

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: <i>'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.'</i>	Y	The Ombudsman's definition of a complaint is fully incorporated into our policy.
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.	Y	Our complaints policy notes the broad definition above so the word 'complaint' does not have to be used. Furthermore third parties may make complaints.
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.	Y	All complaints are logged, dated and reviewed.
1.7	A landlord must accept a complaint unless there is a valid reason not to do so.	Y	Any expression of dissatisfaction will be logged as a complaint in accordance with our published policy.

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.	Y	All complaints will be investigated. Our policy notes where complaints may not be upheld as detailed in Clause 5.4 of the published policy.
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.	Y	The policy notes when we will not uphold a complaint and examples are provided in Clause 5.4.

Best practice 'should' requirements

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.	Y	Our policy notes the difference between service request and complaints in the event that a service request is not actioned in a timely fashion. Our procedure is that enquiries, direct and indirect requests are recorded, dated and monitored.
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.	Y	New customers are surveyed following completion of their purchase along with an invitation to complete a Trustpilot review. All feedback is actioned. We have previously undertaken STAR surveys and are preparing for the new TSM from RoSH. We have recently introduced periodic surveying of resales, staircasing and remortgaging.

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.	Y	Customers can raise a complaint with Heylo through multiple channels including: website, telephone, email, letter, Trustpilot, FaceBook and Twitter – all of which are monitored throughout the working day.
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.	Y	<p>Our current complaints policy is available on our website and will be emailed or posted to customers on request. It is currently not available in other formats but work is in progress to make this fully accessible for all customers e.g. braille, large print, other languages, etc.</p> <p>The procedure for dealing with complaints and the stages involved, timescales, etc is currently being reviewed and will available on the website by 31 March 2023.</p>
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.	Y	The complaints procedure and how to log a complaint is currently showing under the Contact Us section on the website. The website is to be altered so that the complaints policy and procedure is easier to locate and be more prominent. This will be actioned by 30 April 2023.

2.5	<p>Landlords must comply with the Equality Act 2010 and may need to adapt normal policies, procedures, or processes to accommodate an individual's needs.</p> <p>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.</p>	Y	<p>Our current complaints policy is available on our website and will be emailed or posted to customers on request. It is currently not available in other formats but work is in progress to make this fully accessible for all customers e.g. braille, large print, other languages, etc. This will be available by 30 April 2023.</p>
2.6	<p>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.</p>	Y	<p>The complaints policy and procedure is currently showing under our Contact Us tab on the website. Heylo have traditionally not issued regular newsletter but our first was issued in early January but this did not contain information on complaints. Further newsletters are planned in 2023 and the complaints policy and procedure along with details of HOS will be included.</p> <p>A new customer portal is due to be launched later in 2023 and this will have a prominent landing page for complaints.</p>

2.7	Landlords must provide residents with contact information for the Ombudsman as part of its regular correspondence with residents.	Y	Available on website and will be in newsletter going forward along with the new customer portal.
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.	Y	The revised complaints policy details HOS.

Best practice 'should' requirements

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.	Y	Our policy advises that customers can use social media to raise a complaint with us and we will log the complaint accordingly.

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".	Y	Complaints are captured, logged and dated by the Risk Team. They are then referred to the relevant department to be delegated and responded to. The complaints process is overseen by the Head of Customer Experience.
3.2	...the complaint handler appointed must have appropriate complaint handling skills and no conflicts of interest.	Y	All customer facing staff have received handling training in Feb 2023. Training needs will be monitored going forward with refresher sessions being held throughout the year or as and when required.

Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
3.3	<p>Complaint handlers should:</p> <ul style="list-style-type: none"> • be able to act sensitively and fairly • be trained to handle complaints and deal with distressed and upset residents • have access to staff at all levels to facilitate quick resolution of complaints • have the authority and autonomy to act to resolve disputes quickly and fairly. 	Y	<p>Customer facing staff are trained in dealing with complaints as part of their induction programme.</p> <p>Regular training need audits will be introduced to ensure that staff have the right levels of skills, competencies and confidence in dealing with complaints.</p>

Section 4 - Complaint handling principles

Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
4.1	<p>Any decision to try and resolve a concern must be taken in agreement with the resident and a landlord's audit trail/records should be able to demonstrate this. Landlords must ensure that efforts to resolve a resident's concerns do not obstruct access to the complaints procedure or result in any unreasonable delay. It is not appropriate to have extra named stages (such as 'stage 0' or 'pre-complaint stage') as this causes unnecessary confusion for residents. When a complaint is made, it must be acknowledged and logged at stage one of the complaints procedure within five days of receipt.</p>	Y	<p>Complaints are centrally logged, dated and monitored by Risk Team. However, the procedure is currently being reviewed to ensure that it is fit for purpose and the customer's desired resolution is explored and recorded. The revised and updated procedure will be available on the website by 31 March 2023.</p>

