### **Appendix A: Self-assessment form**

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

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

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

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

### **Section 1: Definition of a complaint**

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
1.2	A complaint must be defined as:  'an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the landlord, its own staff, or those acting on its behalf, affecting a resident or group of residents.'	Yes	PowerPoint to teach staff about complaints includes these details. The YMCAW complaints policy outlines this. Handover documents outline staff capturing comments of all feedback natures, which is then followed up by management.	
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	PowerPoint to teach staff about complaints includes these details. The YMCAW complaints policy outlines this.	
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	Yes	YMCAW has developed a complaints spreadsheet which tracks complaints at Stage 1, 2, service user requests and ASB reports. This is also made clear in the policy.	

	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	In YMCAW complaints policy.	
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	TSM cover letter includes details on how to make a complaint due to TSM being anonymous.	

#### **Section 2: Exclusions**

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
2.1	Landlords must accept a complaint unless there is a valid reason not to do so. If landlords decide not to accept a complaint they must be able to evidence their reasoning. Each complaint must be considered on its own merits	Yes	In YMCAW complaints policy.	No complaints have been refused to date.
	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:			
2.2	The issue giving rise to the complaint occurred over twelve months ago.	Yes	In YMCAW complaints policy.	
	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.			
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	In YMCAW complaints policy.	No complaints have been received which have required discretion or refusal.
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	In YMCAW complaints policy.	No complaints have been received which have required discretion or refusal.
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Yes	In YMCAW complaints policy.	No complaints have been received which have required discretion or refusal.

### **Section 3: Accessibility and Awareness**

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
3.1	Landlords must make it easy for residents to complain by providing different channels through which they can make a complaint. Landlords must consider their duties under the Equality Act 2010 and anticipate the needs and reasonable adjustments of residents who may need to access the complaints process.	Yes	In YMCAW complaints policy	Tenants can complain via the Feedback area on the website. directly to the complaints page, email the complaints email address.  Drop-in sessions are arranged at General needs properties to have conversations with tenants and collect feedback, if dissatisfaction is expressed staff are available to support the tenant to record the complaint. Tenants can complain via a staff member who will record on handover. Tenants can telephone, email, text, chat in person, send a letter, write a complaints form, log on the website. If a tenant required language line this will be provided.
3.2	Residents must be able to raise their complaints in any way and with any	Yes	In YMCAW complaints policy the variety of ways. The complaints	

	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.		log can evidence the multiple ways tenants have raised dissatisfaction and the mediums in which this was passed on. Policy is made available to staff on Bright HR system and complaints training PowerPoint is delivered, staff have this	
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	In YMCAW complaints policy and training PowerPoint.	Quarterly management meetings to discuss complaints received and prompt for them to be a key focus area. We are significantly increasing the numbers of complaints centrally recorded because of the changes made.
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	In YMCAW complaints policy.	Handed out in inductions to staff and residents.
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	In YMCAW complaints policy. Information about Ombudsman on complaint acknowledgement and response letters	

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	In YMCAW complaints policy.	Anyone can advocate and join complaints meetings however due to vulnerable client group in our charity consideration is given to empowering tenants to speak for themselves and to ensure their views are reflected accurately, staff must consider controlling relationships and ensure the tenants views are the views being expressed.
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	In YMCAW complaints policy. All tenant acknowledgement and response letters have details about the tenant right to access the Ombudsman service.	

# **Section 4: Complaint Handling Staff**

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
4.1	Landlords must have a person or team assigned to take responsibility for complaint handling, including liaison with the Ombudsman and ensuring complaints are reported to the governing body (or equivalent). This Code will refer to that person or team as the 'complaints officer'. This role may be in addition to other duties.	Yes	Complaints policy outlines the complaints officers as the Project Manager, and the Head of Housing and Support.	We have also added an additional layer by the Housing Improvement Officer processing the complaints and ensuring good administration.
4.2	The complaints officer must have access to staff at all levels to facilitate the prompt resolution of complaints. They must also have the authority and autonomy to act to resolve disputes promptly and fairly.	Yes	The officers highlighted in policy are managers of staff and have therefore autonomy to manage complaints and facilitate resolution.	Head of Housing is the officer responsible for managing stage 2 complaints, along with Senior management team, this is to ensure different persons are managing at stage 2, to those that managed stage 1.
4.3	Landlords are expected to prioritise complaint handling and a culture of learning from complaints. All relevant staff must be suitably trained in the importance of complaint handling. It is important that complaints are seen as a	Yes	Complaints policy outlines this. The training PowerPoint delivered to staff outlines this and the complaints spreadsheet has an area to capture learning, which is reviewed with mangers and Head of Housing quarterly.	<b>Y</b>

core service and must be resourced to		
handle complaints effectively		

# **Section 5: The Complaint Handling Process**

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
5.1	Landlords must have a single policy in place for dealing with complaints covered by this Code. Residents must not be treated differently if they complain.	Yes	In YMCAW complaints policy.	
5.2	The early and local resolution of issues between landlords and residents is key to effective complaint handling. It is not appropriate to have extra named stages (such as 'stage 0' or 'informal complaint') as this causes unnecessary confusion.	Yes	In YMCAW complaints policy.	We removed the additional stages when the new code was released, challenge has been to ensure that if dissatisfaction is expressed and resolved very quickly, staff are still recording this. The handover templates and team meetings were designed to capture this. The drop-in sessions are forming crucial to identify and resolve issues early on.
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	In YMCAW complaints policy	Only the two stages as recommended.

