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	East Boro follows the Housing Ombudsman's definition of a complaint. This is detailed in the Group Complaints Policy (adopted by East Boro) and East Boro Complaint Procedure. The Complaints section on East Boro website is being expanded.
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	This is detailed in the Group Complaints Policy (adopted by East Boro) and East Boro Complaint Procedure.
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	Service request considerations are covered in the East Boro Complaint Procedure.
1.7	A landlord must accept a complaint unless there is a valid reason not to do so.	Yes	This is detailed in the Group Complaints Policy (adopted by East Boro) and East Boro Complaint Procedure

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	This is detailed in the Group Complaints Policy (adopted by East Boro) and East Boro Complaint Procedure
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 the role of the PA to Chief Executive

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	Yes	This is detailed in the Group Complaints Policy (adopted by East Boro) and East Boro Complaint Procedure
	complaint about the service they have/have not received.		Training to be undertaken to ensure a consistent approach.
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.	No	East Boro are introducing a Complaint Process Satisfaction Survey. This survey information will be assessed by the PA to the Chief Executive and direct contact made with the customer as required.
			Other Customer Satisfaction Surveys, such as the Annual Tenant Satisfaction Survey, are in place and respondents are contacted if specific comments/questions are raised outside of the standard set question responses.

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	East Boro tenants/customers can make a complaint in writing, via email, telephone, website facilities such as Book A Chat, and in person including with the support of Care & Support Workers
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 Policy is available on East Boro's Website and copies are supplied on request of tenants/customers.
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 Complaints Policy is available on East Boro's Website and copies are supplied on request of tenants/customers. The Complaints Procedure is supplied on request of tenants/customers and is to be added to the website.
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	East Boro complies with the equality Act 2010 and has a Diversity and Inclusion policy. Diversity and Inclusion e-Learning will be a mandatory learning module for all East Boro staff when they have access to th appropriate IT Software which is expected in 2023. The complaints policy at paragraph 2.11 advises - we will ensure we are approachable and helpful throughout the complaints procedure. We will always ensure that we carry out any reasonable adjustments to the complaints process for 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		There is a dedicated complaints page on East Boro's website containing the Complaints Policy and Procedure, East Boro's Self-Assessment, and the Housing Ombudsman Code.
	residents.	No	A communication plan is to be put in place to ensure the complaints procedure, the role of the Housing Ombudsman, learning from complaints and East Boro's complaint performance is published both internally to staff and externally to customers. At present this is only done externally and to Senior Staff & Board

2.7	Landlords must provide residents with contact information for the Ombudsman as part of its regular correspondence with residents.	No	The role of the Ombudsman and links to the Ombudsman's website is to be added to the complaints page.
			At present this is only provided on request.
2.8	Landlords must provide early advice to residents regarding their right to access the Housing Ombudsman		The role of the Ombudsman and links to the Ombudsman's website is to be added to the complaints page.
_	Service throughout their complaint, not only when the landlord's complaints process is exhausted.	No	At present this is only provided on request.

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.		East Boro has a Facebook page specifically for The Waverley in Weymouth and this is managed by one member of staff who responds to communication and signposts to other areas of the organisation if required. East Boro does not use Social Media to communicate with tenants/customers.

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	East Boro's complaints are acknowledged by the PA to Chief Executive and allocated to an appropriate Manager/Senior Manager for investigation. The PA to Chief Executive produces quarterly Reports for East Boro Management Team and Group Customer Experience Panel. Reports will also be provided in future to the relaunched Tenant Consultative Committee and Staff teams outside of the Management Team.
3.2	the complaint handler appointed must have appropriate complaint handling skills and no conflicts of interest.	Yes	Investigating Officers from appropriate Service Areas are appointed to Investigate complaints and part of the PA to Chief Executive's role is to ensure there are no conflicts of interest. Training is to be provided to all potential Investigating Officers to enhance and continue to develop their skills, complaint management and the promotion of a positive complaints culture.

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. 		Investigating Officers have authority and autonomy to act to resolve complaints and have access to relevant colleagues for support. East Boro's approach to complaint investigation emphasises a no blame culture when trying to resolve complaints and everyone is treated fairly and honestly throughout.

Section 4 - Complaint handling principles Mandatory 'must' requirements

Code sectio n	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	Complaints are acknowledged and dealt with in line with Policy and Procedure. Quarterly Reports are produced identifying compliance and any non-compliance.

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	Complaint Acknowledgements reference the issue of complaint. If any aspects of the complaint are unclear at any stage, the PA to Chief Executive or Investigating Officer will make contact with the customer.
4.6	A complaint investigation must be conducted in an impartial manner.	Yes	All complaint investigations are conducted in an open, no blame and transparent way. This approach is detailed in the Complaints Policy.
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	Investigating Officers conduct the investigations within East Boro's approach to complaint management with the emphasises on a no blame culture, trying to resolve complaints and ensuring everyone is treated fairly and honestly throughout. This is detailed in the complaints policy.
4.11	Landlords must adhere to any reasonable arrangements agreed with residents in terms of frequency and method of communication	Yes	Investigating Officers agree with the customer their preferred way to communicate, and if outside of timescales the frequency of contact.
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	Customers (and if applicable staff) are contacted by the Investigating Officer at both stage 1 and 2 as part of the investigation process. The PA to Chief Executive coordinates escalation to stage 2 and ascertain why a customer remains dissatisfied and the resolution they are seeking. This ensures all parties have an opportunity to explain, be heard and 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	This is detailed in the Complaints Policy & Procedure.
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	Yes	This is detailed in the Complaints Policy

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.	
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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	The PA to Chief Executive keeps a record of all correspondence and associated documents during a formal complaint investigation.
4.18	Landlords must have policies and procedures in place for managing unacceptable behaviour from residents and/or their representatives when pursuing a complaint.	No	This is referred to in the Complaints Policy but not Procedure.

