

Appendix B – Self-Assessment Form

This self-assessment form should be completed by the complaints officer and discussed at the landlord’s governing body annually.

Evidence should be included to support all statements with additional commentary as necessary.

Explanations must also be provided where a mandatory ‘must’ requirement is not met to set out the rationale for the alternative approach adopted and why this delivers a better outcome.

Section 1 - Definition of a complaint

Mandatory ‘must’ requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
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 organisation, its own staff, or those acting on its behalf, affecting an individual resident or group of residents.</i>	Yes	2.1 Definition of a complaint We define a complaint using the Housing Ombudsman’s standard definition: “an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by ISHA, our own staff, or those acting on our behalf, affecting an individual resident or group of residents.”
1.3	The resident does not have to use the word ‘complaint’ for it to be treated as such. A complaint that is submitted via a third party or representative must still be handled in line with the landlord’s complaints policy.	Yes	2.1 Definition of a complaint this section includes: Our residents do not have to specifically use the word ‘complaint’ for it to be treated as such. However, we differentiate between a service request, where a resident may be unhappy with a situation that they want resolved, and a complaint about the service they have or have not received from ISHA. In the case of a

			<p>service request, action will be taken to resolve the issue.</p> <p>2.4 Who can complain? Anyone who has received a service from ISHA (or those acting on behalf of ISHA) who is dissatisfied with that service. A representative or advocate can act on behalf of a resident. They must provide signed authority from the resident. This could be a friend, relative or a representative of an external organisation such as the Citizens Advice Bureau or MIND. MPs and councillors can also act on behalf of a resident.</p>
1.6	... if further enquiries are needed to resolve the matter, or if the resident requests it, the issue must be logged as a complaint.	Yes	<p>2.1 Definition of a complaint</p> <p>We say: Our residents do not have to specifically use the word 'complaint' for it to be treated as such. However, we differentiate between a service request, where a resident may be unhappy with a situation that they want resolved, and a complaint about the service they have or have not received from ISHA. In the case of a service request, action will be taken to resolve the issue. If further enquiries are needed to resolve the matter, or if the resident requests it, the issue will be logged as a complaint.</p>
1.7	A landlord must accept a complaint unless there is a valid reason not to do so.	yes	Our policy is that: We want to hear from residents when they feel dissatisfied about their home or a service provided by us or

			anyone acting on our behalf. We will make it easy for residents to tell us their concerns in the way that is most convenient to them. We welcome complaints because they are really important to us. We want to take the opportunity to fix an immediate problem, rebuild our relations with customers, learn from this and improve our services. We will always try to resolve a customer's complaint
1.8	A complaints policy must clearly set out the circumstances in which a matter will not be considered, and these circumstances should be fair and reasonable to residents.	Yes	Our complaints policy provides a list of clear reasons under 2.2 of our policy when we will not accept a complaint.
1.9	If a landlord decides not to accept a complaint, a detailed 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.	Yes	We have clear reasons for not accepting a complaint and where applicable this is communicated to the resident and the complaint is declined.

Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
1.4	Landlords should recognise the difference between a service request , where a resident may be unhappy with a situation that they wish to have rectified, and a complaint about the service they have/have not received.	Yes	We have updated our policy to reflect our recognition of the difference between a service request and a complaint about the service.
1.5	Survey feedback may not necessarily need to be treated as a complaint, though, where possible, the person completing the survey should be made aware of how they can pursue their dissatisfaction as a complaint if they wish to.	yes	We signpost to our complaints process in resident communication and where appropriate, include signposting in our survey information.

