

Appendix B – Self-Assessment Form

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

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

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

Section 1 - Definition of a complaint

Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
1.2	A complaint must be defined as: <i>'an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the organisation, its own staff, or those acting on its behalf, affecting an individual resident or group of residents.'</i>	Yes	Our Housing Complaints Policy has adopted this definition of a complaint at para 3.2
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	Our Housing Complaints Policy explicitly states this at para 3.3

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	Our Housing Complaints Policy explicitly states this at para 3.26
1.7	A landlord must accept a complaint unless there is a valid reason not to do so.	Yes	Our Housing Complaints Policy states this at para 3.21
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	Para 3.22 of our Housing Policy lists exclusions we will consider as acceptable.
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	We have templates for when a complaint is excluded from the complaints process. Para 3.23 of our Housing Complaints Policy lists exclusions we will consider as acceptable and explicitly states this.

Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
1.4	Landlords should recognise the difference between a service request , where a resident may be unhappy with a situation that they wish to have rectified, and a complaint about the service they have/have not received.	Yes	Para 3.25 of our Housing Complaints Policy clarifies the difference between a service request and 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	Our Housing Policy explicitly states this at para 3.9

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	Our Housing Policy explicitly states this at para 3.30
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	This is included in our Housing Complaints Policy in at paras 3.11 to 3.16
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	Website: https://www.royalgreenwich.gov.uk/info/2/00161/complaints/548/complaints_about_the_royal_borough_of_greenwich
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	Officers are aware of our responsibilities under the Equality Act inc. 149 (Public Sector equality duty). Our standard responses state that they are available in other formats, e.g. braille. This is included in our Housing Complaints Policy at para 3.27
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	We included information regarding the housing ombudsman scheme in all our complaint acknowledgement S1 and 2 letters. We also publicise how to make a complaint on our website and provide

			<p>details of the Housing Ombudsman Scheme.</p> <p>Our communications plan also outlines further details of where we publicise this information.</p>
2.7	Landlords must provide residents with contact information for the Ombudsman as part of its regular correspondence with residents.	Yes	<p>We include information regarding the housing ombudsman scheme in all our complaint acknowledgement S1 and 2 letters.</p> <p>Our communications plan also outlines further details of where we publicise this information.</p>
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	We signpost to the Ombudsmen when we acknowledge a complaint.

Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
2.2	Where a landlord has set up channels to communicate with its residents via social media, then it should expect to receive complaints via those channels. Policies should contain details of the steps that will be taken when a complaint is received via social media and how confidentiality and privacy will be maintained.	Yes	This is included in our Housing Complaints Policy at paras 3.31 and 6.3

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	Corporately all complaints are reported quarterly
3.2	...the complaint handler appointed must have appropriate complaint handling skills and no conflicts of interest.	Yes	<p>HOS eLearning is publicised to everyone in HSC. Dedicated complaint handling staff are selected with reference to their skills and abilities in handling complaints.</p> <p>Staff are expected to disclose potential conflicts of interest in their work and RBG has a process for declaring interests</p> <p>This is included in our Housing Complaints Policy at paras 3.35 and 3.41</p>

Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
3.3	<p>Complaint handlers should:</p> <ul style="list-style-type: none"> • be able to act sensitively and fairly • be trained to handle complaints and deal with distressed and upset residents • have access to staff at all levels to facilitate quick resolution of complaints • have the authority and autonomy to act to resolve disputes quickly and fairly. 	Yes	<p>Training is available to all staff on dealing with distressed customers. There are no organisational barriers to staff collaborating across teams and this is encouraged.</p> <p>Dispute resolution sits with investigating managers, who have autonomy to act and resolve disputes.</p> <p>We are developing a structured learning programme to support complaint handlers as well as possible.</p>

