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	Stated in Complaint Policy (version September 2020)
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	Statement included in the revised draft policy (April 2023)
1.6	if further enquiries are needed to resolve the matter, or if the resident requests it, the issue must be logged as a complaint.	Yes	
1.7	A landlord must accept a complaint unless there is a valid reason not to do so.	Yes	Occasionally a complaint may be received from someone who is not our resident, however we help where we can / signpost

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	Complaints Policy sets out the circumstances where a complaint will not be accepted including: • Where is considered a 'service request' • Where legal action has been commenced • Where it is an appeal against a warning or termination notice Where in excess of 6 months has passed since the issue arose and it has not been raised previously and does not fall under the category of health and safety or safeguarding
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	This is included within the revised policy

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	A definition of service request is included within the revised policy and this will be included in training for staff and managing agents as part of the roll out of the new 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	Surveys are completed by the Property Inspection Team. Where feedback meets the threshold of a complaint this can be raised as a complaint, the survey asks a specific question in respect of understanding of how to make a complaint and information provided if the resident requires this. The impending independent survey will ensure information is available for any respondents on how to make a complaint.

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	The policy provides for complaints to be made via multiple channels including, face to face, by phone, email, via the CHA web page. Contacts for complaints posted on notice boards. Compliance with complaints is included within the Provider Performance Management Framework to ensure compliance. Complaints explained at sign up and included within the Knowing Your Rights SD-19 form to be completed and signed by residents. This is audited in case files as part of the support audit process.
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	Complaints Policy on website Action: Easy Read Summary to be included with signup packs from July 2023 in line with launch of revised policy.
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	Complaints Policy easy to find on the website. The webpage includes a form for on-line submission of a complaint
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	There is a range of accommodation available which caters for individual needs, however if there were needs greater than provision then this case would be referred to the Birmingham City Council / Adult Social Care. The revised policy includes provisions for reasonable adjustments as part of the complaints process and seeks to ensure it is accessible and inclusive to all residents.

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.		Website updated with new complaints policy, Housing Ombudsman Code and lessons learnt from complaints.
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2.7	Landlords must provide residents with contact information for the Ombudsman as part of its regular correspondence with residents.	Yes	Details of how to contact the Housing Ombudsman Service are set out in every licence agreement and information provided on notice board within properties.
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	The website also contains this information Included within new policy and incorporated in template acknowledgements and template responses And license agreement makes clear that residents can contact the Housing Ombudsman at any point in the process for advice and assistance even if the service is not yet able to accept the complaint for investigation.

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.	N/A currently	Concept do not currently have social media accounts however where complaints have been raised via Google Reviews or similar. CHA is planning to undertake a review of its use of social media for communication with residents and will ensure this requirement is further considered in the development of the approach.

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	Resident and Community Engagement Team Designated Complaints Manager
3.2	the complaint handler appointed must have appropriate complaint handling skills and no conflicts of interest.	Yes	Complaints Manager and RACE Team have appropriate skills and experience. No conflicts of interest

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	The RACE Team report to the Customer Services Manager who has operational responsibility for the Resident Experience and complaints. They report to the Director of Customer Service and the team have regular access to both in the escalation, management and resolution of complaints. Staff are trained to deal with complaint and will be subject to refresher training as part of the launch of the new policy. The team operate within the delegated authority levels of CHA however are empowered to support early resolution and are able to act quickly to respond to resident needs and concerns

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	Two-stage complaints process only: Complaints logged within 2 days of receipt and automatic response given when logging a complaint via the website. Revised complaints procedure drafted and consulted on ahead of implementation in July 2023.

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	Recorded via PACE
4.6	A complaint investigation must be conducted in an impartial manner.	Yes	No conflict of interests in the RACE Team. Restructure of RACE Team includes additional resources
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	Expectations of this are set out in job description, via the organisation code of conduct, probity and conflict of interest policies. This is reinforced through team meetings and discussed as part of 121's This is also to be reinforced via pre go-live training for Complaint Handlers.
4.11	Landlords must adhere to any reasonable arrangements agreed with residents in terms of frequency and method of communication	Yes	Residents are updated throughout the complaints process. This is usually by email or in person given the individual / specific needs / vulnerabilities of residents
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	Safeguarding matters linked to a complaint are given utmost importance and any staff linked to such a complaint are removed from the case / investigation. Managing agents are given the opportunity to respond to a complaint from a resident and are informed when the final decision is made
4.13	A landlord must include in its complaints policy its timescales for a resident to request escalation of a complaint	Yes	This is included within the new policy
4.14	A landlord must not unreasonably refuse to escalate a complaint through all stages of the complaints procedure and must have clear and valid reasons for taking that course of action. Reasons for declining to escalate a complaint must be clearly set out in a landlord's complaints policy and must be the same as	Yes	This is included within the new policy

	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.	Yes	All stages of the complaint and all associated correspondence is logged on PACE
4.18	Landlords must have policies and procedures in place for managing unacceptable behaviour from residents and/or their representatives when pursuing a complaint.	Yes	The policy covers how the organisation will respond to 'unreasonable complainants'.