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	Investigating Officers will manage expectations during their investigations.
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	Part of the assessment and classification process is consideration of achieving a resolution as early as possible and timescales are in detailed with Policy and Procedures
4.5	Landlords should give residents the opportunity to have a representative deal with their complaint on their	Yes	Paragraph 2.10 of complaints policy refers to representatives supporting customers

	behalf, and to be represented or accompanied at any meeting with the landlord where this is reasonable.		
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 would be included in the complaint response

4.9	Communication with the resident should not generally identify individual members of staff or contractors.	Yes	Unless known to customer generally these details are not divulged
4.10	Landlords should keep residents regularly updated about the progress of the investigation.	Yes	This is the role of both the Investigating Officer & PA to Chief Executive
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	East Boro has introduced a Complaints 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	East Boro's approach to complaint investigation emphasises a no blame culture when trying to resolve complaints and everyone is treated fairly and honestly throughout. The value of being able to learn from complaints and learning from the dedicated Aster Group Learning Complaint Group will be shared throughout the organisation and with customers.
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	East Boro complies with the Equality Act 2010

Section 5 - Complaint stages

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	This is the role of the Investigating Officer.
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	Responses include all of these points, but the replies are tailored to the individual needs of the complainant.

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	This is detailed in the Complaints Policy & Procedure
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	Responses are provided within the timescales detailed in the Policy & Procedure and these response and subsequent tracking and actioning of outstanding actions is the responsibility of the Investigating Officer and PA to Chief Executive.

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	This is detailed in the Complaints 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.		The PA to Chief Executive is responsible for the escalation process to stage 2.
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 detailed in the Complaints Policy and 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 detailed in the Complaints Procedure
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	Yes	This is detailed in the Complaints Policy and Procedure.

	containing a clear timeframe for when the response will be received. This should not exceed a further 10 days without good reason.	
	Landlords must confirm the following in writing to the resident at the completion of stage two in clear, plain language:	This is the role of the Investigating Officer. East Boro does not have a Stage 3 but does have the option of a Designated Complaints Panel.
5.16	 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. 	Details of Housing Ombudsman Service to be added to letter as at present only included in Policy etc

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.	Not Applicable	East Boro has a 2 stage complaints process

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	This is detailed in the Complaints 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	Should there be a disagreement or concerns regarding delays in response times the customer will be reminded of the option to approach the Housing Ombudsman and will be provided with their contact details
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 forms part of investigative process.
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	The Investigating Officer and PA to Chief Executive will consider any new information during an investigation to consider if this can be incorporated into the response at the current stage of the investigation, or if a new complaint should be logged consulting with and updating the customer

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	This is detailed in the Complaints 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	Should there be a disagreement or concerns regarding delays in response times the customer will be reminded of the option to approach the Housing Ombudsman and will be provided with their contact details

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</u> <u>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.	Not Applicable	East Boro has a 2 stage complaints process
5.19	Where agreement over an extension period cannot be reached, landlords should provide the Housing Ombudsman's contact	Not Applicable	East Boro has a 2 stage complaints process

details so the resident can landlord's plan for responding and/or the prop landlord's	
response.	

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	This is the role of the Investigating Officer
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 the role of the Investigating Officer
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 the role of the Investigating Officer
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 the role of the Investigating Officer

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	This is the role of the Investigating Officer and PA to Chief Executive and forms part of Learning Record. Aster Group have created a Complaint Learning Group which East Boro is involved with.
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	Assessment of complaints are made by the Investigating Officers to ensure they are dealt with via the correct process.

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	Quarterly & Annual reports are produced.

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	Yes	There are clear lines of responsibility (a delegation matrix) detailing reporting lines, accountability and responsibly to monitor East Boro and Aster's performance and provide assurance. Senior Operations Teams and the Customer Experience Panel, report and provide

	ensuring the governing body receives regular information on complaints that provides insight to the governing body on the landlord's complaint handling performance.		assurance to the Executive Board, the Customer and Community Network and the Overlap Boards. Involved customer groups monitor performance and the Customer and Community Network assess an annual complaint report for assurance to the Overlap Boards. East Boro also has a Board of Management
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	Quarterly & Annual reports are produced.

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	Aster has a dedicated Complaints Learning Group. The Group is responsible for reviewing and challenging complaint learning identified by complaint investigating managers, monitoring Housing Ombudsman determinations, orders and recommendations, and driving improvements in assessing and implementing learning across Aster. The group reports to the Customer Services
			Leadership Team. East Boro is involved with the Learning Group.

 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. 	staff via the Customer Service Leadership Team . East Boro will be able to consider/utilise this.
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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	An Annual self-assessment is conducted against the code and is used an opportunity to provide continuing assurance against the code requirements and any implement any changes required.
8.2	Landlords must also carry out a self-assessment following a significant restructure and/or change in procedures.		Detailed in the Complaints Policy