

Housing Ombudsman Complaint Handling Code: Self-assessment form – updated code March 2022

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

Code section	Code requirement	Compliant? Y/N	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	Our policy defines what a complaint is, and our team members understand what constitutes a complaint.
1.3	The resident does not have to use the word ‘complaint’ for it to be treated as such. A complaint that is submitted via a third party or representative must still be handled in line with the landlord’s complaints policy.	Yes	Our policy and how we receive complaints explains how we manage these. We accept complaints on behalf of tenants, with their permission. Currently, cases received as part of an MP or Councillor enquiry are responded to in different timescales. We will move these to respond as we do any stage 1 complaint.
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	This is within our policy and process documents and managed by the Customer Experience team.
1.7	A landlord must accept a complaint unless there is a valid reason not to do so.	Yes	This is within our policy and process documents and managed by the Customer Experience team.
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 complaints policy explains what constitutes a complaint and elements that are not consider a complaint.
1.9	If a landlord decides not to accept a complaint, a detailed explanation must be provided to the resident setting out the reasons why the matter is not suitable for the complaints process and the right to take that decision to the Ombudsman	Yes	This is contained within our complaints policy but also the template letters that we send to residents about the outcome or confirmation of their complaint, or not, if this is applicable.
Best practice ‘should’ requirements			

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 contained within our policy and procedure documents for our teams. We feel that there is more work to do here to strengthen this position and will commit to defining this more clearly with our front line teams.
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 will add this detail to the survey that we send. We identify within our STAR survey feedback where additional contact is required, at this point a complaint could be raised. However, this is a recent action and we do need to do more to strengthen this process. This work has commenced, and we will continue to review over this year.

Section 2 – Accessibility and awareness

Code section	Code requirement	Compliant? Y/N	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	This is in place. We accept complaints across multi-channels, and this is communicated and promoted in various channels such as our website, social media and on the telephone.
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	Our policy is on our website, as well as a summary of this within the page. We send copies of this as required through print, email, or translated.

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 have a dedicated complaints section on our website.
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	Accessibility is listed in our equality and diversity policy. Our complaints policy had an equality impact assessment completed. Our policy lists the relevant legislation we will comply with.
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 don't proactively do this in printed form as there has not been the demand. If a printed version is required, we will supply this. We do publicise our policies, approach and our assessment on our website. We also confirmed our compliance with the code in our tenant newsletter, and in each copy have a section on compliments and complaints.
2.7	Landlords must provide residents with contact information for the Ombudsman as part of its regular correspondence with residents.	Yes	We outline the ways to contact the HOS on all correspondence we send as part of our complaints process. Information is also within our policy and on our website.
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	This is within our policy, documentation and website information, we send to residents as part of the process.
Best practice 'should' requirements			

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	Our teams who monitor the social media channels send any complaint for acknowledgement to our Customer Experience team. Our social media policy identifies our approach to confidentiality.
-----	--	-----	--

Section 3 – complaint handling personnel

Code section	Code requirement	Compliant? Y/N	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	Complaints are managed via the Customer Experience team, who have the designated complaints officer role. The policy and process of complaint handling ensures the process is consistent.
3.2	...the complaint handler appointed must have appropriate complaint handling skills and no conflicts of interest.	Yes	The team are independent from any other service area and have the required level of autonomy required.
Best practice ‘should’ requirements			
3.3	Complaint handlers should: <ul style="list-style-type: none"> • be able to act sensitively and fairly • be trained to handle complaints and deal with distressed and upset residents • have access to staff at all levels to facilitate quick resolution of complaints • have the authority and autonomy to act to resolve disputes quickly and fairly. 	Yes	We have regular training, including ‘lessons learnt’ with our teams. They have autonomy and authority to resolve disputes, including working with manager sand other teams to agree resolutions.

