

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 – from Storm’s Complaints Policy
1.2	<p>A complaint must be defined as:</p> <p><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></p>	Yes	<p>1.1 Storm define complaint 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></p>
1.3	<p>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.</p>	Yes	<p>1.2 The resident does not have to use the word ‘complaint’ for it to be treated as such. Whenever a resident expresses dissatisfaction we must give them the choice to make a complaint.</p> <p>1.3 Storm positively seeks and welcomes feedback in the form of complaints from anyone who is affected by a service we provide or decision taken by us including:</p> <ul style="list-style-type: none"> • Residents named on a Storm tenancy for any of our properties. • Any third party adversely affected by our actions or decisions • Any person acting on behalf of a resident with their consent for example a family member, neighbour, advice agency, member of parliament, councillor or the Housing Ombudsman.

Code provision	Code requirement	Comply: Yes / No	Evidence – from Storm’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	1.4 A service request is a request from a resident to Storm requiring action to be taken to put something right. Service requests are not complaints, but must be recorded, monitored and reviewed regularly.
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	1.5 A complaint must be raised when a resident expresses dissatisfaction with the response to their service request, even if the handling of the service request remains ongoing. We will not stop our efforts to address the service request if the resident complains.
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	Complaints Policy and Procedure published on Storm website. Staffs Housing also publish their policies and procedures on their website who generally send out such publications on behalf of Storm.

Section 2: Exclusions

Code provision	Code requirement	Comply: Yes / No	Evidence
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	<p>2.1 In order that complaints can be investigated effectively, all complaints should be submitted to Storm within twelve months of when the event occurred or it became known to the complainant. Storm may exercise discretion in exceptional circumstances when considering whether to accept a complaint submitted outside of this timescale.</p> <p>2.2 If we decide not to accept a complaint we must keep a record of evidence for reasoning.</p>
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	<p>2.1 In order that complaints can be investigated effectively, all complaints should be submitted to Storm within twelve months of when the event occurred or it became known to the complainant. Storm may exercise discretion in exceptional circumstances when considering whether to accept a complaint submitted outside of this timescale.</p> <p>2.3 We may not accept a complaint if 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.</p>

Code provision	Code requirement	Comply: Yes / No	Evidence
2.3	<p>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.</p> <p>Landlords must consider whether to apply discretion to accept complaints made outside this time limit where there are good reasons to do so.</p>	Yes	<p>2.1 In order that complaints can be investigated effectively, all complaints should be submitted to Storm within twelve months of when the event occurred or it became known to the complainant. Storm may exercise discretion in exceptional circumstances when considering whether to accept a complaint submitted outside of this timescale.</p>
2.4	<p>If a landlord decides not to accept a complaint, an explanation must be provided to the resident setting out the reasons why the matter is not suitable for the complaints process and the right to take that decision to the Ombudsman. If the Ombudsman does not agree that the exclusion has been fairly applied, the Ombudsman may tell the landlord to take on the complaint.</p>	Yes	<p>2.4 There are some things that we will not deal with through our complaint's procedure. These include:</p> <ul style="list-style-type: none"> • A request for a service, such as the first report of a repair • Reports of anti-social behaviour or nuisance (not the handling of an existing ASB case) • Where legal or regulatory action has already been taken and a determination made • Insurance claims and appeals including damage to personal possessions and personal injury accidents which should be referred to the relevant insurers • Matters that have been determined under another Storm policy appeal process (e.g. internal transfer applications or a Housing Ombudsman determination) • The amount of service charge or rent increase set in line with Storm policy <p>If Storm do not accept a complaint, a detailed explanation will be provided to the resident setting out the reasons why the matter is not suitable for</p>

Code provision	Code requirement	Comply: Yes / No	Evidence
			the complaints process and the right to take that decision to the Ombudsman.
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Yes	<p>2.5 A complaint investigation will be conducted in an impartial manner. The complaint handler will:</p> <ul style="list-style-type: none"> • Deal with complaints on their merits • Act independently and have an open mind • Take measures to address any actual or perceived conflict of interest • Consider all information and evidence carefully • Keep the complain as confidential as far as possible, with information only disclosed if necessary to investigate the matter further.

