

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: <i>'an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the landlord, its own staff, or those acting on its behalf, affecting a resident or group of residents.'</i>	Yes	PCH Complaints Policy updated April 2024 PCH Complaints Procedure updated in April 2024	The Complaints Policy sets out the definition of a complaint at page 1.
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	PCH Complaints Policy updated April 2024 PCH Complaints Procedure updated in April 2024	Complaints Policy sets out the complaint will be accepted by a third party at page 1.
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	PCH Complaints Policy updated April 2024	Complaints Policy sets out the difference between service request and complaint. We do not log service requests as complaints but do record and monitor these within our CRM system.

	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	PCH Complaints Procedure updated in April 2024	Set out in our Complaints procedure 2024.
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	Included as part of our independent TSM surveys	

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	PCH Complaints Policy updated April 2024.	This is set out in page 2 of the Complaints Policy.
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. 	Yes	PCH Complaints Policy updated April 2024.	Set out in exclusions under our policy.

	<ul style="list-style-type: none"> 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	<p>PCH Complaints Policy updated April 2024</p> <p>PCH Complaints Procedure updated in April 2024</p> <p>Reasonable Adjustment Policy March 2021</p>	Page 2 of the complaints policy sets this out.
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	PCH Complaints Policy updated April 2024	Page 2 of the complaints policy sets this out.
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Yes	<p>PCH Complaints Policy updated April 2024</p> <p>PCH Complaints Procedure updated in April 2024</p>	

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	PCH Complaints Policy updated April 2024 PCH Complaints Procedure updated in April 2024	Set out in the Complaints Policy – Page 5. Also referenced in the Complaints Procedure and Reasonable Adjustments Policy.
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	PCH Complaints Policy updated April 2024 PCH Complaints Procedure updated in April 2024 Complaints investigators JD and Person Specification.	This is set out in the Complaints procedure also referenced in the Complaints investigators job description and person specification.
3.3	High volumes of complaints must not be seen as a negative, as they can be indicative of a well-publicised and accessible complaints process. Low complaint volumes are potentially a sign that residents are unable to complain.	Yes		Complaints are promoted as positive and welcomed. service area meetings take place regularly including updates to the wider business about complaints. We report complaint volumes to our Executive

				Team, Resident Experience Committee and Board.
3.4	Landlords must make their complaint policy available in a clear and accessible format for all residents. This will detail the two stage process, what will happen at each stage, and the timeframes for responding. The policy must also be published on the landlord's website.	Yes	PCH website	The website sets out our Complaints Policy 2024, detailing our two-stage process.
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	PCH Complaints Policy updated April 2024	Policy sets out details for Housing ombudsman as well as PCH website.
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	PCH Complaints Policy updated April 2024	Policy sets out that 'you or your representative (someone acting on your behalf) can make a complaint.
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	PCH Complaints Policy updated April 2024 PCH website	Set out in the Complaints Policy 2024 – Page 2. We include the Ombudsman contact details in our complaint responses and advertise the details on our website.

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	PCH Complaints Policy updated April 2024.	Phoenix has its own Complaints Investigation Team to manage complaints and we look to ensure that complainants have one point of contact for duration of the complaint
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	PCH Complaints Policy updated April 2024 PCH Complaints Procedure updated in April 2024 Complaints investigators JD and Person Specification.	This is set out in the Complaints procedure also referenced in the Complaints investigators job description and person specification.
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	PCH Complaints Procedure updated in April 2024 Complaints investigators JD and Person Specification.	This is set out in the Complaints Procedure and identified in regular Complaints meetings. A learning log is completed to share with other service areas.

