





### 03.1.2 Annual Complaint Self-Assessment Form 2022/23



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>		Included in 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.		Included in our complaints policy
1.6	... if further enquiries are needed to resolve the matter, or if the resident requests it, the issue must be logged as a complaint.		Included in our complaints policy
1.7	A landlord must accept a complaint unless there is a valid reason not to do so.		Included in our complaints policy


1.8	A complaints policy must clearly set out the circumstances in which a matter will not be considered, and these circumstances should be fair and reasonable to residents.		Included in our complaints policy
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.		Included in our complaints policy







### 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 <b>service request</b> , where a resident may be unhappy with a <b>situation</b> that they wish to have rectified, and a <b>complaint</b> about the <b>service</b> they have/have not received.		Included in our complaints policy
1.5	Survey feedback may not necessarily need to be treated as a complaint, though, where possible, the person completing the survey should be made aware of how they can pursue their dissatisfaction as a complaint if they wish to.		All customers returning a satisfaction form who provide a low satisfaction score are contacted by the Customer Experience Team so we can resolve dissatisfaction at the earliest opportunity, proactively dealing with this feedback.


### 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.		<i>Customers can complain through any contact channel they prefer, the main channels used are listed in the policy.</i>



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.		<i>Copy of the Complaints Policy is available on our website and will be posted out on request, the Policy shows the stages and timeframes are included on our website.</i>
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.		<i>This is all under the 'Complaints' section of our website.</i>
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.		<i>We have an Equality Diversity and Inclusion Policy in place and will make reasonable adjustments to accommodate individual needs. Our website has accessibility software built in too for those who need this type of assistance.</i>
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.		<i>This is on the programme to be included in newsletters and the annual report, and as part of a review of noticeboard information provided at sites..</i>
2.7	Landlords must provide residents with contact information for the Ombudsman as part of its regular correspondence with residents.		<i>Details of the Ombudsman Service has been included in the newsletters and on social media posts. This isn't currently included routinely in more day-to- day correspondence that is not related to a complaint. We will include look at opportunities where this can be added in to contacts.</i>
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.		<i>This information is included on our website.</i>

### 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.		<i>We will accept a complaint through any communication channel and they are processed in the same way regardless of channel used. We will update our policy to make this more explicit..</i>

### 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".		This is the Performance Analyst, who acts as the Complaints Officer as part of their role, being the central hub for all complaints.
3.2	...the complaint handler appointed must have appropriate complaint handling skills and no conflicts of interest.		The Performance Analysts has attended webinars with the Housing Ombudsman. They sit in the Group Services Team, rather than a customer facing role, so is independent of the teams where complaint are received.







### Best practice 'should' requirements



Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
3.3	<p>Complaint handlers should:</p> <ul style="list-style-type: none"> <li>• be able to act sensitively and fairly</li> <li>• be trained to handle complaints and deal with distressed and upset residents</li> <li>• have access to staff at all levels to facilitate quick resolution of complaints</li> <li>• have the authority and autonomy to act to resolve disputes quickly and fairly</li> </ul>		The Performance Analysts has attended webinars with the Housing Ombudsman. They sit in the Group Services Team, rather than a customer facing role, so is independent of the teams where complaint are received. The process sets out our aim to resolve complaints promptly and sensitively. They quality check complaint responses and can escalate cases to the senior leadership team as required.

### 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 <b>within five days of receipt</b> .		Complaints are logged and an automatic acknowledgment is immediately sent to the customer as part of the case management software we use.
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		The complaint acknowledgement only confirms the complaint, however, all complainants are

	asked for clarification and the full definition agreed between both parties.		contacted by the Investigating Manager with 2 working days to discuss the detail of the complaint, the outcomes expected and agree what will be looked into.
4.6	A complaint investigation must be conducted in an impartial manner.		The Complaint Officer reviews all responses before they are sent out to check that the complaint has been responded to appropriately and all matters have been covered.
4.7	The complaint handler must: <ul style="list-style-type: none"> <li>• deal with complaints on their merits</li> <li>• act independently and have an open mind</li> <li>• take measures to address any actual or perceived conflict of interest</li> <li>• consider all information and evidence carefully</li> <li>• keep the complaint confidential as far as possible, with information only disclosed if necessary to properly investigate the matter.</li> </ul>		The Complaint Officer reviews all responses before they are sent out to check that the complaint has been responded to appropriately and all matters have been covered. They understand the frustration of customers and ensure that responses are empathetic, considered and reviewed with an open mind.
4.11	Landlords must adhere to any reasonable arrangements agreed with residents in terms of frequency and method of communication		We would do this where requested.
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: <ul style="list-style-type: none"> <li>• set out their position</li> <li>• comment on any adverse findings before a final decision is made.</li> </ul>		The Complaint Officer reviews all responses before they are sent out to check that the complaint has been responded to appropriately and all matters have been covered.
4.13	A landlord must include in its complaints policy its timescales for a resident to request escalation of a complaint		This is included in the Complaints Policy and timescales shown on our Complaints website page.
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		We would only refuse to accept a complaint in line with the reasons set out in the Complaint Policy.

	complaint.		
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.		Complaints are recorded and tracked in QL Case Management Module, any additional correspondence is saved in Docuware against the case reference number. Cases are reported quarterly to the Customer Voice Board.
4.18	Landlords must have policies and procedures in place for managing unacceptable behaviour from residents and/or their representatives when pursuing a complaint.		This is included in our Complaint Policy.



