Appendix B – Self-Assessment Form

This self-assessment form should be completed by the complaints officer and discussed at the landlord's governing body annually.

Evidence should be included to support all statements with additional commentary as necessary.

Explanations must also be provided where a mandatory 'must' requirement is not met to set out the rationale for the alternative approach adopted and why this delivers a better outcome.

Section 1 - Definition of a complaint

Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
1.2	A complaint must be defined as: 'an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the organisation, its own staff, or those acting on its behalf, affecting an individual resident or group of residents.	Yes	Section 3 of our Complaints Policy uses this definition.
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 staff understand the need to listen to the tone and words used when logging a complaint, and do not wait for a resident to use the word '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	If a service request develops into an expression of dissatisfaction we log it as a complaint.
1.7	A landlord must accept a complaint unless there is a valid reason not to do so.	Yes	Section 3 of our Complaints Policy outlines circumstances where we will not accept a formal complaint.

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	Section 3 of our Complaints Policy outlines circumstances where we will not accept a formal 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	If we decide not to accept a complaint a detailed explanation will be provided to the complainant, setting out the reasons and providing the information for the Ombudsman.

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
1.4	Landlords should recognise the difference between a service request, where a resident may be unhappy with a situation that they wish to have rectified, and a complaint about the service they have/have not received.	Yes	Our staff understand that where a resident is telling us about a problem for the first time, this should be treated as a service request. This is stated in section 3 of our Complaints Policy.
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.	Yes	We use external research partners to complete our surveys and when pertinent, they offer respondents the opportunity to raise their concerns as a complaint for us to pick up in line with our Complaints Policy.

Section 2 - Accessibility and awareness Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
2.1	Landlords must make it easy for residents to complain by providing different channels through which residents can make a complaint such as in person, over the telephone, in writing, by email and digitally. While the Ombudsman recognises that it may not be feasible for a landlord to use all of the potential channels, there must be more than one route of access into the complaints system.	Yes	Section 5 of our Complaints Policy provides a list of the different ways in which a complaint can be logged.
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 Complaints Policy is available on our website and a printed copy is available upon request.
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	Our website has easy to find information on how to raise a complaint, with the policy and process explained as well as being available to download.
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	We comply with the Equality Act 2010 and should the need arise to adapt policies, procedures, or processes to accommodate an individual's needs we would do so.
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	Our website publicises our complaints policy, our self-assessment against the code, and provides a link to the HOS Scheme. Posters are displayed on notice boards, and leaflets available in our reception and on request. In our resident newsletter we provide the information for the Ombudsman.

2.7	Landlords must provide residents with contact information for the Ombudsman as part of its regular correspondence with residents.	V DC	In our resident newsletter we provide as contact information for the Ombudsman.
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	In our acknowledgement letter, we provide early advice to residents on their right to access Housing Ombudsman Service.

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
2.2	Where a landlord has set up channels to communicate with its residents via social media, then it should expect to receive complaints via those channels. Policies should contain details of the steps that will be taken when a complaint is received via social media and how confidentiality and privacy will be maintained.	No	Whilst our Complaints Policy states that complaints can be made on Social Media, we do not explicitly state how we will maintain confidentiality and privacy. This will be addressed in the next review of our policy.

Section 3 - Complaint handling personnel

Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
3.1	Landlords must have a person or team assigned to take responsibility for complaint handling to ensure complaints receive the necessary attention, and that these are reported to the governing body. This Code will refer to that person or team as the "complaints officer".	Yes	Section 13 of our Complaints Policy explains that the Customer Excellence Leader is responsible for ensuring that complaints are recorded and responded to within the agreed timescales.
3.2	the complaint handler appointed must have appropriate complaint handling skills and no conflicts of interest.	Yes	All our staff are trained to handle complaints. If there are any conflicts of interest staff are expected to disclose these, so that we can assign the complaint to an alternative complaint handler.

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
3.3	Complaint handlers should: be able to act sensitively and fairly be trained to handle complaints and deal with distressed and upset residents have access to staff at all levels to facilitate quick resolution of complaints have the authority and autonomy to act to resolve disputes quickly and fairly.	Yes	All our staff are trained to handle complaints, have the autonomy to resolve disputes and treat our residents fairly. Our Customer Excellence Leader helps to facilitate quick resolutions.

