Appendix A: Self-assessment form

This self-assessment form should be completed by the complaints officer and it must be reviewed and approved by the landlord's governing body at least annually.

Once approved, landlords must publish the self-assessment as part of the annual complaints performance and service improvement report on their website. The governing body's response to the report must be published alongside this.

Landlords are required to complete the self-assessment in full and support all statements with evidence, with additional commentary as necessary.

We recognise that there may be a small number of circumstances where landlords are unable to meet the requirements, for example, if they do not have a website. In these circumstances, we expect landlords to deliver the intentions of the Code in an alternative way, for example by publishing information in a public area so that it is easily accessible.

Section 1: Definition of a complaint

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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 landlord, its own staff, or those acting on its behalf, affecting a resident or group of residents.'	N	This specific wording has not previously been used. It has now been added to draft policy awaiting sign off	Awaiting sign off of revised policy by SLT & Board
1.3	A resident does not have to use the word 'complaint' for it to be treated as such. Whenever a resident expresses dissatisfaction landlords must give them the choice to make complaint. A complaint that is submitted via a third party or representative must be handled in line with the landlord's complaints policy.	Y	Staff are aware that an opportunity to raise a complaint should be offered when an expression of dissatisfaction is present. Staff will also offer to share the policy with the individual. This is covered in training with all staff.	To strengthen this we will add it to the policy guidance and induction checklist.
1.4	Landlords must recognise the difference between a service request and a complaint. This must be set out in their complaints policy. A service request is a request from a resident to the landlord requiring action to be taken to put something right. Service requests are not complaints, but must be recorded, monitored and reviewed regularly.	N	Life have previously included some service requests as complaints and therefore staff need guidance and further training to support this separation.	Included in revised policy. Needs to be added to the handbook and separate recording for service requests needs to be created.

1.5	A complaint must be raised when the resident expresses dissatisfaction with the response to their service request, even if the handling of the service request remains ongoing. Landlords must not stop their efforts to address the service request if the resident complains.	Υ	Staff are very aware of the right to complain and will always offer this at all stages of interactions. Staff always work to resolve issues that have arisen as quickly and appropriately as they possibly can as a matter of standard practice.	
1.6	An expression of dissatisfaction with services made through a survey is not defined as a complaint, though wherever possible, the person completing the survey should be made aware of how they can pursue a complaint if they wish to. Where landlords ask for wider feedback about their services, they also must provide details of how residents can complain.	Y	All service users are given information around how to make a complaint and we have posters up at all our sites. All future surveys will also include this information.	This information is now also readily available on our website

Section 2: Exclusions

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
2.1	Landlords must accept a complaint unless there is a valid reason not to do so. If landlords decide not to accept a complaint they must be able to evidence their reasoning. Each complaint must be considered on its own merits	у	Life have never refused to take a complaint.	
2.2	A complaints policy must set out the circumstances in which a matter will not be considered as a complaint or escalated, and these circumstances must be fair and reasonable to residents. Acceptable exclusions include: • The issue giving rise to the complaint occurred over twelve months ago. • Legal proceedings have started. This is defined as details of the claim, such as the Claim Form and Particulars of Claim, having been filed at court. • Matters that have previously been considered under the complaints	N	This has now been added to draft policy awaiting sign off	Awaiting sign off of revised policy by SLT & Board

2.3	Landlords must accept complaints referred to them within 12 months of the issue occurring or the resident becoming aware of the issue, unless they are excluded on other grounds. Landlords must consider whether to apply discretion to accept complaints made outside this time limit where there are good reasons to do so.	Y	Life accepts historic complaints and does not specify a time frame in which a complaint can be made.	To strengthen this it has been added to the revised policy awaiting sign off.
2.4	If a landlord decides not to accept a complaint, an 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. If the Ombudsman does not agree that the exclusion has been fairly applied, the Ombudsman may tell the landlord to take on the complaint.	Y	Life has never refused a complaint	To strengthen this a template letter will be created to ensure the appropriate information is provided should the need ever arise.
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Y	Life has never refused a complaint and always considers complaints on an individual basis	

