

Appendix A: Self-assessment form for Sutton Housing Society (SHS) – April 2024

This self-assessment form has been completed by the SHS complaints officer, the Operations Director, and will be reviewed as part of the annual complaints summary of performance and service improvement report the SHS Board, at its May 2024 meeting. The SHS Board will be asked to approve the report and the self-assessment.

Once approved, SHS will publish the self-assessment as part of the annual complaints performance and service improvement report on our website. The SHS' Board response to the report will be published alongside the self-assessment.

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

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	Included on page 1 of the SHS complaints policy under “defining a complaint”.	
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	Included within the “defining a complaint” section within the SHS complaints policy, on page 1.	Discussed at HOC in January 2024 prior to policy being agreed.
1.4	Landlords must recognise the difference between a service request and a complaint. This must be set out in their complaints policy. A service request is a request from a resident to the landlord requiring action to be taken to put something right. Service requests are not complaints, but must be recorded, monitored and reviewed regularly.	Yes	Referenced on page 1 of the Complaints policy is a clear explanation about the difference between a service request and a complaint.	Article in Sutton Scoop (Winter 2023 edition) giving examples of service requests and complaints. Complaints training held for involved residents in February 2024; explored the difference between a service request and a complaint.

1.5	A complaint must be raised when the resident expresses dissatisfaction with the response to their service request, even if the handling of the service request remains ongoing. Landlords must not stop their efforts to address the service request if the resident complains.	Yes	Complaints Officer reviews service requests monthly, ensuring they are up to date with no actions outstanding.	
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	This information is now contained within the SHS complaints policy, on page 2, from January 2024.	Monthly repair surveys are reviewed. Should a resident highlight any concerns, the Complaints Officer will contact the resident to discuss and to establish if they wish to pursue the issue as a complaint.

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	Referenced in the complaints policy, page 3.	SHS make it clear in its complaints policy, section <i>“circumstances not covered by the complaints policy”</i> that SHS must accept a complaint unless there is a valid reason not to do so. There are clear examples of when SHS would not accept a complaint.
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	Referenced in the complaints policy page 3 and 4.	<p>There are 9 circumstances outlined in the policy for why SHS would not consider a complaint:</p> <ol style="list-style-type: none"> 1. The issue of the complaint occurred over twelve months ago 2. The matter has already been considered under the complaints policy 3. A resident complains about the behaviour of another resident (this is ASB)

	<ul style="list-style-type: none">• Matters that have previously been considered under the complaints policy.			<ol style="list-style-type: none">4. A resident complains about their level of rent and service charge e.g. they are unhappy with the amount of increase rather than believing it has been incorrectly calculated5. It is a complaint about the decision of the review panel which hears appeals arising from other procedures6. The issue is subject to legal action or to an enforcement notice or other statutory notice7. The complainant refuses to reasonably engage with SHS / the process after making the complaint, is abusive to staff or acts unreasonably8. Several related complaints are made, which would be more effectively dealt with together rather than on an individual basis.
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				9. Complaints made by SHS staff – these are dealt with under the grievance procedure through HR.
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	Referenced in the complaints policy on page 3.	The SHS complaints policy was changed in January 2024 to allow for complaints referred within 12 months of the issue occurring, rather than the previous 6 months.
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	Referenced in the complaints policy on page 4.	This has not occurred at SHS in the last 12 months.
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Yes	The SHS complaints policy is clear that complaints should be accepted, apart from if any of the 9 the grounds outlined apply.	See 2.2 above.

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	Referenced on page 2 of the SHS Complaints policy.	<p>We are mindful of our duties as outlined in The Equality Act 2010, to make reasonable adjustments for individuals with disabilities. We will make reasonable adjustments where necessary for those people with protected characteristics.</p> <p>A reasonable adjustment was offered to one (of five) complainants in 2023 / 2024 financial year.</p>
3.2	Residents must be able to raise their complaints in any way and with any member of staff. All staff must be aware of the complaints process and be able to pass details of the complaint to the appropriate person within the landlord.	Yes	Referenced on page 1 of the SHS complaints policy.	<p>Staff are trained to recognise the difference between a service request, survey feedback and a formal complaint.</p> <p>Staff are encouraged to take appropriate steps to resolve the issue for residents as early as possible.</p> <p>Update training provided in April 2024 to ensure all team</p>

