

Self-Assessment Form – 4 September 2024

This self-assessment covers the period from 1 April 2023 to 31 March 2024 and relates only to those tenants and shared ownership leaseholders where FAHHA is their direct landlord. The majority of our properties, however, are leased to third party managing housing associations who have their own experienced, professional staff, complaints policies and procedures and are able to provide a local, responsive and customer-focused service to residents. We work closely with those managing housing associations to ensure that the service residents of those properties receive meets the high standards we strive for. References to the Complaints Policy and Procedure in this document are to FAHHA’s own documents and compliance, but our managing registered provider partners have also carried out and published their own self-assessments against the Code.

This document is available in alternative format on request.

Section 1: Definition of a complaint

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
1.2	A complaint must be defined as: <i>‘an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the landlord, its own staff, or those acting on its behalf, affecting a resident or group of residents.’</i>	Yes	Complaints Policy (CP), paragraph 3.1.	We have adopted the Housing Ombudsman’s definition of a Complaint and a service request in our CP with the minor exception that our CP uses the term “customer” rather than “resident”
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	Yes	Complaint is defined as an “expression of dissatisfaction” (CP, paragraph 3.1). Our CP applies to all tenants (as defined at CP, paragraph 2) and	Our CP details how we’ll deal with a resident’s expression of dissatisfaction. Any enquiry fitting the definition of a complaint will be raised and

	representative must be handled in line with the landlord's complaints policy.		their representatives (CP, paragraph 3.15).	handled as such. We accept complaints via third parties.
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	CP para 3.2.	FAHHA's designated complaints officer has a clear understanding of the distinction between a service request and a complaint and our managing registered provider partners have their own experienced complaints handling teams.
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	CP para 3.3.	This situation has not arisen in relation to any of FAHHA's directly managed homes.
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	CP para 3.4.	All comments from TSM surveys are reviewed and where appropriate have been followed up with our managing registered provider partners.

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	CP paras 3.9 to 3.11	Our managing registered provider partners have confirmed that they have not refused to accept any complaints.
2.2	<p>A complaints policy must set out the circumstances in which a matter will not be considered as a complaint or escalated, and these circumstances must be fair and reasonable to residents. Acceptable exclusions include:</p> <ul style="list-style-type: none"> • The issue giving rise to the complaint occurred over twelve months ago. • Legal proceedings have started. This is defined as details of the claim, such as the Claim Form and Particulars of Claim, having been filed at court. • Matters that have previously been considered under the complaints policy. 	Yes	CP para 3.9	FAHHA's complaints policy sets out these circumstances
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	CP para 3.9.1	Managing registered providers and agents providing services on behalf of FAHHA are contractually required to provide their services, including complaint handling, in accordance with applicable law and regulation, which includes the Code. FAHHA is not aware of any non-compliance.

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	CP para 3.10	No complaints were refused for this period.
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Yes	CP para 3.11	No complaints were refused for this period.

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 may make a complaint in person, by telephone, in writing or by email (CP, paragraph 3.5).	
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	CP, paragraph 3.5. Support and assistance and alternative methods of making a complaint will be offered (CP, paragraph 3.7)	The CP is available for all staff to access.
3.3	High volumes of complaints must not be seen as a negative, as they can be	Yes	CP, Paras 1.1 and 1.3.	

	indicative of a well-publicised and accessible complaints process. Low complaint volumes are potentially a sign that residents are unable to complain.			
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	CP, para 3.16 and Complaints Procedure (CPr) para 5. CP and CPr available at Complaints - Funding Affordable Homes .	
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	CPr, para 6.	Our CPr sets out the contact information for the Ombudsman and their website details.
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	CP, para 3.15 and CPr para 2.1	
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	CPr, para 6.2 and via our website (Complaints - Funding Affordable Homes).	

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	Our designated complaints officer (CO) is responsible for complaints.	Compliance and reporting for complaints to our governing body and Member Responsible for Complaints (MRC) are the responsibility of the CO.
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 CO has the authority and direct reporting line to our Chief Executive Officer.	The CO is also the Company Secretary of and Head of Legal at FAHHA and has access to staff at all levels
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 service and must be resourced to handle complaints effectively	Yes	Our CO attends training webinars including those hosted by the Ombudsman. It is also intended to provide training for the FAHHA Board to assist in understanding the new Code.	

