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

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| --- | --- | --- | --- | --- |
| **Code section** | **Code requirement** | **Comply: Yes/No** | **Evidence, commentary and any explanations** | **Action Point** |
| **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** | See policy point 2.1 – complaint is correctly defined. |  |
| **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. | **PARTLY** | Whilst it is clear that a complaint submitted via a third part is handled in line with the policy (See policy point 2.1) it is less clear that an expression of dissatisfaction will be treated as a complaint, even if the word ‘complaint’ is not used. | A and B |
| **1.6** | Chasers on a service request, such as a missed appointment, can often be resolved ‘there and then’ with an apology and the provision of another appointment and may not need to enter the complaints system. However, if further enquiries are needed to resolve the matter, or if the resident requests it, the issue must be logged as a complaint. | **NO** | Whilst staff have some awareness, there is not sufficient evidence that the difference is fully understood across the organisation. | B |

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| **1.7** | A landlord must accept a complaint unless there is a valid reason not to do so. | **YES** | There is no policy of rejecting or failing to consider a complaint at stage 1, for example on specific timeframes. |  |
| **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** | See 1.7 above. |  |
| **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** | See 1.7 above. |  |

Best practice ‘should’ requirements

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| --- | --- | --- | --- | --- |
| **Code section** | **Code requirement** | **Comply: Yes/No** | **Evidence, commentary and any explanations** |  |
| **1.4** | Landlords should recognise the difference between a | **NO** | See 1.6 above. | B |
| **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. |
| **1.5** | Survey feedback may not necessarily need to be | **NO** | In future, consider adding more information on this into the survey, or to accompany survey - however this might prove to be ‘too much information’ given client group, and the message may be more effectively conveyed separately. | C |
| 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. |

Section 2 - Accessibility and awareness Mandatory ‘must’ requirements

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| **Code section** | **Code requirement** | **Comply: Yes/No** | **Evidence, commentary and any explanations** | **Action** |
| **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** | See section 5.1 of policy and Residents complaint leaflet which explains the channels that may be used.  Complaints within the current financial year have been submitted verbally and via email. |  |
| **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** | A leaflet is available that explains the stages involved. To further ensure accessibility, consider producing an ‘easy read’ version. | D |
| **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** | <https://nortonhousingandsupport.org.uk/complaints/> |  |
| **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. | **PARTLY** | The policy addresses reasonable adjustments in terms of other formats for the policy and meetings – but it needs to be clearer on how the range of reasonable adjustments that could be requested will be addressed. | E |
| **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. | **PARTLY** | As per below, additional publicising would help NH&S to comply more fully – raising awareness of the complaint handling code. | F |

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| --- | --- | --- | --- | --- | --- |
|  | **Leaflets** | **Posters** | **Newsletters** | **Online** | **Correspondence** |
| **Policy** | ✓(specific complaints leaflet) | 🗴 | 🗴 | ✓ | 🗴 not routinely |
| **Complaint handling Code** | 🗴 | 🗴 | ✓ This is referred to in the annual report | 🗴 | 🗴 |
| **Housing ombudsman** | ✓ | 🗴 | 🗴 | ✓ | 🗴 not routinely |

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| **Code section** | **Code requirement** | **Comply:**  **Yes/No** | **Evidence, commentary and any explanations** | **Action Point** |
| **2.7** | Landlords must provide residents with contact  information for the Ombudsman as part of its regular correspondence with residents. | **PARTLY** | See 2.6 | F/G |
| **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** | Template letters provide details from the first acknowledgement. To ensure residents are receiving this information, it is important that complaint handlers utilize the templates and protocols put in place. | H |

Best practice ‘should’ requirements

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| **Code section** | **Code requirement** | **Comply:**  **Yes/No** | **Evidence, commentary and any explanations** | **Action Point** |
| **2.2** | Where a landlord has set up channels to communicate | **YES** | See policy section 5.1, and Residents complaint leaflet. |  |
| 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. |