Section 2 - Accessibility and awareness

Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
2.1	Landlords must make it easy for residents to complain by providing different channels through which residents can make a complaint such as in person, over the telephone, in writing, by email and digitally. While the Ombudsman recognises that it may not be feasible for a landlord to use all of the potential channels, there must be more than one route of access into the complaints system.	Yes	2.3 How to make a complaint Residents can make complaints through all our usual contact points – we provide details in the policy. Where a resident needs help to make a complaint, we will provide support needed including encouraging (with permission from the resident) the use of a representative or advocate where appropriate
2.3	Landlords must make their complaint policy available in a clear and accessible format for all residents. This will detail the number of stages involved, what will happen at each stage and the timeframes for responding.	Yes	Available on the website
2.4	Landlord websites, if they exist, must include information on how to raise a complaint. The complaints policy and process must be easy to find on the website.	Yes	Available under our Contact Us page and on the page: Complaints and compliments (isha.co.uk)
2.5	Landlords must comply with the Equality Act 2010 and may need to adapt normal policies, procedures, or processes to accommodate an individual's needs. Landlords must satisfy themselves that their policy sets out how they will respond to reasonable adjustments requests in line with the Equality Act and that complaints handlers have had appropriate training to deal with such requests.	Yes	Addressed under section 4 of our policy. Our ED&I strategy is in place and addresses our approach to inclusion. We adapt our approach as required or requested to accommodate an individual's needs in line with the Equality Act 2010

2.6	Landlords must publicise the complaints policy and process, the Complaint Handling Code and the Housing Ombudsman Scheme in leaflets, posters, newsletters, online and as part of regular correspondence with residents.	Yes	The complaints process is regularly included in our resident correspondence, on our website and in our newsletter.
2.7	Landlords must provide residents with contact information for the Ombudsman as part of its regular correspondence with residents.	Yes	The complaints process is regularly included in our resident correspondence
2.8	Landlords must provide early advice to residents regarding their right to access the Housing Ombudsman Service throughout their complaint, not only when the landlord's complaints process is exhausted.	Yes	Specified in the policy and on our website.

Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
2.2	Where a landlord has set up channels to communicate with its residents via social media, then it should expect to receive complaints via those channels. Policies should contain details of the steps that will be taken when a complaint is received via social media and how confidentiality and privacy will be maintained.	Yes	Policy has been updated to include the steps taken when complaints are received via social media. Including a reference to our House Rules and protection of privacy.

Section 3 - Complaint handling personnel

Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
3.1	Landlords must have a person or team assigned to take responsibility for complaint handling to ensure complaints receive the necessary attention, and that these are reported	Yes	Full time complaints officer in place and from May 2023 a second part time complaints officer has been appointed.

	to the governing body. This Code will refer to that person or team as the “complaints officer”.		
3.2	...the complaint handler appointed must have appropriate complaint handling skills and no conflicts of interest.	Yes	Our complaints officers have been through a rigorous application process, including panel interview and tasks appropriate to the role. They undertake regular training through Ombudsman webinars and other relevant training.

Best practice ‘should’ requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
3.3	Complaint handlers should: <ul style="list-style-type: none"> • be able to act sensitively and fairly • be trained to handle complaints and deal with distressed and upset residents • have access to staff at all levels to facilitate quick resolution of complaints • have the authority and autonomy to act to resolve disputes quickly and fairly. 	Yes	Supported by the Head of Communication and Involvement, the complaint handlers have the authority and autonomy to act to resolve disputes quickly and fairly, and regularly work with staff at all levels around the business. They have been selected through a rigorous application process and undertake regular training.

Section 4 - Complaint handling principles

Mandatory ‘must’ requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
--------------	------------------	----------------	---

4.1	Any decision to try and resolve a concern must be taken in agreement with the resident and a landlord's audit trail/records should be able to demonstrate this. Landlords must ensure that efforts to resolve a resident's concerns do not obstruct access to the complaints procedure or result in any unreasonable delay. It is not appropriate to have extra named stages (such as 'stage 0' or 'pre-complaint stage') as this causes unnecessary confusion for residents. When a complaint is made, it must be acknowledged and logged at stage one of the complaints procedure within five days of receipt.	yes	Our policy is compliant with the ombudsman standard for logging and acknowledging a complaint within 5 days. 2.5 Resolving the complaint We will send written acknowledgement of receipt of a complaint within 5 working days of receipt by ISHA. We will make our decision, and inform the complainant of that decision in writing, within 10 working days of acknowledgement of the complaint. If this time period needs to be extended, the complainant will be informed of the good reasons for that extension
4.2	Within the complaint acknowledgement, landlords must 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.	Yes	We use a template to ensure we meet requirements for acknowledging complaints and responding to complaints.
4.6	A complaint investigation must be conducted in an impartial manner.	Yes	The complaints team sits separately from the operational teams and is able to investigate and respond to complaints with full authority.
4.7	The complaint handler must: <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 complaint confidential as far as possible, with information only disclosed if necessary to properly investigate the matter. 	Yes	Outlined in our policy and our process