Section 4 - Complaint handling principles Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
4.1	Any decision to try and resolve a concern must be taken in agreement with the resident and a landlord's audit trail/records should be able to demonstrate this. Landlords must ensure that efforts to resolve a resident's concerns do not obstruct access to the complaints procedure or result in any unreasonable delay. It is not appropriate to have extra named stages (such as 'stage 0' or 'pre-complaint stage') as this causes unnecessary confusion for residents. When a complaint is made, it must be acknowledged and logged at stage one of the complaints procedure within five days of receipt.	Yes	Section 7.2 of our Complaints Policy states that we will acknowledge a complaint by telephone or in writing within 5 working days.

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.	Yes	In our acknowledgement we outline our understanding of the complaint, the outcomes our resident is seeking. Should we be unclear we ask our resident so that we agree the definition of their complaint.
4.6	A complaint investigation must be conducted in an impartial manner.	Yes	We treat our residents fairly when handling complaints.
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	All our staff are supported to handle complaints with an open mind, considering all information carefully.
4.11	Landlords must adhere to any reasonable arrangements agreed with residents in terms of frequency and method of communication	Yes	Section 7.1 of our Complaints Policy states that we will agree reasonable outcomes.
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	Section 7.2 of our Complaints Policy states that we will discuss the complaint with the complainant to ensure we understand the background details.
4.13	A landlord must include in its complaints policy its timescales for a resident to request escalation of a complaint	Yes	Section 7.2 of our Complaints Policy states that "You will need to make your request within one month of your Stage 1 response letter being sent to you."
4.14	A landlord must not unreasonably refuse to escalate a complaint through all stages of the complaints	Yes	Section 7.2 of our Complaints Policy states the criteria that an appeal must meet to be accepted.

	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.		
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.		Each complaint that is logged at Tuntum has a shared folder where complaint handlers can save all information relating to the case.
4.18	Landlords must have policies and procedures in place for managing unacceptable behaviour from residents and/or their representatives when pursuing a complaint.	VAC	Sections 8 and 9 of our Complaints Policy talk about behaviour and we have a Violence & Aggression to Staff Policy which guides us.

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	We are clear and explain to tenants when their expectations are unreasonable, this is covered in Section 10 of our Complaints Policy.
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 aim to offer a solution at the earliest possible opportunity.
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	Section 4 of our Complaints Policy makes it clear when we will accept a complaint from a representative of a tenant.
4.8	Where a key issue of a complaint relates to the parties' legal obligations landlords should clearly set out their understanding of the obligations of both parties.	Yes	Where a complaint relates to our legal obligations we would set these out to the complainant.

4.9	Communication with the resident should not generally identify individual members of staff or contractors.	Yes	We take full ownership of our complaints and do not identify staff or contractors.
4.10	Landlords should keep residents regularly updated about the progress of the investigation.	Yes	We provide regular updates throughout our complaint handling process.
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.	No	We currently do not do this, we are looking at implementing a post response letter survey.
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	Our Customer Excellence Leader is on hand to support staff. We hold regular Complaints Lessons Learnt sessions to review all complaints to taking away learnings to benefit all residents.
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	We comply with and have due regard to the Equality Act 2010.

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	Section 7.2 of our Complaints Policy explains our timeframes for investigation which match the HOS Code.
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	We aim to resolve complaints as efficiently as possible and so will provide a response letter with our agreed or proposed solution as soon as we're able to.

5.6	Landlords must address all points raised in the complaint and provide clear reasons for any decisions, referencing the relevant policy, law and good practice where appropriate.	Yes	We take all customer complaints seriously and ensure our response letters address each point our resident raises with us.
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	All staff understand what information is required when writing a response to a complaint.

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
5.9	If all or part of the complaint is not resolved to the resident's satisfaction at stage one it must be progressed to stage two of the landlord's procedure, unless an exclusion ground now applies. In instances where a landlord declines to escalate a complaint it must clearly communicate in writing its reasons for not escalating as well as the resident's right to approach the Ombudsman about its decision.	Yes	Section 7.2 of our Complaints Policy states the criteria that an appeal must meet to be accepted.
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	When we acknowledge a Stage 2 escalation request we explain who is reviewing their complaint and get in touch with our resident within five working days. We offer the opportunity for a personal telephone conversation or meeting.
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	Our Complaints Policy make clear the process in order to reach 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	Section 7.2 of our Complaints Policy makes it clear that the person who considers the complaint at Stage 2 will not have previously been involved.
5.13	Landlords must respond to the stage two complaint <u>within 20</u> 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	Section 7.2 of our Complaints Policy explains the timeframes we set, which match the HOS Code.
5.16	Landlords must confirm the following in writing to the resident at the completion of stage two in clear, plain language: the complaint stage the complaint definition the decision on the complaint the reasons for any decisions made the details of any remedy offered to put things right details of any outstanding actions and if the landlord has a third stage, details of how to escalate the matter to stage three if this was the final stage, details of how to escalate the matter to the Housing Ombudsman Service if the resident remains dissatisfied.	Yes	All staff understand what information is required when writing a response to a Stage 2 complaint.

