

**Sanctuary Group's Self-Assessment against the Housing Ombudsman Service Code**

<b>Section 1 - Definition of a complaint</b>				
<b>Code Provision</b>	<b>Code Requirement</b>	<b>Comply (Yes/No)</b>	<b>Evidence</b>	<b>Commentary/Explanation</b>
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 Complaints Procedure	As per the new Housing Ombudsman Complaint Handling Code (April 2024), the definition of a complaint has been explicitly defined within both Sanctuary's Policy and Procedure documentation.
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 & Procedure Review of sample complaints received in 2024	Residents do not have to use the word complaint for Sanctuary to log a formal complaint. Sanctuary can evidence through a review of complaints received and logged that customers do not need to use the word complaint for a formal complaint to be raised.  Sanctuary process complaints received from third parties in line with Sanctuary's complaints policy.
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 & Procedure Review of sample complaints received in 2024	Sanctuary recognise the difference between a service request and a complaint, Sanctuary's complaints policy outlines that initial service requests should be dealt with as Customer Contact and there is a Customer Contact Procedure in place. The Regular meetings take place between Customer Service Centre and Complaints to ensure ongoing monitoring of the implementation of this.
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	Complaints Policy	Sanctuary recognise that a customer does not need to explicitly use the word complaint for an expression of dissatisfaction to be treated as such
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	Customer Satisfaction feedback loop IFF Research requirements - Perception Measures	Where Sanctuary collate customer satisfaction survey information, customers who flag dissatisfaction are routed to operational teams who can make a judgement on the next steps, including contacting the customer to discuss any issues further. This is built into the contract for our external satisfaction surveys, and internal tools are set up to deliver this.
<b>Section 2 - Exclusions</b>				
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 Complaints Procedure	Sanctuary outline the circumstances where we would not accept a complaint. These circumstances are in line with the guidance set out in the Housing Ombudsman Complaint Handling Code (April 2024)
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	Yes	Complaints Policy	Sanctuary outline the circumstances where we would not accept a complaint. These circumstances are in line with the guidance set out in the Housing Ombudsman Complaint Handling Code (April 2024)
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	Sanctuary outline the circumstances where we would not accept a complaint. These circumstances are in line with the guidance set out in the Housing Ombudsman Complaint Handling Code (April 2024)
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	Sanctuary outline the circumstances where we would not accept a complaint. These circumstances are in line with the guidance set out in the Housing Ombudsman Complaint Handling Code (April 2024)
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint	Yes	Complaints Policy	Sanctuary outline the circumstances where we would not accept a complaint and that a blanket approach is not to be applied, but that the individual circumstances must be considered. These circumstances are in line with the guidance set out in the Housing Ombudsman Complaint Handling Code (April 2024)
<b>Section 3 - Accessibility &amp; Awareness</b>				
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	Review of source of complaints received in 2024 Complaints Policy Equality and Diversity e-learning Complaints Guidance – Reasonable Adjustments	The complaints policy outlines that complaints are accepted in any format, including written, verbal and digitally.  The Complaints Policy contains reference to the commitment to make reasonable adjustments when handling complaints. The Customer Relations Team undertake Equality and Diversity training in line with the Sanctuary training framework
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 Complaints Website	The complaints policy outlines that complaints are accepted in any format, including written via letters or email verbal, via our customer contact team and digitally via the customer website which, routes online complaint forms to the Complaints team.
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	Complaints Policy Complaints Website Complaints (MI) Management Information	The Complaints Policy makes clear the complaints process and that complaints are accepted in any format. In addition, FAQs positioned clearly within our Complaints Website detail how complaints can be made. We also track complaint volumes via our Management Information, whereby we can evidence increasing volumes and a steady stream of complaints for our teams to investigate. The number of complaints received per 1,000 homes is reviewed in Sanctuary's balanced business scorecard at each meeting of the Executive Committee and Group board.
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 Complaints Website	The complaints policy is available on the Sanctuary website in the Complaints section. The policy includes the relevant information needed. The customer website has been built to high accessibility standards and the website has been accredited by the Plain English society. Where a copy of the policy is requested, this can be provided to residents and we have tools and frameworks in place to adapt to customer communication preferences
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 Complaints Website Website promotes Ombudsman Contact	Sanctuary's complaints policy is included and referenced across a range of different customer communications, including specific large-scale communications.
