Appendix B – Self-Assessment Form June 2022

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

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

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

Section 1 - Definition of a complaint

Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any Explanations
1.2	A complaint must be defined as: 'an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the organisation, its own staff, or those acting on its behalf, affecting an individual resident or group of residents.	Yes	Section 3.3 of the Customer Feedback Policy
1.3	The resident does not have to use the word 'complaint' for it to be treated as such.	No	ACTION The policy will be amended to state this
	A complaint that is submitted via a third party or representative must still behandled in line with the landlord's complaints policy.	Yes	Section 3.3 of the Customer Feedback Policy
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	ACTION Staff guidance will be amended to reflect this and make clear that if it is a repeat failure to deliver a service e.g., a repair missed repeatedly that the issue will be logged as a complaint.
1.7	A landlord must accept a complaint unless there is a valid reason not to do so.	Yes	Section 2.2 of the Customer Feedback Policy. The Council welcomes all customer feedback. The policy clearly details where the policy does not apply i.e. where there is a separate process for reporting a matter to the Council or there is a statutory right of appeal.

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	Section 2.2 of the Customer Feedback 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.	Not defined in the policy but a response would be sent. Staff guidance to be amended to reflect this

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	Section 2.2 of the Customer Feedback 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	Viewpoint has been amended to reflect this.

Section 2 - Accessibility and awareness Mandatory 'must' requirements

Code section	Code requirement	Comply:	Evidence, commentary and any	
		Yes/No	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	 Online – via the online form Email To any of our staff including by telephone Letter Social media The complaint can be made either directly by the complainant or by someone appointed to act on their behalf e.g. friend, relative or a voluntary agency.
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	The Policy is available on the front page of the Council website https://www.newark-sherwooddc.gov.uk/customerfeedback/ There is a 'feedback button' on the front page of the Council's website, which takes you to the 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	The Policy is available on the front page of the Council website https://www.newark-sherwooddc.gov.uk/customerfeedback/ There is a 'feedback button' on the front page of the Council's website, which takes you to the policy.

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.	No No	ACTION Further work is required to comply with this. This will be included in the action plan for non-compliance against the code
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.	Partially	The Policy is available on the front page of the Council website https://www.newark-sherwooddc.gov.uk/customerfeedback/ There is a 'feedback button' on the front page of the Council's website, which takes you to the policy. Council does not produce paper newsletters ACTION In the future: • promote policy in rent statements, rent letters and reminders • Feature in Annual Tenant report • To consider displaying details on the electronic signage at Castle House and posters at Ollerton Local office
2.7	Landlords must provide residents with contact information for the Ombudsman as part of its regular correspondence with residents.	No	See 2.6

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	Ombudsman contact details included in stage 2 complaint response template Website and policy includes the wording You can also make contact with the Housing Ombudsman at any point for additional support, and do not have to complete the councils' full complaints process before the do so.
			The stage 1 response template will be amended to include the above wording

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.	Partially	Section 2.1 of the Customer Feedback Policy. States through any channel ACTION The policy and guidance to be amended to state how complaints made via social media will be dealt and to add clarity

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	There is a single point of access for all complaints. All complaints are managed through a CRM system called Meritec. The customer service team leaders log the complaints and allocate them to the senior officer for action
	the complaint handler appointed must have appropriate complaint handling skills and no conflicts of interest	Yes	Training provided on how to deal with complaints. Stage 2 complaints are allocated to a senior officer not involved in stage 1 complaint

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 	Yes	Front facing staff receive training in dealing with difficult situations. Staff who resolve complaints are due to receive further training on complaint handling
	Resolution of complaints have the authority and autonomy to act to resolve disputes quickly and fairly.		Complaints responses are dealt with by senior staff who have the autonomy to resolve complaints

Section 4 - Complaint handling principles Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
4.1	Any decision to try and resolve a concern must be taken in agreement with the resident and a landlord's audit trail/records should be able to demonstrate this. Landlords must ensure that efforts to resolve a resident's concerns do not obstruct access to the complaints procedure or result in any unreasonable delay. It is not appropriate to have extra named stages (such as 'stage 0' or 'pre-complaint stage') as this causes unnecessary confusion for residents. When a complaint is made, it must be acknowledged and logged at stage one of the complaints procedure within five days of receipt.	Yes	Customer Feedback policy details the two stages of the complaint procedure. No stage 0 or pre-complaint stage Stage one complaints are logged and acknowledged within 3 working days of receiving it Any communication with the customer relating to this logged on the Meritec system against the complaint and also on the Capita housing system

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	Template letters support this and officers are encouraged to phone the complainant to ensure they understand what they are complaining about and what resolution they are wanting
4.6	A complaint investigation must be conducted in an impartial manner.	Yes	Stage one complaints are dealt with by a senior officer within the business unit the complaint relates and stage two complaints are dealt with by a business manager or director who was not involved in the stage one complaint.
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	•
4.11	Landlords must adhere to any reasonable arrangements agreed with residents in terms of frequency and method of communication	Yes	Best practice
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. 	Partially	If it is appropriate, the officer dealing with the complaint will discuss it with the staff member concerned. The outcome of a stage 1 complaint is not usually discussed with the complainant before the decision is issued to them. ACTION The policy and guidance will be amended to reflect that any adverse findings are

			communicated to the complaint prior to the final decision being issued and that as part of any investigation into the complaint about a staff member, that staff member is given the opportunity to set out their position
4.13	A landlord must include in its complaints policy its timescales for a resident to request escalation of a complaint	Yes	Sections 3.3 and 3.4 of the 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 the reasons for not accepting a complaint.	Yes	Best practice. The Council would not refuse for a complaint to be escalated through its complaints procedure unless the complaint had been advised that there is a separate process for reporting it or a statutory right of appeal.
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	Yes	Records kept on the Meritec complaints system and Capita housing system

	correspondence with the resident, correspondence with other parties and any reports or surveys prepared.		
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	https://www.newark-sherwooddc.gov.uk/media/nsdc-redesign/documents-and-images/your-council/our-policies/policies-and-procedures/Dealing-with-Unreasonable-Behaviour-inc-Vexatious-Complaints-Policy.pdf Link does not work because the document
			opens in a PDF, but the document is on the page of this link https://www.newark-

sherwooddc.gov.uk/ourpoliciesandproced s/
ACTION The title of the Dealing with Unreasonabl Behaviour policy to be reviewed in line w the Housing Ombudsman guidance to remove the word vexatious

