

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	This is the definition within the policy. (Paragraph 3.1)
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	Set out within the policy. Paragraphs 3.1 and 4.1
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	Set out within the policy. Paragraph 6.1 / 6.2
1.7	A landlord must accept a complaint unless there is a valid reason not to do so.	Yes	An explanation of what does not constitute a Complaint is set out clearly in the Complaints Policy. Paragraphs 3.2 and 3.4
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	Paragraphs 3.2 and 3.4.
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	Explicit within the policy. Paragraph 3.4

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	Policy clear that issue that requires further investigation to resolve satisfactorily regarded as a complaint. Table 5.1..
1.5	Survey feedback may not necessarily need to be	No	Will be included in future surveys – for example, resident survey and annual tenant satisfaction survey.

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	Options: Email, telephone, online form, face to face Paragraph (section) 4
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	Paragraph 6.1 / 6.2 On our website and available on request to all customers. Tenants made aware through sign up process.
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	See 4.3.3 Weblink: Give a compliment, leave feedback or make a complaint – Melton Borough Council

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
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	Policy refresh completed. EIA completed and reviewed by check and challenge group representatives. Paragraph 21. Equalities training is a mandatory training requirement for staff. See paragraph 21.1
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	Policy on website. Included as standing item on all tenant newsletters. Include in Your Choice residents meetings.
2.7	Landlords must provide residents with contact information for the Ombudsman as part of its regular correspondence with residents.	Yes	Information supplied on stage 2 letter for residents. Housing stage 1 responses will also include this. Detailed within the policy.
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	Template for stage one response to customers updated to include this. Explicit reference made within the revised policy (paragraph 6.1. 6.4 6.6)

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	Oversight of social media channels through communications team who have dialogue with relevant teams in response to dissatisfaction expressed on social media channels.

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	Email address for our complaints team is complaints@melton.gov.uk . Weekly tracker communicated by lead business support officer to managers to ensure visibility and progress on resolution. Complaints performance reported to Senior Leadership Team / Cabinet. Corporate management and oversight of the process.
3.2	...the complaint handler appointed must have appropriate complaint handling skills and no conflicts of interest.	Yes	A complaint handler is allocated upon receipt of complaint. Details are communicated to the complainant. Officers managing complaints are provided with training. The process offers different levels of managers/directors to review complaints where they may have been part of the initial decision.

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. 	Partially	

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	Table 6.1 we aim to acknowledge all complaints within 3 working days.
4.2	<p>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.</p>	Yes	Acknowledgements updated to include this.

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
4.6	A complaint investigation must be conducted in an impartial manner.	Yes	Has to be someone not linked to the initial decision. Separate people at stage 1 and stage 2.
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 <p>keep the complaint confidential as far as possible, with information only disclosed if necessary to properly investigate the matter.</p>	Yes	
4.11	Landlords must adhere to any reasonable arrangements agreed with residents in terms of frequency and method of communication	Yes	Operate a case-by-case request, but normally contact them initially in the method they contact us to arrange a discussion and if any further contact is required in the process.
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 <p>comment on any adverse findings before a final decision is made.</p>	Yes	Two stage process allows for comments and further investigation before a final decision is made. Investigation would include dialogue with complainant and staff where applicable.
4.13	A landlord must include in its complaints policy its timescales for a resident to request escalation of a complaint	Yes	For Housing related complaints, tenants have the right to access the Housing Ombudsman Service throughout their complaint. Details of how to contact the Housing Ombudsman in the policy.

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
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	<p>Two stage process is clear on escalation.</p> <p>For Housing related complaints, tenants have the right to access the Housing Ombudsman Service throughout their complaint. Details of how to contact the Housing Ombudsman in the policy.</p> <p>Details of when a complaint would not be considered a complaint set out at section 3.4 of the policy</p>
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	Full records are kept with a specific complaints reference for each case. A tracker is maintained and progress is monitored.
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	Unreasonably persistent complaints are dealt with in the policy itself (section 16)