Section 3: Accessibility and Awareness

Code provision	Code requirement	Comply: Yes / No	Evidence
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	<p>3.1 Complaints can be reported in different ways. These are by telephone, in person, on social media, in writing by letter or by completing the online complaints form. Full details of the complaints process and ways to contact us are detailed on our website.</p> <p>3.2 Storm are committed to making our service easy to use for all members of the community. In line with our statutory equalities duties, we will always ensure that reasonable adjustments are made to help residents access and use our services.</p>
3.2	Residents must be able to raise their complaints in any way and with any member of staff. All staff must be aware of the complaints process and be able to pass details of the complaint to the appropriate person within the landlord.	Yes	3.3 Residents are 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 Storm.
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	3.4 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.

Code provision	Code requirement	Comply: Yes / No	Evidence
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	<p>3.1 Complaints can be reported in different ways. These are by telephone, in person, on social media, in writing by letter or by completing the online complaints form. Full details of the complaints process and ways to contact us are detailed on our website.</p> <p>5.1 Our complaints process is comprised of two stages. Stage one will be an investigation carried out by a case manager. If the complaint is escalated to stage two, an independent review will be carried out by a senior manager. When a complaint is made, it will be acknowledged and logged at stage one of the complaints procedure within 5 working days. Please refer to the Complaints Procedure for further details on how this process works.</p>
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	<p>3.1 Complaints can be reported in different ways. These are by telephone, in person, on social media, in writing by letter or by completing the online complaints form. Full details of the complaints process and ways to contact us are detailed on our website.</p> <p>3.5 We have fully adopted the Housing Ombudsman Complaint Handling Code and we have worked with our customers to look at our complaints procedure to ensure the good practice recommendations from the Housing Ombudsman are embedded in the way we manage your complaint. If we are unable to comply with the Code due to exceptional circumstances, such as a</p>

Code provision	Code requirement	Comply: Yes / No	Evidence
			cyber incident, we must inform the Ombudsman, provide information to residents who may be affected, and publish this on our website. We will also provide a timescale for returning to compliance with the Code.
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	3.6 Storm will accept complaints made by advocates authorised to act on a tenant's/tenants' behalf. Where reasonable, the advocate will be permitted to attend any meetings with Storm.
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	3.5 We have fully adopted the Housing Ombudsman Complaint Handling Code and we have worked with our customers to look at our complaints procedure to ensure the good practice recommendations from the Housing Ombudsman are embedded in the way we manage your complaint. If we are unable to comply with the Code due to exceptional circumstances, such as a cyber incident, we must inform the Ombudsman, provide information to residents who may be affected, and publish this on our website. We will also provide a timescale for returning to compliance with the Code.

Section 4: Complaint Handling Staff

Code provision	Code requirement	Comply: Yes / No	Evidence
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	4.1 The Operations Director (Josh Roden) is currently the 'Complaints Officer' for Storm. As such, he is assigned to take responsibility for complaint handling, including liaison with the Ombudsman and ensuring complaints are reported to the governing body (or equivalent). The complaints officer has the authority and autonomy to act to resolve disputes promptly and fairly.
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	Josh has access to staff at all levels and has been given authority and autonomy to act to resolve disputes promptly 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 core service and must be resourced to handle complaints effectively.	Yes	8.3 Themes and trends of complaints and complaint handling will be assessed by senior management to identify serious issues, serious risks or policies or procedures amendments required and to inform staff and contractor training. 1.3 Storm positively seeks and welcomes feedback 3.4 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.

