Housing Ombudsman Complaint Handling Code: Annual self-assessment form appendix B

This self-assessment form should be completed by the Complaints Officer and discussed with the landlord's governing body annually (undertaken 31.3.23)

Section 1 – definition of a complaint

Code section	Code requirement	Comply: Yes / No	Evidence, commentary and any explanations
1.2 - mandatory	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	Clearly noted in our Complaints & Concerns policy https://www.greatwellhomes.org.uk/wp-content/uploads/2021/03/Customer-Complaints-Concerns-Procedure-V4-updated-6.6.22.pdf
1.3 - mandatory	The resident does not have to use the word 'complaint' for to be treated as such. A complaint that is submitted via a third party or representative must still be handled in line with the landlords' complaints policy.	Yes	As noted in paragraph 6.1 of Complaints & Concerns policy
1.4 – best practice	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	Clarified in paragraph 3.2 and 3.3 of Complaints & Concerns policy
1.5 – best practice	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	Customers who give negative feedback regarding the service they have received are contacted to discuss any concerns and where possible, issues are resolved informally with them. If this is not able to be achieved, then a formal complaint will be logged to fully review and investigate issues raised.
1.6 – mandatory	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.	Yes	Customer Service officers have a clear awareness of expectations of complaint handling code. On the occasion an appointment has been missed if due to service failure by Greatwell Homes then a complaint is logged.

1.7 – mandatory	A landlord must accept a complaint unless there is a valid reason		
	not to do so.	Yes	Exceptions to this are noted in paragraph 3.5 of Complaints & Concerns
			policy
1.8 - mandatory	A complaints policy must clearly set out the circumstances in		
	which a matter will not be considered, and these circumstances	Yes	Clarified in paragraph 3.5 of Complaints & Concerns policy
	should be fair and reasonable to residents.		
1.9 - mandatory	If a landlord decides to not to accept a complaint, a detailed		
	explanation must be provided to the resident setting out the	Yes	Exceptions as outlined in paragraph 3.5 apply, however, clarity on this is
	reasons why this matter is not suitable for the complaints process		fully explained and noted on tenancy management notepad where
	and the right to take that decision to the Ombudsman		applicable.

Section 2 – Accessibility and awareness

Code section	Code requirement	Comply:	Evidence, commentary and any explanations
		Yes / No	
2.1 - mandatory	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 the potential channels, there must be more than one route of access into the complaints system.	Yes	Complaints can be made via telephone, on-line portal, email into contact centre, via social media and directly with staff members face to face.
2.2 – best practice	Where a landlord has set up channels to communicate with its residents via social media, then is should expect to receive complaints via those channels. Policies should contain details of the steps that will be taken when a complaint is received via social media and how confidentiality and privacy will be maintained.	Yes	Covered in paragraph 5.2 of Complaints & Concerns policy
2.3 - mandatory	Landlords must make their complaints 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	Policy available on website. Posters in Independent Living schemes explain how to access policy. Printed copy will be sent to customers on request. Monthly customer e-newsletter has regular update.
			Information included in annual report.

2.4 - mandatory	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://www.greatwellhomes.org.uk/how-to-make-a-complaint/ https://www.greatwellhomes.org.uk/?s=complaints+policy
2.5 - mandatory	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 request in line with the Equality Act and that complaint handlers have had appropriate training to deal with such requests.	Yes	Reasonable Adjustments Policy and Procedure in place. Policy https://www.greatwellhomes.org.uk/downloads/reasonable-adjustments-policy/ Procedure https://www.greatwellhomes.org.uk/downloads/reasonable-adjustments-procedure/
2.6 - mandatory	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	Website: Complaints & Concerns policy, Complaint Handling Code, Housing Ombudsman scheme - https://www.greatwellhomes.org.uk/how-to-make-a-complaint/ E-newsletter: monthly correspondence Posters in Independent Living Schemes
2.7 - mandatory	Landlords must provide residents with contact information for the Ombudsman as part of its regular correspondence with residents.	Yes	E-newsletter Annual report
2.8 - mandatory	Landlords must provide early advice to residents regarding their right to access the Housing Ombudsman Service through their complaint, not only when the landlord's complaints process is exhausted.	Yes	Information is included in acknowledgement to customer, stage 1 and stage 2 outcomes letters and in Complaints & Concerns policy.