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	Paragraph 10.2. Case by case basis approach.
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	
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	Paragraph 3.1 and 4.1 Case by case basis approach.
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	Case by case basis approach
4.9	Communication with the resident should not generally identify individual members of staff or contractors.	Yes	This is the case but is dependent on the nature of the specific complaint.
4.10	Landlords should keep residents regularly updated about the progress of the investigation.	Yes	Timescales set and adhered to and extensions if required must be agreed.
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	To be considered as a key agenda item for 'your choice' tenant engagement panel. To include in future tenant surveys.
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 earning that can be gained	Yes	Learning is reviewed from complaints to highlight trends and issues with services. To be strengthened through appointment of customer insight officer. Policy reference 1.3 / 9.1 / 9.71 / 19.2.6

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	The Equality Act applies to all complainants. The policy includes Equality Access considerations and clearly sets out how Unreasonably Persistent Complainants are identified; How the Council will deal with Unreasonably Persistent Complainants and how an Unreasonably Persistent Status is reviewed and considered for withdrawal of that status.
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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	Responses times and extensions are covered in the policy. 6.1
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	Response outcomes are collated. Complaints where actions still in progress are monitored on a case-by-case basis, overseen by the investigating officer. Further work will be done to ensure effective tracking on 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.	Yes	Yes and guided by template letters

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
5.8	<p>Landlords must confirm the following in writing to the resident at the completion of stage one in clear, plain language:</p> <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	All these are set out in a template letter to be updated dependant on the complaint.

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	MBC does not exclude requests to go to stage 2 and approach 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	Via 2 stage process
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	Yes 2 stage process is clear
5.12	The person considering the complaint at stage two, must not be the same person that considered the complaint at stage one.	Yes	

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
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	
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	In the response letter to the complainant

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	MBC does not have a stage 3 complaint 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 	N/A	
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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 done by email via the complaints inbox. Requests for extension (10-day max unless exception reason for longer) are made by the investigating officers and must be justified.
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	To add to extension process.
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	All taken into the account of the complaint if it has been a long-term issue to ensure a full understanding is required. Complaint tracking in place.

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
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	If raised with the complaint handler at that time it will be included into the investigation and complaint. Referenced in table

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	Email to complainant. Opportunity to escalate to ombudsman if not in agreement.
5.15	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	Opportunity to escalate to ombudsman if not in agreement.

Stage 3

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
5.18	Complaints should only go to a third stage if the resident has actively requested a third stage review of their complaint. Where a third stage is in place and has been requested, landlords must respond to the stage three complaint within 20 working days of the complaint being escalated. Additional time will only be justified if related to convening a panel. An explanation and a date for when the stage three response will be received should be provided to the resident.	N/A	MBC does not have a stage 3 complaint process

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	
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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	Actions and changes are logged in the response letter. Policy reference 9.6
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	Reference to Ombudsman guidance used to help determine remedy
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	Actions in the letters should be clear and followed up
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	Section 19 of the Complaints 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	Complaints and trends reviewed by senior manager. Appointment of customer insight officer will further strength this.
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	These cases will be reviewed on a case-by-case basis with our Legal Team for a guidance

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	Corporate oversight via SLT and Cabinet. Include in your choice meetings and newsletters. Annual review report on of tenant engagement will include learning from complaints. Corporate complaints audit proposed for 24/25.

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	Portfolio Holder for Housing and Landlord Services. Portfolio Holder for Climate, Access and Management. Reports SLT and Cabinet. Appointment of customer insight officer will further strengthen this.
7.4	As a minimum, governing bodies should receive: <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. The annual self-assessment against the Complaint Handling Code for scrutiny and challenge. 	Yes	Via portfolio holders / cabinet. Individual ombudsman outcomes are shared with SLT and relevant PFH and are reported to Cabinet by legal team. Self-assessment will be reported to cabinet on an annual basis.
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	Reviewed at Housing Leadership Meetings. Appointment of customer insight officer will further strengthen this.

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
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>Teams and encouraged to work together around complaints and issues across services and looking role out a training programme to all staff around complaints. MBC has a no blame culture within the authority and looks at complaints as a method of learning.</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	We will review again in 12 months to ensure compliance.
8.2	Landlords must also carry out a self-assessment following a significant restructure and/or change in procedures.	Yes	Yes – carried out in Jan 2023 in line with updated policy
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	Include in decision notice as part of policy revision. Scrutiny scheduled – regulatory compliance, June 2023. Will be scheduled annually thereafter. Self-assessment to be published to website.