Appendix A: Self-assessment form

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

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

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

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

Section 1: Definition of a complaint

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
1.2	A complaint must be defined as: 'an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the landlord, its own staff, or those acting on its behalf, affecting a resident or group of residents.'	Yes	Audley's Complaints Handling Procedure, page 3, paragraph 3.1	Audley's Complaints Handling Procedure includes this definition
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	Page 3, Paragraph 3.2 of the Complaints Handling Procedure expressly states that the matter does not need to be expressly referred to as a complaint. Page 5, paragraph 5.2 of the Complaints Handling Procedure states that complaints can be submitted by third parties.	Staff are trained to recognise complaints where the word 'complaint' is not used. Audley does allow complaints submitted by a third party. However, appropriate authority is sought where a third party or representative submits a complaint on someone's behalf.
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	Yes	Audley's Complaints Handling Procedure, at page 4, paragraph 4.2	Audley's Complaints Handling Procedure, at page 4, paragraph 4.2 explains that requests can

	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.		See also "Our approach to complaints" in Complaints Handling Policy.	be for a service (unless such requests have been dealt with improperly or with undue delay).
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	See Paragraph 4.2 of the Complaints Handling Procedure.	
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	Surveys are routinely sent to owners. Where these survey results show that there is dissatisfaction with services received, these are reported internally to identify lessons learned and improvements that can be made. See para 4.4. of the procedure.	

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		Complaints Handling Procedure, at page 3, paragraph 4	The circumstances where a complaint will not be considered is included in the Complaints Handling Procedure, at page 3, paragraph 4
2.2	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: • 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	Our policy states: "If we reject a complaint at any Stage, we will explain why in our response and make it clear that complainants may then refer the matter to the relevant Ombudsman."	See also para 4.3 of the procedure which states: "Where Audley decides that a complaint cannot be dealt with as a complaint in accordance with this Procedure, we will write to the complainant explaining the reasons for this and advising them of their right to take that decision to the relevant Ombudsman. Please see section 12 below."

	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	Both the policy and procedure are clear that a complaint should all be accepted that it can be difficult to investigate them effectively and satisfactorily due to passage of time, so .	All complaints are accepted, subject to very limited exceptions.
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	The circumstances where a complaint will not be considered is included in the Complaints Handling Procedure, at page 3, paragraph 4.3	
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Yes		Our policy states: "If we reject a complaint at any Stage, we will explain why in our response and make it clear that complainants may then refer the matter to the relevant Ombudsman." See also para 4.3 of the policy.

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	Audley's Complaint's Handling Procedure at page 5, paragraph 6, states that complainants can contact the Audley in several ways, including email, via the website, telephone or in writing.	
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	Staff are trained to recognise complaints where the word 'complaint' is not used.	Internal and on-line training courses form part of the employee induction.
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	The annual survey for each village along with the respective verbatim comments help identify any trending concerns allowing for intervention	

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	Audley's Complaints Handling Policy is available on Audley's website under the feedback page, and at village reception. The policy sets out the stages and timescales involved on page 2.	
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	Audley's Complaints Handling Policy (including key process) is available on Audley's website under the feedback page, at village reception, and within collateral distributed to owners.	
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	See clause 5.2 of the Complaints Handling Procedure.	Third party representation is encouraged given the residential community are classified as vulnerable
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	We advise complainants that they have the right to contact the Ombudsman during the complaints process and after their complaint has exhausted Audley's Complaints Handling Policy (see letter template). In addition, the template acknowledgement includes a link to the policy which informs of the right to escalate to the Ombudsman (see template).	Should the investigation require a time extension, the right to access the Ombudsman service is reiterated.

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	See final paragraph of the Complaint Handling Policy.	Group Operations Directors is accountable for overall policy and implementation.
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	All complaints are dealt with by experienced managers. All complaint investigations are conducted in an impartial manner. To ensure fairness we will take measures to address any actual or perceived conflict of interest (see paragraph 7.5).	
4.3	Landlords are expected to prioritise complaint handling and a culture of learning from complaints. All relevant staff must be suitably trained in the importance of complaint handling. It is important that complaints are seen as a	Yes	Audley has a positive complaint handling culture and recognises the importance of learning from complaints. See the provisions of "our approach to complaints handling" on Page 1 of the Complaints Handling Policy	The complaint policy forms part of the compliance and onboarding training for relevant team members

core service and must be resourced to	
handle complaints effectively	

Section 5: The Complaint Handling Process

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
5.1	Landlords must have a single policy in place for dealing with complaints covered by this Code. Residents must not be treated differently if they complain.	Yes	Complaints Policy (page 1) "We will not treat complainants differently because they have made a complaint."	Note that owing to nature of the company TPOS is also relevant during the sales process.
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	See "Our Complaints Procedure" in Complaints Procedure	
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	See "Our Complaints Procedure" in Complaints Procedure which identifies two stages.	
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	N/A	N/A	