Section 3 – Complaint Handling Personnel

Code section	Code requirement	Comply: Yes / No	Evidence, commentary and any explanations
3.1 - mandatory	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	Dedicated Complaints Resolution Officer

3.2 - mandatory	The complaints officer may allocate complaints handling to another person. Where this is the case, the complaint handler appointed must have appropriate complaint handling skills and no conflict of interest.	Yes	Additional staff trained – namely, Customer Services Team Leader and Customer Services Manager supported by Head of Customer Excellence – all of whom have undertaken external training
3.3 – best practice	Complaint handlers should: Be able to act sensitively and fairly Be trained to handle complaints and deal with distressed and upset customers Have access to staff at all levels to facilitate quick resolution complaints Have the authority and autonomy to act as to resolve disputes quickly and fairly	Yes	Yes, external training delivered by HQN.

Section 4 – Complaint Handling Principles

Code section	Code requirement	Comply:	Evidence, commentary and any explanations
		Yes / No	
4.1 - mandatory	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.	Yes	Work items raised by Customer Services team and logged on complaints database and assigned a reference number and owner to who is responsible for responding to customer with a resolution with 3 working days.
	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 a stage one of the procedure within five days of receipt		Greatwell Homes Complaints policy has 2 stages and complaints are logged and acknowledged within prescribed timescales.
4.2 - mandatory	Within the complaint acknowledgement, landlords must set out their understanding of the complaint and the outcomes the residents 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	Standard template for acknowledgement of complaint to ensure requirements are covered.
4.3 – best practice	Landlords should manage resident's expectations from the outset, being clear where a desired outcome is unreasonable or unrealistic.	Yes	Complaint Resolution Officer as part of process engages directly with customer to ensure clear understanding of presenting issues to ensure has

			clarity on issues / desired outcome and takes opportunity to manage expectations and note on file.
4.4 – best practice	A complaint should be resolved at the earliest possible opportunity, having assessed what evidence is needed fully to consider the issues, what outcome would resolve the matter for the resident and whether there are more urgent actions required.	Yes	Complaint Resolution Officer fully assesses complaint and speaks with customer to ensure has full oversight of issues. Where there are more urgent action required, will consult with Manager/Head of Service for advice and support to agree resolution where required.
4.5 – best practice	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	This is covered in our Complaints & Concerns Policy
4.6 - mandatory	A complaint investigation must be conducted in an impartial manner.	Yes	Complaints Resolution Officer is independent role within organisation to ensure impartiality.
4.7 - mandatory	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	As above.
4.8 – best practice	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	Reference to tenancy agreement where applicable is referenced to aid understanding.
4.9 – best practice	Communication with the resident should not generally identify individual members of staff or contractors.	Yes	Response refer to 'staff member' rather than by individual name, with exception of where a specific staff member / contractor has been identified and named in complaint
4.10 – best practice	Landlords should keep residents regularly updated about the progress of the investigation.	Yes	Complaint Resolution Officer ensures regular contact and documents contact made.
4.11 – mandatory	Landlords must adhere to any reasonable arrangements agreed with residents in terms of frequency and method of communication.	Yes	Response timescale of 10 working days for Stage 1 complaints is managed within acknowledgement letter and follow up contact with customer be it verbal or in writing ensures customer is clear on progress of complaint investigation. Customer Services Officer when logging complaint notes customer's preferred contact method to ensure we are meeting customer's expectations.

4.12 – mandatory	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	Complaint Handler prior to making adverse determination discusses findings with complainant and explains rationale of decision.
4.13 - mandatory	A landlord must include in its complaints policy its timescales for residents to request escalation of a complaint.	Yes	Please see Complaints & Concerns Policy – section 7 – Complaint Resolution which sets out timeframes
4.14 - mandatory	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 landlords' complaints policy and must be the same as the reasons for not accepting a complaint.	Yes	Please see Complaints & Concerns Policy – refer to paragraph 3.5
4.15 - mandatory	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	Case file opened for each complaint with all supporting documentation from both customer and internal/external sources
4.16 – best practice	Landlords should seek feedback from residents in relation to the landlord's complaint handling a part of the drive to encourage a positive complaint and learning culture.	Yes	Complaint handling satisfaction questionnaire is undertaken by Customer Services Officer who has not been part of the complaint handling process — a key performance indicator is in place to measure customer satisfaction levels.
4.17 – best practice	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 from it.	Yes	Regular update to Operational Managers via 6-weekly meetings on expectations in management of complaints and their role and the role of their teams, volume of complaints and key learning. Complaint Resolution Officer provides updates to service managers on complaint findings and learning. Where there have been repeat issues around staff behaviours external training has been arranged to support them along with managers picking up in 121's
			Service changes as result of complaints publicised in monthly e-newsletter and updated on website.

