

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: '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.	yes	Detailed in our complaints and compliments policy.
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	All colleagues receive training in recognising any dissatisfaction as a complaint. Complaints submitted by third parties or representatives are handled in line with policy. A dedicated email address is available for elected members to contact us directly on behalf of our customers.
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	Enquiries are logged as a complaint if they can't be resolved following initial contact or at the customer's request.
1.7	A landlord must accept a complaint unless there is a valid reason not to do so.	yes	Detailed in the policy as shown in 1.8

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
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	On very rare occasions we may not be able to consider a complaint, such as: • when a customer behaves in a way which could be considered inappropriate, abusive or where harassment occurred • when we feel that a complaint is unreasonable (based on its content), where we have received a high level of unsubstantiated complaints or where the frequency of individual contact, could hinder our consideration of their, or other people's complaints • complaints relating to another service provider that is not a sub-contractor – these complaints can't be investigated by us and will need to be directed to the relevant provider e.g. any complaints about services delivered by the local authority such as bin collections, or a utility supplier handling a power cut • where a customer's complaint relates to an active insurance claim - this will be managed by our insurers who will contact the customer directly • issues that are subject to legal action or proceedings will be managed by the solicitor appointed to act on our behalf - this would include disrepair cases where there is a specific process in place.

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
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	All complaints were accepted in 2022/23.

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
1.4	Landlords should recognise the difference between a service request , where a resident may be unhappy with a situation that they wish to have rectified, and a complaint about the service they have/have not received.	Yes	We recognise the difference between a service request and a complaint. This is detailed within our Policy. Where appropriate, we discuss the difference with our customers and follow the relevant steps to raise a service request or a complaint as necessary.
1.5	Survey feedback may not necessarily need to be treated as a complaint, though, where possible, the person completing the survey should be made aware of how they can pursue their dissatisfaction as a complaint if they wish to.	Yes	We publish clear details of how to complain on our website and on various communications and publications throughout the year. Recovery calls are made to a cross section of customers who share negative survey feedback. They are made aware of how to complain during these calls.

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	We accept complaints using all of the mentioned channels.
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 policy is available in full on our website, along with a document explaining each step in a format for customers to easily follow.
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	This is detailed on our website. We also host a webform on the website for customers to submit complaints from the website directly.
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	To comply with the Equality Act 2010, an Equality Analysis (EA) was completed and approved in June 2020. This will be reviewed as part of a full policy review in June 2023.
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	Detailed on our website and in regular publications to our customers, including our annual customer magazine and regular newsletters.

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
2.7	Landlords must provide residents with contact information for the Ombudsman as part of its regular correspondence with residents.	Yes	Included on all complaint letters sent to customers.
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	Included on all complaint letters sent to customers.

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	Any customer reporting dissatisfaction via social media is messaged privately for further information and details are sent to the Complex Queries and Complaints team to manage through the complaints process. Our Compliments and Complaints policy is due to be reviewed in June 2023 and references to complaints made via social media will be strengthened.

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Section 3 - Complaint handling personnel

Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
3.1	Landlords must have a person or team assigned to take responsibility for complaint handling to ensure complaints receive the necessary attention, and that these are reported to the governing body. This Code will refer to that person or team as the "complaints officer".	Yes	We have a dedicated Complex Queries & Complaints team with responsibility for complaint handling. They provide support to investigating managers across the organisation, ensuring complaints receive the necessary attention.
3.2	the complaint handler appointed must have appropriate complaint handling skills and no conflicts of interest.	Yes	Complaint handlers complete the Housing Ombudsman e-learning modules on dispute resolution and receive internal complaint handling training.

Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
3.3	 Complaint handlers should: 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	Our approach to complaint handling is driven from the very top of the organisation. Colleagues are empowered and trained to resolve complaints for customers. The Executive Director for each service receives details of complaint escalations and resolutions to drive our approach to complaint handling, providing leadership level support and guidance for complaint handlers.