Section 3 - Complaint handling personnel Mandatory ‘must’ requirements

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| **Code section** | **Code requirement** | **Comply: Yes/No** | **Evidence, commentary and any explanations** | **Action Point** |
| **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** | The policy refers to a complaints officer. Due to the size of the organisation, it is not possible to have a dedicated role - instead, the Operational Management Team take this role. |  |

Best practice ‘should’ requirements

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| **Code section** | **Code requirement** | **Comply: Yes/No** | **Evidence, commentary and any explanations** | **Action Point** |
| **3.2** | …the complaint handler appointed must have appropriate complaint handling skills and no conflicts of  interest. | **PARTLY** | Conflicts of interest are covered in the policy section 5.1. | I |
| **3.3** | Complaint handlers should: | **YES** | Members of the OMT are experienced in dealing with those suffering distress and those with learning disabilities. They have access to staff at all levels and can act to resolve complaints quickly. | I |
| * 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. |

Section 4 - Complaint handling principles Mandatory ‘must’ requirements

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| **Code section** | **Code requirement** | **Comply: Yes/No** | **Evidence, commentary and any explanations** | **Action Point** |
| **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**. | **PARTLY**  **YES**  **PARTLY** | In practice, those involved in investigating and resolving a complaint will normally discuss the resolution with the Service User, however better auditing of this would improve compliance.  2 stage process in place with no additional delays. Target timescales for resolution in place, in line with ombudsman guidance.  Whilst the policy is clear on this, there may be lack of understanding in terms of the definition of a ‘complaint’ vs ‘service request’, and therefore some complaints are not dealt with in line with the policy. | J  B |

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| **Code section** | **Code requirement** | **Comply: Yes/No** | **Evidence, commentary and any explanations** | **Action Point** |
| **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. | **PARTLY** | Following some amendment, this is now included in the template letter.  Those responding to complaints must ensure templates are utilised. | H |
| **4.6** | A complaint investigation must be conducted in an impartial manner. | **YES** | See policy section 5.3 |  |
| **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** | See policy section 5.3 and also section 8. |  |
| **4.11** | Landlords must adhere to any reasonable  arrangements agreed with residents in terms of frequency and method of communication | PARTLY | In practice, staff are aware of the individual needs of residents and will communicate with them in ways that meet their needs both in terms of method and frequency, however this could be made clearer in the policy. | K |

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| **Code section** | **Code requirement** | **Comply: Yes/No** | **Evidence, commentary and any explanations** | **Action Point** |
| **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. | PARTLY | Where staff are implicated there is a clear disciplinary procedure that gives them the chance to set out their position.  With residents, the process does not give them the opportunity to comment before the decision is made. | L |
| **4.13** | A landlord must include in its complaints policy its  timescales for a resident to request escalation of a complaint | **YES** | See section 5.5 and also standard response letter which outlines this. |  |
| **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** | The only grounds in which a complaint is not escalated is timeframe, this is made clear. |  |

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| **Code section** | **Code requirement** | **Comply: Yes/No** | **Evidence, commentary and any explanations** | **Action Point** |
| **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** |  |  |
| **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** | Unacceptable behaviour to be dealt with under breach of licence / tenancy agreement, or ASB Bullying and Harassment Policy. |  |

Best practice ‘should’ requirements

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| **Code section** | **Code requirement** | **Comply: Yes/No** | **Evidence, commentary and any explanations** | **Action Point** |
| **4.3** | Landlords should manage residents’ expectations from the outset, being clear where a desired outcome is unreasonable or unrealistic | **YES** | Whilst it is difficult to produce evidence given the low numbers of complaints and small size of organisation, investigating officers work closely with residents including managing expectations. |  |
| **4.4** | A complaint should be resolved at the earliest possible | **YES** | Clear timescales given in policy. Resolution times monitored against target and reported to the board. |  |
| 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. |
| **4.5** | Landlords should give residents the opportunity to have | **PARTLY** | The policy makes clear that a representative may make the complaint but doesn’t make clear that they can represent or accompany them to meetings. | M |
| 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. |

