out in this Code. Residents must not be expected to go through two complaints processes.	Yes	All complaints received by McCarthy Stone are dealt with internally and therefore there is a single complaint policy
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Not Applicable	As per 5.4
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	Covered in standardised templates within initial complaint acknowledgement.
5.7	When a complaint is acknowledged at either stage, landlords must be clear which aspects of the complaint they are,	Yes	Covered in standardised templates within initial complaint acknowledgement

	and are not, responsible for and clarify any areas where this is not clear.		
5.8	At each stage of the complaints process, complaint handlers must: a. deal with complaints on their merits, act independently, and have an open mind; b. give the resident a fair chance to set out their position; c. take measures to address any actual or perceived conflict of interest; and d. consider all relevant information and evidence carefully.	Yes	As per specific training for complaint handlers measures (a) and (d) are covered and are subject to quality assurance processes and spot check reviews by a senior member of the team
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	Where complaints are not possible to be answered within the expected timeframes, regular contact is maintained and updates agreed in relation to updates until resolution
5.10	Landlords must make reasonable adjustments for residents where appropriate under the Equality Act 2010. Landlords must keep a	Yes	Where disclosed, all reasonable adjustments are discussed and with consent will be held on file

	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.		to help with any potential future complaints
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	All complainants are given the right to escalate to Stage 2 in the Stage 1 response, as well as provided with information for further external review in the Stage 2 response
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	All information is captured on the Customer Relations Management system
5.13	Landlords must have processes in place to ensure a complaint can be remedied at any stage of its complaints process. Landlords	Yes	At any point during the complaint handling process, every attempt is made to agree appropriate

	must ensure appropriate remedies can be provided at any stage of the complaints process without the need for escalation.		remedies and were one cannot be found and the complaint process is exhausted, then routes for external review is offered
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.	No	This is currently in a working draft format and operational colleagues are operating within our respectful use 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.	No	To be covered by policy as stated in 5.14

Section 6: Complaints Stages

<u>Stage 1</u>

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
6.1	Landlords must have processes in place to consider which complaints can be responded to as early as possible, and which require further investigation. Landlords must consider factors such as the complexity of the complaint and whether the resident is vulnerable or at risk. Most stage 1 complaints can be resolved promptly, and an explanation, apology or resolution provided to the resident.	Yes		All inbound complaints are subject to initial screening and triage to allow those of lower levels of complexity or high priority (health and safety for example) to be dealt with quickly, appropriately to enable expedited responses
6.2	Complaints must be acknowledged, defined and logged at stage 1 of the complaints procedure <u>within five</u> <u>working days of the complaint being</u> <u>received</u> .	Yes	Monthly business report packs available	99% of complaints are acknowledged within three working days, 100% in five working days
6.3	Landlords must issue a full response to stage 1 complaints <u>within 10 working</u> <u>days</u> of the complaint being acknowledged.	No	Complaints summary published on internet pages <u>The Housing Ombudsman</u> <u>McCarthy Stone</u>	In FY24, of the 6 complaints, 50% of them were answered inside this timeframe. Those that weren't were discussed with complainant and a full response was provided within

				20 working days (within the guidelines of the code)
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		As per 6.3 for financial year 2024, with this factor applied our performance would have been 100%
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		When an extension is agreed for reasonable reasons, details of the Ombudsman are provided
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		Processes are in place to comply with this requirement and then are followed up by the complaint manager until all works are 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	Standardised complaint response framework	

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	Standardised complaint response framework	
6.9	Landlords must confirm the following in writing to the resident at the completion of stage 1 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 g. details of how to escalate the matter to stage 2 if the individual is not satisfied with the response.	Yes	Standardised complaint response letters	

<u>Stage 2</u>

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	https://www.mccarthyandstone.co.uk/what- we-offer/services/advice-and- information/complaints-policy/	As per Policy
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		99% of Stage 2's are acknowledged within 3 days, 100% within 5 days
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		Unless stated otherwise it is assumed that escalation to Stage 2 is due to dissatisfaction of the Stage 1 response and remedial / corrective action(s) taken and will make reasonable effort to establish further dissatisfaction