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	CP, paras 1.2 and 3.15	We have one complaints policy and procedure in place for all our residents.

				Our CP outlines how complaints will be handled fairly.
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	CP, para 3.16 and CPr, para 5.	We set out the stages of our complaint procedure in our CP and CPr, both of which are available on our website. We don't have an informal stage.
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	Our complaints policy is a two-stage process.	
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 of our managing registered provider partners operate a two-stage process under their own policies and procedures.	
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Yes	Managing registered providers and agents providing services on behalf of FAHHA are contractually required to provide their services, including complaint handling, in accordance with applicable law and regulation, which includes the Code. FAHHA is not aware of any non-compliance.	
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	Yes	No complaints received by FAHHA for its directly managed schemes for the period in question. Managing registered providers and agents providing services on behalf of FAHHA at other schemes are	

	complaint is unclear, the resident must be asked for clarification.		obliged to comply with this requirement of the Code, and FAHHA is not aware of any non-compliance.	
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	No complaints received by FAHHA for its directly managed schemes for the period in question. Managing registered providers and agents providing services on behalf of FAHHA at other schemes are obliged to comply with this requirement of the Code, and FAHHA is not aware of any non-compliance.	
5.8	At each stage of the complaints process, complaint handlers must: <ul style="list-style-type: none"> a. deal with complaints on their merits, act independently, and have an open mind; b. give the resident a fair chance to set out their position; c. take measures to address any actual or perceived conflict of interest; and d. consider all relevant information and evidence carefully. 	Yes	No complaints received by FAHHA for its directly managed schemes for the period in question. Managing registered providers and agents providing services on behalf of FAHHA at other schemes are obliged to comply with this requirement of the Code, and FAHHA is not aware of any non-compliance.	
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	No complaints received by FAHHA for its directly managed schemes for the period in question. Managing registered providers and agents providing services on behalf of FAHHA at other schemes are obliged to comply with this requirement of the Code, and FAHHA is not aware of any non-compliance.	

5.10	Landlords must make reasonable adjustments for residents where appropriate under the Equality Act 2010. Landlords must keep a record of any reasonable adjustments agreed, as well as a record of any disabilities a resident has disclosed. Any agreed reasonable adjustments must be kept under active review.	Yes	No complaints received by FAHHA for its directly managed schemes for the period in question. Managing registered providers and agents providing services on behalf of FAHHA at other schemes are obliged to comply with this requirement of the Code, and FAHHA is not aware of any non-compliance.	
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	Our CP and CPr outline our escalation route. No complaints received by FAHHA for its directly managed schemes for the period in question so we have not yet made any refusal to escalate. Managing registered providers and agents providing services on behalf of FAHHA at other schemes are obliged to comply with this requirement of the Code, and FAHHA is not aware of any non-compliance.	
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	No complaints received by FAHHA for its directly managed schemes for the period in question. Managing registered providers and agents providing services on behalf of FAHHA at other schemes are obliged to comply with this requirement of the Code, and FAHHA is not aware of any non-compliance.	
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	Yes	No complaints received by FAHHA for its directly managed schemes for the period in question. Managing registered providers and	

	remedies can be provided at any stage of the complaints process without the need for escalation.		agents providing services on behalf of FAHHA at other schemes are obliged to comply with this requirement of the Code, and FAHHA is not aware of any non-compliance.	
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	FAHHA has an Unacceptable Behaviour Policy and an ASB Policy.	The Unacceptable Behaviour and ASB policies detail procedures in place for managing unacceptable behaviour.
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	FAHHA's Unacceptable Behaviour Policy makes it clear that where any type of restriction has been put in place as part of managing the unacceptable behaviour, the customer will be informed by us in writing of the restrictions imposed, how long they will be in place and when these will be reviewed. The policy also states that if we consider that a customer is disabled or if a request for reasonable adjustments is made we will undertake an Equality Assessment before taking any formal action to understand if there are any other needs and if these needs could be met in any other way. We will make sure the appropriate support is provided to the customer including sign posting to the relevant organisations, such as to mental health services. We may also undertake an assessment	

			where we believe the customer may be vulnerable for a reason other than disability.	
--	--	--	---	--