				members are aware of the new complaints policy.
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	A high volume of complaints is referenced in the “governance” section of the SHS complaints policy.	This was covered as part of the update training in April 2024.
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	The complaints policy, which is a 2-stage process, is available on the website at Our policies Sutton Housing Society	
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	This is referenced in the “governance” section of the SHS complaints policy.	
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	Referenced on page 4 of the SHS complaints policy, in the “Use of advocates” section.	
3.7	Landlords must provide residents with information on their right to access the Ombudsman service and how the	Yes	The Housing Ombudsman Service is promoted on our digital noticeboards and on our website.	Response letters to complaints have been amended to include reference to the Housing

	individual can engage with the Ombudsman about their complaint.		Articles appear in our resident newsletter "Sutton Scoop" on a regular basis.	Ombudsman Service and the support they can provide, even before escalating to this service.
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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	Role sits within the senior management team, with the Operations Director.	
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 Operations Director works with all members of the team and has autonomy to resolve issues / disputes quickly and fairly.	
4.3	Landlords are expected to prioritise complaint handling and a culture of learning from complaints. All relevant staff must be suitably trained in the importance of complaint handling. It is important that complaints are seen as a core service and must be resourced to handle complaints effectively.	Yes	The whole team (18 in total) attend complaints training / updates. Standing item on the quarterly all-team meetings to discuss any concerns, summarise any complaints and to highlight performance / learning from complaints.	

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	SHS 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	Two-stage complaints process is in place and outlined in the complaints policy.	
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	As above.	
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.	N/A	Internal complaints log shows SHS team members as the lead in dealing with complaints.	All complaints made are handled by SHS employees, with reference to contractors etc. as necessary.
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	N/A	See 5.4 above.	

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		This happens at an early stage, with clarification requested if SHS is unsure of what the complaint / issue is
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		Addressed at stage 1 and stage 2.
5.8	At each stage of the complaints process, complaint handlers must: <ul style="list-style-type: none"> a. deal with complaints on their merits, act independently, and have an open mind; b. give the resident a fair chance to set out their position; c. take measures to address any actual or perceived conflict of interest; and d. consider all relevant information and evidence carefully. 	Yes		Complaints Officer oversees responses to complaints, to ensure a consistent approach is applied.
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	Yes		SHS advises the complainant of the likely timescale and seeks their agreement.

	suitable intervals for keeping them informed about their complaint.			
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	This is included within the internal complaints log.	
5.11	Landlords must not refuse to escalate a complaint through all stages of the complaints procedure unless it has valid reasons to do so. Landlords must clearly set out these reasons, and they must comply with the provisions set out in section 2 of this Code.	Yes		Complaints escalate to stage 2 when requested, including when the complaint is upheld at stage 1.
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	The internal complaints log is a summary of all actions taken, with relevant timescales etc. All correspondence / information is logged on our housing management system.	
5.13	Landlords must have processes in place to ensure a complaint can be remedied at any	Yes		Complaints are acted upon swiftly and resolution sought

	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.			by managers as soon as possible. The team is aware of the need to address concerns quickly, and to apologise when appropriate. They can send flowers etc to say sorry in a genuine way, if felt appropriate.
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	SHS has a “residents that pose a risk” policy, as well as reference within the complaints policy (point 7) of when SHS can refuse to deal with the issue as a complaint (see section 2.2).	
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		This is understood by the SHS team. Residents that pose a risk are reviewed on a regular basis and at least annually.

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		All complaints / service requests are dealt with as they arise, and as early as possible. SHS does not need a process to consider which complaints are responded to as early as possible due to the low numbers received.
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	SHS complaints log would support complaints being acknowledged within 5 working days.	
6.3	Landlords must issue a full response to stage 1 complaints <u>within 10 working days</u> of the complaint being acknowledged.	Yes	SHS complaints log would support complaints being responded to within the timescales required.	
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	Yes	SHS complaints log would support complaints being responded to within the timescales required and of extensions where necessary.	