6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Yes	Stage 2 complaints are reviewed by a Senior colleague and will establish the management of the Stage 1 complaint and response. The Stage 2 response will be signed by this Senior colleague.
6.14	Landlords must issue a final response to the stage 2 <u>within 20 working days</u> of the complaint being acknowledged.	Yes	Whilst no Stage 2 have been received all complaint managers are aware of this timeframe
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	Whilst no complaints have been escalated to Stage 2, the same processes will be followed as per response in 6.3 and 6.4
6.16	When an organisation informs a resident about an extension to these timescales, they must be provided with	Yes	As per 6.3 and 6.4

	the contact details of the		
6.17	Ombudsman. 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	Standard practices ensure that when the complaint response / outcome is known it is fully communicated with planned timelines to provide a timely response, once the response is sent then the complaint manager will monitor the situation to completion but this does not prevent a complaint response being sent
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	As per standardised Stage 2 responses
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;	Yes	As per standardised Stage 2 responses

	 c. the decision on the complaint; d. the reasons for any decisions made; e. the details of any remedy offered to put things right; f. details of any outstanding actions; and g. details of how to escalate the matter to the Ombudsman Service if the individual remains dissatisfied. 		
6.20	Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.	Yes	Complaint handlers have the authority to collaborate and engage with all appropriate colleagues across the business to resolve issues

Section 7: Putting things right

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
7.1	Where something has gone wrong a landlord must acknowledge this and set out the actions it has already taken, or intends to take, to put things right. These can include:	Yes		This is part of the standardised complaint response framework ensuring the compliant manager

	 Apologising; Acknowledging where things have gone wrong; Providing an explanation, assistance or reasons; Taking action if there has been delay; Reconsidering or changing a decision; Amending a record or adding a correction or addendum; Providing a financial remedy; Changing policies, procedures or practices. 		considers and addresses all of these matter
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Yes	Difficult to evidence but is impact assessed on a case by case basis
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	Included in our complaint responses and our remedies will be monitored by the same complaint manager to ensure all actions are completed
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes	Where guidance has been issued by the Ombudsman, this will be fully reviewed before assigning an appropriate remedy

Section 8: Putting things right

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: a. the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements. b. a qualitative and quantitative analysis of the landlord's complaint handling performance. This must also include a summary of the types of complaints the landlord has refused to accept; c. any findings of non-compliance with this Code by the Ombudsman; d. the service improvements made as a result of the learning from complaints; e. any annual report about the landlord's performance from the Ombudsman; and f. any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord.	Yes		Published 23 rd Dec 2024

8.2	The annual complaints performance and service improvement report must be reported to the landlord's governing body (or equivalent) and published on the on the section of its website relating to complaints. The governing body's response to the report must be published alongside this.	Yes	As above
8.3	Landlords must also carry out a self- assessment following a significant restructure, merger and/or change in procedures.	Yes	Detailed in governance arrangements.
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	Yes	Detailed in governance arrangements.
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	Detailed in governance arrangements.

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		Processes are in place to capture immediate and longer term organisational learnings.
9.2	A positive complaint handling culture is integral to the effectiveness with which landlords resolve disputes. Landlords must use complaints as a source of intelligence to identify issues and introduce positive changes in service delivery.	Yes		The Customer and Colleague Director in conjunction with the McCarthy Stone Insights and Analytics Team report on a monthly and quarterly basis to use the information from complaints as a source of driving future policy, process or system
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		The complaints summary and service improvement plan is shared internally to all appropriate teams and is shared on the Mccarthy Stone internet page and therefore accessible to residents and relevant external committees.
9.4	Landlords must appoint a suitably senior lead person as accountable for their complaint handling. This person must	Yes		Customer and Colleague Director (SLT) and Chief Customer Officer (Exec)

Section 9: Scrutiny & oversight: continuous learning and improvement

	assess any themes or trends to identify potential systemic issues, serious risks, or policies and procedures that require revision.		
9.5	In addition to this a member of the governing body (or equivalent) must be appointed to have lead responsibility for complaints to support a positive complaint handling culture. This person is referred to as the Member Responsible for Complaints ('the MRC').	Yes	A suitably senior member of the Shared Ownership board is appointed as the Member Responsible for Complaints.
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	Reported and discussed at Board level on a quarterly basis.
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;	Yes	Reported and discussed at Board level on a quarterly basis

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.		
 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 cooperative 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	The customer relations team have a specific objective in their 2025 performance framework to support compliance to Policy and appropriate code The customer relations team are highly trained and experienced in dealing with complaints and operate within these guidelines – with oversight by a manager and accountability held at Director level