Section 6: Complaints Stages

Stage 1

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
6.1	Landlords must have processes in place to consider which complaints can be responded to as early as possible, and which require further investigation. Landlords must consider factors such as the complexity of the complaint and whether the resident is vulnerable or at risk. Most stage 1 complaints can be resolved promptly, and an explanation, apology or resolution provided to the resident.	Yes	No complaints received by FAHHA for its directly managed schemes for the period in question. Managing registered providers and agents providing services on behalf of FAHHA at other schemes are obliged to comply with this requirement of the Code, and FAHHA is not aware of any non-compliance.	
6.2	Complaints must be acknowledged, defined and logged at stage 1 of the complaints procedure <u>within five working days of the complaint being received.</u>	Yes	No complaints received by FAHHA for its directly managed schemes for the period in question. Our managing registered provider partners providing complaints handling services on our behalf have confirmed the relevant response times have been met for 100% of complaints.	
6.3	Landlords must issue a full response to stage 1 complaints <u>within 10 working days</u> of the complaint being acknowledged.	Yes	No complaints received by FAHHA for its directly managed schemes for the period in question. Two of our managing registered provider partners providing complaints handling services on our behalf have confirmed the relevant response times have been met for 100% of complaints. The third managing registered provider partner received two complaints. Due to a misunderstanding as to	

			responsibility for dealing with the complaint, both complaints were responded to outside the 10 working day period. Both complaints were ultimately dealt with and upheld.	
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	No complaints received by FAHHA for its directly managed schemes for the period in question. Managing registered providers and agents providing services on behalf of FAHHA at other schemes are obliged to comply with this requirement of the Code, and FAHHA is only aware of the two instances of non-compliance at 6.3 above.	
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	No complaints received by FAHHA for its directly managed schemes for the period in question. Managing registered providers and agents providing services on behalf of FAHHA at other schemes are obliged to comply with this requirement of the Code, and FAHHA is only aware of the two instances of non-compliance at 6.3 above.	
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	No complaints received by FAHHA for its directly managed schemes for the period in question. Managing registered providers and agents providing services on behalf of FAHHA at other schemes are obliged to comply with this requirement of the Code, and	

			FAHHA is not aware of any non-compliance.	
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	No complaints received by FAHHA for its directly managed schemes for the period in question. Managing registered providers and agents providing services on behalf of FAHHA at other schemes are obliged to comply with this requirement of the Code, and FAHHA is not aware of any non-compliance.	
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	No complaints received by FAHHA for its directly managed schemes for the period in question. Managing registered providers and agents providing services on behalf of FAHHA at other schemes are obliged to comply with this requirement of the Code, and FAHHA is not aware of any non-compliance.	
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	Yes	No complaints received by FAHHA for its directly managed schemes for the period in question. Managing registered providers and agents providing services on behalf of FAHHA at other schemes are obliged to comply with this requirement of the Code, and FAHHA is not aware of any non-compliance.	

	g. details of how to escalate the matter to stage 2 if the individual is not satisfied with the response.			
--	---	--	--	--

Stage 2

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
6.10	If all or part of the complaint is not resolved to the resident's satisfaction at stage 1, it must be progressed to stage 2 of the landlord's procedure. Stage 2 is the landlord's final response.	Yes	See CP and CPr. No complaints received by FAHHA for its directly managed schemes for the period in question. Managing registered providers and agents providing services on behalf of FAHHA at other schemes are obliged to comply with this requirement of the Code, and only one complaint was escalated to Stage 2.	
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	See CP and CPr. No complaints received by FAHHA for its directly managed schemes for the period in question. Managing registered providers and agents providing services on behalf of FAHHA at other schemes are obliged to comply with this requirement of the Code, and FAHHA is not aware of any non-compliance.	
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	See CP and CPr. No complaints received by FAHHA for its directly managed schemes for the period in question. Managing registered providers and agents providing services on behalf of FAHHA at other schemes are obliged to comply with this requirement of the	