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
5.17	Two stage landlord complaint procedures are ideal. This ensures that the complaint process is not unduly long. If landlords strongly believe a third stage is necessary, they must set out their reasons for this as part of their self-assessment. A process with more than three stages is not acceptable under any circumstances.	Yes	We have a two stage process with an option for an external review by our Independent Complaints Panel.

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	_	We do not have a Stage 3 in our Complaints Policy.
	Ombudsman Service if the resident remains dissatisfied		

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	Section 7.2 of our Complaints Policy explains the timeframes we set, and how we manage them.
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.	No	We provide the Ombudsman's contact details in our acknowledgement letter, and these will also be provided in the response letter.
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	If a resident has reported their concerns to us previously we take these into consideration when investigating their complaint.
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	We deal with all concerns that are raised with us whilst the complaint is open. Should a new issue arise post issuing the response letter this would be logged as a new complaint.

Stage 2

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
5.14	If an extension beyond 10 working days is required to enable the landlord to respond to the complaint fully, this should be agreed by both parties.	No	Our policy states that if we exceed the 10 working day extension, an explanation and a date when the stage two response will be sent.
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		We provide HOS contact details in our acknowledgement and response letters.

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.	-	We do not have a Stage 3 in our 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.	-	We do not have a Stage 3 in our Complaints Policy.

Section 6 - Putting things right

Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
6.1	Effective dispute resolution requires a process designed to resolve complaints. Where something has gone wrong a landlord must acknowledge this and set out the actions it has already taken, or intends to take, to put things right.	Yes	In our complaint response letters we acknowledge when something has gone wrong, and set out our actions.
6.2	Any remedy offered must reflect the extent of any service failures and the level of detriment caused to the resident as a result. A landlord must carefully manage the expectations of residents and not promise anything that cannot be delivered or would cause unfairness to other residents.	Yes	We treat all residents fairly, taking into account their individual circumstances when looking at the level of detriment that has been caused.
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	In our complaint response letters we provide timeframes where applicable.
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 helps to guide us in awarding compensation.

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	We hold regular Complaints Lessons Learnt sessions to review all complaints to take away learning to benefit all residents.
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 seek legal advice when necessary.

Section 7 - Continuous learning and improvement

Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
7.2	Accountability and transparency are integral to a positive complaint handling culture. Landlords must report back on wider learning and improvements from complaints in their annual report and more frequently to their residents, staff and scrutiny panels.	Yes	Following our Complaints Lessons Learnt sessions we publish our findings to all staff members, and in our resident newsletter. Our Annual Report contains information collated from these sessions, reporting on how we have learnt from complaints.

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	The Chair of our Customer Experience Committee (CEC) has been appointed to hold lead responsibility for complaints. At the CEC they receive information on complaints and are able to report to the governing body.
7.4	 As a minimum, governing bodies should receive: Regular updates on the volume, categories and outcome of complaints, alongside complaint handling performance including compliance with the Ombudsman's orders Regular reviews of issues and trends arising from complaint handling, The annual performance report produced by the Ombudsman, where applicable Individual complaint outcomes where necessary, including where the Ombudsman made findings of severe maladministration or referrals to regulatory bodies. The implementation of management responses should be tracked to ensure they are delivered to agreed timescales. The annual self-assessment against the Complaint Handling Code for scrutiny and challenge. 	Yes	Our CEC receives this information as part of their regular committee meetings. The Chair of the CEC gives feedback on complaints at each Board meeting.

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 Customer Excellence Leader reports to our Director of Community Services on trends and systemic issues following the regular Complaints Lessons Learnt sessions.
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. 	Yes	Our staff work together to resolve complaints for our residents. In section 1 of our Complaints Policy we explain out Purpose and Approach to complaint handling

Section 8 - Self-assessment and compliance Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
8.1	Landlords must carry out an annual self-assessment against the Code to ensure their complaint handling remains in line with its requirements.	Yes	We completed the initial self-assessment in December 2020 and we completed a self-assessment in December 2021 on a voluntary basis.
8.2	Landlords must also carry out a self-assessment following a significant restructure and/or change in procedures.	Yes	When a restructure occurs that effects how we handle complaints, we would perform a new self-assessment.
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	Our Board is provided with a copy of our self-assessment for feedback. We ensure that our website and annual report contains link to the latest self-assessment.