				Training is provided to the Complaints Team to handle complaints effectively
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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	PCH Complaints Policy updated April 2024	We have a single policy for complaint handling
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	PCH Complaints Policy updated April 2024 PCH Complaints Procedure updated in April 2024	We have followed the criteria as set out in the code for a two-stage complaint process of Stage 1 and Stage 2
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	PCH Complaints Policy updated April 2024 PCH Complaints Procedure updated in April 2024	
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	Yes	Complaints are handled internally via the Complaints investigation Team.	All complaints regarding services including those provided by a contractor are investigated by Phoenix. We liaise with the contractor

	this Code. Residents must not be expected to go through two complaints processes.			to discuss the complaint to assist our findings and provide the response to the complainant
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Yes		All complaints are managed by Phoenix through their complaint process which is in line with the 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	PCH Complaints Procedure updated April 2024	Residents are contacted to discuss and clarify the complaint issues at Stage 1 and 2 and the reason for the complaint is set out in the complaint letter.
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	PCH Complaints Procedure updated in April 2024	As above
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; 	Yes		Complaints are investigated by the Complaint Officers through an evidence-based approach

	<ul style="list-style-type: none"> c. take measures to address any actual or perceived conflict of interest; and d. consider all relevant information and evidence carefully. 			
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	PCH Complaints Procedure updated April 2024	
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	<p>PCH Complaints Policy updated April 2024</p> <p>PCH Complaints Procedure updated in April 2024</p> <p>Reasonable Adjustment Policy March 2021</p>	
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	<p>PCH Complaints Policy updated April 2024</p> <p>PCH Complaints Procedure updated in April 2024</p>	
5.12	A full record must be kept of the complaint, and the outcomes at each stage. This must include the original	Yes		This is held within our internal Customer

	complaint and the date received, all correspondence with the resident, correspondence with other parties, and any relevant supporting documentation such as reports or surveys.			Relationship Management system (CRM)
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	PCH Complaints Procedure updated in April 2024	
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	PCH Complaints Policy updated April 2024 Unacceptable Behaviour Policy	
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	PCH Complaints Procedure updated in April 2024 Unacceptable Behaviour Policy	

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	PCH Complaints Policy updated April 2024 PCH Complaints Procedure updated in April 2024	Training has been provided to the Complaints Officers.
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	PCH Complaints Policy updated April 2024 PCH Complaints Procedure updated in April 2024	
6.3	Landlords must issue a full response to stage 1 complaints <u>within 10 working days</u> of the complaint being acknowledged.	Yes	PCH Complaints Policy updated April 2024 PCH Complaints Procedure updated in April 2024	We aim to respond to all complaints within 10 working days of the acknowledgment. Where this is not possible for good reason, we will discuss this with the resident.

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	PCH Complaints Policy updated April 2024 PCH Complaints Procedure updated in April 2024	
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	PCH Complaints Procedure updated in April 2024	We provide the Housing Ombudsman contact details with all extensions required for the complaint
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	PCH Complaints Policy updated April 2024 PCH Complaints Procedure updated in April 2024	Our process is to respond to the complaint once the investigation has been completed. Any outstanding actions are noted and tracked separately by the Complaints Team
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	PCH Complaints Policy updated April 2024 PCH Complaints Procedure updated in April 2024	A full response is provided to the resident in all complaint cases.
6.8	Where residents raise additional complaints during the investigation, these must be incorporated into the stage 1 response if they are related and	Yes	PCH Complaints Policy updated April 2024	

	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.			
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	PCH Complaints Procedure updated in April 2024	A template is used by all Complaint Officers to ensure that this criterion is met.

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	Yes	PCH Complaints Procedure updated in April 2024	

	2 of the landlord's procedure. Stage 2 is the landlord's final response.			
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	PCH Complaints Procedure updated in April 2024	
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	PCH Complaints Procedure updated in April 2024	
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Yes	PCH Complaints Procedure updated in April 2024	Stage 2 responses are considered by a director of service as set out in our procedure.
6.14	Landlords must issue a final response to the stage 2 <u>within 20 working days</u> of the complaint being acknowledged.	Yes	PCH Complaints Policy updated April 2024 PCH Complaints Procedure updated in April 2024	
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	PCH Complaints Policy updated April 2024 PCH Complaints Procedure updated in April 2024	