Section 5: The Complaint Handling Process

Code provision	Code requirement	Comply: Yes / No	Evidence
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	<p>Single policy in place.</p> <p>3.5 We have fully adopted the Housing Ombudsman Complaint Handling Code and we have worked with our customers to look at our complaints procedure to ensure the good practice recommendations from the Housing Ombudsman are embedded in the way we manage your complaint.</p>
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	5.3 When an expression of dissatisfaction is received, we would first look to resolve the matter locally via our contact centre or by the relevant housing manager or contractor. If this approach has not reached the desired resolution, or it is deemed inappropriate, it can be registered and dealt with as a formal complaint by contacting the local team or registering a formal complaint.
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	5.2 A complaint may be also made in the form of a petition. The complaint will be dealt with following the normal complaints procedure, on the address of the first signatory only. The petition will be treated as one complaint and all correspondence will be addressed to the first signatory. If the complaint reaches stage two of our complaints process and a panel meeting is convened, the first signatory may attend the complaints panel with one other signatory. Details of the outcome of the complaint

Code provision	Code requirement	Comply: Yes / No	Evidence
			will be copied to each signatory on the petition once it has been resolved.
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	<p>5.5 In the event a 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.</p> <p>5.4 Storm is committed to responding promptly and courteously to all expressions of dissatisfaction and delivering a high standard of service to ensure that actions are carried out as quickly as possible and that communication is timely and accurate.</p>
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Yes	5.6 Where we are using a third party managing agent, we will work with the agent to ascertain where their existing processes do not align to Storm policies. We can decide in these instances to follow the managing agent’s policies where appropriate, as long as they are still aligned with the Complaints Code.
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	5.7 Within the complaint acknowledgement or escalation request, Storm will set out their understanding of the complaint and the outcomes the resident is seeking. If any aspect of the complaint is unclear, the resident must be asked for clarification and the full definition agreed between both parties.

Code provision	Code requirement	Comply: Yes / No	Evidence
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	5.7 Within the complaint acknowledgement or escalation request, Storm will set out their understanding of the complaint, responsibilities of both parties and the outcomes the resident is seeking. If any aspect of the complaint is unclear, the resident must be asked for clarification and the full definition agreed between both parties.
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	2.5 A complaint investigation will be conducted in an impartial manner. The complaint handler will: <ul style="list-style-type: none"> • Deal with complaints on their merits • Act independently and have an open mind • Take measures to address any actual or perceived conflict of interest • Consider all information and evidence carefully • Keep the complain as confidential as far as possible, with information only disclosed if necessary to investigate the matter further.
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	5.8 Storm will respond to the complaint within 10 working days of the complaint being logged. Where this is not feasible for whatever reason, Storm will provide an explanation to the resident containing a clear timeframe for when the response will be received. This should not exceed a further 10 days without good reason and must be agreed by both parties.

Code provision	Code requirement	Comply: Yes / No	Evidence
			5.9 Storm must respond to the stage two complaint within 20 working days of the complaint being escalated. Exceptionally, we may provide an explanation to the resident containing a clear timeframe for when the response will be received. This should not exceed a further 10 days without good reason and must be agreed by both parties.
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	3.2 Storm are committed to making our service easy to use for all members of the community. In line with our statutory equalities duties, we will always ensure that reasonable adjustments are made to help residents access and use our services.
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	2.1 In order that complaints can be investigated effectively, all complaints should be submitted to Storm within twelve months of when the event occurred or it became known to the complainant. Storm may exercise discretion in exceptional circumstances when considering whether to accept a complaint submitted outside of this timescale.
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	5.10 Storm will keep a full record of the complaint, any review and the outcomes at each stage. This includes the original complaint and the date received, all correspondence with the resident, correspondence with other parties and any reports or surveys prepared.
5.13	Landlords must have processes in place to ensure a complaint can be remedied at any stage of its complaints process.	Yes	5.1 Our complaints process is comprised of two stages. Stage one will be an investigation carried out by a case

Code provision	Code requirement	Comply: Yes / No	Evidence
	Landlords must ensure appropriate remedies can be provided at any stage of the complaints process without the need for escalation.		<p>manager. If the complaint is escalated to stage two, an independent review will be carried out by a senior manager. When a complaint is made, it will be acknowledged and logged at stage one of the complaints procedure within 5 working days. Please refer to the Complaints Procedure for further details on how this process works.</p> <p>5.2 A complaint may be also made in the form of a petition. The complaint will be dealt with following the normal complaints procedure, on the address of the first signatory only. The petition will be treated as one complaint and all correspondence will be addressed to the first signatory. If the complaint reaches stage two of our complaints process and a panel meeting is convened, the first signatory may attend the complaints panel with one other signatory. Details of the outcome of the complaint will be copied to each signatory on the petition once it has been resolved.</p> <p>5.3 When an expression of dissatisfaction is received, we would first look to resolve the matter locally via our contact centre or by the relevant housing manager or contractor. If this approach has not reached the desired resolution, or it is deemed inappropriate, it can be registered and dealt with as a formal complaint by contacting the local team or registering a formal complaint.</p> <p>6.1 Storm will 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. We will only escalate a complaint to stage two</p>