	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		This was introduced in 2023 and can be evidenced via 1 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		The Complaints Officer regularly reviews the internal complaints log to ensure timescales are adhered to and / or actions are agreed with the complainant.
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	Response letters to complaints would support this approach.	
6.8	Where residents raise additional complaints during the investigation, these must be incorporated into the stage 1 response if they are related and the stage 1 response has not been issued. Where the stage 1 response has been issued, the new issues are unrelated to the issues already being investigated or it would	Yes		This is evidenced in one complaint during 2023 / 2024.

	unreasonably delay the response, the new issues must be logged as a new complaint.			
6.9	<p>Landlords must confirm the following in writing to the resident at the completion of stage 1 in clear, plain language:</p> <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	These details are included in our complaint response letters.	

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	One complaint escalated to Stage 2 in 2023 / 2024, even though it was upheld at Stage 1. This was due to the resident being unhappy with the resolution proposed.	
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	SHS complaints log would support complaints being acknowledged within 5 working days.	
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		SHS would ask the complainant for the reason for the escalation if this is unclear, to ensure the complaint is understood.
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Yes	This escalates to the line manager of the person that dealt with Stage 1.	
6.14	Landlords must issue a final response to the stage 2 within 20 working days of the complaint being acknowledged.	Yes	SHS complaints log would support complaints being responded to within the required timescale.	

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	SHS Complaints Log would support complaints being responded to within the timescales required and of extensions where necessary.	
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	This information is included in the SHS response letters.	
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	Response letters to complaints would support this approach.	
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	Response letters to complaints would support this approach.	

6.19	<p>Landlords must confirm the following in writing to the resident at the completion of stage 2 in clear, plain language:</p> <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 the Ombudsman Service if the individual remains dissatisfied. 	Yes	This is evidenced in one complaint during 2023 / 2024.	
6.20	Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.	Yes	This is evidenced in one complaint during 2023 / 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. These can include:</p> <ul style="list-style-type: none"> • Apologising; • Acknowledging where things have gone wrong; • Providing an explanation, assistance or reasons; • Taking action if there has been delay; • Reconsidering or changing a decision; • Amending a record or adding a correction or addendum; • Providing a financial remedy; • Changing policies, procedures or practices. 	Yes	This is evidenced in our complaints letters / service requests.	
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Yes	SHS has a “Compensation and other payments” policy which largely addresses issues that are likely to arise.	This often refers to property related issues.
7.3	The remedy offer must clearly set out what will happen and by when, in agreement	Yes	This is included within the response letters.	

	with the resident where appropriate. Any remedy proposed must be followed through to completion.			
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes	Complaints Officer is aware and reviews all complaints letters before they are issued.	

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	<p>This report is presented to the Board at its May meeting as part of year-end performance. It is also presented to the Housing Operations Committee (residents are in the majority) at its July meeting for review and comment, ahead of (a shortened version) inclusion in the annual report.</p>	

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	The information is included in the SHS annual report, which is available on the website. From June 2024, the annual complaints performance and service improvement report and the Board's response to this, will be available on the website.	
8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	Yes	SHS is aware of this, should the need arise.	
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	Yes	SHS is aware of this, should the need 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	SHS would follow the code as necessary.	

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		This is part of our collaborative working. Any improvements that can be made are discussed with individuals and at the all team meetings.
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 Officer reviews complaints and service requests monthly, sharing these with the wider team, noting topics and reviewing any areas of concern.
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	The quarterly performance report to the Housing Operations committee and to the Board, detail complaints received and actions taken, together with any relevant learning points.	
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	Yes	The Complaints Officer is the Operations Director, who is part of the 3-person senior management team	

	policies and procedures that require revision.			
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	The Board Chair was appointed to this role in February 2024.	
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	Access to the internal complaints log, copies of correspondence, reports etc are all available to the MRC.	
9.7	As a minimum, the MRC and the governing body (or equivalent) must receive: <ul style="list-style-type: none"> 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 	Yes	The MRC receives this information quarterly, as does the wider Board.	

	<p>d. maladministration findings; and 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> <ul style="list-style-type: none"> a. have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments; b. take collective responsibility for any shortfalls identified through complaints, rather than blaming others; and c. act within the professional standards for engaging with complaints as set by any relevant professional body. 	Yes	<p>This is part of the SHS collective responsibility agenda and the SHS “Be the body...” initiative and it is included in the annual corporate objectives issued to all employees via the appraisal process.</p>	