Section 4 - Complaint handling principles

Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
4.1	<p>Any decision to try and resolve a concern must be taken in agreement with the resident and a landlord's audit trail/records should be able to demonstrate this. Landlords must ensure that efforts to resolve a resident's concerns do not obstruct access to the complaints procedure or result in any unreasonable delay. It is not appropriate to have extra named stages (such as 'stage 0' or 'pre-complaint stage') as this causes unnecessary confusion for residents. When a complaint is made, it must be acknowledged and logged at stage one of the complaints procedure within five days of receipt.</p>	Yes	<p>This is included in our Housing Complaints Policy at paras 3.42, 3.13 and 6.4</p>

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	The understanding of the complaint is included on our acknowledgment template. This is also covered at para 3.14 of our Housing Complaints Policy.
4.6	A complaint investigation must be conducted in an impartial manner.	Yes	This is included in our Housing Complaints Policy at para 3.38 We intend to draft guidance to staff involved in complaints investigation to ensure impartiality.
4.7	The complaint handler must: <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	This is included in our Housing Complaints Policy at para 3.41 We use standard response templates to encourage transparency in investigations. We intend to draft guidance to staff involved in complaints investigation to ensure impartiality.
4.11	Landlords must adhere to any reasonable arrangements agreed with residents in terms of frequency and method of communication	Yes	This is included in our Housing Complaints Policy at para 3.17
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: <ul style="list-style-type: none"> • set out their position • comment on any adverse findings before a final decision is made. 	Yes	Although we do not explicitly state this in the corporate policy, we expect complaint investigators to take all views into account in coming to a final decision. We intend to draft guidance to staff involved in complaints investigation to ensure happens in consistently.
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 in our Housing Complaints Policy at para 3.16

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	This is included in our Housing Complaints Policy at para 3.23
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	Case recording in Pentana
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 have a corporate Unreasonable and Persistent Behaviour policy

Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
4.3	Landlords should manage residents' expectations from the outset, being clear where a desired outcome is unreasonable or unrealistic	Yes	<p>Acknowledgements and Stage 1 responses set out our understanding of what the complainant wants and should respond to this at this stage.</p> <p>Complaint handlers are expected to not give indication of expectations before the stage 1 response is issued.</p> <p>We intend to include in our procedures later this year.</p>
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	Our standard complaint response templates encourage this
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	This is included in our Housing Complaints Policy at paras 3.4-3.9
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	<p>Our standard templates invite consideration of this.</p> <p>We plan to issue more detailed guidance to complaint investigators.</p>

4.9	Communication with the resident should not generally identify individual members of staff or contractors.	Yes	<p>Sometimes it is better to include details of officers involved in a case and shows accountability. This is at the discretion of the investigating manager.</p> <p>Where needed generic contact details are provided to residents to ensure continuity of service.</p> <p>We plan to issue more detailed guidance to complaint investigators.</p>
4.10	Landlords should keep residents regularly updated about the progress of the investigation.	Yes	This is included in our Housing Complaints Policy at para 3.17
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.	No	<p>We plan to seek structured feedback as part of our work with Tenant Satisfaction Measures from April 2023.</p> <p>We have recently also set up a resident KPI group to review performance which includes complaints.</p>
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	There is training available to all staff on giving and receiving feedback and having difficult conversations.
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	Corporate policy requires a report including reference to equalities

Section 5 - Complaint stages

Mandatory 'must' requirements

Stage 1

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
5.1	Landlords must respond to the complaint <u>within 10 working days</u> of the complaint being logged. Exceptionally, landlords may provide an explanation to the resident containing a clear timeframe for when the response will be received. This should not exceed a further 10 days without good reason.	Yes	This is included in our Housing Complaints Policy at para 3.15 and 3.17
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	Once a complaint response is issued, services manage follow-on actions internally.
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	A standard complaint template based on the HOS standard response template has been developed to support this
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	A standard complaint template based on the HOS standard response template has been developed to support this

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	This is included in our Housing Complaints Policy at para 3.23 Officers are aware of the requirement to inform the resident of their right to approach the Housing Ombudsman.
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	We use standard acknowledgement template that include this information.
5.11	Landlords must only escalate a complaint to stage two once it has completed stage one and at the request of the resident.	Yes	This is included in our Housing Policy at para 3.16

