

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	Customer Feedback Policy uses exact definition, as aligned following the first self-assessment in 2020.
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	Customer Feedback Policy
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	Customer Feedback Policy
1.7	A landlord must accept a complaint unless there is a valid reason not to do so.	Yes	Customer Feedback Policy
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	The Customer Feedback Policy sets out what is not considered as 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	The Customer Feedback Policy details that <i>"If we decide not to accept a complaint, a detailed explanation will be provided, setting out the reasons why the matter is not suitable for the complaints process"</i> This can be evidenced by related correspondence.

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	Customer Feedback Policy
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	From Q2 2023/24, TSM survey respondents who express dissatisfaction are to be made aware by Acuity (who undertake the survey for Acis) of how they can pursue a complaint if they wish to.

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	Complaints are received in person, over the telephone, in writing, by email, and digitally (website and social media). Evidenced by OneView case recording. Ease of making a complaint is assessed as part of the post-closure survey (as reported to the Operations Committee at each cycle).
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	The Customer Feedback Policy is available on the website and would be provided in hard copy format or alternative format (as assessed as reasonable) on request. The Customer Feedback Policy details the number of stages involved, what will happen at each stage and timeframes for responding

			which align with the HO Complaint Handling Code.
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	The website search facility enables navigation to the Customer Feedback Policy and information about raising a complaint.
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	Customer Feedback Policy commits to the application of our Reasonable Adjustments Policy in the management of complaints. Where requests for reasonable adjustments arise, guidance will be given to those handling the complaints.
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	HO Complaint Handling Code is on the website . Details included in Home News as published (ongoing) Content on MyAcis landing page by end Q2 2023/24
2.7	Landlords must provide residents with contact information for the Ombudsman as part of its regular correspondence with residents.	Yes	Details included in Home News as published (ongoing)
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	This is included in the complaint procedure (to be applied by those handling complaints). It is also advised on the 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	Customer Feedback Policy.

Section 3 - Complaint handling personnel

Mandatory ‘must’ requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
	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 to the governing body. This Code will refer to that person or team as the “complaints officer”.	Yes	Complaints and Escalation Officer post was created to take responsibility for complaint management. Complaints management performance is has been reported to the Board - KPI (complaints closed within timescales). Complaints TSMs are to be reported to the Board quarterly from 1/4/23. Customer Feedback dashboard report including complaints management goes to the Operations Committee at each cycle.
	...the complaint handler appointed must have appropriate complaint handling skills and no conflicts of interest.	Yes	The Complaints and Escalation Officer was appointed on the basis of their skills and experience, and has been trained to meet the requirements of the post. There are no evident conflicts of interest.

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	Evidenced by training materials.

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	All service issues/complaints are logged as One View interactions and notes will show any agreements made with customers about resolutions. All complaints are acknowledged at Stage One within 2 days of receipt. The above can be evidenced by audits following case closure. The Customer Feedback Policy/complaints process contains no Stage 0 or Pre-Complaint stages.
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	Evidenced by Complaints Procedure.
4.6	A complaint investigation must be conducted in an impartial manner.	Yes	At Stage 1, complaints are assigned to people who have had no direct involvement but who are from the service area in question. At Stage 2, complaints are assigned to SMT/ELT members from different services areas. This can be evidenced by the records of those handling complaints.

4.7	<p>The complaint handler must:</p> <ul style="list-style-type: none"> • deal with complaints on their merits • act independently and have an open mind • take measures to address any actual or perceived conflict of interest • consider all information and evidence carefully • keep the complaint confidential as far as possible, with information only disclosed if necessary to properly investigate the matter. 	Yes	This requirement is reinforced through training and evidenced through audits following complaint closures.
4.11	Landlords must adhere to any reasonable arrangements agreed with residents in terms of frequency and method of communication	Yes	This is routinely established as part of the acknowledgement contact and is evidenced in the Complaints Procedure
4.12	<p>The resident, and if applicable any staff member who is the subject of the complaint, must also be given a fair chance to:</p> <ul style="list-style-type: none"> • set out their position • comment on any adverse findings before a final decision is made. 	Yes	Confirmed by the complaint Procedure and Customer Feedback Policy.
4.13	A landlord must include in its complaints policy its timescales for a resident to request escalation of a complaint	Yes	Included in the Customer Feedback Policy
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	Reasons for declining to escalate a complaint are set out in the Customer Feedback Policy.
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	Complaints are managed within the CRM system (One View) as a single repository for all related correspondence and interactions. Compliance with this requirement is evidenced through audits following complaint

			closures.
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 Customer Feedback Policy includes content under the “Unreasonable Behaviour” heading.

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	This is done as appropriate and evidenced by audits following complaint closures. Evidenced in Complaints Procedure.
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	The intention to reach a resolution quickly is stated in the Customer Feedback Policy. Case notes in OneView.
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	The Customer Feedback Policy confirms that advocates or representatives can make complaints on behalf of our customers providing we have written consent.
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	Complaint correspondence
4.9	Communication with the resident should not generally identify individual members of staff or contractors.	Yes	Complaint correspondence
4.10	Landlords should keep residents regularly updated about the progress of the investigation.	Yes	This requirement is set out in the Complaints Procedure and evidenced by OneView case notes.
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.	Yes	Complainants are contacted after closure and asked seven questions about complaint handling. Responses are included in the Customer Feedback dashboard that goes to the Operations Committee at each cycle.

