Appendix B – 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	We have this as the sole definition in our Policy and Process.
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.	Partially	We would be partially compliant in this area as we have made good progress; further training is needed on what is a complaint and the difference between an informal and formal complaint. MP enquiries are dealt with as formal complaints.
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	We would always act in line with the residents request unless it was an exception as stated in our Policy.
1.7	A landlord must accept a complaint unless there is a valid reason not to do so.	Yes	Exceptions are stated 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.	Yes	Our Policy complies with this.
	If a landlord decides not to accept a complaint, a	Yes	We would always provide an explanation

1.9	detailed explanation must be provided to the resident	and we promote the access to the Housing
	setting out the reasons why the matter is not suitable	Ombudsman at all times.
	for the complaints process and the right to take that	
	decision to the Ombudsman.	

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	This is identified when the complaint is allocated and sent to the appropriate team.
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.	No	We would not be compliant, wee need to review this with the lead for area where a transactional survey is in place to ensure we have assurance this approach is being consistently applied as 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.	Yes	We accept complaints via all of our communication 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	This is available on the website and by request. We are going to make a video in the future.
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	We received feedback from the Housing Ombudsman Service that it should be available on the home page and only 1 click to access it. We have actioned this. We have a simple online form, for tenants and non- tenants to complete. Tenants can also use Tenants Online.
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	Our Policy provides assurance that we will provide reasonable adjustments to ensure tenants are able to make a complaint and actively take part in the 2 stages. Examples are in the policy such as using advocates and options for online or in person stage 2 panels.
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	We promote regularly in D2D magazine and would like to develop this further. We have posters in communal areas of sheltered schemes, housing with care and general needs where there are notice boards.

2.7	Landlords must provide residents with contact information for the Ombudsman as part of its regular correspondence with residents.	Yes	We include this in our complaints leaflet and on the website. We are going to update our acknowledgement letters to include it also.
			We received feedback from customers that there was a general lack of awareness that this was an option.
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	We include this in our complaints leaflet and on the website. We are going to update our acknowledgement letters to include it also.
			The customer feedback identified that the majority were not made aware of this at Stage 1.

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 treat complaints via social media in the same way we do those received via e mail or a telephone call.

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 8 staff trained to deal with stage 1 complaints. A paper is provided to Board 6 monthly with an update on performance and learnings.
3.2	the complaint handler appointed must have appropriate complaint handling skills and no conflicts of interest.	Yes	All staff have had appropriate training and have ongoing support afterwards. Complaints are logged and the most appropriate person takes the complaint, this would allow any staff member to declare a conflict of interest.

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	Assessing the complaints, we have had over the last 2 years, we have not had these points escalated in the stage 2 complaint.

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	We do not have any additional stages in the formal process. The increase in stage 1 complaints over the last 2 years indicates our process is accessible.
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.	No	We would not be compliant in this area at present. This will require a change in our process when allocating complaints which we will do once we have reviewed the current resource in complaint handling.in the coming months

4.6	A complaint investigation must be conducted in an impartial manner.	Partially	We are not able to evidence we are fully compliant in this area. We will review this again once we have the data from the October Tenant Perception Survey as we have asked some specific questions to give us more feedback about this and this should allow us to score this more fairly.
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 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	Assessing the complaints, we have had over the last 2 years, we have not consistently had these points escalated in the stage 2 complaint.
4.11	Landlords must adhere to any reasonable arrangements agreed with residents in terms of frequency and method of communication	Yes	Complaint Handling Team will always discuss with the customer how they want to communicate during the complaint investigation and agree when updates will be given.
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. 	Partially Yes	We have moved ourselves to compliant as we cannot evidence, we are not. Residents are given the opportunity to raise any concerns at the next stage. We have not received any complaint handling failure orders to date which would be a warning indicator.
4.13	A landlord must include in its complaints policy its timescales for a resident to request escalation of a complaint	Yes	We include this in our stage 1 response and are flexible if the customer needs more time.
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	Yes	We have not refused any customer escalating their complaint to stage 2.

	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.		
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	Overall, we are meeting this, however we do need to make some improvements around record keeping and updating open complaints.
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	We have a Policy in place and have used it within the last year. This is an area of improvement for us as we do not feel we have the right approach.

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 is hard to evidence, however at Stage 1, we would always have a realistic conversation about outcomes and remedies available. The area where this happens most is compensation, and we advise the customer to go and look at the Housing Ombudsman Remedies Guidance and case studies.
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 Handlers will always look to resolve any urgent issues first and then follow up with the written response.
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	We encourage this and consider it a reasonable adjustment.
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	Where this occurs, we would always set out the responsibilities of BHA and the customer as per their tenancy agreement.

		Yes	We do not name staff in the formal
4.9	Communication with the resident should not generally identify individual members of staff or contractors.	168	response letters; we use the name of
	identity individual members of stall of contractors.		the role as not to identify staff.
4.10	Landlords should keep residents regularly updated about the progress of the investigation.	Partially	We are not able to evidence we are fully compliant in this area. We will review this again once we have the data from the October Tenant Perception Survey as we have asked some specific questions to give us more feedback
			about this and this should allow us to
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.	Partially	score this more fairly. We feel we are partially compliant as we have learnt from complaints throughout the year and have amended our Complaints Policy and procedures five times as a result.
			We need to review how we get feedback on the complaint handling after the complaint has closed. We have stopped sending the survey and are reviewing what we do moving forward
			We will review this again once we have the data from the October Tenant Perception Survey as we have asked some specific questions to give us more feedback about this and this should allow us to score this more fairly.
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	Partially	We report on learnings to Board annually and we publish learnings in every Door to Door. We have shared the work to date with TAP and our proposal for moving forward. There is a

			specific session with the TAP in November where they will be holding us to account on how we learn from complaints. This is our biggest area of focus over the next year.
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.	Partially Yes	We have reviewed this policy, however we have only used it once. The policy considers the Equlaity Act and gives the resident alternative options to liaise with us such as use of an advocate.