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
4.3	Landlords should manage residents' expectations from the outset, being clear where a desired outcome is unreasonable or unrealistic	Yes	This is covered in the policy and associated procedures and will be covered further in training before launch of new 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	The policy is aimed to support early resolution whilst ensuring effective investigation. Where issues raised in the complaint are or an urgent or emergency nature resolution should not be delayed as a result of the complaint investigation.
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	Provisions in the new policy. Consideration to provide training for involved residents who wish to offer their time to support residents through the complaints process.
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	This is included within policy and will be covered in training. This should be checked as part of the Quality Assurance processes as well.

4.9	Communication with the resident should not generally identify individual members of staff or contractors.	Yes	We will specifically refer to the managing agent however general responses should not include full names of individual employees or representatives of managing agent. This should be included in the quality check process.
4.10	Landlords should keep residents regularly updated about the progress of the investigation.	Yes	This is an expectation as part of the complaint policy and process and timeliness of responses are reviewed and reported on
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.	Yes	Complaint Handling experience is captured as part of customer satisfaction surveys conducted with residents.
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	This is made clear across the organisation and good cross departmental relationships are held to ensure co-ordination and sharing of information across teams to support responses. Further work is required to embed this fully through our network of managing agents.
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	This is covered in both the policy, guidance and planned training for investigating officers.

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	Exceptional circumstances relate to where there are difficulties in communicating with the resident.
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	Resident is kept updated during the process and the complaint closed when the resident has been informed of the outcome.

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	All points raised in a complaint are logged and addressed, reference to policy, law, good practice where appropriate.
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	This is generally undertaken by telephone or face to face due to the needs of the residents but should also be confirmed in writing as part of the new policy. Where this is not possible as forwarding address unknown a written record of the conversation with the resident should be included on PACE. Where in writing this is usually by email.

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.	Yes	The new policy makes provisions for this
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	The new policy makes provisions for this
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	This is a change that is reflected in the new policy

5.12	The person considering the complaint at stage two, must not be the same person that considered the complaint at stage one.	Yes	This is a requirement in the revised policy
5.13	Landlords must respond to the stage two complaint within 20 working days of the complaint being escalated. Exceptionally, landlords may provide an explanation to the resident containing a clear timeframe for when the response will be received. This should not exceed a further 10 days without good reason.	Yes	This is within the policy. Exceptions should be agreed with the resident with a clear explanation as to why additional time is required.
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	There is no stage 3 in the CHA policy, details of the Housing Ombudsman Service us provided.

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.	Yes	CHA has a 2-stage policy

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	N/A	- N/A	
	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	Any extension in time is required to be negotiated with residents
5.3	Where agreement over an extension period cannot be reached, landlords should provide the Housing Ombudsman's contact details so the resident can challenge the landlord's plan for responding and/or the proposed timeliness of a landlord's response.	Yes	Where agreement cannot be reached with residents in respect of extension of time HoS details should be provided.
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	The policy requires review of historical complaints as part of the investigation but this does not extend to reinvestigating complaints that have already been through the complaints process although learning from these should be considered.
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	This is reflected in the revised 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.	Yes	Provisions in revised 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	Yes	Provisions in revised policy

Stage 3

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
5.18	Complaints should only go to a third stage if the resident has actively requested a third stage review of their complaint. Where a third stage is in place and has been requested, landlords must respond to the stage three complaint within 20 working days of the complaint being escalated. Additional time will only be justified if related to convening a panel. An explanation and a date for when the stage three response will be received should be provided to the resident.	N/A	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	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.	Yes	Included in Complaints Policy and covered in responses, Further training to be provided ahead of launch of new policy.
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	Included in Complaints Policy and covered in responses, Further training to be provided ahead of launch of new policy.
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	Included in policy and procedure and monitoring o completion of 'unfinished actions' to be included following implementation of the new policy
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	Included in Complaints Policy

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	Regular analysis by the Customer Services Operation Manager is now in place to identify patterns and trends that may require wider process of system changes and this is reported to the Resident Committee on a quarterly basis
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	Where such cases arise, these are escalated and legal advice is sought. This is reflected in procedure.

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.		Quarterly reports to Resident Committee Monthly internal lessons learnt reviews Annual Complaints Report

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 Board will appoint a member to be the lead officer for complaints and ensure a positive complaint handling culture. The Resident Committee will make a recommendation to the board alongside the new policy and this will be in place ahead of the launch of the new policy.
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	Complaints Code Self-Assessment presented and approved Information presented to both board and resident committee on complaint handling both in terms of volumes and categories and performance. Lessons from complaints are also presented.

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.		Themes and lessons learnt from complaints are analysed and have been included in feedback to SMT / EMT and being shared with the Resident Committee.
			These have informed the policy review and will inform the design of the training for staff ahead of roll out.
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	These principles underpin CHA's values and approach to complaint handling and this to be explicitly covered in relation to how the values are measured and monitored as part of the performance management cycle.

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	Reported to Customer Committee 13th October 2022
8.2	Landlords must also carry out a self-assessment following a significant restructure and/or change in procedures.	Yes	New self-assessment being completed and report as part of complaint policy review April 2022
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	Resident Committee 13th October 2022 To be published on website on Board approval December 2022