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| **Code section** | **Code requirement** | **Comply: Yes/No** | **Evidence, commentary and any explanations** | **Action Point** |
| **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 parities | **NO** | Due to the low number of complaints, it is difficult to assess, but the policy should make this clearer. | N |
| **4.9** | Communication with the resident should not generally identify individual members of staff or contractors. | **YES** | See policy section 6. |  |
| **4.10** | Landlords should keep residents regularly updated about the progress of the investigation. | **NOT CLEAR** | The policy should make this clearer. | K |
| **4.16** | Landlords should seek feedback from residents in | **YES** | Feedback sought on individual basis and via annual survey. |  |
| relation to the landlord’s complaint handling as part of |
| the drive to encourage a positive complaint and |
| learning culture. |
| **4.17** | Landlords should recognise the impact that being | **YES** | See policy section 7. All complaints logged have lessons learnt recorded (where applicable) |  |
| 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 |
| **4.19** | Any restrictions placed on a resident’s contact due to | **YES** | This is dealt with via the ASB, Bullying and Harassment process. |  |
| unacceptable behaviour should be appropriate to their |
| needs and should demonstrate regard for the |
| provisions of the Equality Act 2010. |

Section 5 - Complaint stages Mandatory ‘must’ requirements Stage 1

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| --- | --- | --- | --- | --- |
| **Code section** | **Code requirement** | **Comply:**  **Yes/No** | **Evidence, commentary and any explanations** | **Action Point** |
| **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** | See policy section 5.4 |  |
| **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. | **PARTLY** | See policy 5.4 – however, the policy should make it clearer that the complainant will receive further updates on any actions. | O |
| **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. | **PARTLY** |  |  |
| **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** | See template letter and policy. |  |

Stage 2

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| --- | --- | --- | --- | --- |
| **Code section** | **Code requirement** | **Comply:**  **Yes/No** | **Evidence, commentary and any explanations** | **Action Point** |
| **5.9** | If all or part of the complaint is not resolved to the resident’s | **PARTLY** | See policy section 5.5 – however this stage is to see if the right procedures have been followed – the code seems to suggest that it should be a review of the complaint and redress given. | P |
| 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. |
| **5.10** | On receipt of the escalation request, landlords must set out their | **YES** | See template later. |  |
| 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. |
| **5.11** | Landlords must only escalate a complaint to stage two once it | **YES** |  |  |
| has completed stage one and at the request of the resident. |

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| --- | --- | --- | --- | --- |
| **Code section** | **Code requirement** | **Comply:**  **Yes/No** | **Evidence, commentary and any explanations** | **Action Point** |
| **5.12** | The person considering the complaint at stage two, must not be | **YES** | See policy 5.5 |  |
| the same person that considered the complaint at stage one. |
| **5.13** | Landlords must respond to the stage two complaint **within 20** | **YES** | See policy 5.5 – response targets are monitored and reported to board. |  |
| **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. |
| **5.16** | Landlords must confirm the following in writing to the resident at | **YES** | See policy 5.5 and 5.6 and template letters. |  |
| 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. |

Stage 3

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **Code section** | **Code requirement** | **Comply: Yes/No** | **Evidence, commentary and any explanations** | **Action Point** |
| **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** | 2 Stage process in place. |  |
| **5.20** | 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 * 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 | **N/A** |  |  |

Best practice ‘should’ requirements Stage 1

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| --- | --- | --- | --- | --- |
| **Code section** | **Code requirement** | **Comply: Yes/No** | **Evidence, commentary and any explanations** | **Action Point** |
| **5.2** | If an extension beyond 20 working days is required to enable the | **NO** | There is no evidence that this would be agreed by the complainant. | Q |
| landlord to respond to the complaint fully, this should be agreed |
| by both parties. |
| **5.3** | Where agreement over an extension period cannot be reached, | **NO** | As above | Q |
| 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. |
| **5.4** | Where the problem is a recurring issue, the landlord should | **Unclear** | Whilst this would be part of an investigation, there is no evidence or mention in the policy. | R |
| consider any older reports as part of the background to the |
| complaint if this will help to resolve the issue for the resident. |
| **5.7** | Where residents raise additional complaints during the | **Unclear** | This is not referred to in the policy. | S |
| investigation, these should be incorporated into the stage one |
| response if they are relevant and the stage one response has |
| not been issued. Where the stage one response has been |
| issued, or it would unreasonably delay the response, the |
| complaint should be logged as a new complaint. |  |