Code provision	Code requirement	Comply: Yes / No	Evidence
			once it has completed stage one and at the request of the resident.
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	Storm's ASB policy covers unacceptable behaviour from residents and/or their representatives.
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	5.11 Any restrictions placed on a resident's contact due to unacceptable behaviour should be appropriate to their needs and should demonstrate regard for the provisions of the Equality Act 2010.

Section 6: Complaints Stages

Stage 1

Code provision	Code requirement	Comply: Yes / No	Evidence
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	6.1 Storm will 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. We will only escalate a complaint to stage two once it has completed stage one and at the request of the resident.
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	5.1 Our complaints process is comprised of two stages. Stage one will be an investigation carried out by a case manager. If the complaint is escalated to stage two, an independent review will be carried out by a senior manager. When a complaint is made, it will be acknowledged and logged at stage one of the complaints procedure within 5 working days. Please refer to the Complaints Procedure for further details on how this process works.
6.3	Landlords must issue a full response to stage 1 complaints <u>within 10 working days</u> of the complaint being acknowledged.	Yes	5.8 Storm will respond to the complaint within 10 working days of the complaint being logged. Where this is not feasible for whatever reason, Storm will provide an explanation to the resident containing a clear timeframe for when the response will be received. This should not exceed a further 10 days

Code provision	Code requirement	Comply: Yes / No	Evidence
			without good reason and must be agreed by both parties.
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	5.8 Storm will respond to the complaint within 10 working days of the complaint being logged. Where this is not feasible for whatever reason, Storm will provide an explanation to the resident containing a clear timeframe for when the response will be received. This should not exceed a further 10 days without good reason and must be agreed by both parties.
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	6.2 If all or part of the complaint is not resolved to the resident's satisfaction at stage one it must be progressed to stage two (unless an exclusion ground applies). In instances where Storm decline to escalate a complaint or if we are informing a complainant about extensions to timescales, we must clearly communicate in writing our reasons for not escalating as well as the resident's right to approach the Ombudsman about its decision.
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	6.19 The complaint response will be sent to the complainant once the answer is known, regardless of outstanding actions. Outstanding actions must be tracked and actioned expeditiously with regular updates provided to the complainant.
6.7	Landlords must address all points raised in the complaint definition and provide clear reasons for any decisions,	Yes	6.21 Storm will address all points raised in the complaint and provide clear reasons for any

Code provision	Code requirement	Comply: Yes / No	Evidence
	referencing the relevant policy, law and good practice where appropriate.		decisions, referencing the relevant policy, law and good practice where appropriate.
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	6.12 Where residents raise additional complaints during the investigation, these should be incorporated into the stage one response if they are relevant and the stage one response has not been issued. Where the stage one response has been issued, or it would unreasonably delay the response, the complaint should be logged as a new complaint.
6.9	Landlords must confirm the following in writing to the resident at the completion of stage 1 in clear, plain language: <ul style="list-style-type: none"> 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	6.8 Storm will confirm the following in writing to the complainant at the completion of stages or where relevant: <ul style="list-style-type: none"> • the complaint stage • the decision on the complaint • the reasons for any decisions made • the details of any remedy offered to put things right • details of any outstanding actions and timescales • at stage one, details of how to escalate the matter to stage two if the resident is not satisfied with the answer • if it is the final stage, details of how to escalate the matter to the Housing Ombudsman Service if the resident remains dissatisfied.

