

ANNUAL SELF-ASSESSMENT FORM – SEPTEMBER 2022

Section 1 – definition of a complaint

Code section	Code requirement	Comply: Yes/No	Evidence, commentary, and any explanations
1.2	A complaint must be defined as: 'An expression of dissatisfactions, however made, about the standard of service, actions, or lack of action by the organisation, its own staff, or those acting on its behalf,	YES	We updated our policy in May 2021 and future policy reviews will reflect any revised changes in the Complaints Handling Code
	affecting an individual resident or group of residents'		
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	All key-customer-facing staff have received appropriate training and support to understand how best to deal with any issues related to reports of service failures.
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	
1.7	A landlord must accept a complaint unless there is valid reason not to do so.	YES	
1.8	A complaints policy must clearly set out the circumstances in which a matter will not be considered, and the circumstances should be fair and reasonable	YES	Complaints Policy – 1.3
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 the decision to the Ombudsman	YES	



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Code section	Code requirement	Comply: Yes/No	Evidence, commentary, and any explanations
Best practice 'sho	uld' requirements	1007110	
1.4	Landlords should recognise the difference between 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	As part of our updated complaints policy, we introduced 'Early Resolutions', that deals with service requests and expressions of dissatisfaction that we were not previously aware of.
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 how they can pursue their dissatisfaction as complaint if they so wish to	NO	This is not an activity that is currently embedded in our approach when reviewing feedback from surveys as we do not always have the capacity to contact all residents individually that offer 'negative' feedback about their experience or complaint service issue. However, this situation will change as we plan to make better use of AI tools to analyse comments so we can be more proactive in responding to issues of dissatisfaction.



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Section 2 – Accessibility and awareness

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 person, over the telephone, in writing, by email and digitally. While the Ombudsman recognise it may not be feasible for a landlord to use all potential channels, there must be one route of access into the complaints system	YES	Customers can make complaints via emails, telephone, website, My Rosebery (resident online portal) and face to face with staff.
2.3	Landlords must make their complaints policy available in clear and accessible format for all residents. This will detail the number of stages involved, what will happen at each stage and the timescales for responding.	YES	Our complaints policy is published on our website. We also publish an annual report and quarterly complaints performance and handling reports. In addition, periodic articles in our quarterly residents' newsletters and social media channels.
2.4	Landlord websites, if they exist, must include information on how to complaint. The complaints policy and process must be easy to find on the website.	YES	See above
2.5	Landlord must comply with the Equality Act 2010 and need to adapt normal policies, procedures, or processes to accommodate an individual's needs. Landlords must satisfy themselves that their policy sets out how to respond to reasonable adjustments requests in line with the Equality Act and that complaint handlers have and appropriate training to deal with requests.	YES	



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Section 2 – Accessibility and awareness (continued)

Code section	Code requirement	Comply: Yes/No	Evidence, commentary, and any explanations
2.6	Landlords must publicise the complaints policy and process, the Complaint Handling Code and Housing Ombudsman Scheme in leaflets, posters, newsletter, online and a part of regular correspondences with residents	YES	All information is published on our website, newsletters, and social media channels.
2.7	Landlords must provide residents with contact information for the Ombudsman as part of its regular correspondences with residents	YES	An information leaflet is provided with acknowledgement of complaints, and this is also included in stage one and two responses.
2.8	Landlords must provide early advise 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	Within our acknowledgement letter, customers are advised and provided with the contact details of the Housing Ombudsman Service, if they want independent advise or guidance about their complaint.



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Code section	Code requirement	Comply:	Evidence, commentary, and any explanations
		Yes/No	
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 receive via social media and how confidentiality and privacy will be maintained.	Yes	Social Media Policy



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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 complaints 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	In September 2019, we created a new role within our Customer Experience Team of Senior Customer Experience Officer. This role has the dedicated responsibility to lead on the management and co-ordination of all complaint across the organisation, supported by the Customer Experience Manager.
3.2	the complaints handler appointed must have the appropriate complaint handling skills and no conflicts of interest.	YES	Our Senior Customer Experience Officer has received appropriate complaints training and periodically attends in-house and external training courses to keep abreast of changes and best practice across the section. We have also ensured that all key customerfacing staff that will be required to be complaint handlers have received in-house training.