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	Sanctuary's complaints policy sets out that complaints can be handled by third parties/representatives given appropriate authority from the resident.
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 Complaints Website	Sanctuary's complaints policy details that at all stages of the complaints process the customer is made aware of their right to contact the Housing Ombudsman regarding their concerns. In addition the Complaints Website also includes details of how to engage the Housing Ombudsman.
<b>Section 4 - Complaint Handling Staff</b>				
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 procedure Complaint Handler Role profiles	Customer Relations Team have overall responsibility for complaint management and would be those generally identified as 'Complaint Handlers'. Specific staff across Housing and Supported Living also support in complaint handling and would play the complaint handling role. This is outlined in the Complaints Procedure.
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 procedure Complaint Handler Role profiles 121s Complaint Quality Checks	The Customer Relations Team is an independent team with a specific remit and skill set around complaint handling. The role profile outlines this skill set clearly. The Customer Relations Team also have access to staff at all levels with escalation processes in place to Operational Director level. The team have undergone inclusion and diversity training and work within the organisations behaviour framework which include 'Integrity' behaviours linked to our values
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	Complaints Policy Root Cause Analysis Framework Complaint Quality Checks	Sanctuary's Complaints Policy fosters a learning-centric culture, further supported by our Root Cause Analysis Framework which, further enhances the importance of complaint handling and putting things right. Our Teams have access to all training materials and receive regular feedback as part of quality checks
<b>Section 5 - The Complaint Handling Process</b>				
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	Sanctuary have a single policy in place for dealing with complaints, this has also been updated accordingly to include any new provisions, or clarification points detailed within the new Housing Ombudsman Code.
5.2	The early and local resolution of issues between landlords and residents is key to effective complaint handling. It is not appropriate to have extra named stages (such as 'stage 0' or 'informal complaint') as this causes unnecessary confusion	Yes	Complaints Policy	Sanctuary operate a two stage process only - explicitly outlined in the Complaints Policy, recently updated to reflect the new Housing Ombudsman Code.

**Sanctuary Group's Self-Assessment**

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	Sanctuary operate a two stage process only - explicitly outlined in the Complaints Policy, recently updated to reflect the new Housing Ombudsman Code.
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	Sanctuary operate a two stage process only - explicitly outlined in the Complaints Policy, recently updated to reflect the new Housing Ombudsman Code.
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code	Yes	Complaints Policy	All staff working with, or on behalf of Sanctuary must adhere to the Code as specified by our Policy
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 Complaints Procedure Escalation Forms	All complaints are logged within our Complaints system and or escalated using our internal Escalation forms that document the reason for the complaint moving to Stage 2. As per the Code whereby it is no longer required to provide a reason for the escalation the team are encouraged to contact the customer to better understand the issue.
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 Complaints Procedure Acknowledgement Examples	Our Policy & Procedure makes clear how we must acknowledge complaints and our Acknowledgement Letter/email clearly outlines the complaints details
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	Complaints Policy Complaints Procedure	Our Policy clearly specifies our complaints process and each stage of the complaint, including contact with the resident and what evidence needs to, and will be, considered
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 Complaints Procedure	Residents are kept up to date at all stages of the complaints process. At Sanctuary we endeavour to address concerns within the timescales set within the Code. Our Works Co-ordination Team also continue to update the resident re any repairs following complaint resolution.
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	Complaints Policy Review of source of complaints received in 2024 Equality and Diversity e-learning Complaints Guidance – Reasonable Adjustments	The complaints policy outlines that complaints are accepted in any format, including written, verbal and digitally.  The Complaints Policy contains reference to the commitment to make reasonable adjustments when handling complaints. The Customer Relations Team undertake Equality and Diversity training in line with the Sanctuary training framework
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	At Sanctuary we do not require the customer to explain why they wish to escalate their complaint and will escalate as required once the customer expresses a desire to move to the next stage, which our Policy supports including any refusals.
