

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

	Requirements where we are fully compliant
	Requirements where we are not fully compliant

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>		The definition is adopted in the Policy and included in the procedure and guidance.
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.		This is expressly set out in the Policy, procedure and guidance.
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.		This concept is expressly set out in procedure and the guidance.
1.7	A landlord must accept a complaint unless there is a valid reason not to do so.		This is 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.		Detailed circumstances set out in the 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.		The customers option to approach the Housing Ombudsman is set out in all acknowledgement and resolution letters. The procedure and guidance speak to the need to explain any refusal to hear a complaint.

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.		The difference between the two areas is clear in the Policy, procedure and guidance.
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.		Dissatisfactions are routinely flagged by the survey team to the relevant department. This has been recently strengthened to include guidance around the complaints procedure, if appropriate.

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.		Regularly promoted through social media and on the website. Options to raise a dissatisfaction are highlighted on surveys where the customer is clearly unhappy. Dissatisfactions can be raised through the app or portal. We will be providing more paper based options in Q3.
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.		The current customer guidance addresses most of these areas and has been re-drafted to provide further clarity on time frames. This will go live in October alongside the revised process.
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.		Links to the Complaints Policy and procedure are on the footer of every web page.
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.		Obligations under the Act are set out in the Policy. We continue to work on our equality credentials and awareness training is in regularly provided.
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.		The complaints process, including Housing Ombudsman involvement, is regularly promoted through social media and website. Hard copy options will be provided and promoted through the Autumn.
2.7	Landlords must provide residents with contact information for the Ombudsman as part of its regular correspondence with residents.		The HO contact information is available on the website and within the standard letters issued in the complaints process. We will be providing more touch points in the future through upcoming customer communications.

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.		Advice is included in all acknowledgement and resolution letters as standard.
-----	--	--	---

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.		Social media contacts are now dealt with and covered by Customer Experience Team protocols.

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".		The Customer Experience Manager is the designated complaints officer.
3.2	...the complaint handler appointed must have appropriate complaint handling skills and no conflicts of interest.		Heads of Service have been trained and will have annual refreshers in future.

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 & deal with distressed & upset residents -have access to staff at all levels to facilitate quick resolution of complaints -have the authority & autonomy to act to resolve disputes quickly and fairly.		Performance in this area can be inconsistent, with some instances where we have not shown empathy with the complainant. These themes will largely be covered by the complaints and customer service training in the Autumn, though further upskilling around handling distressed complainants will be 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 within five days of receipt.		We are not yet 100% consistent in acknowledging complaints within five days of receipt, though performance is improving with the renewed focus on complaints and involvement of the Customer Experience Manager and we expect to be compliant by the end of October.
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.		The structured acknowledgement letters in QL address these issues by providing a clear framework for our response, including clarity of the outcome the customer is seeking.
4.6	A complaint investigation must be conducted in an impartial manner.		Impartiality/objectivity is set out in the Policy and procedure. There is no evidence of any specific bias.
4.7	The complaint handler must: <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. 		These principles are in the procedure and guidance and will be followed up in subsequent training sessions.
4.11	Landlords must adhere to any reasonable arrangements agreed with residents in terms of frequency and method of communication.		A few recent complaints have highlighted that we have not previously taken into account customers contact preferences when communicating with them. We are working on how we flag such issues more clearly in QL for those responding to customers (not just for complaints).

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"> set out their position comment on any adverse findings before a final decision is made. 		Partially Compliant - customers do not always get an opportunity to comment on the findings prior to the final decision of a complaint at stage 1. This will form part of the training material in future.
4.13	A landlord must include in its complaints policy its timescales for a resident to request escalation of a complaint.		Timescales are set out in the Policy and guidance.
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.		Complaints are always escalated if the customer requests it. However, the picture with dissatisfactions is less clear. Circumstances where we might decline a request to escalate are set out in the Policy.
4.15	A full record must be kept of the complaint, any review and the outcomes at each stage. This must include the original complaint and the date received, all correspondence with the resident, correspondence with other parties and any reports or surveys prepared.		Partially Compliant - record keeping is currently inconsistent and occasionally poor. The need to maintain good evidence keeping is part of the complaints training and we expect to be fully compliant thereafter.
4.18	Landlords must have policies and procedures in place for managing unacceptable behaviour from residents and/or their representatives when pursuing a complaint.		An Unacceptable Behaviour Policy is in place.

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.		In some cases, better managed expectations would have helped resolve complaints at an earlier stage. The focus on early intervention and engagement is part of a wider customer service training planned for the Autumn, but will be included in the complaints sessions also.
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.		We need to encourage more engagement with the customer at the start of any complaint. See comment above.