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 and resolve disputes quickly and fairly 	YES	See above



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Section 4 – Complaint handling principles

Code section	Code requirement	Comply:	Evidence, commentary, and any explanations
		Yes/No	
4.1	Any decision to try and resolve a concern must be taken in agreement with the resident and 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 complaint 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 have a two-stage complaints process. When we updated our policy in May 2021, we added that the complainant must be contacted within three working days of acknowledgement of their complaint to clarify the cause of their complaint and agree possible options for resolution.
4.2	Within the complaint acknowledgement, landlords must set out their understanding of the complaint and the outcomes the resident is seeking. If any of the aspect is unclear, the resident must be asked for clarification and the full definition agreed between both parties.	YES	Our acknowledgement letter template includes the need to confirm the reason for the complaint and the outcomes being sought. Further clarity of this is gained through contact with the complainant as described above.
4.6	A complaint investigation must be conducted in an impartial manner	YES	



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Section 4 – Complaint handling principles (continued)

Code section	Code requirement	Comply: Yes/No	Evidence, commentary, and any explanations
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	We have a robust complaints process that undertake detail investigation to the cause(s) of the complaint and collate all the necessary evidence to allow any decision(s) made to be based on the evidence that is available. Any decisions made, where appropriate are undertaken in consultation with the complainant to allow expectations to be managed and lead to a successful resolution.
4.11	Landlord must adhere to any reasonable arrangements agreed with the resident in terms of frequency and method of communication	YES	See above
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	YES	



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Section 4 – Complaint handling principles (continued)

Code section	Code requirement	Comply: Yes/No	Evidence, commentary, and any explanations
4.13	A landlord must include in its complaints policy its timescales for a resident request escalation to the complaint.	YES	This is explained in the information leaflet that is provided at acknowledgment of complaint and stage one and two responses (if required).
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 reason for not accepting the complaint	YES	Complaints Policy – 1.3
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, correspondences with other parties and any reports or surveys.	YES	We have a dedicated complaints management database, where all relevant details relating to all complaints investigations and early resolutions are kept.
4.18	Landlords must have policies and procedure in place for managing unacceptable behaviour from residents and/or their representatives when pursuing a complaint.	YES	We have a policy and procedure in place for managing unacceptable behaviour



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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 will be discussed within three days of acknowledgement of a complaint being received as part of our revised policy and procedure.
4.4	A complaint should be resolved at the earliest 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 matters.	YES	See 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.	YES	Complaints Procedure under heading 'What if you need help raising a complaint?'
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	
4.9	Communication with the resident should not generally identify individual members of staff or contractors.	YES	This was addressed following a training session held with all key-customer facing staff, in February 2022 that may be required to be lead handlers. We reviewed and implemented changes in the standard and quality of our responses for stage one and two letters, including this.
4.10	Landlords should keep residents regularly updated about the progress of the investigation.	YES	Yes, this is primarily managed by our Customer Experience Team, but the complaint handler can also take responsibility where appropriate.
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	NO	This is currently under review, and we now plan to seek regular feedback by sending a survey via SMS Text/Email, once the complaint is closed. We anticipate that our new feedback programme will be up and running by October 2022.



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Code section	Code requirement	Comply: Yes/No	Evidence, commentary, and any explanations
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	On a quarterly basis all closed complaints are reviewed by the Housing Leadership Team, for trends and root causes. Any lessons learnt are disseminated to staff and reported to the Board.
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	Public Sector Equality Duty training delivered to all customer facing team members in May 2022



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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.	YES	All complaints are logged and acknowledged within two working days. In cases where extension of time is required this is first agreed with the complainant and a 'holding' written response letter is sent, confirming details, reason(s) for the delay and new target deadline.
5.5	A complaint response must be sent to the resident when the answer to the complaint is known, not when the outstanding actions required to address the issue, are completed. Outstanding actions must still be tracked and actioned expeditiously with regular updates provided to the resident.	YES	
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	Following staff training held in February 2022, we implemented a revised writing style for response letters, to ensure all points raised in letters are responded to and added a sub-heading 'lessons learnt'.



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Section 5 – Complaint stages (continued)

Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary, and any explanations
5.8	Landlords must confirm the following in writing to the resident at the completion of stage two in clear, plain language: • the complaint stage • the decision on the complaint • the reason 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 satisfied with the answer.	YES	See above
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	



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Section 5 – Complaint stages (continued)

Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary, and any explanations
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	
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	All complaints that have completed stage one, will be escalated to stage two, at the request of the complainant.
5.12	The person considering the complaint at stage two, must not be the same person that considered the complaint at stage one.	YES	All complaints that were escalated to stage two were managed by a Senior Manager that had no previous involvement or knowledge of the case.
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	Our Complaints Policy states responses will be provided within 10 working days



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Section 5 – Complaint stages (continued)

Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary, and any explanations
5.16	Landlords must confirm the following in writing to the resident at the completion of stage two in plain language: • the complaint stage • the complaint definition • the decision on the complaint • the reasons for the decision made • the details of any remedy 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	YES YES	
	 if this is the final stage, details of how to escalate to the Housing Ombudsman Service if the resident remains dissatisfied. 		