4.2	<p>Within the complaint acknowledgement, landlords must set out their understanding of the complaint and the outcomes the resident is seeking. If any aspect of the complaint is unclear, the resident must be asked for clarification and the full definition agreed between both parties.</p>	Y	<p>Policy sets out what we require from the complainant and what they will expect as a response from us.</p> <p>If any aspect is unclear we ask for further information.</p> <p>However, the procedure is currently being reviewed to ensure that it is fit for purpose. The revised and updated procedure will be available on the website by 31 March 2023.</p>
4.6	<p>A complaint investigation must be conducted in an impartial manner.</p>	Y	<p>Noted in policy</p>
4.7	<p>The complaint handler must:</p> <ul style="list-style-type: none"> • deal with complaints on their merits • act independently and have an open mind • take measures to address any actual or perceived conflict of interest • consider all information and evidence carefully • keep the complaint confidential as far as possible, with information only disclosed if necessary to properly investigate the matter. 	Y	<p>This is complied with however, the procedure is currently being reviewed to ensure that it is fit for purposed. The revised and updated procedure will be available on the website by 31 March 2023.</p>
4.11	<p>Landlords must adhere to any reasonable arrangements agreed with residents in terms of frequency and method of communication</p>	Y	<p>This is complied with however, the procedure is currently being reviewed to ensure that it is fit for purposed. The revised and updated procedure will be available on the website by 31 March 2023.</p>
4.12	<p>The resident, and if applicable any staff member who is the subject of the complaint, must also be given a fair chance to:</p> <ul style="list-style-type: none"> • set out their position • comment on any adverse findings before a final decision is made. 	Y	<p>This is complied with however, the procedure is currently being reviewed to ensure that it is fit for purposed. The revised and updated procedure will be available on the website by 31 March 2023.</p>

4.13	A landlord must include in its complaints policy its timescales for a resident to request escalation of a complaint	Y	This is complied with however, the procedure is currently being reviewed to ensure that it is fit for purpose. The revised and updated procedure will be available on the website by 31 March 2023.
4.14	A landlord must not unreasonably refuse to escalate a complaint through all stages of the complaints	Y	This is complied with however, the procedure is currently being reviewed to ensure that it is fit for purpose. The revised and updated procedure will be available on the website by 31 March 2023.

	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.	Y	Complaints log and tracker are centrally maintained. All correspondence throughout the complaint are also stored.
4.18	Landlords must have policies and procedures in place for managing unacceptable behaviour from residents and/or their representatives when pursuing a complaint.	Y	We are currently reviewing all policies and procedures in line with the code.

Best practice 'should' requirements

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	Y	Displayed in the 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.	Y	Displayed in the policy.
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.	Y	We would allow a third party deal with a residents complaint, providing we have written consent to do so.
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.	Y	Noted.

4.9	Communication with the resident should not generally identify individual members of staff or contractors.	N	We have reviewed the inbound call handling settings and all calls now reach a call loop for the desired department, rather than an individual. If there is a specific individual dealing with a customer, they can then be transferred to if appropriate.
4.10	Landlords should keep residents regularly updated about the progress of the investigation.	Y	This is part of the process and set out in the policy.
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.	Y	We have incorporated this in policy and will be actively seeking feedback moving forward.
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	Y	We look to ensure complaints generate productive change. We are still in the process of building an internal H&S Policy for staff. However, we have introduced a well being app and have now got trained mental health first aiders and regularly promote this feature in the business.
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.	Y	Unreasonable behaviour and the adaptations we may make regarding this is now detailed in the policy.

Section 5 - Complaint stages

Mandatory 'must' requirements Stage 1

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
5.1	Landlords must respond to the complaint <u>within 10 working days</u> 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.	Y	This is detailed in the policy, and monitored from the log by the Risk and Customer Service teams.
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	Y	This is carried out.

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.	Y	This is carried out.
5.8	<p>Landlords must confirm the following in writing to the resident at the completion of stage one in clear, plain language:</p> <ul style="list-style-type: none"> • the complaint stage • the decision on the complaint • the reasons for any decisions made • the details of any remedy offered to put things right • details of any outstanding actions • details of how to escalate the matter to stage two if the resident is not satisfied with the answer 	Y	We follow this on the complaints log and this is set out in the policy.

Stage 2

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.	Y	This is carried out and set out in the policy.
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.	Y	If any aspect is unclear we ask for further information.
5.11	Landlords must only escalate a complaint to stage two once it has completed stage one and at the request of the resident.	Y	Included in the policy and set out in the procedure.