			Code, and FAHHA is not aware of any non-compliance.	
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Yes	See CP and CPr. No complaints received by FAHHA for its directly managed schemes for the period in question. Managing registered providers and agents providing services on behalf of FAHHA at other schemes are obliged to comply with this requirement of the Code, and FAHHA is not aware of any non-compliance.	
6.14	Landlords must issue a final response to the stage 2 <u>within 20 working days</u> of the complaint being acknowledged.	Yes	See CP and CPr. No complaints received by FAHHA for its directly managed schemes for the period in question. Our managing registered partners providing complaints handling services on our behalf have confirmed the relevant response times have been met for 100% of complaints.	
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	See CP and CPr. No complaints received by FAHHA for its directly managed schemes for the period in question. Managing registered providers and agents providing services on behalf of FAHHA at other schemes are obliged to comply with this requirement of the Code, and FAHHA is not aware of any non-compliance.	
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	See CP and CPr. No complaints received by FAHHA for its directly managed schemes for the period in question. Managing registered providers and agents providing services on behalf of FAHHA at	

			other schemes are obliged to comply with this requirement of the Code, and FAHHA is not aware of any non-compliance.	
6.17	A complaint response must be provided to the resident when the answer to the complaint is known, not when the outstanding actions required to address the issue are completed. Outstanding actions must still be tracked and actioned promptly with appropriate updates provided to the resident.	Yes	See CP and CPr. No complaints received by FAHHA for its directly managed schemes for the period in question. Managing registered providers and agents providing services on behalf of FAHHA at other schemes are obliged to comply with this requirement of the Code, and FAHHA is not aware of any non-compliance.	
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	See CP and CPr. No complaints received by FAHHA for its directly managed schemes for the period in question. Managing registered providers and agents providing services on behalf of FAHHA at other schemes are obliged to comply with this requirement of the Code, and FAHHA is not aware of any non-compliance.	
6.19	Landlords must confirm the following in writing to the resident at the completion of stage 2 in clear, plain language: <ul style="list-style-type: none"> a. the complaint stage; b. the complaint definition; c. the decision on the complaint; d. the reasons for any decisions made; e. the details of any remedy offered to put things right; f. details of any outstanding actions; and 	Yes	See CP and CPr. No complaints received by FAHHA for its directly managed schemes for the period in question. Managing registered providers and agents providing services on behalf of FAHHA at other schemes are obliged to comply with this requirement of the Code, and FAHHA is not aware of any non-compliance.	

	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	See CP and CPr. No complaints received by FAHHA for its directly managed schemes for the period in question. Managing registered providers and agents providing services on behalf of FAHHA at other schemes are obliged to comply with this requirement of the Code, and FAHHA is not aware of any non-compliance.	

Section 7: Putting things right

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
7.1	<p>Where something has gone wrong a landlord must acknowledge this and set out the actions it has already taken, or intends to take, to put things right. These can include:</p> <ul style="list-style-type: none"> • Apologising; • Acknowledging where things have gone wrong; • Providing an explanation, assistance or reasons; • Taking action if there has been delay; • Reconsidering or changing a decision; • Amending a record or adding a correction or addendum; • Providing a financial remedy; 	Yes	No complaints received by FAHHA for its directly managed schemes for the period in question. Managing registered providers and agents providing services on behalf of FAHHA at other schemes are obliged to comply with this requirement of the Code, and FAHHA is not aware of any non-compliance.	

	<ul style="list-style-type: none"> Changing policies, procedures or practices. 			
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Yes	See FAHHA Compensation Policy. No complaints received by FAHHA for its directly managed schemes for the period in question. Managing registered providers and agents providing services on behalf of FAHHA at other schemes are obliged to comply with this requirement of the Code, and FAHHA is not aware of any non-compliance.	
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	See FAHHA Compensation Policy. No complaints received by FAHHA for its directly managed schemes for the period in question. Managing registered providers and agents providing services on behalf of FAHHA at other schemes are obliged to comply with this requirement of the Code, and FAHHA is not aware of any non-compliance.	
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes	See FAHHA Compensation Policy. No complaints received by FAHHA for its directly managed schemes for the period in question. Managing registered providers and agents providing services on behalf of FAHHA at other schemes are obliged to comply with this requirement of the Code, and FAHHA is not aware of any non-compliance.	

