

Housing Ombudsman Self-Assessment Form

Issued: September 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	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>	Yes	The Ombudsman's definition of a complaint is included on the Calico Homes website and in the internal complaints procedure.
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	The procedure outlines how we triage, log and act upon complaints including those submitted by a 3 rd party or representative.
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	This is assessed at the triage stage and the matter is recorded as a complaint.
1.7	A landlord must accept a complaint unless there is a valid reason not to do so.	Yes	This is assessed at the triage stage and the matter is recorded as a complaint.
1.8	A complaints policy must clearly set out the circumstances in which a matter will not be considered, and these circumstances should be fair and reasonable to residents.	Yes	Complaints from customers about other customers are handled as per our ASB procedure. Anything that falls outside our landlord responsibilities and our tenancy agreement, for example matters that are the responsibilities

			of other organisations such as the council, or Lancashire Highways.
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	As above

Best practice 'should' requirements

Code section	Code requirement	Comply	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	Customer's problems are triaged at the first point of contact to clarify if they are a service request, an unhappy situation, or a complaint.
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	If a customer reports dissatisfaction on a transactional survey these are logged and passed onto the department Coordinator to follow up with the customer to resolve or report as a complaint.

Section 2 - Accessibility and awareness

Mandatory 'must' requirements

Code section	Code requirement	Comply	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 the potential channels, there must be more than one route of access into the complaints system.	Yes	Customers can make a complaint in their preferred channel; face to face, over the telephone, by email, letter, via their online account, via our website, or via a social media channel. This is explained in the customer complaints (Have your say) leaflet.
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 complaints procedure is explained on the website. The website translates web content into all languages.
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	As above. There is a 'Making a Complaint' section on the website. https://calicohomes.org.uk/make-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	We have a Reasonable Adjustments Policy.
2.6	Landlords must publicise the complaints policy and process, the Complaint Handling Code and the Housing Ombudsman Scheme in leaflets, posters, newsletters, online and as part of regular correspondence with residents.	Yes	This is published <ul style="list-style-type: none"> • On posters in the reception area • In the complaints leaflet which is on the website and emailed to customers when they have a complaint. • As part of the Stage 1 and Stage 2 response letters • Promotions on social media

2.7	Landlords must provide residents with contact information for the Ombudsman as part of its regular correspondence with residents.	Yes	As above – plus the Ombudsman’s contact details are included in Stage 1 and Stage 2 letter templates.
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	As above.

Best practice ‘should’ requirements

Code section	Code requirement	Comply	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.	Yes	Guidance on the handling of social media complaints is included in the internal complaints procedure.

Section 3 - Complaint handling personnel

Mandatory ‘must’ requirements

Code section	Code requirement	Comply	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	Named supervisors and coordinators in each department who are responsible for Stage 1 complaint resolution. Stage 2 complaints are handled by a Service Manager.
3.2	...the complaint handler appointed must have appropriate complaint handling skills and no conflicts of interest.	Yes	Staff and Managers receive complaints training, the training is supported by the guidance provided in the complaints policy, complaints procedure, compensation policy and in an ICT system user guide.

Best practice 'should' requirements

Code section	Code requirement	Comply	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. 	Yes	These points are covered in the complaints training.

Section 4 - Complaint handling principles

Mandatory 'must' requirements

Code section	Code requirement	Comply	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>	Yes	Complaints are logged on CRM, which has an audit trail and feeds into a complaint case management system. Stage 1 and Stage 2 complaints are acknowledged within 2 working days.

4.2	Within the complaint acknowledgement, landlords must set out their understanding of the complaint and the outcomes the resident is seeking. If any aspect of the complaint is unclear, the resident must be asked for clarification and the full definition agreed between both parties.	Yes	Stage 1 and Stage 2 acknowledgement letter templates provide a section for that detail.
4.6	A complaint investigation must be conducted in an impartial manner.	Yes	A service manager reviews all Stage 1 and Stage 2 responses before they are sent to the customer.
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. 	Yes	To support this, a complaint investigation checklist is provided within the internal complaints procedure.
4.11	Landlords must adhere to any reasonable arrangements agreed with residents in terms of frequency and method of communication	Yes	This is part of our internal procedure.
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. 	Yes	This is part of our internal procedure.
4.13	A landlord must include in its complaints policy its timescales for a resident to request escalation of a complaint	Yes	The escalation process and timescales are included in the Stage 1 and Stage 2 letters.
4.14	A landlord must not unreasonably refuse to escalate a complaint through all stages of the complaints	Yes	Complaints from customers about other customers are dealt with as part of the ASB Policy.

	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.	Yes	This covered in the complaints procedure and the records kept in the folders of the case management system.
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	We refer to our approach on this within the internal complaints' procedure.

Best practice 'should' requirements

Code section	Code requirement	Comply	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 built into our internal procedure as part of the assessment stage of a customer's problem.
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	All complaints are triaged at the first point of contact.
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	We would check that the customer is happy for a representative to deal with their complaint.
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	Any legal obligations are explained as part of the Stage 1 or Stage 2 response.