4.11	Landlords must adhere to any reasonable arrangements agreed with residents in terms of frequency and method of communication	Yes	2.5 As part of the investigation we will work with the resident to agree on a course of action and keep them updated on the progress of their complaint. The frequency of contact between the Complaints and Resolution Officer and the resident will be agreed as part of the investigation and updates provided to the resident based on the agreement made.
4.12	The resident, and if applicable any staff member who is the subject of the complaint, must also be given a fair chance to: <ul style="list-style-type: none"> • set out their position • comment on any adverse findings before a final decision is made. 	Yes	Our policy has been updated in Version 3 to include this requirement and now specifies the opportunity to set out their position and comment on findings.
4.13	A landlord must include in its complaints policy its timescales for a resident to request escalation of a complaint	Yes	Our policy has been updated to specify a 20 working day timescale for escalation of a complaint following the final response.
4.14	A landlord must not unreasonably refuse to escalate a complaint through all stages of the complaints procedure and must have clear and valid reasons for taking that course of action. Reasons for declining to escalate a complaint must be clearly set out in a landlord's complaints policy and must be the same as the reasons for not accepting a complaint.	Yes	We define our reasons for not accepting a complaint in 2.2 of our policy. We define our reasons for not escalating to stage 2 of our process under 2.8. This includes anything under 2.2 as well as if the stage 1 process is still open.
4.15	A full record must be kept of the complaint, any review 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 reports or surveys prepared.	Yes	We keep records confidentially on our system, with full details of complaints, investigation findings and responses.

4.18	Landlords must have policies and procedures in place for managing unacceptable behaviour from residents and/or their representatives when pursuing a complaint.	Yes	The complaints policy is now aligned with our managing vexatious and unacceptable behaviour guidance.
-------------	---	-----	---

Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
4.3	Landlords should manage residents' expectations from the outset, being clear where a desired outcome is unreasonable or unrealistic	Yes	We aim to be clear about what is within the remit of the complaints process and how the investigation will be undertaken from the outset of a complaint investigation.
4.4	A complaint should be resolved at the earliest possible opportunity, having assessed what evidence is needed to fully consider the issues, what outcome would resolve the matter for the resident and whether there are any urgent actions required.	Yes	We have specified deadlines in the policy and associated process in line with Ombudsman requirements.
4.5	Landlords should 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 where this is reasonable.	Yes	2.4 Who can complain? Anyone who has received a service from ISHA (or those acting on behalf of ISHA) who is dissatisfied with that service. A representative or advocate can act on behalf of a resident. They must provide signed authority from the resident. This could be a friend, relative or a representative of an external organisation such as the Citizens Advice Bureau or MIND. MPs and councillors can also act on behalf of a resident.
4.8	Where a key issue of a complaint relates to the parties' legal obligations landlords should clearly set out their understanding of the obligations of both parties.	Yes	This is our practice and is now acknowledged in the policy from Version 3.

4.9	Communication with the resident should not generally identify individual members of staff or contractors.	Yes	Unless they are named in the complaint initially, we don't name individual members of staff or contractors.
4.10	Landlords should keep residents regularly updated about the progress of the investigation.	Yes	Our policy says: The frequency of contact between the Complaints and Resolution Officer and the resident will be agreed as part of the investigation and updates provided to the resident based on the agreement made.
4.16	Landlords should seek feedback from residents in relation to the landlord's complaint handling as part of the drive to encourage a positive complaint and learning culture.	No	This is a work in progress as we work with our new Resident and Community Involvement Lead to develop the appropriate approach.
4.17	Landlords should recognise the impact that being complained about can have on future service delivery. Landlords should ensure that staff are supported and engaged in the complaints process, including the learning that can be gained	Yes	Regular reporting and lessons learned reviews.
4.19	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.	yes	It is rare that we would take this action and we refer to our 'Dealing with unreasonable or unreasonably persistent customers guidance. We are compliant with the Equality Act and work with our residents to understand their support needs.