	this Code. Residents must not be expected to go through two complaints processes.		
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	N/A	N/A
5.6	When a complaint is logged at Stage 1 or escalated to Stage 2, landlords must set out their understanding of the complaint and the outcomes the resident is seeking. The Code will refer to this as "the complaint definition". If any aspect of the complaint is unclear, the resident must be asked for clarification.	Yes	See paragraph 7.2 of the Complaints Handling Procedure, as well as the Template Letters
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	See paragraph 7.3 of the Complaint Handling Procedure
5.8	At each stage of the complaints process, complaint handlers must: 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	See paragraph 7.3 of the Complaint Handling Procedure

	 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	The complaints policy states that "If at any Stage we find that we need more time to investigate a complaint, we will explain why and agree a new deadline with you."	Time extension letter template alignment.
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	See the "Your Rights and Protections" section of the Complaints Policy"	
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	Both policy and procedure are clear that where a complainant is unsatisfied with the result, the complaint will be escalated.	
5.12	A full record must be kept of the complaint, and the outcomes at each stage. This must include the original	Yes	Paragraph 7.8 of the procedure requires that "A full record must be kept of the complaint, any	Complaints are managed and logged within Protecht.

	complaint and the date received, all correspondence with the resident, correspondence with other parties, and any relevant supporting documentation such as reports or surveys.		review, and the outcomes at each stage."	
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	See Paragraph 11 of the Complaints Handling procedure	
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	Clause 7.10 of the procedure provides "Audley should manage unacceptable behaviour from complainants and/or their representatives when pursuing a complaint in accordance with the attached "Unacceptable Behaviour" protocol".	Separate conduct policy covers the behaviour of owners towards others and team members.
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	See Unacceptable Behaviour protocol.	

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.		Operations Director has visibility of all complaints that ensures they are dealt with in accordance with the policy and promptly.	
6.2	Complaints must be acknowledged, defined and logged at stage 1 of the complaints procedure within five working days of the complaint being received.	Yes	See complaints stages within "Our Complaints Procedure" of Complaints Policy as well as letter templates.	
6.3	Landlords must issue a full response to stage 1 complaints within 10 working days of the complaint being acknowledged.	Yes	See complaints stages within "Our Complaints Procedure" of Complaints Policy.	See stage 1 of the complains handling policy
6.4	Landlords must decide whether an extension to this timescale is needed when considering the complexity of the complaint and then inform the resident	Yes	See complaints stages within "Our Complaints Procedure" of Complaints Policy.	

	of the expected timescale for response. Any extension must be no more than 10 working days without good reason, and the reason(s) must be clearly explained to the resident.			
6.5	When an organisation informs a resident about an extension to these timescales, they must be provided with the contact details of the Ombudsman.		Time extension letter template provides details on how to contact the Ombudsman Service.	
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	A stage 1 response may include that further action will be completed. This is followed up by the relevant manager. See paragraph 11.1 & 11.2 of the Complaints Handling Procedure and the template letter.	
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	See paragraph 11 of the Complaints Handling Procedure.	Full reasons are also provided if a complaint is not upheld
6.8	Where residents raise additional complaints during the investigation, these must be incorporated into the stage 1 response if they are related and the stage 1 response has not been issued. Where the stage 1 response has been issued, the new issues are unrelated to the issues already being	Yes	See clause 7.14 of procedure. "Where complainants 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	

	investigated or it would unreasonably delay the response, the new issues must be logged as a new complaint.		stage one response has been issued, or it would unreasonably delay the response, the complaint should be logged as a new complaint."	
6.9	Landlords must confirm the following in writing to the resident at the completion of stage 1 in clear, plain language: a. the complaint stage; b. the complaint definition; c. the decision on the complaint; d. the reasons for any decisions made; e. the details of any remedy offered to put things right; f. details of any outstanding actions; and g. details of how to escalate the matter to stage 2 if the individual is not satisfied with the response.	Yes	See clause 7.6 of the Complaints Procedure.	Letter templates for each stage have been designed so this detail is also provided.

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	Both complaint policy and procedure state that if a complainant is unhappy with our stage 1 response, we will escalate it to stage 2.	