4.18 – mandatory	Landlords must have policies and procedures in place for managing unacceptable behaviour from residents and/or their representatives when pursuing a complaint.	Yes	Complaints & Concerns policy – paragraph 3.6 – persistent and unreasonable complainants cover this.
4.19 – best practice	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	Reasonable adjustments policy and procedure clearly outlines expectations to ensure compliance with this requirement. Formal training has been delivered to complaint handling staff – August 2022.

Section 5 – Complaint Stages

Stage 1

Code section	Code requirement	Comply: Yes / No	Evidence, commentary and any explanations
5.1 - mandatory	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	On the occasions a complaint response is outside of 10 working days it is in agreement with customer and contact and rationale recorded to evidence.
5.2 – best practice	If an extension beyond 20 working days is required to enable the landlord to respond to the complaint fully, this should be agreed with both parties.	Yes	Complaint Resolution Officer aware must ensure timely conversation with customer if a complex issue whereby information to support resolution is not readily available and must communicate this with customer ahead of timescale – is recorded on database and confirmed in writing.
5.3 – best practice	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	Complaint Resolution Officer aware of this requirement – to date this situation has not occurred.
5.4 – best practice	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 the issue for the resident.	Yes	Historic records held on our systems are accessed to help build picture and better understand issues being raised by customer – this is saved in complaint folder to support determination.
5.5 - mandatory	A complaint response must be sent the resident when the answer to the complaint is known, not when the outstanding actions required to address the issue, are completed.	Yes	Formal response letter is sent.

	Outstanding actions must still be tracked and actioned expeditiously with regular updates provided to the resident.		Complaints resolution tracker in place with identified lead for delivery of action. Is reviewed weekly by Complaints Resolution Officer and discussed at Operational Managers meeting with Executive Director present to ensure oversight across the organisation.
5.6 – mandatory	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	Stage 1 and Stage 2 outcome letters have templates in place to ensure all requirements are covered as laid down in the Code.
5.7 – best practice	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.	Yes	Complaint Resolutions Officer is aware of this requirement and it is adhered to.
	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	As above
5.8 – mandatory	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	Yes	Letter templates adhere to this requirement.
	 Details of how to escalate the matter to stage two if the resident is not satisfied with the answer 		

Stage 2

Code section	Code requirement	Comply: Yes / No	Evidence, commentary and any explanations
5.9 – mandatory	If all part 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	Yes	There have been no instances of refusal to escalate to Stage 2.

	writing its reasons for not escalating as well as the resident's right to approach the Ombudsman about its decision		
5.10 - mandatory	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	Letter template ensures this requirement is adhered to.
5.11 - mandatory	Landlords must only escalate a complaint to stage two once it has completed stage one and at the request of the resident.	Yes	Fully comply with this requirement – advice is given in Stage 1 outcome letter clearly setting out right to escalate to Stage 2 and how to do so.
5.12 - mandatory	The person considering the complaint at stage two, must not be the same person that considered the complaint at stage one.	Yes	Adhered to ensure impartiality.
5.13 - mandatory	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	Adhered to.
5.14 – best practice	If an extension beyond 10 working days is required to enable the landlord to respond to the complaint fully, this should be agreed with both parties.	Yes	No Stage 2 complaints have exceeded 20 working days and as such an extension has not been required.
5.15 – best practice	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	Awareness of requirement, however, not required to date.
5.16 - mandatory	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	Yes	Template in place to ensure compliance
	anu	N/A	

(If the landlord has a third stage, details of how to escalate the matter to stage three)		
 If this is the final stage, details of how to escalate the matter to the Housing Ombudsman Service if the resident remains dissatisfied. 	Yes	Included in letter clearly outlining how to escalate with full contact details

Stage 3

Code section	Code requirement	Comply:	Evidence, commentary and any explanations
		Yes / No	
5.17 - mandatory	Two stage landlord complaint procedures are ideal. This		
	ensures that the complaint process is not unduly long.	Yes	Greatwell Homes has a two-stage process only
	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	n/a	
	acceptable under any circumstances.		
5.18 – good practice	Complaints should only go to a third stage if the resident has		
	actively requested a third stage review of their complaint.	n/a	Greatwell Homes does not have a three-stage process
5.19 – good practice	Where an agreement over an extension period cannot be		
	reached, landlords should provide the Housing		
	Ombudsman's contact details so the resident can challenge	n/a	Greatwell Homes does not have a three-stage process
	the landlord's plan for responding and/or the proposed		
	timelines of a landlord's response.		
5.20 - mandatory	Landlords must confirm the following in writing to the		
	resident at the completion of stage three, in clear plain	n/a	Greatwell Homes does not have a three-stage process
	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 how to escalate the matter to the		
	Housing Ombudsman Service if the resident		
	remains dissatisfied.		