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 Policy Complaints System Internal Case Folders (SharePoint)	Record keeping is a mandatory part of Sanctuary's complains process, all staff who work complaints are able to save case details into the case folders and record any details within our Complaints 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 must ensure appropriate remedies can be provided at any stage of the complaints process without the need for escalation	Yes	Complaints Policy Complaints Procedure Internal Complaint Case Clinics	Sanctuary consider all individual circumstances when receiving a complaint and will provide an informed resolution once it is known. In addition cases that cannot be resolved swiftly will be discussed in Case Clinics to ensure an appropriate resolution is provided as quickly as possible.
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	Complaints Policy Complaints Procedure	Sanctuary's Policy and Procedure clearly sets out how to manage unacceptable behaviours and what restrictions are in place
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	Complaints Policy	Sanctuary's Policy and Procedure clearly sets out how to manage unacceptable behaviours and what restrictions are in place
<b>Section 6 - Complaints Stages</b>				
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	Sanctuary consider all individual circumstances when receiving a complaint and will provide an informed resolution once it is known. The customer will be kept updated throughout the process.
6.2	Complaints must be acknowledged, defined and logged at stage 1 of the complaints procedure within five working days of the complaint being received.	Yes	Complaints Policy	Sanctuary's Complaints Policy makes clear the timescales regarding acknowledgement at both stages of the process
6.3	Landlords must issue a full response to stage 1 complaints within 10 working days of the complaint being acknowledged.	Yes	Complaints Policy Complaints performance information	Our complaints policy sets out a target of responding to complaints within 10 working days of a complaint being logged. Any extensions to this are minimal and logged and discussed with the resident in the spirit of the Ombudsman's code. Where an extension is needed to ensure that we are able to respond fully and resolve the issues for a resident are discussed with them.
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 Review of sampled complaint responses	Our standard complaints responses sent to customers contain the information outlined by the Housing Ombudsman. This is tested and monitored through ongoing complaint case reviews of each complaint handler.
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 Procedure Review of sampled complaint responses	Our standard complaints responses sent to customers contain the information outlined by the Housing Ombudsman. This is tested and monitored through ongoing complaint case reviews of each complaint handler.
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	Complaint procedure Complaint system specifications Review of complaint responses via Quality Checks	We respond to all complaints when the answer is known and in line with our SLAs. Where further actions are identified to address the issue, we will inform the customer. We provide customers with an update. Where complaints have follow on actions needed, these are logged as such as remain at that status until the follow on actions are complete.
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	Complaint case audits Complaint procedure Review of sampled complaint responses Quality Checks	Complaint responses sent to residents are as comprehensive as possible based on each individual complaint. This will set out any rationale for decisions or actions, based on reference to policy, procedure or legislation where needed
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 Quality Checks	Sanctuary's Complaints Policy details the approach to additional complaints and unrelated/related issues and our Complaints Teams are trained to ensure they are able to distinguish between new and linked aspects to a complaint
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 dissatisfied with the	Yes	Complaint case audits Complaint procedure Review of sampled complaint responses Quality Checks	Our standard complaints responses sent to customers contain the information outlined by the Housing Ombudsman. This is tested and monitored through ongoing complaint case reviews of each complaint handler.
<b>Stage Two</b>				
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 Complaints Procedure Request to Escalate Complaint system specifications	The same principles apply to escalating a complaint as to initially accepting a complaint at stage 1. We do not as a standard refuse customer request to escalate complaint to Stage 2, and see this as an important part of the process. This process is embedded within the complaint system specification to ensure it is monitored. In the exception that there would be a refusal to escalate, this would be confirmed in writing to the resident.
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 Procedure	Sanctuary's Complaints Procedure makes clear the timescales regarding acknowledgement at both stages of the process
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 Complaints Procedure Request to Escalate Complaint system specifications	The same principles apply to escalating a complaint as to initially accepting a complaint at stage 1. We do not as a standard refuse customer request to escalate complaint to Stage 2, and see this as an important part of the process. This process is embedded within the complaint system specification to ensure it is monitored.