Section 3: Accessibility and Awareness

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
3.1	Landlords must make it easy for residents to complain by providing different channels through which they can make a complaint. Landlords must consider their duties under the Equality Act 2010 and anticipate the needs and reasonable adjustments of residents who may need to access the complaints process.	у	Complaints can be made in person, via phone, email, online form, text message or letter. When we are aware of individuals not speaking very good English we make every attempt to make the complaints information accessible	To strengthen this we will consider a standard set of resources in languages we most frequently encounter that are not English.
3.2	Residents must be able to raise their complaints in any way and with any member of staff. All staff must be aware of the complaints process and be able to pass details of the complaint to the appropriate person within the landlord.	Y	All staff are made aware of how to handle complaints. And who to speak to if they encounter an unhappy service user.	To strengthen this we will be including specific training as part of the induction process.
3.3	High volumes of complaints must not be seen as a negative, as they can be indicative of a well-publicised and accessible complaints process. Low complaint volumes are potentially a sign that residents are unable to complain.	Y	Management view complaints as a positive part of the continual learning cycle and this information is used to improve service and provide you said we did feedback to service users.	
3.4	Landlords must make their complaint policy available in a clear and accessible format for all residents. This	Y	The old policy is available through service user agreement packs, in our premises and on	Revised policy is awaiting sign off.

	will detail the two stage process, what will happen at each stage, and the timeframes for responding. The policy must also be published on the landlord's website.		our website. The revised policy sets out the two stages and the explanation of these stages	
3.5	The policy must explain how the landlord will publicise details of the complaints policy, including information about the Ombudsman and this Code.	N	The old policy had limited information in relation to his. Revised policy has this included and is awaiting sign off.	Awaiting sign off of revised policy by SLT & Board
3.6	Landlords must 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.	Y	Life staff work in a trauma informed way and will always act in the best interested of the service user and this includes the opportunity for support with complaints.	To strengthen the service users understanding of this we will add their rights for support to the handbook
3.7	Landlords must provide residents with information on their right to access the Ombudsman service and how the individual can engage with the Ombudsman about their complaint.	Y	This information is already included in the old policy. More detail is included in the revised policy.	To strengthen the service users understanding of their rights and how to access the Ombudsman we will add this information to the handbook

Section 4: Complaint Handling Staff

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
4.1	Landlords must have a person or team assigned to take responsibility for complaint handling, including liaison with the Ombudsman and ensuring complaints are reported to the governing body (or equivalent). This Code will refer to that person or team as the 'complaints officer'. This role may be in addition to other duties.	Y	The Complaints Officer is the Director of Housing. The management team are all involved with investigating complaints that are allocated by the Complaints Officer.	
4.2	The complaints officer must have access to staff at all levels to facilitate the prompt resolution of complaints. They must also have the authority and autonomy to act to resolve disputes promptly and fairly.	Y	The Complaints Officer is the Director of Housing and has the appropriate level of authority to fulfil this role.	
4.3	Landlords are expected to prioritise complaint handling and a culture of learning from complaints. All relevant staff must be suitably trained in the importance of complaint handling. It is important that complaints are seen as a core service and must be resourced to handle complaints effectively	Y	All staff are aware of how to manage complaints. New training has been devised to provide to all staff and then a separate module for complaint handlers.	To strengthen this further we will share with all staff on a quarterly bases any complaints received and associated action plans

Section 5: The Complaint Handling Process

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
5.1	Landlords must have a single policy in place for dealing with complaints covered by this Code. Residents must not be treated differently if they complain.	Y	Although the organisation is diverse Life only has one Complaints policy	
5.2	The early and local resolution of issues between landlords and residents is key to effective complaint handling. It is not appropriate to have extra named stages (such as 'stage 0' or 'informal complaint') as this causes unnecessary confusion.	Y	Our old policy state 3 steps but the revised policy has two and is awaiting sign off. However, we have introduced the two step process already in Housing.	Awaiting sign off of revised policy by SLT & Board
5.3	A process with more than two stages is not acceptable under any circumstances as this will make the complaint process unduly long and delay access to the Ombudsman.	Y	Life understand this and has already applied this to practice	
5.4	Where a landlord's complaint response is handled by a third party (e.g. a contractor or independent adjudicator) at any stage, it must form part of the two stage complaints process set out in this Code. Residents must not be expected to go through two complaints processes.	Y	This is standard practice and is always applied by complaint handlers.	To strengthen this we will make it clear in the policy

5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	N/A	Life handles all of its own complaints internally	
5.6	When a complaint is logged at Stage 1 or escalated to Stage 2, landlords must set out their understanding of the complaint and the outcomes the resident is seeking. The Code will refer to this as "the complaint definition". If any aspect of the complaint is unclear, the resident must be asked for clarification.	N	Whilst we always define the complaint we are not consistently requesting desired outcomes.	We will set a standardised response for clarifying desired outcomes and amend the complaints log to include desired outcome information.
5.7	When a complaint is acknowledged at either stage, landlords must be clear which aspects of the complaint they are, and are not, responsible for and clarify any areas where this is not clear.	Y	If Life are not responsible for any part of a complaint we always ensure this is shared with the complainant and information is provided on who they need to complaint to and how they can do this.	
5.8	At each stage of the complaints process, complaint handlers must: a. deal with complaints on their merits, act independently, and have an open mind; b. give the resident a fair chance to set out their position; c. take measures to address any actual or perceived conflict of interest; and d. consider all relevant information and evidence carefully.	Y	Life take all complaints seriously and do not make any assumptions or decisions until a full investigation has taken place. We work in a trauma informed where everyone has a voice.	