Section 6 – putting things right

Code section	Code requirement	Comply: Yes / No	Evidence, commentary and any explanations
6.1 - mandatory	Effective dispute resolution requires a process designed to resolve complaints. Where something has gone wrong a landlord must acknowledge this and set out the actions it has already taken, or intends to take, to put things right.	Yes	Our Complaint & Concerns policy and procedure underpin these principles
6.2 - mandatory	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	Compensation policy and procedure in place – endorsed by our Customer Assembly (strategically involved customers)
6.3 – best practice	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	Service changes as a result of complaints are logged and evidence and learning shared with customers via e-newsletter and updates on our website.
6.5 - mandatory	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	Complaints Resolution action tracker in place to ensure oversight of remedy to conclusion.
6.6 – mandatory	In awarding compensation, a landlord must consider whether any statutory payments are due, if any quantifiable losses have been occurred, the time and trouble a resident has been put to as well a any distress and inconvenience caused.	Yes	Compensation policy in place.
6.7 – best practice	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	Complaint handling staff aware of this requirement and utilise legal advice via HALA framework.

Section 7 – continuous learning and improvements

Code section	Code requirement	Comply:	Evidence, commentary and any explanations
		Yes / No	
7.2 - mandatory	Accountability and transparency are integral to a positive complaint handling culture. Landlords must report back on wider learning and improvements from complaints in their	Yes	E-newsletter – monthly updates provided.
			Annual report – overview provided

	annual report and more frequently to their residents, staff and scrutiny panels.		Scrutiny members use data regarding complaints to help determine future scrutiny topics for forthcoming year. Customer Assembly receive quarterly performance updates on complaints
7.3 – best practice	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	Chair of Audit & Risk Committee (Board member) has lead responsibility for complaints. Complaint performance is reported to our Audit & Risk Committee in February, May, July and November. Annual self-assessment will be conducted April of each year and reported to Audit and Risk Committee in July and has been added into our compliance calendar. In addition, full Board receive update on complaints as part of quarterly reporting.
7.4 – best practice	As a minimum, governing bodies should receive: Regular updates on the volumes, categories and outcomes of complaints, alongside complaint handling performance including compliance with the Ombudsman's orders. Regular reviews of issues and trends arising from complaint handing. 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	Complaint performance is reported to Audit & Risk Committee in February, May, July and November. If an adverse finding is made via the Ombudsman this is shared with all Board members and included on board packs.
7.5 – best practice	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	Reported at Performance Clinic on quarterly basis attended by Senior Managers which comprises Executive Directors and Head of Service.

7.6 – best practice	Landlords should have a standard objective in relation to		
	complaint handling for all employees that reflect the need to:	Yes	
	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 ty the Chartered Institute of		
	Housing https://www.cih.org/media/acmfyas1/how-to-		
	handle-complaints-effectively.pdf		

Section 8 – self assessment and compliance

Code section	Code requirement	Comply:	Evidence, commentary and any explanations
		Yes / No	
8.1 - mandatory	Landlords must carry out an annual self-assessment against the		
	Code to ensure their complaint handling remains in line with its	Yes	Undertaken 31.3.22 and scheduled for annual review hereafter at the close
	requirements.		of Quarter 4 of financial year.
8.2 – mandatory	Landlords must also carry out a self-assessment following a	Yes	Noted - no significant restructure/change in procedures made during 22-23.
	significant restructure and/or change in procedures		
8.3 – mandatory	Following each self-assessment, a landlord must:		
	 report the outcome of their self-assessment to their 	Yes	Planned meeting with Chair of Audit & Risk Committee – 21 April 2023
	governing body (in the case of local authorities, self-		(lead Board member for Complaints) – full assessment will be published
	assessment outcomes should e reported to elected		with May Board papers to the full Board.
	members).		
	 Publish the outcome of their assessment on their 	Yes	
	website if they have one, or otherwise, make accessible		
	to resident.		
	 Include the self-assessment in their annual report 	Yes	Scheduled for inclusion in annual report that will be published in July 2023.
	section on complaints handling performance		