Section 4 - Complaint handling principles Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
4.1	Any decision to try and resolve a concern must be taken in agreement with the resident and a landlord's audit trail/records should be able to demonstrate this. Landlords must ensure that efforts to resolve a resident's concerns do not obstruct access to the complaints procedure or result in any unreasonable delay. It is not appropriate to have extra named stages (such as 'stage 0' or 'pre-complaint stage') as this causes unnecessary confusion for residents. When a complaint is made, it must be acknowledged and logged at stage one of the complaints procedure within five days of receipt.	Yes	Our complaints and compliments policy adopts this approach.
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	The triage period includes a telephone call with a customer to clarify the details of a complaint. Details of this conversation are noted within our records. If a customer prefers email correspondence, details of the complaint will be clarified and confirmed using their preferred method.
4.6	A complaint investigation must be conducted in an impartial manner.	Yes	Investigations are impartial, with the Complex Queries and Complaints team providing oversight and challenge if required.
4.7	 The complaint handler must: deal with complaints on their merits act independently and have an open mind take measures to address any actual or perceived conflict of interest 	Yes	We apply the Housing Ombudsman principles of Dispute Resolution to our complaint investigations

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
	 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. 		
4.11	Landlords must adhere to any reasonable arrangements agreed with residents in terms of frequency and method of communication	Yes	We adhere to any reasonable arrangements agreed with customers. Where we can't meet a customers requested arrangement we'll explain our reasons why.
4.12	 The resident, and if applicable any staff member who is the subject of the complaint, must also be given a fair chance to: set out their position comment on any adverse findings before a final decision is made. 	Yes	Colleagues are given the opportunity to set out their position and where appropriate are further supported by our internal HR policies and procedures.
4.13	A landlord must include in its complaints policy its timescales for a resident to request escalation of a complaint	Yes	Our policy includes this detail.
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	Our policy includes this detail. There have been no refusals to escalate a complaint in 2022/2023.
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	Yes	All details are recorded within our Housing Management System. Reports and surveys are currently recorded on a separate system and a review is underway

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
	correspondence with the resident, correspondence with other parties and any reports or surveys prepared.		to identify ways to better combine this with contact and correspondence records.
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	This is included within our complaints and compliments policy.

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 forms part of the initial call to the cusotmer when establishing all the details. Notes are recorded on the Housing Management System.
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	Complaint handling timescales are considered to be 'maximums'. If a complaint can be resolved sooner, we'll work to resolve it at the earliest opportunity.
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	This is discussed with the customer throughout the complaint investigation and customers can request support at any stage.
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	
4.9	Communication with the resident should not generally identify individual members of staff or contractors.	Yes	We don't generally identify individuals, however, given our open approach to customer relationships, if it is appropriate to identify a colleague, we use first names of staff and job titles.

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
4.10	Landlords should keep residents regularly updated about the progress of the investigation.	Yes	Customers receive updates via telephone, home visits or email
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	Following the closure of a complaint, customers are sent a transactional survey to share their feedback. We plan to increase opportunities for customers to feedback on their experience through qualitative surveys.
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	Our positive approach to complaints is designed to support colleagues in engaging transparently with the process. Regular meetings take place to discuss learning and to support colleagues in implementing service improvements.
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	No customers had restrictions placed on them in 2022/23. Our decision making will always include compliance with the provisions of the Equality Act 2010.

Section 5 - Complaint stages

Mandatory 'must' requirements

Stage 1

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
5.1	Landlords must respond to the complaint <u>within 10 working</u> <u>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	In 2022/23, 643 of 838 of complaints resolved at stage one were handled within the ten day timescale. A further 140 complaints had extensions agreed.
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	Complaints are resolved as quickly as possible, with agreed actions actioned and tracked.
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	Our complaint responses aim to address all points raised, along with rationale for decisions made. The Complex Queries and Complaints team review responses and provide feedback to investigating managers where appropriate.
5.8	 Landlords must confirm the following in writing to the resident at the completion of stage one in clear, plain language: the complaint stage the decision on the complaint the reasons for any decisions made the details of any remedy offered to put things right details of any outstanding actions details of how to escalate the matter to stage two if the resident is not satisfied with the answer 	Yes	This information is included within our responses.