Section 8: Self-assessment, reporting and compliance

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
8.1	<p>Landlords must produce an annual complaints performance and service improvement report for scrutiny and challenge, which must include:</p> <ul style="list-style-type: none"> a. the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements. b. a qualitative and quantitative analysis of the landlord's complaint handling performance. This must also include a summary of the types of complaints the landlord has refused to accept; c. any findings of non-compliance with this Code by the Ombudsman; d. the service improvements made as a result of the learning from complaints; e. any annual report about the landlord's performance from the Ombudsman; and f. any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord. 	Yes	<p>See Annual Complaints Performance and Service Improvement Report which is published on our website.</p> <p>8.1 d. Evidence of service improvements included in TSM report to FAHHA Governance & Compliance Committee on 4 September 2024</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	<p>See Annual Complaints Performance and Service Improvement Report which is published on our website. This confirms that the Annual Complaints Performance and Service Improvement Report and this Self-Assessment were shared with FAHHA's Governance & Compliance Committee on 4</p>	

			September 2024, and it also includes their response.	
8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	Yes		No merger/restructure/change in procedures is currently anticipated.
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	Yes		We will review and update this self-assessment if required to do so.
8.5	If a landlord is unable to comply with the Code due to exceptional circumstances, such as a cyber incident, they must inform the Ombudsman, provide information to residents who may be affected, and publish this on their website Landlords must provide a timescale for returning to compliance with the Code.	Yes		We are able to comply with the Code. We shall inform the Ombudsman where we aren't able to and provide a timescale for compliance.

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	See Annual Complaints Performance and Service Improvement Report.	
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	See Annual Complaints Performance and Service Improvement Report.	See also response to Code provision 9.7 below. Going forward we will take a more proactive approach collecting regular information on complaints managing registered provider partners and agents and discussing learning outcomes, as well seeking assurance that steps have been taken to achieve service improvement.
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	See Annual Complaints Performance and Service Improvement Report.	
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	Our Head of Legal & Company Secretary, who reports to the Chief Executive Officer, is our Complaints Senior Lead and Officer responsible for complaints and responsible for policy ownership.	Lessons from complaints and other sources are reviewed by the executive team.

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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	We have a lead Board member who is responsible for complaints (MRC) to ensure oversight and insight for the Board.	
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	The MRC has direct access to the Complaints Senior Lead and Officer as well as the wider executive team. This Self-Assessment and the Annual Complaints Performance and Service Improvement Report have been discussed and agreed with the MRC prior to review and approval by FAHHA's Governance and Compliance Committee.	
9.7	As a minimum, the MRC and the governing body (or equivalent) must receive: <ul style="list-style-type: none"> a. regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance; b. regular reviews of issues and trends arising from complaint handling; c. regular updates on the outcomes of the Ombudsman's investigations and progress made in complying with orders related to severe maladministration findings; and d. annual complaints performance and service improvement report. 	No (in relation to a. and b.)	<p>The majority of our properties are leased to and/or managed by third party managing housing associations who handle complaints in accordance with their own policies and procedures. FAHHA's Governance & Compliance Committee receives quarterly performance monitoring reports but those reports have not historically included updates on complaints handling.</p> <p>There have been no Ombudsman investigations or orders related to severe maladministration findings.</p>	<p>FAHHA recognises that, where it remains the direct landlord, notwithstanding the fact that services are provided by either a third-party registered provider or managing agent, it remains responsible for ensuring compliance with the Code.</p> <p>This currently applies to 247 homes where either (i) FAHHA directly manages (ii) there are management agreements in place or (iii) where leases to our managed registered provider partners are due to</p>

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
				<p>be but have not yet been granted.</p> <p>Those homes have been included for the purpose of this Self-Assessment and the Annual Complaints Performance and Service Improvement Report (presented to the Governance & Compliance Committee on 4 September 2024), and going forward quarterly updates will be provided to Governance & Compliance Committee, of which the MRC is also a member. The next Governance & Compliance Committee meeting is on 20 November 2024.</p>
9.8	<p>Landlords must have a standard objective in relation to complaint handling for all relevant employees or third parties that reflects the need to:</p> <ul style="list-style-type: none"> a. have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments; b. take collective responsibility for any shortfalls identified through complaints, rather than blaming others; and c. act within the professional standards for engaging with complaints as set by any relevant professional body. 	Yes	<p>FAHHA encourages a standard objective for all staff and contractors. Managing registered providers and agents providing services on behalf of FAHHA are contractually required to provide their services, including complaint handling, in accordance with applicable law and regulation, which includes the Code.</p>	