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1	Yes	Complaints Procedure	The complaint procedure specifically states that the person investigating a complaint at Stage 2 cannot be the same person as Stage 1
6.14	Landlords must issue a final response to the stage 2 within 20 working days of the complaint being acknowledged	Yes	Complaints Policy Complaints performance information	Our complaints policy sets out a target of responding to complaints within 20 working days of a complaint being logged. Any extensions to this are minimal and logged and discussed with the resident in the spirit of the Ombudsman's code. Where an extension is needed to ensure that we are able to respond fully and resolve the issues for a resident are discussed with them.

**Sanctuary Group's Self-Assessment**

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 Complaints performance information	Our complaints policy sets out a target of responding to complaints within 20 working days of a complaint being logged. Any extensions to this are minimal and logged and discussed with the resident in the spirit of the Ombudsman's code. Where an extension is needed to ensure that we are able to respond fully and resolve the issues for a resident are discussed with them.
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 Procedure Review of sampled complaint responses	Our standard complaints responses sent to customers contain the information outlined by the Housing Ombudsman. This is tested and monitored through ongoing complaint case reviews of each complaint handler.
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	Complaint procedure Complaint system specifications Review of complaint responses via Quality Checks	We respond to all complaints when the answer is known and in line with our SLAs. Where further actions are identified to address the issue, we will inform the customer. We provide customers with an update. Where complaints have follow on actions needed, these are logged as such as remain at that status until the follow on actions are complete.
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 Complaints Procedure Review of sampled complaint responses	Our standard complaints responses sent to customers contain the information outlined by the Housing Ombudsman. This is tested and monitored through ongoing complaint case reviews of each complaint handler.
6.19	Landlords must confirm the following in writing to the resident at the completion of stage 2 in clear, plain language: a. the complaint stage; b. the complaint definition; c. the decision on the complaint; d. the reasons for any decisions made; e. the details of any remedy offered to put things right; f. details of any outstanding actions; and g. details of how to escalate the matter to the Ombudsman Service if the individual is dissatisfied	Yes	Complaints Policy Complaints Procedure Review of sampled complaint responses	Our standard complaints responses sent to customers contain the information outlined by the Housing Ombudsman. This is tested and monitored through ongoing complaint case reviews of each complaint handler.
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	Sanctuary only operate a two stage process, our Final Response is provided at Stage Two and our investigation is then concluded
<b>Section 7 - Putting Things Right</b>				
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: • 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	Yes	Complaints Policy Complaints Procedure Compensation guidance Review of sampled complaint responses	Our standard complaints responses sent to customers contain the information outlined by the Housing Ombudsman. This is tested and monitored through ongoing complaint case reviews of each complaint handler - working within a compensation and redress framework to consider other things we can do to put things right.
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified	Yes	Complaints policy Complaints Procedure Additional Guidance – compensation Compensation payments Review of complaint response Ongoing complaint audits	When responding to a complaint, handlers consider a range of impacts and issues when confirming the resolution. First and foremost the team are focussed on addressing the underlying cause of the complaint, but then work within a compensation and redress framework to consider other things we can do to put things right.
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	Complaint procedure Complaint system specification and status Work coordination and complaint taskforce	Complaints responses seek to set out the timescale or timeframe that actions will be completed. These are flagged as 'Follow on Actions' within the complaint system, or captured separately to enable them to be tracked through by relevant action owners.
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies	Yes	Complaints Website RCA Framework HOS Case Clinics & Case Reviews	Sanctuary use Root Cause Analysis to identify opportunities for improvement with regard to HOS cases and associated feedback, this is then shared to ensure a consistent approach and appropriate remedies.
<b>Section 8 - Putting Things Right Cont....</b>				
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	Yes	NOTE - THE GROUP BOARD REPORT FOR MAY (SOCIAL HOUSING COMPLAINTS REVIEW) SHOULD COVER THE POINTS LISTED IN THIS PART OF THE CODE.	Sanctuary's self-assessment will serve as evidence of compliance in this respect, including the additional requirements such as relevant reports and publications/performance and service improvements. Sanctuary's Executive Committee and Group Board receive updates on complaints performance throughout the year and an annual update on performance is included at year end.  NOTE - THE GROUP BOARD REPORT FOR MAY (SOCIAL HOUSING COMPLAINTS REVIEW) SHOULD COVER THE POINTS LISTED IN THIS PART OF THE CODE.