4.9	Communication with the resident should not generally identify individual members of staff or contractors.	Yes	This is part of our internal procedure.
4.10	Landlords should keep residents regularly updated about the progress of the investigation.	Yes	This is part of our internal procedure.
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	When the complaint case has been closed. Customers are invited to complete a satisfaction survey
4.17	Landlords should recognise the impact that being complained about can have on future service delivery. Landlords should ensure that staff are supported and engaged in the complaints process, including the learning that can be gained.	Yes	Learning actions are summarised in the Stage 1 response letter and these are tracked by Service Managers on a monthly basis and reported on via the Monthly FIG learning report
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 assessed by our Neighbourhood Management service as part of our Keeping Safe Policy.
Section 5 Complaint stages			
Mandatory 'must' requirements Stage1			
Code section	Code requirement	Comply	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.	Yes	Our Stage 1 response timescale is 10 working days which is measured and reported on the Monthly KPI report.
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	This is part of our internal procedure. Outstanding actions are recorded on the Action Plan. System developments are scheduled from October that will provide an audit trail of action completions

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	Part of our Stage 1 and Stage 2 outcome letter templates.
5.8	Landlords must confirm the following in writing to the resident at the completion of stage one in clear, plain language: <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	Yes	Part of our Stage 1 and Stage 2 outcome letter templates
Stage 2			
Code section	Code requirement	Comply	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	This is part of our internal procedure.
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	This is part of our internal procedure.
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 part of our internal procedure.

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 part of our internal 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.	Yes	This is part of our internal procedure and Stage 2 response letter.
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. 	Yes	This is part of our internal procedure and Stage 2 response letter.

Stage 3

Code section	Code requirement	Comply	Evidence, commentary, and any explanations
5.17	Two stage landlord complaint procedures are ideal. This ensures that the complaint process is not unduly long. If landlords strongly believe a third stage is necessary, they must set out their reasons for this as part of their self-assessment. A process with more than three stages is not acceptable under any circumstances.	Yes	We use a two-stage process.

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 	Not Applicable	We use a two-stage process.
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Best practice 'should' requirements

Stage 1

Code section	Code requirement	Comply	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	This is part of our internal procedure.
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	This is part of our internal procedure.
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	This is part of our internal investigation procedure.
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 part of our internal procedure.

Stage 2

Code section	Code requirement	Comply	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	This is part of our internal procedure.
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	This is part of our internal procedure.

Stage 3

Code section	Code requirement	Comply	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	We use a 2-stage procedure
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	We use a 2-stage procedure

Section 6 - Putting things right

Mandatory 'must' requirements

Code section	Code requirement	Comply	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	This is covered in our complaints procedure and in the Stage 1 and Stage 2 outcome letters.
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	This is included in our Compensation Procedure.
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	This is covered in our FIG Procedure and in the Stage 1 and Stage 2 outcome letters.
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	This is included in our Compensation Procedure

Best practice 'should' requirements

Code section	Code requirement	Comply	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	This is considered and captured as part of the case handling process. All learning actions are reviewed to understand potential impact on other customers. This is captured on the FIG Action Plan.

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	Compensation policy refers to instances where legal remedy is in process alongside complaints process (Disrepair / Eviction proceedings). and professional legal advice will be gained before making any offers of redress and that wording around resolution is legally checked and approved.
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Section 7 - Continuous learning and improvement

Mandatory 'must' requirements

Code section	Code requirement	Comply	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	This detail will be included in the 2022 annual report, and shared with residents, and updated every 6 months.

Best practice 'should' requirements

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	Complaints handling performance is reported on a monthly and quarterly basis.
7.4	<p>As a minimum, governing bodies should receive:</p> <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. 	Yes	<p>Complaints handling performance is reported on a monthly and quarterly basis.</p> <p>A new complaints trends analysis report is scheduled for development from October 2022.</p>

	<ul style="list-style-type: none"> The annual self-assessment against the Complaint Handling Code for scrutiny and challenge. 		
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	Themes are reviewed: <ul style="list-style-type: none"> weekly / monthly basis by Homes Leadership team SLT monthly (including Exec). Added to the action plan in relation to informing staff training
7.6	Landlords should have a standard objective in relation to complaint handling for all employees that reflects the need to: <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. 	Yes	<ul style="list-style-type: none"> Links to values – going one step further with our customers Links to Homes Strategic objective – To provide a high quality and personalised customer experience, collaborating with the rest of the Group Introduced as part of 121's – standard complaints performance and professionalism checks (step further framework)

Section 8 - Self-assessment and compliance

Mandatory 'must' requirements

8.1	Landlords must carry out an annual self-assessment against the Code to ensure their complaint handling remains in line with its requirements.	Yes	We will update this document once approved on our website by 1 October 2022
8.2	Landlords must also carry out a self-assessment following a significant restructure and/or change in procedures.	Yes	As applicable when any changes occur
8.3	Following each self-assessment, a landlord must: <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 	Yes	<ul style="list-style-type: none"> Self-assessment will be shared with Board in September 2022 Published in October 2022 on website Include in annual report