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 included in our Housing Complaints Policy at para 3.39
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 included in our Housing Complaints Policy at para 3.16
5.16	Landlords must confirm the following in writing to the resident at the completion of stage two in clear, plain language: <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 and <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	We use standard response templates base on the HOS response template at stages 1 & 2

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.		N/A

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

Best practice 'should' requirements

Stage 1

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
5.2	If an extension beyond 20 working days is required to enable the landlord to respond to the complaint fully, this should be agreed by both parties.	Yes	This is included in our Housing Complaints Policy at para 3.17
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 included in our Housing Complaints Policy at para 3.17
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	Complaint investigators have wide licence to include any relevant information in the response to the complaint, which includes old reports. We intend to include this in guidance to complaint investigators later this year
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 included in our Housing Communities Complaints Policy at para 3.19

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 included in our Housing Complaints Policy at para 3.17
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 included in our Housing Complaints Policy at para 3.17

Stage 3

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

Section 6 - Putting things right

Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
6.1	Effective dispute resolution requires a process designed to resolve complaints. Where something has gone wrong a landlord must acknowledge this and set out the actions it has already taken, or intends to take, to put things right.	Yes	We use standard response templates base on the HOS response template at stages 1 & 2, which covers this
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	We have a housing reimbursement and redress 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	We have a housing reimbursement and redress 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	We have a housing reimbursement and redress policy

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	<p>Standard response templates invite consideration of learning including changes and improvements. These are signed off by senior managers.</p> <p>We are reviewing our approach to learning and intend to develop a mechanism for dealing with issues with process/system changes that are picked up through the complaints process.</p>

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	Teams are in contact with legal services and we have a redress policy.
------------	--	-----	--

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.	No	<p>We do not have an annual report which covers learning. Learning from complaints is regularly discussed at the Directorate Management Team.</p> <p>We plan to report learning via the Housing and Anti-Poverty scrutiny panel. We have formed a resident group that is currently focusing on complaint handling.</p>

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.	Yes	The Lead Member for Housing, Neighbourhoods and Homelessness
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 	No	<p>Corporate quarterly performance reports are shared with officers and Councillors.</p> <p>We are reviewing our understanding of trends and seeking to implement a mechanism for sharing these with Councillors.</p> <p>The annual performance report is sent to the Overview and scrutiny committee on an annual basis.</p>

	<p>implementation of management responses should be tracked to ensure they are delivered to agreed timescales.</p> <ul style="list-style-type: none"> The annual self-assessment against the Complaint Handling Code for scrutiny and challenge. 		<p>Where individual outcomes raise serious systemic issues, these are shared ad hoc.</p> <p>The self assessment is shared as standard.</p>
7.5	<p>Any themes or trends should be assessed by senior management to identify potential systemic issues, serious risks or policies and procedures that require revision. They should also be used to inform staff and contractor training.</p>	Yes	<p>A report is provided qtrly to senior management team.</p> <p>We are reviewing our mechanism for reporting this information to strengthen our compliance with this requirement.</p>
7.6	<p>Landlords should have a standard objective in relation to complaint handling for all employees that reflects the need to:</p> <ul style="list-style-type: none"> have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments take collective responsibility for any shortfalls identified through complaints rather than blaming others act within the Professional Standards for engaging with complaints as set by the Chartered Institute of Housing. 	Yes	<p>We currently expect all staff to collaborate and cooperate across teams, adopt a blame-free culture and be professional at all times.</p> <p>We intend to include this in HSC Policy, procedure and guidance later this year.</p>

Section 8 - Self-assessment and compliance

Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
8.1	Landlords must carry out an annual self-assessment against the Code to ensure their complaint handling remains in line with its requirements.	Yes	Self assessment completed and published on website
8.2	Landlords must also carry out a self-assessment following a significant restructure and/or change in procedures.	Yes	This will be undertaken when necessary. We plan to explicitly state this in our HSC policy later in the year
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	Our self assessment is reported to our Lead Member for Housing and Safer Communities. Compliance with the Complaint Handling Code Royal Borough of Greenwich (royalgreenwich.gov.uk)