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	NOTE - THE GROUP BOARD REPORT FOR MAY (SOCIAL HOUSING COMPLAINTS REVIEW) SHOULD COVER THE POINTS LISTED IN THIS PART OF THE CODE.	Sanctuary will endeavour to publish this years report once it is made available
8.3	Landlords must also carry out a self assessment following a significant restructure, merger and/or change in procedures	Yes	NOTE - THE GROUP BOARD REPORT FOR MAY (SOCIAL HOUSING COMPLAINTS REVIEW) SHOULD COVER THE POINTS LISTED IN THIS PART OF THE CODE.	Sanctuary are committed to development and efficiency and would look to conduct a self-assessment following a restructure, merger and/or change in procedures
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation	Yes	NOTE - THE GROUP BOARD REPORT FOR MAY (SOCIAL HOUSING COMPLAINTS REVIEW) SHOULD COVER THE POINTS LISTED IN THIS PART OF THE CODE.	Sanctuary are committed to development and efficiency and would look to comply with any ask following an Ombudsman investigation
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	NOTE - THE GROUP BOARD REPORT FOR MAY (SOCIAL HOUSING COMPLAINTS REVIEW) SHOULD COVER THE POINTS LISTED IN THIS PART OF THE CODE.	Sanctuary will endeavour to publish the required information if unable to comply with the Code for any reason and inform the Ombudsman of timescales and reasoning
<b>Section 9 - Scrutiny &amp; Oversight, Continuous Learning &amp; Improvement</b>				
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	RCA Framework Peer Reviews	We track and monitor complaint themes to identify where there are learning opportunities from complaints. Where individual complaints are considered to flag more wide-ranging issues, these are reviewed by the Performance and Improvement Manager and if appropriate, case reviews conducted.
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	RCA Framework Complaint performance information Learning outcomes Complaint Reports to Committees and Board	Complaint trends, drivers and learning are shared with Executive Committee, Group Housing Committee and Group Board throughout the year. Learning outcomes on individual complaints where issues are highlighted are also discussed and raised with individual managers. The Resident Scrutiny Panel receive a complaints update at each formal meeting, with questions and scrutiny on this. The complaint community of interest are the key route through for conducting deep dive activity. Further improvement of this is planned
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	Lessons Learnt Logs Peer Reviews	Complaint trends, drivers and learning are shared with Executive Committee, Group Housing Committee and Group Board throughout the year. Learning outcomes on individual complaints where issues are highlighted are also discussed and raised with individual managers. The Resident Scrutiny Panel receive a complaints update at each formal meeting, with questions and scrutiny on this. The complaint community of interest are the key route through for conducting deep dive activity. Further improvement of this is planned
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	RCA Framework Complaint performance information Learning outcomes Complaint Reports to Committees and Board	Key themes from complaints are flagged regularly to senior management teams to allow for consideration of service improve, business risks and required improvements. We can evidence how the monitoring of complaints has driven ongoing discussion about service improvement
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	Complaints Policy Complaints Website	The Group Board is committed to ensuring we meet regulatory and industry requirements. It also makes sure that we are transparent and accountable. Our Non-Executive and Executive Members Responsible for Complaints are Trudi Elliot, and Nicole Sevmour, respectively.
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	Complaints Website Complaint reports to Board and Committees (Annual Complaints & Performance Report)	Update reports contain the information shared - Annual Complaints & Performance Reports

9.7	<p>As a minimum, the MRC and the governing body (or equivalent) must receive:</p> <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> </ul>	Yes	Complaint reports to Board and Committees (Annual Complaints & Performance Report)	Update reports contain the information shared - Annual Complaints & Performance Reports
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"> <li>a. have a collaborative and cooperative 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;</li> </ul> <p>and</p> <ul style="list-style-type: none"> <li>c. act within the professional standards for engaging with complaints as set by any relevant professional body</li> </ul>	Yes	RCA Framework	All staff are expected to follow Sanctuary policies and procedures when undertaking their roles. This includes complying with the Complaints Policy and Procedure. We do not have a standard complaint handling objective for all staff; however, the intentions of this requirements are delivered through our described approach. NRSP have supported this view.