Section 4 – Complaint handling principles

Code section	Code requirement	Compliant? Y/N	Evidence, commentary and any explanations
4.1	<p>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.</p> <p>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</p>	Yes	<p>Yes, our housing management system (Civica CX) supports this approach, we log each case and this is monitored with the SLA within the system.</p> <p>The Customer Experience team make contact with the complainant, identifies the elements and outcomes of the complaint and looks to resolve as quickly as possible.</p> <p>We have a simple two-stage process, and do not have a local resolution stage, where confusion can occur.</p>
4.2	<p>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.</p>	Yes	<p>Our letter templates are set out to ensure this information is collected in our acknowledgement and response.</p>
4.6	<p>A complaint investigation must be conducted in an impartial manner.</p>	Yes	<p>The Customer Experience team are independent from any other service area and have the required level of autonomy.</p>
4.7	<p>The complaint handler must:</p> <ul style="list-style-type: none"> • deal with complaints on their merits • act independently and have an open mind • take measures to address any actual or perceived conflict of interest • consider all information and evidence carefully • keep the complaint confidential as far as possible, with information only disclosed if necessary to properly investigate the matter 	Yes	<p>The Customer Experience team review the complaint information and any reference to individuals.</p> <p>We have taken the decision to build accountability and trust within this process so complaints can be viewed and those involved in the complaint are included in part of the investigation and response.</p> <p>We ensure any lessons learnt are anonymised when training/presenting back to teams.</p>

4.11	Landlords must adhere to any reasonable arrangements agreed with residents in terms of frequency and method of communication	Yes	Our CRM Civica CX system presents preferred method of communication.
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. 	Yes	We complete a full review of the areas of the complaint which will include, where appropriate, discussions with individuals involved with the complaint case.
4.13	A landlord must include in its complaints policy its timescales for a resident to request escalation of a complaint	Yes	All stages and the timescales attributed to these are included in our policy but also in the correspondence sent to the complainant.
4.14	A landlord must not unreasonably refuse to escalate a complaint through all stages of the complaints procedure and must have clear and valid reasons for taking that course of action. Reasons for declining to escalate a complaint must be clearly set out in a landlord's complaints policy and must be the same as the reasons for not accepting a complaint.	Yes	We have not yet made any refusal to escalate. Where we might do this, our policy outlines that we will set out the reasons clearly.
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	Our CRM Civica CX system records all stages of the complaint.
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 separate 'Managing Unacceptable Behaviour' policy.
Best practice 'should' requirements			
4.3	Landlords should manage residents' expectations from the outset, being clear where a desired outcome is unreasonable or unrealistic	Yes	Our correspondence sets out, having been agreed with the resident, the scope of the investigation and also the agreed preferred outcomes.

4.4	A complaint should be resolved at the earliest possible opportunity, having assessed what evidence is needed to fully consider the issues, what outcome would resolve the matter for the resident and whether there are any urgent actions required.	Yes	We do this wherever possible and use any potential learning/improvement as part of lessons learnt with teams.
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 facilitate this and accept complaints from others, providing permission from the resident has been given.
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	<p>We've declined a complaint because there was a disrepair claim in progress, and we've had complaints that we referred as a disrepair claim instead of a complaint case. If Insurance falls under this bracket, we refer those too.</p> <p>The complaints officer makes this determination based on our policy.</p>
4.9	Communication with the resident should not generally identify individual members of staff or contractors.	No	<p>We have taken the decision to build accountability and trust within this process, and those involved are included in the investigation and the response. We feel this is important in terms of the transparency of dealing with complaint handling, particularly where residents will be aware of those involved, as part of the complaint. However, where it is appropriate to anonymise, we will do this.</p> <p>We ensure any lessons learnt are anonymised when training/presenting back to teams.</p> <p><u>We are therefore proposing we do not implement this requirement.</u></p>

4.10	Landlords should keep residents regularly updated about the progress of the investigation.	Yes	Our policy and process builds in updates and contact to the resident during the complaint investigation. We have some improvements to make across the business in ensuring that actions are carried out and continued, after the complaint has been closed.
4.16	Landlords should seek feedback from residents in relation to the landlord's complaint handling as part of the drive to encourage a positive complaint and learning culture	Yes	We now complete customer journey mapping of some complaints, which we're using to make further improvements across the management and prevention of these.
4.17	Landlords should recognise the impact that being complained about can have on future service delivery. Landlords should ensure that staff are supported and engaged in the complaints process, including the learning that can be gained	Yes	We have built a culture of providing lessons learnt to all teams, with improvements shown across many areas. We recognise though there is more to do and this is a priority for us this 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.	Yes	Our managing unacceptable behaviour contains this information and underwent an equality impact assessment.