Stage 2

Code provision	Code requirement	Comply: Yes / No	Evidence
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	6.2 If all or part of the complaint is not resolved to the resident's satisfaction at stage one it must be progressed to stage two (unless an exclusion ground applies). In instances where Storm decline to escalate a complaint or if we are informing a complainant about extensions to timescales, we must clearly communicate in writing our reasons for not escalating as well as the resident's right to approach the Ombudsman about its decision.
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	6.4 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.
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	6.5 Residents are not to be required to explain their reasons for requesting a stage 2 consideration. Storm must make reasonable efforts to understand why a resident remains unhappy as part of its stage 2 response.
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Yes	6.3 The staff member assessing the complaint at stage two, must not be the same staff member that assessed the complaint at stage one.
6.14	Landlords must issue a final response to the stage 2 <u>within 20 working days</u> of the complaint being acknowledged.	Yes	5.9 Storm must respond to the stage two complaint within 20 working days of the complaint being escalated. Exceptionally, we may provide an explanation to the resident containing a clear timeframe for when the response will be received.

Code provision	Code requirement	Comply: Yes / No	Evidence
			This should not exceed a further 10 days without good reason and must be agreed by both parties.
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	5.9 Storm must respond to the stage two complaint within 20 working days of the complaint being escalated. Exceptionally, we may provide an explanation to the resident containing a clear timeframe for when the response will be received. This should not exceed a further 10 days without good reason and must be agreed by both parties.
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	6.2 If all or part of the complaint is not resolved to the resident's satisfaction at stage one it must be progressed to stage two (unless an exclusion ground applies). In instances where Storm decline to escalate a complaint or if we are informing a complainant about extensions to timescales, we must clearly communicate in writing our reasons for not escalating as well as the resident's right to approach the Ombudsman about its decision.
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	6.19 The complaint response will be sent to the complainant once the answer is known, regardless of outstanding actions. Outstanding actions must be tracked and actioned expeditiously with regular updates provided to the complainant.
6.18	Landlords must address all points raised in the complaint definition and provide clear reasons for any decisions, referencing the relevant policy, law and good practice where appropriate.	Yes	6.21 Storm will address all points raised in the complaint and provide clear reasons for any decisions, referencing the relevant policy, law and good practice where appropriate.

Code provision	Code requirement	Comply: Yes / No	Evidence
6.19	<p>Landlords must confirm the following in writing to the resident at the completion of stage 2 in clear, plain language:</p> <ol 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 g. details of how to escalate the matter to the Ombudsman Service if the individual remains dissatisfied. 	Yes	<p>6.8 Storm will confirm the following in writing to the complainant at the completion of stages or where relevant:</p> <ul style="list-style-type: none"> • the complaint stage and definition • the decision on the complaint • the reasons for any decisions made • the details of any remedy offered to put things right • details of any outstanding actions and timescales • at stage one, details of how to escalate the matter to stage two if the resident is not satisfied with the answer • if it is the final stage, details of how to escalate the matter to the Housing Ombudsman Service if the resident remains dissatisfied.
6.20	<p>Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.</p>	Yes	<p>5.1 Our complaints process is comprised of two stages. Stage one will be an investigation carried out by a case manager. If the complaint is escalated to stage two, an independent review will be carried out by a senior manager. When a complaint is made, it will be acknowledged and logged at stage one of the complaints procedure within 5 working days. Please refer to the Complaints Procedure for further details on how this process works.</p>

Section 7: Putting things right

Code provision	Code requirement	Comply: Yes / No	Evidence
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; • Changing policies, procedures or practices. 	Yes	<p>6.8 Storm will confirm the following in writing to the complainant at the completion of stages or where relevant:</p> <ul style="list-style-type: none"> • the complaint stage and definition • the decision on the complaint • the reasons for any decisions made • the details of any remedy offered to put things right • details of any outstanding actions and timescales • at stage one, details of how to escalate the matter to stage two if the resident is not satisfied with the answer • if it is the final stage, details of how to escalate the matter to the Housing Ombudsman Service if the resident remains dissatisfied.
7.2	<p>Any remedy offered must reflect the impact on the resident as a result of any fault identified.</p>	Yes	<p>7.3 In awarding compensation, Storm will consider whether any statutory payments are due, if any quantifiable losses have been incurred, the time and trouble a resident has been put to as well as any distress and inconvenience caused. Any remedy offered must reflect the impact on the resident as a result of the fault identified.</p>

Code provision	Code requirement	Comply: Yes / No	Evidence
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	7.4 The remedy offer must clearly set out what will happen and by when, in agreement with the resident where appropriate. Any remedy proposed must take account of Ombudsman guidance and be followed through to completion.
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes	7.4 The remedy offer must clearly set out what will happen and by when, in agreement with the resident where appropriate. Any remedy proposed must take account of Ombudsman guidance and be followed through to completion.