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	No complaints are handled by a third party. Tenants would only need to follow the YMCA complaints process.	N/A
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Yes	No third parties responsible for handling complaint. Landlord remains responsible.	N/A
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	Tenant acknowledgment and response letters outline this and prompt staff to fulfil these elements in the letters. Also outlines in YMCAW complaints policy	
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	In YMCAW complaints policy. Response letters structured to answer elements of the complaint.	
5.8	At each stage of the complaints process, complaint handlers must:	Yes	In YMCAW complaints policy. Highlighted in training PowerPoint.	

	<ul> <li>a. deal with complaints on their merits, act independently, and have an open mind;</li> <li>b. give the resident a fair chance to set out their position;</li> <li>c. take measures to address any actual or perceived conflict of interest; and</li> <li>d. consider all relevant information and evidence carefully.</li> </ul>			
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	In YMCAW complaints policy	No complaints to date have fallen outside of timescales.
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	In YMCAW complaints policy	There haven't been any reasonable adjustments made as there hasn't been any requests. Staff have been attending on site to support tenants with communication barriers even if these are not formally recognised barriers. Examples are discussing with tenants and staff helping to draft the complaint into writing. Staff are meeting the needs of

				the tenants based on the tenant's preference.
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	In YMCAW complaints policy	No refusals have been made so far.
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	In YMCAW complaints policy	The new system is now fully rolled out. complaints are stored and backed up in the online housing management system. Inform. one place and accessible.
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	In YMCAW complaints policy. Also, a YMCA remedies policy.	Remedy has been offered as a good will gesture due to tenants whose property has been damaged by a leaking boiler. Remedies also offered to tenant who vacated flat due to flood damage from upstairs shower.
5.14	Landlords must have policies and procedures in place for managing unacceptable behaviour from residents and/or their representatives. Landlords	Yes	In YMCAW complaints policy.	Due to the charity values and client group staff operate in a trauma informed way and are

	must be able to evidence reasons for putting any restrictions in place and must keep restrictions under regular review.			encouraged to avoid restrictions wherever possible and work positively with clients and address what the tenants needs are.
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	In YMCAW complaints policy.	Any restrictions placed must be escalated to senior management team to ensure that all barriers to success have been supported positively.

### **Section 6: Complaints Stages**

### Stage 1

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
6.1	Landlords must have processes in place to consider which complaints can be responded to as early as possible, and which require further investigation. Landlords must consider factors such as the complexity of the complaint and whether the resident is vulnerable or at risk. Most stage 1 complaints can be resolved promptly, and an explanation, apology or resolution provided to the resident.	Yes	Complaint response letters demonstrate the apologies given and the varying time frames. The complaints spreadsheet demonstrates the speed at which some complaints are resolved.	Some complaints are resolved the day they are submitted, and the logging of the complaint is purely an administration task to capture the process followed.
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	In YMCAW complaints policy. Evidenced in complaints spreadsheet.	Inform tracks dates to ensure they are responded to effectively.
6.3	Landlords must issue a full response to stage 1 complaints within 10 working days of the complaint being acknowledged.	Yes	In YMCAW complaints policy. Evidenced in complaints spreadsheet.	Inform tracks dates to ensure they are responded to effectively
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	Yes	In YMCAW complaints policy.	No extensions have been used.

	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.			
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	In YMCAW complaints policy. In complaints response letters.	No extensions have been used.
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 response letters log these and the complaints spreadsheet tracks actions taken.	
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	In YMCAW complaints policy.	
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	Yes	In YMCAW complaints policy.	No incidents of this have occurred.

	investigated or it would unreasonably delay the response, the new issues must 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:  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	In YMCAW complaints policy. Complaints response letters include these details.	Complaints response letters are a template which prompts staff to include the relevant information as detailed in point 6.9 of the code.

### Stage 2

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
6.10	If all or part of the complaint is not resolved to the resident's satisfaction at stage 1, it must be progressed to stage 2 of the landlord's procedure. Stage 2 is the landlord's final response.	Yes	In YMCAW complaints policy. We have template letters designed acknowledging this escalation.	No stage 2 complaints.
6.11	Requests for stage 2 must be acknowledged, defined and logged at stage 2 of the complaints procedure	Yes	In YMCAW complaints policy and logged on complaints spreadsheet.	No stage 2 complaints.