Section 5 - Complaint stages

Mandatory 'must' requirements

Stage 1

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
--------------	------------------	----------------	---

5.1	Landlords must respond to the complaint within 10 working days of the complaint being logged. Exceptionally, landlords 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.	Yes	Clearly set out in the policy and supported by the process
5.5	A complaint response must be sent 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 expeditiously with regular updates provided to the resident.	Yes	Policy updated in Version 3 to evidence this. Process supports this.
5.6	Landlords must address all points raised in the complaint and provide clear reasons for any decisions, referencing the relevant policy, law and good practice where appropriate.	Yes	Process supports the policy.
5.8	Landlords must confirm the following in writing to the resident at the completion of stage one in clear, plain language: <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 • details of how to escalate the matter to stage two if the resident is not satisfied with the answer 	Yes	This is included in our policy and we use templates to ensure every response contains this information.

Stage 2

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
---------------------	-------------------------	---------------------------	--

5.9	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 of the landlord's procedure, unless an exclusion ground now applies. In instances where a landlord declines to escalate a complaint it must clearly communicate in writing its reasons for not escalating as well as the resident's right to approach the Ombudsman about its decision.	Yes	Policy outlines this and process supports. However it is rare that we decline to take forward a complaint.
5.10	On receipt of the escalation request, landlords must set out their understanding of issues outstanding 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.	Yes	Clear in the policy and supported by the process.
5.11	Landlords must only escalate a complaint to stage two once it has completed stage one and at the request of the resident.	Yes	Escalation information is contained in the stage 1 response template and clearly defined in the policy.
5.12	The person considering the complaint at stage two, must not be the same person that considered the complaint at stage one.	Yes	As per the policy and supported by the process.
5.13	Landlords must respond to the stage two complaint within 20 working days of the complaint being escalated. Exceptionally, landlords 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.		Clear in the policy and supported by the process.
5.16	Landlords must confirm the following in writing to the resident at the completion of stage two in clear, plain language: <ul style="list-style-type: none"> • the complaint stage • the complaint 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 	Yes	Clear in the policy and supported by the process. There is no stage 3 in our complaints policy. After stage 2, residents are referred to the Ombudsman process.

	<p>and</p> <ul style="list-style-type: none"> • if the landlord has a third stage, details of how to escalate the matter to stage three • if this was the final stage, details of how to escalate the matter to the Housing Ombudsman Service if the resident remains dissatisfied. 		

Stage 3

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
5.17	Two stage landlord complaint procedures are ideal. This ensures that the complaint process is not unduly long. If landlords strongly believe a third stage is necessary, they must set out their reasons for this as part of their self-assessment. A process with more than three stages is not acceptable under any circumstances.	Yes	Our complaints policy has two clear stages.
5.20	Landlords must confirm the following in writing to the resident at the completion of stage three in clear, plain language: <ul style="list-style-type: none"> • the complaint stage • the complaint 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 • details of how to escalate the matter to the Housing Ombudsman Service if the resident remains dissatisfied 	NA	NA

Best practice ‘should’ requirements

Stage 1

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
5.2	If an extension beyond 20 working days is required to enable the landlord to respond to the complaint fully, this should be agreed by both parties.	Yes	Clear in policy
5.3	Where agreement over an extension period cannot be reached, landlords should provide the Housing Ombudsman’s contact details so the resident can challenge the landlord’s plan for responding and/or the proposed timeliness of a landlord’s response.	Yes	We have added this to our policy in Version 3.
5.4	Where the problem is a recurring issue, the landlord should consider any older reports as part of the background to the complaint if this will help to resolve the issue for the resident.	Yes	History is checked as part of the investigation as a matter of course.
5.7	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.	Yes	Set out in our process.

Stage 2

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
5.14	If an extension beyond 10 working days is required to enable the landlord to respond to the complaint fully, this should be agreed by both parties.	Yes	Set out in policy and clearly communicated with residents if relevant to the complaint.