Section 5 – complaint stages

Code section	Code requirement	Compliant? Y/N	Evidence, commentary and any explanations
Stage 1			
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.	Yes	100% of complaints at Stages 1 and 2 have been responded to within timescales since January 2021. This includes where any cases have had a maximum of 10 days extension.
5.5	A complaint response must be sent to the resident when the answer to the complaint is known, not	Yes	As above, all responses are sent in time. Where works are still outstanding, we detail these in our responses with a

	<p>when the outstanding actions required to address the issue, are completed.</p> <p>Outstanding actions must still be tracked and actioned expeditiously with regular updates provided to the resident.</p>		<p>timescale, wherever known, is also detailed. If fuller timescales are not known, our next point of contact timescale is confirmed.</p>
5.6	<p>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.</p>	Yes	<p>Elements of Complaint and Preferred Outcomes are set out in all responses at each stage and are responded to accordingly in the full reply.</p>
5.8	<p>Landlords must confirm the following in writing to the resident at the completion of stage one in clear, plain language:</p> <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 <p>details of how to escalate the matter to stage two if the resident is not satisfied with the answer</p>	Yes	<p>This is included in each response. Revised letter templates were created to include plain language, and the Complaint Officers team “tone of voice” each response before sending to remove any jargon, acronyms etc.</p>
Best practice ‘should’ requirements			
Code section	Code requirement	Compliant? Y/N	Evidence, commentary and any explanations
5.2	<p>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.</p>	Yes	<p>We have very few examples of extensions at stage 2 but where we have these have been agreed by the complainant and have always been relevant to ongoing investigations related to works for the complaint. Where we have extended, we have given a full response within that extension time and have not exceeded 10 working days.</p>
5.3	<p>Where agreement over an extension period cannot be reached, landlords should provide the Housing Ombudsman’s contact details so the resident can</p>	Yes	<p>We provide HOS details at each stage but have not yet experienced not reaching an agreement with the complainant.</p>

	challenge the landlord's plan for responding and/or the proposed timeliness of a landlord's response.		
5.4	Where the problem is a recurring issue, the landlord should consider any older reports as part of the background to the complaint if this will help to resolve the issue for the resident.	Yes	We always sense check previous records at any stage of the complaint in case this issue is repeating and needs fuller investigation.
5.7	Where residents raise additional complaints during the investigation, these should be incorporated into the stage one response if they are relevant and the stage one response has not been issued. Where the stage one response has been issued, or it would unreasonably delay the response, the complaint should be logged as a new complaint.	Yes	Where issues are unrelated, we recommend that the complainant creates a new, separate complaint at Stage 1. Where relevant and timely, we will include new elements.
Code section	Code requirement	Compliant? Y/N	Evidence, commentary and any explanations
Stage 2			
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 escalation since January 2021
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	Elements of Complaint and Preferred Outcomes are reconfirmed by the team for every escalation.
5.11	Landlords must only escalate a complaint to stage two once it has completed stage one and at the request of the resident.	Yes	We do not open a complaint directly at Stage 2

5.12	The person considering the complaint at stage two, must not be the same person that considered the complaint at stage one.	Yes	Stage 2 complaints are considered by an executive director and up to three involved tenants. The Stage 2 response does not involve the Stage 1 responder, and another executive director would hear this case, if this had happened.
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	100% of Stage 2 complaints have been responded to within timescales including where an extension may have been agreed, but never beyond a maximum 10 working days.
5.16	Landlords must confirm the following in writing to the resident at the completion of stage two in clear, plain language: <ul style="list-style-type: none"> • the complaint stage • the complaint definition • the decision on the complaint • the reasons for any decisions made • the details of any remedy offered to put things right • details of any outstanding actions and <ul style="list-style-type: none"> • if the landlord has a third stage, details of how to escalate the matter to stage three • if this was the final stage, details of how to escalate the matter to the Housing Ombudsman Service if the resident remains dissatisfied. 	Yes	All of these are confirmed within the letter response.
Best practice 'should' requirements			
Code section	Code requirement	Compliant? Y/N	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 would, although this has not been required, to date.
5.15	Where agreement over an extension period cannot be reached, landlords should provide the Housing	Yes	This has not been applicable so far, but we would and do offer HOS contact details at each contact point.