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
5.9	If all or part of the complaint is not resolved to the resident's satisfaction at stage one it must be progressed to stage two of the landlord's procedure, unless an exclusion ground now applies. In instances where a landlord declines to escalate a complaint it must clearly communicate in writing its reasons for not escalating as well as the resident's right to approach the Ombudsman about its decision.	Yes	All requests to escalate a complaint to stage two of our procedure were agreed in 2022/23.
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	Customers are contacted to discuss the escalation request and to understand the reason for the escalation.
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	
5.12	The person considering the complaint at stage two, must not be the same person that considered the complaint at stage one.	Yes	Stage two investigations are completed by a colleague who wasn't involved in the stage one investigation.
5.13	Landlords must respond to the stage two complaint <u>within 20</u> <u>working days</u> 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	29% (55) complaints that escalated to stage two required extensions to be agreed with customers as they related to complex complaints that required detailed review.
5.16	 Landlords must confirm the following in writing to the resident at the completion of stage two in clear, plain language: the complaint stage the complaint definition the decision on the complaint the reasons for any decisions made 	Yes	Our complaint responses include this detail. Stage two is the final stage of our complaints procedure and customers are made aware of how to escalate their complaint to the Housing Ombudsman.

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
	 the details of any remedy offered to put things right details of any outstanding actions and if the landlord has a third stage, details of how to escalate the matter to stage three if this was the final stage, details of how to escalate the matter to the Housing Ombudsman Service if the resident remains dissatisfied. 		

Stage 3

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
5.17	Two stage landlord complaint procedures are ideal. This ensures that the complaint process is not unduly long. If landlords strongly believe a third stage is necessary, they must set out their reasons for this as part of their self-assessment. A process with more than three stages is not acceptable under any circumstances.	Yes	We have adopted a clear two stage process as detailed within our compliments and complaints policy.
5.20	 Landlords must confirm the following in writing to the resident at the completion of stage three in clear, plain language: 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 – we do not have a third stage

Stage 1

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
5.2	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 is agreed verbally and followed up in writing.
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	Details are provided to customers throughout the investigation period to allow customers to contact the Service for guidance and support.
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	Complaint investigations include a review of previous complaint history and historic repair logs.
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	

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Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
5.14	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	Extensions are discussed and agreed with customers.
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	There were no situations in which an agreement could not be reached with a customer in 2022/23.

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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.	NA	N/A
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	N/A

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	All colleagues with responsibility for complaint handling complete the Housing Ombudsman e-learning modules for dispute resolution.
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	The Housing Ombudsman remedies guidance is used to support compensation decisions and is discussed with the customer.
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	Agreed actions are recorded, monitored and tracked. In 2022/23 there were some instances where agreed actions were not completed in agreed timescales. We have strengthened our approach to improve our approach to remedies for customers.
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	The Housing Ombudsman remedies guidance is used to support compensation decisions.

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	We've adopted a 'learning loop' approach to ensure we can put things right to benefit all customers, beyond the customer who has complained.

6.7	In some cases, a resident may have a legal entitlement to	Yes	Our approach is in line with this
	redress. The landlord should still offer a resolution where		guidance.
	possible, obtaining legal advice as to how any offer of resolution		
	should be worded.		

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	Complaint performance is reported within our annual report, In addition, learnings and themes are reported regularly, via our website, with our customer panel and internally to all colleagues.

Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
7.3	A member of the governing body should be appointed to have lead responsibility for complaints to support a positive complaint handling culture. This role will be responsible for ensuring the governing body receives regular information on complaints that provides insight to the governing body on the landlord's complaint handling performance.	Yes	A Board Member, the chair of the Customer Services Committee, is appointed in this role.
7.4	 As a minimum, governing bodies should receive: 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 	Yes	Our Customer Services Committee, which is a committee of the Group Board, receives regular updates on all of the items listed.

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
	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.		
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	Our positive complaints handling approach is driven by senior management. Regular Director and Executive Director reviews are completed to ensure themes are identified and addressed appropriately.
7.6	 Landlords should have a standard objective in relation to complaint handling for all employees that reflects the need to: 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	

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	Reviewed in May each year
8.2	Landlords must also carry out a self-assessment following a significant restructure and/or change in procedures.	Yes	No significant restructures or changes in procedure have taken place in 2022/23
8.3	 Following each self-assessment, a landlord must: 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	Reported to Customer Service Committee on 11th May 2023.Self-Assessment published on the websiteThis self-assessment will be included with our annual report, published later