Stage 2

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **Code section** | **Code requirement** | **Comply: Yes/No** | **Evidence, commentary and any explanations** | **Action Point** |
| **5.14** | If an extension beyond 10 working days is required to enable the | **NO** | There is no evidence that this would be agreed by the complainant. | Q |
| landlord to respond to the complaint fully, this should be agreed |
| by both parties. |
| **5.15** | Where agreement over an extension period cannot be reached, | **NO** | As above | Q |
| 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 |

Stage 3

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **Code section** | **Code requirement** | **Comply: Yes/No** | **Evidence, commentary and any explanations** | **Action Point** |
| **5.18** | Complaints should only go to a third stage if the resident has | **N/A** |  |  |
| 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. |
| **5.19** | Where agreement over an extension period cannot be reached, | **N/A** |  |  |
| 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. |

Section 6 - Putting things right Mandatory ‘must’ requirements

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| **Code section** | **Code requirement** | **Comply:**  **Yes/No** | **Evidence, commentary and any explanations** | **Action** |
| **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** | Policy and templates make clear that the complainant will be informed of any actions. The policy also makes clear the importance of learning from complaints. |  |
| **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. | **PARTLY** | It is not clear from the policy or from any other internal procedures how remedies are decided upon. | T |
| **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. | **PARTLY** | In practice, this is done, but policy could make this clearer. | U |
| **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. | **See 6.2** | See 6.2 | T |

Best practice ‘should’ requirements

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| --- | --- | --- | --- | --- |
| **Code section** | **Code requirement** | **Comply:**  **Yes/No** | **Evidence, commentary and any explanations** | **Action** |
| **6.3** | Landlords should look beyond the circumstances of the | **YES** | See section 7 of the policy. All complaints logged have ‘lessons learnt’ recorded. |  |
| individual complaint and consider whether anything needs to be |
| ‘put right’ in terms of process or systems to the benefit of all |
| residents. |
| **6.7** | In some cases, a resident may have a legal entitlement to | **NO** | ? |  |
| redress. The landlord should still offer a resolution where |
| possible, obtaining legal advice as to how any offer of resolution |
| should be worded. |

Section 7 - Continuous learning and improvement

**Mandatory ‘must’ requirements**

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| **Code section** | **Code requirement** | **Comply:**  **Yes/No** | **Evidence, commentary and any explanations** | **Action** |
| **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** | Complaints are covered in the annual report. A report on complaints and how they have been dealt with is also reviewed by the lead trustee for complaints. Where possible and appropriate, information on complaints |  |

**Best practice ‘should’ requirements**

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| **Code section** | **Code requirement** | **Comply:**  **Yes/No** | **Evidence, commentary and any explanations** | **Action** |
| **7.3** | A member of the governing body should be appointed to have | **YES** | There is a lead Trustee for complaints who reviews them annually. |  |
| lead responsibility for complaints to support a positive complaint |
| handling culture. This role will be responsible for ensuring the |
| governing body receives regular information on complaints that |
| provides insight to the governing body on the landlord’s |
| complaint handling performance. |
| **7.4** | As a minimum, governing bodies should receive: | **PARTLY** | At present, Trustees do not receive regular information on the outcome or category of complaints – consider adding to the performance monitoring suite.  As the volume of complaints is fairly low, they receive an annual report that highlights issues or trends. | V |
| * 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. |

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| --- | --- | --- | --- | --- |
| **Code section** | **Code requirement** | **Comply: Yes/No** | **Evidence, commentary and any explanations** | **Action** |
| **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** | See section 5.5 |  |
| **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. | **PARTLY** | This is covered to some extent in the code of conduct for support staff. | B |

