

Appendix B – Self-Assessment Form

June 2023

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	Compliant as per our policy. The standard Housing Ombudsman definition already forms part of our complaints 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	Our policy and how we receive complaints explains how we manage these. We accept complaints on behalf of residents, with their permission, or third parties.
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	Compliant as per our policy and procedure.
1.7	A landlord must accept a complaint unless there is a valid reason not to do so.	Yes	Compliant as per our policy and procedure.

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	Compliant as per our policy and procedure.
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	Compliant as per our policy and procedure.

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	Compliant as per our policy and procedure.
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 have revised the text included within the introduction of our resident surveys, and the complaint handling questions to better reflect this.

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	Compliant as per our policy and procedure.
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	A number of potential adjustments are available including large print, translations and other formats as requested as part of the policy, alongside the website accessibility tools when viewed on our website. The policy has an Equality Impact Assessment in place.
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	Full information is included on the website to support residents to make a complaint including the policy and process.
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	Yes	The policy has an Equality Impact Assessment in place which has determined that should a request be received to accommodate a complainant's needs, we will assess the request and make any adjustments if deemed reasonable by the complaint

	handlers have had appropriate training to deal with such requests .		handler. We will agree any extended complaint response deadlines with the complainant if needed. If further advice is required, the view of our Respect and Inclusion Lead will be sought.
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	The complaints information page on our website includes the policy and procedure, the Complaint Handling Code and HOS details. We have a scheme poster and checks in place to ensure this is on display. Contact details for the HOS are in place on any relevant correspondence.

2.7	Landlords must provide residents with contact information for the Ombudsman as part of its regular correspondence with residents.	Yes	Reference to the Housing Ombudsman is included within our complaints correspondence throughout the process. Contact information to be included to be included within Annual Report going forward.
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	Reference to the Housing Ombudsman is included within our complaints correspondence throughout the process.

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	We have a process in place to work with social media complainants and this is recognised in our policy. Complaints via social media are monitored, taken "offline" and responded to directly with the complainant only.

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 process in place to work with social media complainants and this is recognised in our policy. However, we need to review how and when confidentiality should be maintained.
3.2	...the complaint handler appointed must have appropriate complaint handling skills and no conflicts of interest.	Yes	Colleagues operate within our behaviour and skills framework. Training and updates are provided throughout employment.

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	A lot of training and support has been offered in this area including advice and support around dealing with distressed and upset residents.

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	Compliant as per our policy and procedure. Our policy is to deal with any informal complaints around dissatisfaction with our services or employees as quickly and effectively as possible. In 2022 - 2023 100% of our 127 complaints were acknowledged within five days of receipt.

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	Compliant as per our management guidance. Responses are subject to line manager review to ensure fairness and consistency.
4.6	A complaint investigation must be conducted in an impartial manner.	Yes	Compliant as per our management procedure. Responses are subject to line management review to ensure a full and complete response.
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	Compliant as per our management guidance.
4.11	Landlords must adhere to any reasonable arrangements agreed with residents in terms of frequency and method of communication	Yes	Compliant as per our management guidance and learning and development, which stresses the need to keep complainants up to date in the manner preferred by them.
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	Compliant as per our policy and procedure.

4.13	A landlord must include in its complaints policy its timescales for a resident to request escalation of a complaint	Yes	Compliant as per our policy and procedure.
4.14	A landlord must not unreasonably refuse to escalate a complaint through all stages of the complaints	Yes	Compliant as per our management guidance. Responses are subject to line manager review to ensure fairness and consistency.
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	Compliant as per our policy and procedure. Our complaints management system supports full records and uploads of supporting information. These are available only to those involved in the complaint to review at each stage and is reflected in our management guidance.
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	Compliant as per our policy and procedure which were co-produced with our Resident Complaint Panel.

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	Compliant as per our management guidance.
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	We seek to resolve any complaint brought to us at the first opportunity as per our policy and procedure.
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 explicit in our management guidance and acknowledgements.
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	This is explicit in our management guidance.