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	No	ACTION Further work required to make this clear
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	Section 3.3 & 3.4 of the Customer Feedback 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.	Yes	Section 3.3 & 3.4 of the Customer Feedback Policy Complaint can be made on behalf of someone acting on the complainant's behalf. Stage 2 complaint - the Policy clearly states that a visit to the complaint by y the lead officer accompanied by a tenant representative will be encouraged

			ACTION Staff guidance to be amended to make this clear
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	Will form part of the response
4.9	Communication with the resident should not generally identify individual members of staff or contractors.	Partially	If a complainant mentions a specific individual or contactor then it may be appropriate to mention them in the response
4.10	Landlords should keep residents regularly updated about the progress of the investigation.	Yes	This will happen if there is a delay or additional information is required
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	This is carried out in a variety of ways:
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	Complaint outcomes are reviewed to support service reviews
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.	Partially	ACTION The link to the Unacceptable Behaviour Policy to be added to the Customer Comments Policy EIA required for Dealing with Unreasonable Behaviour Policy

Section 5 - Complaint stages

Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations	
5.1	Landlords must respond to the complaint within 10 working days of the complaint being logged. Exceptionally, landlords may provide an explanation to the resident containing a clear timeframe for when the response will be received. This should not exceed a further 10 days without good reason.	Yes	Section 3.4 of the Customer Feedback policy	,

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.	Partially	Section 3.4 of the Customer Feedback policy – covers the first part of the statement. ACTION The policy does not state that a complaint will be responded to before outstanding actions are completed, with tracking and updates to the tenant. The Policy will be updated to reflect this
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.	Partially	Template letters to be reviewed to ensure they cover all of these points
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	Stage one response letter template

Code section	Code requirement	Comply:	Evidence, commentary and any
		Yes/No	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 Council would not stop a complaint escalating to stage 2
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	Investigating officer contacts customer to discuss stage 2 complaint
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	Section 3.4 of the Customer Feedback 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	Section 3.4 of the Customer Feedback policy Investigated by business manager or director not involved in the stage 1 complaint

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.	Partially	Council policy is within 15 working days of having received the complaint. If further time is required to continue the investigation, the investigating officer will contact the complainant to explain the reasons why. This will not exceeded a further 10 working days. ACTION Amend policy and guidance to reflect The investigating officer will contact the complaint to seek their agreement on this extension of time
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	Template letter

Code section	Code requirement	Comply:	Evidence, commentary and any
		Yes/No	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	Council policy is two stage Section 3.4 of the Customer Feedback 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	N/a	No stage 3 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 		

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.	No	ACTION Policy to be amended to reflect this To be included in staff guidance
5.3.	Where agreement over an extension period cannot be reached, landlords should provide the Housing Ombudsman's contact details so the resident can challenge the landlord's plan for responding and/or the proposed timeliness of a landlord's response.	No	ACTION To be included in staff guidance
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	Best practice ACTION To be included in staff guidance

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.		Best practice ACTION To be included in staff guidance
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.	Partially	Not always practical to do so ACTION To be included in staff guidance
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	No	ACTION To be included in staff guidance Policy to be amended to reflect this

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	No stage three
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	No stage three

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	Letter templates
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	Letter templates and best practice
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	Letter templates and best practice
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	Approved by portfolio holder July 2022 ACTION Once ratified by Tenant Engagement Board on 25 August, it will be published on the website

Best practice 'should' requirements

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	Complaints are reviewed by senior managers and any learning implemented
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	This would be done in conjunction with the Councils legal team

Section 7 - Continuous learning and improvement Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
7.2	Accountability and transparency are integral to a positive complaint handling culture. Landlords must report back on wider learning and improvements from complaints in their annual report and more frequently to their residents, staff and scrutiny panels.	Yes	Complaints report and associated learning reported to Directorate Management Team monthly, Policy and Performance Improvement Committee, Tenant Engagement and features in the Annual Tenants report Action To consider publishing report on the website

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.		Portfolio holder to update Cabinet on self- assessment and Policy and Performance Improvement Committee to receive regular update reports relating to housing complaints

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 	DMT and SLT

7.5	Any themes or trends should be assessed by senior management to identify potential systemic issues, serious risks or policies and procedures that require revision. They should also be used to inform staff and contractor training.	Yes	Any themes or trends raised at Housing, Health and Wellbeing Monthly Director Meetings and reported Senior Leadership Team
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. 	No	Action Corporate steer required. Further work required to review the CIH professional standards

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	This is the second completed self- assessment
8.2	Landlords must also carry out a self-assessment following a significant restructure and/or change in procedures.	Yes	This will form part of any restructures or significant changes in procedures
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	Yes	
	 publish the outcome of their assessment on their website if they have one, or otherwise make accessible to residents 	Yes	
	 include the self-assessment in their annual report section on complaints handling performance 	Yes	Self-assessment will be included in the 21/22 annual tenant report