5.15	Where agreement over an extension period cannot be reached, landlords should provide the Housing Ombudsman's contact details so the resident can challenge the landlord's plan for responding and/or the proposed timeliness of a landlord's response	Yes	Now reflected in our complaints policy.
------	---	-----	---

Stage 3

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
5.18	Complaints should only go to a third stage if the resident has actively requested a third stage review of their complaint. Where a third stage is in place and has been requested, landlords must respond to the stage three complaint within 20 working days of the complaint being escalated. Additional time will only be justified if related to convening a panel. An explanation and a date for when the stage three response will be received should be provided to the resident.	NA	NA
5.19	Where agreement over an extension period cannot be reached, landlords should provide the Housing Ombudsman's contact details so the resident can challenge the landlord's plan for responding and/or the proposed timeliness of a landlord's response.	NA	NA

Section 6 - Putting things right

Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
6.1	Effective dispute resolution requires a process designed to resolve complaints. 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.	Yes	Clear in policy and process

6.2	Any remedy offered must reflect the extent of any service failures and the level of detriment caused to the resident as a result. A landlord must carefully manage the expectations of residents and not promise anything that cannot be delivered or would cause unfairness to other residents.	Yes	We have compensation guidance and framework in place which guides compensation decisions.
6.5	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	Policy in place and process includes commitment log where outstanding commitments are monitored through to completion.
6.6	In awarding compensation, a landlord must 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.	Yes	Covered in our compensation guidance.

Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
6.3	Landlords 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.	Yes	Trends and reports are reviewed by leadership regularly and updates made where possible/applicable
6.7	In some cases, a resident may have a legal entitlement to redress. The landlord should still offer a resolution where possible, obtaining legal advice as to how any offer of resolution should be worded.		If we receive legal instruction or correspondence during the handling of a complaint, we reserve the right to hand over the case to our legal representative.

Section 7 - Continuous learning and improvement

Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations

7.2	Accountability and transparency are integral to a positive complaint handling culture. Landlords must report back on wider learning and improvements from complaints in their annual report and more frequently to their residents, staff and scrutiny panels.	Yes	Reporting in our annual residents' report, regular website updates and resident newsletters.
------------	--	-----	--

Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
7.3	A member of the governing body should be appointed to have lead responsibility for complaints to support a positive complaint handling culture. This role will be responsible for ensuring the governing body receives regular information on complaints that provides insight to the governing body on the landlord's complaint handling performance.	Yes	The complaints team is managed by the Head of Communication and Involvement and the complaints function is sponsored by the CEO, who sits on the Board.
7.4	As a minimum, governing bodies should receive: <ul style="list-style-type: none"> • Regular updates on the volume, categories and outcome of complaints, alongside complaint handling performance including compliance with the Ombudsman's orders • Regular reviews of issues and trends arising from complaint handling, • The annual performance report produced by the Ombudsman, where applicable • Individual complaint outcomes where necessary, including where the Ombudsman made findings of severe maladministration or referrals to regulatory bodies. The implementation of management responses should be tracked to ensure they are delivered to agreed timescales. The annual self-assessment against the Complaint Handling Code for scrutiny and challenge. 	Yes	Reporting to leadership team on a bi-monthly basis and the Board on a quarterly basis. All ombudsman investigations and findings are communicated to leadership team as soon as they are handed down.
7.5	Any themes or trends should be assessed by senior management to identify potential systemic issues, serious risks or policies and procedures that require revision. They should also be used to inform staff and contractor training.	Yes	The Leadership team reviews reports on a bi-monthly basis.

7.6	<p>Landlords should have a standard objective in relation to complaint handling for all employees that reflects the need to:</p> <ul style="list-style-type: none"> • have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments • take collective responsibility for any shortfalls identified through complaints rather than blaming others • act within the Professional Standards for engaging with complaints as set by the Chartered Institute of Housing. 	No	<ul style="list-style-type: none"> • We do not currently have this in place within our target-setting framework. Elements are captured under our ISHA values. • Pride in Team ISHA • Respect for everyone • Trusted to make the difference • Passionate commitment to customers
-----	--	----	--

Section 8 - Self-assessment and compliance

Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
8.1	Landlords must carry out an annual self-assessment against the Code to ensure their complaint handling remains in line with its requirements.	Yes	Current document as evidence.
8.2	Landlords must also carry out a self-assessment following a significant restructure and/or change in procedures.	NA	NA
8.3	<p>Following each self-assessment, a landlord must:</p> <ul style="list-style-type: none"> • report the outcome of their self-assessment to their governing body. In the case of local authorities, self-assessment outcomes should be reported to elected members • publish the outcome of their assessment on their website if they have one, or otherwise make accessible to residents • include the self-assessment in their annual report section on complaints handling performance 	Yes	This is in place on our website and will be reported in future reports and assessments.