Section 8: Putting things right

Code provision	Code requirement	Comply: Yes / No	Evidence
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>8.2 Storm will produce an annual complaints performance and service improvement report for scrutiny and challenge, which includes:</p> <ul style="list-style-type: none"> b. the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements. c. 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; d. any findings of non-compliance with this Code by the Ombudsman; e. the service improvements made as a result of the learning from complaints; f. any annual report about the landlord’s performance from the Ombudsman; and g. any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord.
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>8.2 Storm will publish information about complaints each year, including their number and nature, the outcome of the complaints and wider learning and improvements noted. This will be reviewed by the board of directors and include:</p> <ul style="list-style-type: none"> c. the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements.

Code provision	Code requirement	Comply: Yes / No	Evidence
			<p>d. 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;</p> <p>e. any findings of non-compliance with this Code by the Ombudsman;</p> <p>f. the service improvements made as a result of the learning from complaints;</p> <p>g. any annual report about the landlord's performance from the Ombudsman; and</p> <p>any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord.</p>
8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	Yes	6.17 Storm will carry out a self-assessment following a significant 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	6.18 We may be asked to review and update the self-assessment 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	3.5 We have fully adopted the Housing Ombudsman Complaint Handling Code and we have worked with our customers to look at our complaints procedure to ensure the good practice recommendations from the Housing Ombudsman are embedded in the way we manage your complaint. If we are unable to comply with the Code due to exceptional circumstances, such as a cyber incident, we must inform the Ombudsman, provide information to residents who may be affected, and publish this on our website. We will also provide a timescale for returning to compliance with the Code.

Section 9: Scrutiny & oversight: continuous learning and improvement

Code provision	Code requirement	Comply: Yes / No	Evidence
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	7.1 Storm will should look beyond the circumstances of the individual complaint and consider whether anything needs to be 'put right' in terms of process or systems to the benefit of all residents.
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	<p>8.1 We recognise that complaints can impact future service delivery. We will ensure that staff are supported and engaged in the complaints process, including learning that can be gained.</p> <p>1.3 Storm positively seeks and welcomes feedback</p> <p>3.4 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.</p>
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	<p>8.2 Storm will publish information about complaints each year, including their number and nature, the outcome of the complaints and wider learning and improvements noted. The report will be reviewed by the board of directors and include:</p> <p>d. the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements.</p> <p>e. 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;</p>

Code provision	Code requirement	Comply: Yes / No	Evidence
			f. any findings of non-compliance with this Code by the Ombudsman; g. the service improvements made as a result of the learning from complaints; h. any annual report about the landlord's performance from the Ombudsman; and h. any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord.
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	4.1 The Operations Director (Josh Roden) is currently the 'Complaints Officer' for Storm. As such, he is assigned to take responsibility for complaint handling, including liaison with the Ombudsman and ensuring complaints are reported to the governing body (or equivalent). The complaints officer has the authority and autonomy to act to resolve disputes promptly and fairly.
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	4.2 The CEO (Sam Roden) is Storm's Member (of governing body) Responsible for complaints (MRC). The MRC takes lead responsibility for complaints to support a positive complaint handling culture.
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 are reported to the board every board meeting.
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;	Yes	Complaints are reported to the board every board meeting.

Code provision	Code requirement	Comply: Yes / No	Evidence
	<ul style="list-style-type: none"> 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. 		
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>Executive Summary within complaints policy - Storm has a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments. Storm will take collective responsibility for any shortfalls identified through complaints rather than blaming others and act within the Professional Standards for engaging with complaints as set by any relevant professional body.</p>