#### 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		This is our approach.
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.		This is our approach and set out in our Complaint Policy.
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.		This is included in our Complaint Policy.
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.		This is our approach.
4.9	Communication with the resident should not generally identify individual members of staff or contractors.		<i>Where an employee didn't need to be named we would not include their name in any response. However, we do sometimes reference names, usually because as a small association the customer already knows the</i>



			<i>member of staff directly.</i>
4.10	Landlords should keep residents regularly updated about the progress of the investigation.		This is our approach, the Complaint Officer will keep customers updated if there are likely to be any delays to the investigation agreeing timescales with them.
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.		<i>All complainants receive a satisfaction survey for feedback on how their complaint was handled.</i>
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		<i>The value of customer feedback and complaints is included in our Corporate Plan and all staff had MGI Training on dealing effectively with customers and valuing feedback. Learning is now recorded in QL and is an in-built part of the process.</i>
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.		<i>We do not have any such restrictions in place and if it was deemed necessary we would follow the EDI Policy.</i>

## Section 5 - Complaint stages




### Mandatory 'must' requirements Stage1




Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
5.1	Landlords must respond to the complaint <b>within 10 working days</b> 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.		This is in our Complaints Policy and is tracked.
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		This is our approach. The Complaints Officer tracks completions




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.		The Complaint Officer reviews all responses before they are sent out to check that the complaint has been responded to appropriately and all matters have been covered.
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"> <li>• the complaint stage</li> <li>• the decision on the complaint</li> <li>• the reasons for any decisions made</li> <li>• the details of any remedy offered to put things right</li> <li>• details of any outstanding actions</li> <li>• details of how to escalate the matter to stage two if the resident is not satisfied with the answer</li> </ul>		The Complaint Officer reviews all responses before they are sent out to check that the complaint has been responded to appropriately and all matters have been covered.


## 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 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		This is in our Complaints Policy
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		This is in our Complaints Policy
5.11	Landlords must only escalate a complaint to stage two once it has completed stage one and at the request of the resident		This in our Complaint Policy on our website




5.12	The person considering the complaint at stage two, must not be the same person that considered the complaint at stage one		Stage 2 are looked at by a Senior Manager and a member of our Customer Voice Board or Common Board.
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		This in our Complaint Policy on our website.
	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"> <li>• the complaint stage</li> <li>• the complaint definition</li> <li>• the decision on the complaint</li> <li>• the reasons for any decisions made</li> <li>• the details of any remedy offered to put things right</li> <li>• details of any outstanding actions <b>and</b></li> <li>• if the landlord has a third stage, details of how to escalate the matter to stage three</li> <li>• if this was the final stage, details of how to escalate the matter to the Housing Ombudsman Service if the resident remains dissatisfied.</li> </ul>		This in our Complaint Policy on our website.

### 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.		

5.20	<p>Landlords must confirm the following in writing to the resident at the completion of stage three in clear, plain language:</p> <ul style="list-style-type: none"> <li>• the complaint stage</li> <li>• the complaint definition</li> <li>• the decision on the complaint</li> <li>• the reasons for any decisions made</li> <li>• the details of any remedy offered to put things right</li> <li>• details of any outstanding actions</li> <li>• details of how to escalate the matter to the Housing Ombudsman Service if the resident remains dissatisfied</li> </ul>		
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### Best practice 'should' requirements

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.		This is included in the complaint policy.
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.		This is included in the complaint policy.
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.		We would always look at the longer history of a complaint as part of the initial investigation





### Stage 3

5.18	<p>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 <b>within 20 working days</b> 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.</p>		
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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	
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## 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.		This is our policy and practice
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.		This is our policy and practice
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.		This is our policy and practice
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.		This is our policy and practice, we refer to the Right to Repair and recent Ombudsman case studies to guidance

### 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.		We record 'learning from complaints as the complaint is closed
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		This is our policy and practice


## 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.		<i>Quarterly reports on complaints are provided to the Customer Voice Board and annually to Common Board.</i>





### 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		<i>This sits with our Customer Voice Board Lead</i>
	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 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		<i>Quarterly reports on complaints are provided to the Customer Voice Board and annually to Common Board.</i>
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.		<i>Quarterly reports on complaints are provided to Executive, the Customer Voice Board and annually to Common Board.</i>

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"> <li>• have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments</li> <li>• take collective responsibility for any shortfalls identified through complaints rather than blaming others</li> <li>• act within the Professional Standards for engaging with complaints as set by the Chartered Institute of Housing.</li> </ul>		<p>This in line with our One Team and making a difference customer care approach.</p>
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## Section 8 - Self-assessment and compliance

### Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
8.1	<p>Landlords must carry out an annual self-assessment against the Code to ensure their complaint handling remains in line with its requirements.</p>		<p><i>This is scheduled to take place at the start of April each year as a look back over the year prior.</i></p>
8.2	<p>Landlords must also carry out a self-assessment following a significant restructure and/or change in procedures.</p>		<p>This will be planned in as required</p>
8.3	<p>Following each self-assessment, a landlord must:</p> <ul style="list-style-type: none"> <li>• 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</li> <li>• publish the outcome of their assessment on their website if they have one, or otherwise make accessible to residents</li> <li>• include the self-assessment in their annual report section on complaints handling performance</li> </ul>	 	<p>This will form part of our annual assessment reported to Customer Voice Board/ Board and then published on our website</p> <p>KPI measures on complaints are in place and reported quarterly to the Customer Voice Board.</p>