4.9	Communication with the resident should not generally identify individual members of staff or contractors.	Yes	Whilst in normal practice this would be the case, where complaints are about individuals/employees we may refer to them by name if the situation demands it.
4.10	Landlords should keep residents regularly updated about the progress of the investigation.	Yes	Compliant as per our management guidance and as per our Resident Panel Request, particularly in line with the longer response period associated with stage two complaints.
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	We seek this as part of our Star Survey and resident surveys as we implement the Tenant Satisfaction Measures and this is shared with residents and colleagues. Monthly feedback is sought from stage one complainants from our Research Team. We use information from these surveys to identify any specific training needs.
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	Complaint handlers are supported during the complaints process and lessons learnt shared across the organisation, we are in the process of embedding this further to ensure more meaningful engagement and awareness through our internal governance.
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	Yes	Compliant as per our policy, Equality Impact Assessment and procedure.

provisions of the Equality Act 2010.

Section 5 - Complaint stages

Mandatory 'must' requirements

Stage One

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	Compliant as per our policy and procedure. Of the 127 stage one complaints received in 2022 - 2023, six were responded to out of time.
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	Compliant as per our management guidance.

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	Compliant as per our management guidance.
5.8	Landlords must confirm the following in writing to the resident at the completion of stage one in clear, plain language: <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	Compliant as per our management guidance.

Stage 2

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	Compliant as per our policy and procedure. In 2022 – 2023, 26 stage one complaints were escalated to stage two.
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	Compliant as per our management guidance.
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	Compliant as per our policy and procedure.

5.12	The person considering the complaint at stage two, must not be the same person that considered the complaint at stage one.	Yes	Compliant as per our policy and procedure.
5.13	Landlords must respond to the stage two complaint <u>within 20 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	Compliant as per our policy and procedure. In 2022 - 2023, 100% of the 26 stage two complaints.
5.16	Landlords must confirm the following in writing to the resident at the completion of stage two in clear, plain language: <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 and <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	This is explicit in our management guidance.

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.	N/A	Not applicable. The preferred two stage procedure is already in place.
5.20	Landlords must confirm the following in writing to the resident at the completion of stage three in clear, plain language: <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	Not applicable. The preferred two stage procedure is already in place.

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	Compliant as per our policy and procedure.
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	The Housing Ombudsman contact details are included across all our communication with residents about their complaint.
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	Compliant as per our management guidance.
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	Compliant as per our management guidance.

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	Compliant as per our policy and procedure.
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	The Housing Ombudsman contact details are included across all our communication with residents about their complaint.

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	Not applicable. The preferred two stage procedure is already in place.
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	Not applicable. The preferred two stage procedure is already in place.

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	Compliant as per our management guidance. Fair and proportionate remedy will be provided in line with our Compensation Policy. Actions are monitored through our internal governance structures.
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	Compliant as per our management guidance.
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	Compliant as per our management guidance. Actions are monitored through our internal governance structures.
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	Compliant as per our management guidance and Compensation Policy. Actions are monitored through our internal governance structures.

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	An overarching view of complaint outcomes is taken into consideration through our internal governance structures around lessons learnt.
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	This is reflected in our management guidance and the views of our legal team would be sought in this instance.

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	Updates to residents are included within their Court newsletters and the Annual Report. The Resident Complaint Panel meets quarterly as a minimum. Operational colleagues are updated via their monthly complaints report.

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	The Chairs of our Retirement Living and Extra Care Committees agreed to take on this role from September 2022.
7.4	As a minimum, governing bodies should receive: <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 	Yes	The Chairs of our Retirement Living and Extra Care Committees agreed to take on this role from September 2022. Monthly performance reporting as part of our Board reporting is in place.

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	An overarching view of complaint outcomes is taken into consideration through our internal governance structures at strategic level.
7.6	<p>Landlords should have a standard objective in relation to complaint handling for all employees that reflects the need to:</p> <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	We have built on our guiding principles and created a behaviours and skills framework, which works empathetically with the CIH professional standards. In addition to we have co-created (with employees and residents) a Respect and Inclusion Charter. These two documents are the GPS for our employees guiding their behaviours and building a transparent culture that facilitates collaboration, accountability and commitment to 'doing the right thing'. These principles also guide effective objective setting across the business streams.

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	This is in place on annual financial year basis.
8.2	Landlords must also carry out a self-assessment following a significant restructure and/or change in procedures.	Yes	This has not yet been required as a recent restructure expanded the capacity of stage one complaint handlers but would form part of any significant restructure or change to policy.
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	The self-assessment is approved by Board. The current and previous self-assessments have been published on our website where it is easily accessed, and it's location included in the annual report.

June 2023