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.		Set out in the Policy and revised customer guidance.
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.		Legal advice is routinely sought where necessary and the legal position set out in resolution letters.
4.9	Communication with the resident should not generally identify individual members of staff or contractors.		Although this has happened on a handful of occasions, it is very much the exception.
4.10	Landlords should keep residents regularly updated about the progress of the investigation.		In some cases we have not kept the customer aware of progress or updated them on timescales. This theme has been woven into the process and training materials, Policy and procedure.
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.		A survey of every closed complaint has been in place for over six months. Feedback is shared with the complaint handlers.
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.		This area is an improving picture, with regular lessons learned sessions at the end of each complaint.
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.		Recent long standing complaints that have been resolved to the customers satisfaction have shown that restrictions are not always appropriate to the customers needs. We are working on how best to flag specific customer needs more clearly in QL.

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 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.		The 10 day target is often extended for operational reasons. The 20 day target is extended in approximately a third of cases. This is often due to liaising with contractors and other bodies, for example. We continue to educate staff on the need to deliver to the timescales.
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.		Responses are written when the resolutions are known. The tracking of open actions remains the responsibility of the investigating officer and we are working to ensure that customers are updated on progress.
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.		In most cases, resolution letters are well structured and set out the reasoning behind the decisions made.
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. 		The structured QL letters encourage the complaint handlers to address all of these points and in most cases our resolution letters provide a quality response.

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 it's decision.		Complaints are routinely escalated at the customers request and the option to approach the Housing Ombudsman is also clear from both the letters and guidance.
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.		The reason for escalation is built into the standard letters at Stage 2.
5.11	Landlords must only escalate a complaint to stage two once it has completed stage one and at the request of the resident.		As per Policy and process.
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 complaints are always dealt with by a different member of staff.
5.13	Landlords must respond to the stage two complaint within 20 working days of the complaint being escalated. Exceptionally, landlords may provide an explanation to the resident containing a clear timeframe for when the response will be received. This should not exceed a further 10 days without good reason.		Stage 2 complaints are only extended after consultation with the resident and only beyond 20 days when there are extenuating circumstances.
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 • 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. 		The structured QL letters at both stages 1 and 2 encourage the complaint handlers to address all of these points and in most cases our resolution letters provide a quality response.

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.		Not relevant – Rooftop operates a 2 stage process.
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. 		Not relevant – Rooftop operates a 2 stage process.

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.		Complaints are often extended beyond 20 days, but without necessarily seeking agreement from the customer.
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.		The option to contact the Housing Ombudsman at any point in the process is shared in writing as part of the acknowledgment of each complaint case.
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.		Whilst we have not consistently considered the complainants history in the past, recent cases show that we are now doing so. This requirement is flagged in the revised guidance for staff.

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.		
-----	---	--	--

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.		Complaints are often extended beyond 10 days, but without necessarily seeking agreement from the customer.
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.		The option to contact the Housing Ombudsman at any point in the process is shared in writing as part of the acknowledgment of each complaint case.

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 within 20 working days 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.		Not relevant – Rooftop operates a 2 stage process.
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.		Not relevant – Rooftop operates a 2 stage process.

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.		Audit findings confirmed that where we are at fault we do seek to take action and explain those actions to the complainant.
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.		Remedies are generally consistent with other HAs and in accordance with our Compensation Policy. The need for equality can be a difficult sell to customers.
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.		Resolutions offered set out the actions we have taken or are proposing to take and any timescales. The need to ensure that actions are completed will form part of future training.
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.		Compensation, statutory or otherwise is our Compensation Policy, though we are looking at providing more detailed guidance for staff around discretionary compensation payments in the near future.

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.		Regular complaint debriefs and lessons learned are producing tangible changes in custom and practice for the benefit of all customers.
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.		Legal assistance is sought where this is likely to be a consideration.

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.		We currently provide a bi-monthly update on complaints to the Board through the Customer Voice report, including learning from complaints. This report is also shared with the Resident Excellence Panel. The same data is shared quarterly with customers in a similar format through posts on social media and the website.

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.		
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 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.		
7.6	Landlords should have a standard objective in relation to complaint handling for all employees that reflects the need to: <ul data-bbox="309 411 1234 611" 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.		This is not in current job descriptions.

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.		This review forms part of the self-assessment process and will be repeated annually hereafter.
8.2	Landlords must also carry out a self-assessment following a significant restructure and/or change in procedures.		We have waited to make this self-assessment until after the results of the internal audit had been shared and we have had time to re-assess and develop the process and training.
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. 		<p>This report is being shared in full with the Board of RHG. Following this, it will be shared in full, online through the website, with hard copies available on request.</p> <p>An overview of our complaints handling is included in the customer annual report each year. We expect this area to become more of a focus of that document in future years.</p>