	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		
Stage 3	Not applicable, we do not use stage 3.		

Section 6 – putting things right

Code section	Code requirement	Compliant? Y/N	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	Our outcome letter confirmation details the investigation that was completed, the errors and issues and what is being put in place to prevent this happening again.
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	Our compensation policy is aligned to the Housing Ombudsman Service guidance. We ensure that our resolutions align to the preferred outcomes of the investigation, where this is not possible, we confirm our reasons.
6.5	The remedy offer must clearly set out what will happen and by when, in agreement with the resident where appropriate. Any remedy proposed must be followed through to completion.	Yes	Our outcome letters are structure to contain this information.
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	Our compensation policy is aligned to the Housing Ombudsman Service guidance and sets out our approach to compensation.
Best practice 'should' requirements			
Code section	Code requirement	Compliant? Y/N	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	As part of our investigation, we identify if there are changes to any policy or procedures required and include this in our response to the resident.
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	We work with our solicitors to seek legal advice in complex cases. We need to tighten up in the policy cases such as this, and operational management of disrepair claims, so the Customer Experience team are aware. This work has commenced.

Section 7 – continuous learning and development

Code section	Code requirement	Compliant? Y/N	Evidence, commentary and any explanations
7.2	Accountability and transparency are integral to a positive complaint handling culture. Landlords must report back on wider learning and improvements from complaints in their annual report and more frequently to their residents, staff and scrutiny panels.	Yes	We complete quarterly feedback to our Operations Committee and Leadership team around lessons learnt and key issues/themes. We report on our complaint numbers and other key messages in our communications to tenants, for example our newsletter. Our Tenants Forum are involved as part of the stage 2 complaints and review on a quarterly basis, our approach to complaint handling. Our performance and scrutiny panel recently completed a deep dive into complaint handling.
Best practice 'should' requirements			

7.3	<p>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.</p>	Yes	<p>The Chair of the Operations Committee will be the lead for this initially, with this then passing to the Chair of the Tenant Experience Committee.</p> <p>We submit the annual complaints review to our board, and Operations Committee have had a more frequent update of numbers, trends and lessons learned.</p> <p>With immediate effect, board will receive more regular, quarterly updates on complaints information, as set out in the code.</p>
7.4	<p>As a minimum, governing bodies should receive:</p> <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. 	Yes	<p>Operations Committee receive quarterly complaints reviews, as well as an annual review.</p> <p>We have had no HOS orders at the time of writing this report, but we do have three cases which have been escalated.</p> <p>Board will be advised of these once received.</p> <p>With immediate effect, board will receive more regular, quarterly updates on complaints information, as set out in the code.</p>

7.5	Any themes or trends should be assessed by senior management to identify potential systemic issues, serious risks or policies and procedures that require revision. They should also be used to inform staff and contractor training.	Yes	Our leadership team receive quarterly updates on key themes and trends for resolution/escalation.
7.6	Landlords should have a standard objective in relation to complaint handling for all employees that reflects the need to: <ul style="list-style-type: none"> • have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments • take collective responsibility for any shortfalls identified through complaints rather than blaming others • act within the Professional Standards for engaging with complaints as set by the Chartered Institute of Housing. 	Yes	All team members will have an objective around complaints, as described, as well as preventing complaints such as taking ownership and

Section 8 – self-assessment and compliance

Code section	Code requirement	Compliant? Y/N	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 are compliant to date on our self-assessment requirements. The Customer Experience Manager will be responsible for completing the review each year.
8.2	Landlords must also carry out a self-assessment following a significant restructure and/or change in procedures.	Yes	This will be completed when applicable.

8.3	Following each self-assessment, a landlord must: <ul style="list-style-type: none">• report the outcome of their self-assessment to their governing body. In the case of local authorities, self-assessment outcomes should be reported to elected members• publish the outcome of their assessment on their website if they have one, or otherwise make accessible to residents• include the self-assessment in their annual report section on complaints handling performance	Yes	This will be shared and communicated as required on completion/approval.
-----	---	-----	--