	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		This has been a challenging training area for staff, as no Stage 2 complaints have yet occurred to put it into practice. Staff are unsure how to understand a tenant's continued dissatisfaction without directly asking them.  Training has focused on developing the skills to explore what the tenant wants to happen next, rather than focusing on why they remain unhappy. This approach helps ensure tenants don't feel challenged and supports full resolution at Stage 2 when it does arise.
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Yes	In YMCAW complaints policy, escalation to stage 2 requires senior management oversight.	No stage 2 complaints received. Staff have had to reiterate policy to tenants as some supported housing tenants wish to escalate directly to senior manager.  In the event of whistleblowing or safeguarding this would be dealt with, ordinarily tenants

				are encouraged to follow the process. All complaints so far have been successfully dealt with using the process.
6.14	Landlords must issue a final response to the stage 2 within 20 working days of the complaint being acknowledged.	Yes	In YMCAW complaints policy, tracked on complaints spreadsheet, templates for escalation includes these dates.	
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	In YMCAW complaints policy	No examples of this have occurred, any incidents are flagged to Senior management team for response.
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	In the complaints response templates	No examples have occurred.
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	Tracked via the response letters and the complaints spreadsheet.	No examples have occurred.
6.18	Landlords must address all points raised in the complaint definition and	Yes	In YMCAW complaints policy	No examples have occurred.

	provide clear reasons for any decisions, referencing the relevant policy, law and good practice where appropriate.			
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 remains dissatisfied.	Yes	In YMCAW complaints policy. Complaints response letters include these details.	Complaints response letters are a template which prompts staff to include the relevant information as detailed in point 6.19 of the code.
6.20	Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.	Yes	In YMCW complaints policy that senior management oversee stage two to ensure all relevant parties can be involved if needed.	

# **Section 7: Putting things right**

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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7.1	Where something has gone wrong a landlord must acknowledge this and set out the actions it has already taken, or intends to take, to put things right.  These can include:	Yes	In YMCW complaints policy and in response letters and on complaints log.	
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Yes	Remedies policy used in line with complaints policy	
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	In YMCW complaints policy and remedy policy.	
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes	In YMCW complaints policy and remedy policy which is directly linked to the Ombudsman guidance.	

### Section 8: Self-assessment, reporting and compliance

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
8.1	Landlords must produce an annual complaints performance and service improvement report for scrutiny and challenge, which must include:  a. the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements.  b. a qualitative and quantitative analysis of the landlord's complaint handling performance. This must also include a summary of the types of complaints the landlord has refused to accept;  c. any findings of non-compliance with this Code by the Ombudsman;  d. the service improvements made as a result of the learning from complaints;  e. any annual report about the landlord's performance from the Ombudsman; and  f. any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord.	Yes	YMCAW report on website	

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	YMCAW report on website	
8.3	Landlords must also carry out a self- assessment following a significant restructure, merger and/or change in procedures.	Yes	The self-assessment was completed after the merger, they were timed together.	
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	Yes	No Ombudsman investigations have taken place.	We will take on board any advice from the Ombudsman and will review and update our selfassessment if required.
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	There have been no exceptional circumstances where we have been unable to comply with the code.	Although this has not happened, if we are unable to comply with the code due to exceptional circumstances, we would inform the ombudsman, provide information to residents who may be affected, and publish this on our website. We would 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	Commentary / explanation
9.1	Landlords must look beyond the circumstances of the individual complaint and consider whether service improvements can be made as a result of any learning from the complaint.	Yes	Managers meetings reviews and 1-1s	
9.2	A positive complaint handling culture is integral to the effectiveness with which landlords resolve disputes. Landlords must use complaints as a source of intelligence to identify issues and introduce positive changes in service delivery.	Yes	The complaints report identifying the learning that has taken place.	
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	Weekly drop in notes	Drop ins, resident meetings and Resident reps are nominated in housing projects and are starting to empower tenant voice.
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	Head of Housing and Support, as identified in Complaints policy. Complaints report outlines trends. Housing improvement officer also assesses logs.	

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	YMCAW report on website and in YMCAW policy. Emma Cartwright Trustee is MRC	
9.6	The MRC will be responsible for ensuring the governing body receives regular information on complaints that provides insight on the landlord's complaint handling performance. This person must have access to suitable information and staff to perform this role and report on their findings.	Yes	Board meeting notes and Board reports	Quarterly complaints recording and reports are generated.
9.7	As a minimum, the MRC and the governing body (or equivalent) must receive:  a. regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance;  b. regular reviews of issues and trends arising from complaint handling;  c. regular updates on the outcomes of the Ombudsman's investigations and progress made in complying with orders related to severe maladministration findings; and	Yes	Board meeting notes and Board reports and Housing Committee notes	There has not been much material to discuss due to low numbers of complaints received as we are a small charity.

9.8	d. annual complaints performance and service improvement report.  Landlords must have a standard objective in relation to complaint handling for all relevant employees or third parties that reflects the need to:  a. have a collaborative and cooperative approach towards resolving complaints, working with colleagues across teams and departments;  b. take collective responsibility for any shortfalls identified through complaints, rather than blaming others;	Yes	Culture is set with new staff and this is monitored. Staff 1-1's have evidenced the shift in staff wanting to receive complaints and seeing this a sign of a good relationship and an
9.0	any shortfalls identified through	ies	