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	PCH Complaints Procedure updated in April 2024	We provide the Housing Ombudsman contact details with all extensions required for the complaint using a template letter
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	PCH Complaints Procedure updated in April 2024	
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	This is set out on the Complaint Procedure and letter template for the complaint extension used by the Complaints Officer.	
6.19	Landlords must confirm the following in writing to the resident at the completion of stage 2 in clear, plain language: <ul style="list-style-type: none"> a. the complaint stage; b. the complaint definition; c. the decision on the complaint; d. the reasons for any decisions made; e. the details of any remedy offered to put things right; f. details of any outstanding actions; and 	Yes	PCH Complaints Procedure updated in April 2024	A template is used by all Complaint Officers to ensure that this criterion is met

	g. details of how to escalate the matter to the Ombudsman Service if the individual remains dissatisfied.			
6.20	Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.	Yes	PCH Complaints Procedure updated in April 2024	

Section 7: Putting things right

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
7.1	<p>Where something has gone wrong a landlord must acknowledge this and set out the actions it has already taken, or intends to take, to put things right.</p> <p>These can include:</p> <ul style="list-style-type: none"> • Apologising; • Acknowledging where things have gone wrong; • Providing an explanation, assistance or reasons; • Taking action if there has been delay; • Reconsidering or changing a decision; • Amending a record or adding a correction or addendum; • Providing a financial remedy; 	Yes	<p>PCH Complaints Procedure updated in April 2024</p> <p>Compensation Policy</p>	

	<ul style="list-style-type: none"> Changing policies, procedures or practices. 			
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Yes	<p>PCH Complaints Policy updated April 2024</p> <p>PCH Complaints Procedure updated in April 2024</p>	
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	This is set out in the draft Compensation Policy.	This information is included within the response to the complainant
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes	PCH Complaints Procedure updated in April 2024	Remedies guidance is referred to in the Complaints procedure.

Section 8: Self-assessment, reporting and compliance

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
8.1	<p>Landlords must produce an annual complaints performance and service improvement report for scrutiny and challenge, which must include:</p> <ul style="list-style-type: none"> a. the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements. b. a qualitative and quantitative analysis of the landlord's complaint handling performance. This must also include a summary of the types of complaints the landlord has refused to accept; c. any findings of non-compliance with this Code by the Ombudsman; d. the service improvements made as a result of the learning from complaints; e. any annual report about the landlord's performance from the Ombudsman; and f. any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord. 	Yes	Report will be submitted to our June 2024 Board.	

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.	To follow		
8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	Yes	Recent change in policy in 2024.	
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	Yes		We will fully comply should this arise.
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		Will be reviewed if failure to comply. We will fully comply should this arise.

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	Complaints Procedure Updated in April 2024	Complaints are reviewed on a case-by-case basis.
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	Complaints Procedure Updated in April 2024	The Head of Customer Service and Service Improvement and Scrutiny Manager meet with operational teams to identify areas of improvement and form service improvement plans
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	Reports on Complaints handling.	Reporting on Complaints and learning from complaints are shared with Board, Executive meetings, Scrutiny panel, Phoenix Gateway, Resident Experience Committee and Complaints meetings. We will also utilise feedback from our Tenant Satisfaction Surveys.
9.4	Landlords must appoint a suitably senior lead person as accountable for their complaint handling. This person	Yes	Head of Customer experience JD and Personal Specification sets out that the role will oversee	

	must assess any themes or trends to identify potential systemic issues, serious risks, or policies and procedures that require revision.		all complaint handling with reporting to Board and Executive Team.	
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	Dedicated Board member to lead on complaints	
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	Dedicated Board member to lead on complaints	
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;	Yes	Complaints reports are reviewed by the Executive Team, Resident Experience Committee and Board. This sets out trends and learning along with the volume of complaint handling.	

	<p>c. regular updates on the outcomes of the Ombudsman’s investigations and progress made in complying with orders related to severe maladministration findings; and</p> <p>d. annual complaints performance and service improvement report.</p>			
9.8	<p>Landlords must have a standard objective in relation to complaint handling for all relevant employees or third parties that reflects the need to:</p> <p>a. have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments;</p> <p>b. take collective responsibility for any shortfalls identified through complaints, rather than blaming others; and</p> <p>c. act within the professional standards for engaging with complaints as set by any relevant professional body.</p>	Yes	This will be included in all staff objectives for 2024 –25	