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Section 5 – Complaint stages (continued)

Mandatory 'must' requirements

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 circumstance	YES	We have a two-stage complaints policy
5.20	Landlords must confirm the following in writing to the resident at the completion of stage two in plain language: • the complaint stage • the complaint definition • the decision for the complaint • the reasons for any decisions made • the details of any remedy offered to put things right • details of outstanding actions • details of how to escalate the matter to the Housing Ombudsman Service if the resident remains dissatisfied.	N/A	



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Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary, and any explanations
5.2	If an extension beyond 20 working days is required to enable the landlord to respond to the complaint fully, this should be agreed by both parties.	YES	
5.3	Where agreement over an extension period cannot be reached, landlords should provide the Housing Ombudsman's contact details so the resident can challenge the landlord's plan for responding and/or the proposed timeliness of a landlord's response.	YES	
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	
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	



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Code section	Code requirement	Comply:	Evidence, commentary, and any explanations
		Yes/No	
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	If an extension of time is required to complete our investigation, this will be communicated to the complainant and agreed. We will follow up with a holding letter to advise revised target date for response and the reason(s) why more time is required
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	



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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.	N/A	We only have a two-stage complaints policy
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	See above



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Section 6 – Putting things right

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	
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	
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	This is a clear requirement in our response letters, as this is used to monitor and track our performance in resolving outstanding actions.
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	



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Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary, and any explanations
6.3	Landlords should look beyond the circumstances of the individual complaint and consider whether anything needs to be 'put right' in terms of process or systems to the benefit of all residents.	YES	Every quarter we review all closed complaints to identify, if there were any trend and root causes. If there is evidence to support continued service failures to other residents, the Service Manager is advised to take action to resolve the issue experienced.
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	

Section 7 – Continuous learning and improvement

Code section	Code requirement	Comply:	Code section
7.2	Accountability and transparency are integral to a positive complaint handling culture. Landlords	YES	We periodically publish articles in our residents' newsletters, with annual and quarterly complaints handling and performance reports.
	must report back on wider learning and improvements from complaints in their annual report and more frequently to their residents,		
	staff, and scrutiny panels.		



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Code section	Code requirement	Comply: Yes/No	Evidence, commentary, and any explanations
7.3	A member of the governing body should be appointed to have lead responsibility for complaints to support a positive complaint handling culture. This role will be responsible for ensuring the governing body receives regular information on complaints that provides insight to the governing body on the landlord's complaint handling performance.	YES	We have recently appointed a Board member, to be the nominated customer 'champion'. Meetings are held quarterly to discuss complaints handling and performance reports before they are presented to the full board. A meeting is also held to discuss style and content of our annual complaints report and following resident consultation our annual complaints self-assessment. Going forward, a report detailing complaints handling, performance and identified trends will be submitted to our Board every six months.
7.4	As a minimum, governing bodies should receive: • regular updates on the volume, categories and outcome of complaints that provides insight to the governing body on the landlord's complaint handling performance, including compliance with the Ombudsman's orders • Regular reviews of the issues and trends arising from complaint handling • The annual 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	YES	See above



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	they are delivered to agreed timescales. The annual self-assessment against the Complaint Handling Code for scrutiny and challenge.		
7.5	Any themes or trends should be assessed by senior management to identify potential systemic issues, serious risks or policies and procedures that require revision. They should also be used to inform staff and contractor training.	YES	Quarterly meetings are held by the Housing Leadership Team to review all closed complaints, with the key purpose to identify systemic trends and whether any changes need to be made in our policy and procedure. Summary of upheld complaints is shared at Director level to permit further dispersion of information where deemed necessary.
7.6	Landlords should have 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 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	



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Section 8 – Self-assessment and compliance

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 requirement	YES	We annually complete a self-assessment, we first started this in December 2020
8.2	Landlords must also carry out a self-assessment following a significant restructure and/or change in procedures.	N/A	No significant restructure or change in procedure has taken place. However, we note the requirement and will action if this changes.
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 outcome 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	