Section 5 - Complaint stages

Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
5.1	Landlords must respond to the complaint within 10 working days 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.	No	We would not be compliant as are not currently meeting the required timescales consistently. We are looking at the current resource to help us achieve this.
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	No Partially	

	expeditiously with regular updates provided to the resident.		
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	We could improve in relation to referencing best practice.
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 has been our main area of focus to make sure that the formal response letters are thorough and easy to read. We are currently using the Housing Ombudsman Template letters at stage 1. The involvement of the Tenant Assurance Panel will be able to assist with this by doing quality checking of responses, alongside this there is a piece of work looking at this across Broadland

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	We have not refused any customer escalating their complaint to stage 2.
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	The stage 1 responder would try and clarify this ahead of escalating it to stage 2, however if they were unable to, there is contact with the customer by another member of staff who explains the stage 2 process and also clarifies the points being escalated to stage 2. This ensures both parties are clear on what points of the complaint are being reviewed.
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	We have only escalated to stage 2 after a stage 1 response has been completed.

5.12	The person considering the complaint at stage two, must not be the same person that considered the complaint at stage one.	Yes	The stage 2 panel is not involved at stage 1.
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.	Yes	Overall, we are able to meet this deadline, however, there have been a few occasions when we have been over the time but due to meeting the customers' needs around availability and access.
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 • 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.	Yes	Stage 2 letters include all of this information and are sent out within 3 working days of the panel taking place. We use the Housing Ombudsman templates for our letters.

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 a two-stage process.

	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	N/A	Not applicable
5.20	 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		

Code section	Code requirement	Comply:	Evidence, commentary and any
		Yes/No	explanations
	If an extension beyond 20 working days is required to enable the	Yes	We always explain when additional time
5.2	landlord to respond to the complaint fully, this should be agreed by		is needed to respond and why and check
	both parties.		the customer agrees with this. We are
			now able to log this on the Customer
			record following updates to our system to
			allow us to provide the data for the
			Tenant Satisfaction Measures.
	Where agreement over an extension period cannot be reached,	Yes	We have not had a situation where this
	landlords should provide the Housing Ombudsman's contact		has applied but we are covering it in our
5.3	details so the resident can challenge the landlord's plan for		next update with stage 1 handlers to
	responding and/or the proposed timelines of a landlord's		ensure they are adhering to it.
	response.	\/	Management and the land to be a like to the land of th
	Where the problem is a recurring issue, the landlord should	Yes	We are pro- active in looking at historic
5.4	consider any older reports as part of the background to the		matters where the tenant has a repeat
	complaint if this helps to resolve the issue for the resident.	Yes	complaint.
	Where residents raise additional complaints during the investigation, these should be incorporated into the stage one	res	We have a flexible approach to this and talk through with customers if it can be
	response if they are relevant and the stage one response has not		dealt with as part of their existing
5.7	been issued. Where the stage one response has been issued, or it		complaint or if it would be more
	would unreasonably delay the response, the complaint should be		appropriate for it to be a new complaint.
	logged as a new complaint.		
	Tiogged 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.	Yes	We have done this, and complaijnt handlers are trained to ensure it is only done with agreement of the resident or at their request.
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	We have not had a situation where this has applied but we are covering it in our next update with stage 1 handlers to ensure they are adhering to it.

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.	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	

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	We will always tell the customer when things have gone wrong and apologise. We will tell the customer how we intend on putting it right.
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	We feel that our compensation levels are fair, we use the Housing Ombudsman Remedies Guidance alongside our Compensation Policy, and we have open conversations about what remedy the tenant is seeking.
			We have had many complaints where the remedy is not about compensation.
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.	Partially	We are strong on apologising and paying compensation in a timely manner. We need to do some more work on following through on learnings and ensuring these are fully communicated and completed.
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	We feel that our compensation levels are fair, we use the Housing Ombudsman Remedies Guidance alongside our Compensation Policy, and we have open conversations about what remedy the tenant is seeking.

Rest 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	When identifying learnings, we look at implementing these across all residents where it will lead to a service improvement.
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	Where a resident has a legal entitlement to redress, we would include this in our response, taking legal advice as appropriate.

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	Partially	Learning from complaints is an area for us to develop which will help improve the culture around complaint handling.
	panels.		We need to do more about publicising the work to residents and this is part of our action plan for improvement.
			The TAP will assist with getting more scrutiny from tenants. Our new learning action plans are being populated and will be in place in November where they will
			go to Board and TAP.

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	Yes	We have appointed a lead Board member and will be working alongside him to ensure the Board are receiving

	provides insight to the governing body on the landlord's complaint handling performance.		regular updates and information on complaints.
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 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. 	Yes	We complete an annual review on complaints and a 6 monthly update on learnings. We report the self-assessment to the Board when changes are required. Our Board provide regular feedback to us from their involvement at stage 2 to help us improve our processes
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.	Partially	We have started identifying themes; however, this is an area for us to focus on over the next 6 months.
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. 	No	We are reviewing the behaviours framework to ensure that we have clear behaviours relating to complaints. This will be more appropriate than an objective as the behaviours help set the culture.

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	We have done this since the code was introduced.
8.2	Landlords must also carry out a self-assessment following a significant restructure and/or change in procedures.	Yes	We would do this if this occurred.
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	We report all changes to the self- assessment to Board and will publish an updated version on the website once a year.