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	Clause 7.8 of the procedure states that "a full record must be kept of the complaint, any review, and the outcomes at each stage"	Refer to stage two acknowledgement letter template
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	Paragraph 10 of the Complaints Procedure is clear that if the complainant is unhappy with our stage 1 response, we will escalate it to stage 2.	Covered as part of the team member training.
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Yes	Both Policy and Procedure are clear in relation to who is responsible for each stage of the complaints process.	Stage two is escalated to the Operations Director
6.14	Landlords must issue a final response to the stage 2 within 20 working days of the complaint being acknowledged.	Yes	See paragraphs 10.2 & 10.3 of the Complaints Procedure	
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	The "Our Complaints Procedure" section of the Complaints Policy states that "If at any Stage, we find that we need more time to investigate a complaint, we will explain why and agree a new deadline with you."	
6.16	When an organisation informs a resident about an extension to these	Yes	The complaints policy states: "If you are not satisfied with our final decision at stage 2, or we	Stage two acknowledgment letter refers to the Ombudsman Service.

	timescales, they must be provided with the contact details of the Ombudsman.		fail to provide it by the relevant deadline, you may refer your complaint to the Housing Ombudsman Service. You should normally contact the Ombudsman within 12 months of receiving our final decision."	
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	See paragraph 11.4 of the Complaints Procedure.	
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.	See paragraph 11.2 of the Complaints Procedure.	
6.19	Landlords must confirm the following in writing to the resident at the completion of stage 2 in clear, plain language: a. the complaint stage; b. the complaint definition; c. the decision on the complaint; d. the reasons for any decisions made; e. the details of any remedy offered to put things right;	Yes	Letter templates are designed so that points a-g are covered and adhered to.	

	f. details of any outstanding actions; and 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	Stage 2 is escalation to the Operations Director (See para 10.3 of Complaints Procedure)	

Section 7: Putting things right

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
7.1	Where something has gone wrong a landlord must acknowledge this and set out the actions it has already taken, or intends to take, to put things right. These can include:	Yes	See Paragraph 11.2 of the Complaints Procedure.	

	 Providing a financial remedy; 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	See paragraph 11.5 of Complaints Procedure	
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	See paragraph 11.6 of Complaint Procedure	
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes	See paragraph 11.3 of the Complaints Procedure	

Section 8: Self-assessment, reporting and compliance

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
8.1	Landlords must produce an annual complaints performance and service improvement report for scrutiny and challenge, which must include: a. the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements. b. a qualitative and quantitative analysis of the landlord's complaint handling performance. This must also include a summary of the types of complaints the landlord has refused to accept; c. any findings of non-compliance with this Code by the Ombudsman; d. the service improvements made as a result of the learning from complaints; e. any annual report about the landlord's performance from the Ombudsman; and f. any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord.	Yes	To be discussed as Audley are not a housing association.	

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.	In Progress	Landlords governing body is ARCO – The Association of Retirement Community Operators	ARCO annually undertake an independent audit against the ARCO code. This includes the complaints handling process.
8.3	Landlords must also carry out a self- assessment following a significant restructure, merger and/or change in procedures.	Yes	To be reviewed as required	
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	Yes	To be reviewed as required	
8.5	If a landlord is unable to comply with the Code due to exceptional circumstances, such as a cyber incident, they must inform the Ombudsman, provide information to residents who may be affected, and publish this on their website Landlords must provide a timescale for returning to compliance with the Code.	Yes	To be reviewed as required	

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	Annual owner survey and complaint trends allow for improvement plan. This is undertaken annually each year.	
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	See paragraph 11.10 of the complaint's procedure.	This paragraph could be expanded to reflect the requirement
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.	In Progress	See Paragraph 1.1. of the complaints procedure.	In Progress at time of submission
9.4	Landlords must appoint a suitably senior lead person as accountable for their complaint handling. This person must assess any themes or trends to identify potential systemic issues, serious risks, or policies and procedures that require revision.	Yes	The Group Operations Director is accountable for complaints handling. (See paragraph 7.1 of the procedure).	Group Operations Director and Group General Counsel review complaint themes and policy on an annual basis

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 governing body is ARCO – Association of Community Operators.	ARCO undertake annual audits aligned with the ARCO Code. This includes the complaints handling process.
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	Included as part of the annual ARCO audit	
9.7	As a minimum, the MRC and the governing body (or equivalent) must receive: a. regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance; b. regular reviews of issues and trends arising from complaint handling; c. regular updates on the outcomes of the Ombudsman's investigations and progress made in complying with orders related to severe maladministration findings; and	Yes	Updates provided at the quarterly board meeting	

9.8	d. annual complaints performance and service improvement report. Landlords must have a standard objective in relation to complaint handling for all relevant employees or third parties that reflects the need to: a. have a collaborative and cooperative approach towards resolving complaints, working with colleagues across teams and departments; b. take collective responsibility for any shortfalls identified through complaints, rather than blaming others; and c. act within the professional standards for engaging with complaints as set by any relevant professional body.	Yes	See complaints handling procedure issued to all team members outlining the company's approach to complaints. This forms part of the compliance training for all relevant employees.	
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