5.12	The person considering the complaint at stage two, must not be the same person that considered the complaint at stage one.	Y	Included in the policy and set out in the procedure.
5.13	Landlords must respond to the stage two complaint <u>within 20 working days</u> 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.	Y	Our policy is 10 working days, with an option for a further 10 days (20 days maximum) where additional time is required to comprehensively answer the complaint.
5.16	<p>Landlords must confirm the following in writing to the resident at the completion of stage two in clear, plain language:</p> <ul style="list-style-type: none"> • the complaint stage • the complaint definition • the decision on the complaint • the reasons for any decisions made • the details of any remedy offered to put things right • details of any outstanding actions <p>and</p> <ul style="list-style-type: none"> • if the landlord has a third stage, details of how to escalate the matter to stage three • if this was the final stage, details of how to escalate the matter to the Housing Ombudsman Service if the resident remains dissatisfied. 	Y	Included in the policy and set out in the procedure.

Stage 3

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.	Y	Our policy is 2 stages

5.20	<p>Landlords must confirm the following in writing to the resident at the completion of stage three in clear, plain language:</p> <ul style="list-style-type: none"> • the complaint stage • the complaint definition • the decision on the complaint • the reasons for any decisions made • the details of any remedy offered to put things right • details of any outstanding actions • details of how to escalate the matter to the Housing Ombudsman Service if the resident remains dissatisfied 	N/A	
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Best practice ‘should’ requirements

Stage 1

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.	Y	This would be discussed regularly with the customer.
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.	Y	Details provided on the website and can be sent if required.
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.	Y	We monitor complaints for similarities or trends
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.	Y	Set out in the policy

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.	Y	Included in policy
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	Y	Details provided on the website and can be sent if required.

Stage 3

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
5.18	Complaints should only go to a third stage if the resident has actively requested a third stage review of their complaint. Where a third stage is in place and has been requested, landlords must respond to the stage three complaint <u>within 20 working days</u> of the complaint being escalated. Additional time will only be justified if related to convening a panel. An explanation and a date for when the stage three response will be received should be provided to the resident.	N/A	
5.19	Where agreement over an extension period cannot be reached, landlords should provide the Housing Ombudsman's contact details so the resident can challenge the landlord's plan for responding and/or the proposed timeliness of a landlord's response.	N/A	

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.	Y	Lessons learned feed into internal reporting. We monitor for trends/repeats also.
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.	Y	Each case is assessed individually.
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.	Y	Set out in both stage 1 and 2 responses, whichever is appropriate.
6.6 <small>Best practice 'should' requirements</small>	In awarding compensation, a landlord must consider whether any statutory payments are due, if any quantifiable losses have been suffered, the time and trouble a resident has been put to as well as any distress and inconvenience caused.	Y	Each case will be assessed individually

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.	Y	We look for themes and process failures and act on them such as Land Registry delays and Resales & Staircasing
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.	Y	We would seek legal advice in such instances.

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.	Y	Information collated regularly for board meetings. Information regularly shared with the respective team managers for further monitoring and improvement.

Best practice 'should' requirements

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.	Y	CEO is driving complaints process. Regular reports prepared for Board.
7.4	As a minimum, governing bodies should receive: <ul style="list-style-type: none"> • Regular updates on the volume, categories and outcome of complaints, alongside complaint handling performance including compliance with the Ombudsman's orders • Regular reviews of issues and trends arising from complaint handling, • The annual performance report produced by the Ombudsman, where applicable • Individual complaint outcomes where necessary, including where the Ombudsman made findings of severe maladministration or referrals to regulatory bodies. The implementation of management responses should be tracked to ensure they are delivered to agreed timescales. The annual self-assessment against the Complaint Handling Code for scrutiny and challenge.	Y	Complaints are reported in monthly and quarterly stats to SMT & CEO. Board also have visibility of this and we will continue to enhance the reporting.

7.5	<p>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.</p>	Y	<p>Themes and trends are identified and provided to SMT for assessment and improvement. We also escalate where appropriate.</p> <p>Any issues are reported to Director level for their involvement when an issue cannot be resolved at manager or SMT level.</p>
7.6	<p>Landlords should have a standard objective in relation to complaint handling for all employees that reflects the need to:</p> <ul style="list-style-type: none"> • have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments • take collective responsibility for any shortfalls identified through complaints rather than blaming others • act within the Professional Standards for engaging with complaints as set by the Chartered Institute of Housing. 	Y	<p>We have improved the interdepartmental relationships and collaborative working. All teams adopt the same approach to complaints handling under the policy, and follow the same procedure.</p>

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.	Y	Will be completed every March.
8.2	Landlords must also carry out a self-assessment following a significant restructure and/or change in procedures.	Y	Last was carried out in Aug 2022 and will continue should anything like this occur.
8.3	<p>Following each self-assessment, a landlord must:</p> <ul style="list-style-type: none"> • report the outcome of their self-assessment to their governing body. In the case of local authorities, self-assessment outcomes should be reported to elected members • publish the outcome of their assessment on their website if they have one, or otherwise make accessible to residents • include the self-assessment in their annual report section on complaints handling performance 	Y	This document will be shared with the Board, the Ombudsman and displayed on the website.