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	This is recognised and emphasised in training as evidenced by content. Staff are particularly supported by the Complaints and Escalations Officer, Customer Experience Manager and Head of Customer Operations. Learning is identified by the audits following complaint closures.
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	Such restrictions are applied exceptionally and prior regard would always given to Equality Act provisions. Evidenced by review of any restrictions applied.

Section 5 - Complaint stages

Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
5.1	Landlords must respond to the complaint <u>within 10 working days</u> 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	This target and exception provision is worked to. Evidenced by OneView case notes. Complaints management performance has been reported to the Board - KPI (complaints closed within timescales). Complaints TSM CHO2 (complaints responded to in complaint handling code timescales) to be reported to the Board quarterly from April 2023. Complaints management performance reported to the Operations Committee at each cycle.
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	Evidenced by OneView case notes
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	Complaint correspondence

Stage 1

5.8	<p>Landlords must confirm the following in writing to the resident at completion of Stage 1 in clear plain language:</p> <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	<p>Response template</p> <p>Complaint correspondence</p> <p>Case audits following completion</p>
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Stage 2

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
5.9	<p>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.</p>	Yes	<p>This happens as per the Customer Feedback Policy and Complaints Procedure.</p> <p>Exclusion (non-escalation) grounds are set out in the Customer Feedback Policy and where escalation is declined, reasons are given along with advice about the right to approach the Ombudsman.</p>

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	This happens as part of the acknowledgment contact and is evidenced by OneView case notes.
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	As stipulated the Customer Feedback 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 stipulated in the Customer Feedback Policy.
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.	Yes	This target and exception provision is worked to. Complaints management performance has been reported to the Board - KPI (complaints closed within timescales). Complaints TSM CHO2 (complaints responded to in complaint handling code timescales) to be reported to the Board quarterly from April 2023. Complaints management performance reported to the Operations Committee at each cycle.

5.16	<p>Landlords must confirm the following in writing to the resident at the completion of stage two in clear, plain language:</p> <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 <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. 	Yes	Evidenced by complaint response letters
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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	A two stage complaint process is in operation. Evidenced by Customer Feedback Policy.
5.20	<p>Landlords must confirm the following in writing to the resident at the completion of stage three in clear, plain language:</p> <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 	N/A	N/A

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	Evidenced by OneView case notes
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	As stipulated in the Complaints Procedure. Evidenced in OneView case notes
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	Whilst this is very infrequent, such information would be considered.
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	As stipulated in the Complaints Procedure.

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	This target and exception provision is worked to. Evidenced by OneView case notes
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	Stipulated in the Complaints Procedure. Evidenced in OneView case notes

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 <u>within 20 working days</u> 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.	N/A	NA – we operate a two stage complaint procedure.
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.	N/A	NA – we operate a two stage complaint procedure.

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	The Customer Feedback Policy confirms this intention. Complaint correspondence
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	Remedies are particular to each complaint considered.
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	Evidenced in complaint response letters and captured in One View follow on case type.
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	Compensation is paid as per the Customer Feedback Policy.

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	The monthly review of closed complaints serves to identify learning and any requirements to review system/process.
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.	Yes	Should such be identified, legal advice would be obtained from the company's in house professional or from specialist solicitors as required.

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	Content to next be included in 2022/23 annual report. Next 6 monthly reports to residents/CVP/staff due after end Q2 2022/23.

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.	No	At its meeting of May 2022, the Board debated the appointment of a member with lead responsibility for complaints. It took the view that it was a collective responsibility and expressed concern that should a single member be appointed as lead, the tendency would then be to simply defer to that individual with the Board abrogating their collective responsibility. Noting that this was a best practice and not mandatory requirement, the Board were not minded to appoint a member with lead responsibility for complaints.

7.4	<p>As a minimum, governing bodies should receive:</p> <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	<p>The volume, categories and outcome of complaints, and complaint handling performance are all covered in the quarterly customer feedback dashboard reported to the Operations Committee. The Executive's report, as a standing Board agenda item, includes details of cases both under investigation by the HO and where determinations have been received and, as appropriate, responded to.</p> <p>The latest self-assessment against the code was reported to the Board in June 2023 and will be reported annually thereafter. The Ombudsman's annual report for 21/22 was included in the Reading Room on Convene to accompany this report.</p>
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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	Following the audit of closed complaints, the Complaints and Escalations Officer meets with the Head of Customer Operations and the Director for Customer Operations to review findings and identify if there are any potential systemic issues, serious risks, or policies and procedures that require revision. Staff and contractor training would be arranged if required.
7.6	Landlords should have a standard objective in relation to complaint handling for all employees that reflects the need to: <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. 	Yes	This has been reflected in training to those who may be required to handle complaints and evidenced by training materials.

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	The latest annual self-assessment was undertaken in May 2023.
8.2	Landlords must also carry out a self-assessment following a significant restructure and/or change in procedures.		N/A

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	<p>The outcome of the self-assessment to be reported to the Board on 06/6/23 and thereafter published on the website.</p> <p>The self-assessment will be referenced in the annual report. See 7.2 above.</p>
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