Section 8 - Self-assessment and compliance Mandatory ‘must’ requirements

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| **Code section** | **Code requirement** | **Comply: Yes/No** | **Evidence, commentary and any explanations** | **Action** |
| **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** |  |  |
| **8.2** | Landlords must also carry out a self-assessment following a significant restructure and/or change in procedures. | **PARTLY** | This should be made clearer in the policy. | W |
| **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** |  |  |

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| **Action Point Ref** | **Action Point** | **Mandatory or Recommendation?** | **By Whom?** | **By When?** | **Notes / Date Completed** |
| A | Amend the complaints policy to ensure it is clear that the word ‘complaint’ does not need to be used. | Mandatory |  |  |  |
| B | Ensure frontline staff and their managers fully understand the definition of a complaint, and the difference between service requests and complaints (utilising ombudsman resources) – consider a standard objective in relation to complaint handling for all employees (as per 7.6) | Mandatory |  |  |  |
| C | Consider giving residents more information on how to raise a complaint alongside the annual survey. | Recommendation |  |  |  |
| D | Consider creating an easy read version of the complaints leaflet | Recommendation |  |  |  |
| E | Ensure policy clear in terms of how NH&S will respond to reasonable adjustments requests in relation to all aspects of the process. | Mandatory |  |  |  |
| F | Review communication channels to ensure that the complaints policy and process, the Complaint Handling Code and the Housing Ombudsman (including contact details) are regularly and consistently communicated to Service Users | Mandatory |  |  |  |

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| **Action Point Ref** | **Action Point** | **Mandatory or Recommendation?** | **By Whom?** | **By When?** | **Notes / Date Completed** |
| G | Ensure relevant / front line staff are aware of the housing ombudsman and their role. | Mandatory |  |  |  |
| H | Ensure all complaint handlers / OMT are aware of the importance of using template letters / protocols so that all necessary information is conveyed in complaint responses. | Mandatory |  |  |  |
| I | Review the complaint handling skills of the management team and consider whether further inhouse learning or CPD would be beneficial | Recommendation |  |  |  |
| J | Ensure all complaint handlers are aware of the importance of discussing resolution, and confirming such discussions in writing | Mandatory |  |  |  |
| K | Amend policy to cover communication during the process, making clear that NH&S will adhere to any reasonable arrangements agreed with residents in terms of frequency and method of communication. | Mandatory |  |  |  |
| L | Amend policy to ensure the process gives complainants the opportunity to comment any adverse findings before a final decision is made. | Mandatory |  |  |  |
| M | Amend policy to make it clear that residents can as someone to represent them, or accompany them to meetings. | Mandatory |  |  |  |

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| **Action Point Ref** | **Action Point** | **Mandatory or Recommendation?** | **By Whom?** | **By When?** | **Notes / Date Completed** |
| N | 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 parities | Recommendation |  |  |  |
| O | Amend policy -to make it clear that the complainant will receive further updates on any actions. | Mandatory |  |  |  |
| P | Review stage 2 and ensure this is available to complainants who did not feel their complaint was resoled at stage 1, and it is not just to look at the investigation process | Mandatory |  |  |  |
| Q | Amend policy to explain that any extension to target timescales will be agreed by the complainant, and if agreement cannot be reached then the HO details will be provided | Recommendation |  |  |  |
| R | Amend policy to clarify that investigations will include looking at old reports / previous complaints | Recommendation |  |  |  |
| S | Amend policy to clarify what should happen if new complaints arise during the process | Recommendation |  |  |  |
| T | Amend policy to clarify the process for deciding on an appropriate remedy | Mandatory |  |  |  |
| U | Amend policy to clarify that the remedy offer will set out what will happen and by when, in agreement with the resident where appropriate | Mandatory |  |  |  |

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| **Action Point Ref** | **Action Point** | **Mandatory or Recommendation?** | **By Whom?** | **By When?** | **Notes / Date Completed** |
| V | Add information on categories and outcome of complaints to quarter performance monitoring for board | Recommendation |  |  |  |
| W | Amend policy to make it clearer in what circumstances the self-assessment will be repeated. | Mandatory |  |  |  |