5.9	Where a response to a complaint will fall outside the timescales set out in this Code, the landlord must agree with the resident suitable intervals for keeping them informed about their complaint.	Y	Timelines for response are set out as a standard response to a complaint. If this can not be met this is communicate with the complainant.	To strengthen this time frames for ongoing communication will be added to the template response.
5.10	Landlords must make reasonable adjustments for residents where appropriate under the Equality Act 2010. Landlords must keep a record of any reasonable adjustments agreed, as well as a record of any disabilities a resident has disclosed. Any agreed reasonable adjustments must be kept under active review.	Y	Life make any necessary adjustment to ensure accessibility.	To strengthen this we will ensure there is a log of this alongside the complaints log for reference.
5.11	Landlords must not refuse to escalate a complaint through all stages of the complaints procedure unless it has valid reasons to do so. Landlords must clearly set out these reasons, and they must comply with the provisions set out in section 2 of this Code.	Y	Life does not refuse to escalate complaints as standard practice.	
5.12	A full record must be kept of the complaint, 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 relevant supporting documentation such as reports or surveys.	Y	Life has a good recording system of complaints and associated investigation information that would make it easy to refer back to or review if required.	

5.13	Landlords must have processes in place to ensure a complaint can be remedied at any stage of its complaints process. Landlords must ensure appropriate remedies can be provided at any stage of the complaints process without the need for escalation.	Y	Life always resolves complaints as efficiently and effectively as possible and does not put unnecessary escalation steps in the way.	
5.14	Landlords must have policies and procedures in place for managing unacceptable behaviour from residents and/or their representatives. Landlords must be able to evidence reasons for putting any restrictions in place and must keep restrictions under regular review.	Y	Information is include in licenses and AST's and handbooks, alongside the visitor policy and procedures	To strengthen this we will look at having a standalone policy for anti-social behaviour.
5.15	Any restrictions placed on contact due to unacceptable behaviour must be proportionate and demonstrate regard for the provisions of the Equality Act 2010.	Y	This is also always considered if restrictions are necessary. This always fully discussed and explained to the service user and their visitors if necessary.	

Section 6: Complaints Stages

Stage 1

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
6.1	Landlords must have processes in place to consider which complaints can be responded to as early as possible, and which require further investigation. Landlords must consider factors such as the complexity of the complaint and whether the resident is vulnerable or at risk. Most stage 1 complaints can be resolved promptly, and an explanation, apology or resolution provided to the resident.	Y	The Complaints Officer reviews all complaints before allocating them to an investigating officer/complaint handler. Information and guidance is provided by the Complaints Officer around suitable steps to be taken.	
6.2	Complaints must be acknowledged, defined and logged at stage 1 of the complaints procedure within five working days of the complaint being received.	Y	This was the time line in our old policy and in the revised policy. The majority of 23-24 complaints were acknowledged in under 5 days.	
6.3	Landlords must issue a full response to stage 1 complaints within 10 working days of the complaint being acknowledged.	Y	Our old policy stated 15 days but the revised policy states 10. We have started working to this timeline whilst awaiting policy sign off.	
6.4	Landlords must decide whether an extension to this timescale is needed when considering the complexity of the	Υ	Communication for not meeting timelines is standard practice. Revised policy states the addition	

	complaint and then inform the resident of the expected timescale for response. Any extension must be no more than 10 working days without good reason, and the reason(s) must be clearly explained to the resident.		of no longer than additional 10 days.	
6.5	When an organisation informs a resident about an extension to these timescales, they must be provided with the contact details of the Ombudsman.	N	This has not previously been provided at this stage but will be going forward.	Need to add an extension template letter that includes the information for the team to use.
6.6	A complaint response must be provided 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 promptly with appropriate updates provided to the resident.	Y	This is done as standard practice by complaint handlers.	To strengthen this it has been included as a point in the new training for all staff
6.7	Landlords must address all points raised in the complaint definition and provide clear reasons for any decisions, referencing the relevant policy, law and good practice where appropriate.	Y	All complaints are broken down and each point is addressed individually with an explanation and outcome.	
6.8	Where residents raise additional complaints during the investigation, these must be incorporated into the stage 1 response if they are related and the stage 1 response has not been issued. Where the stage 1 response has been issued, the new issues are	Y	Yes this is done as part of standard practice.	To strengthen this we will add this to the process guidance

	unrelated to the issues already being investigated or it would unreasonably delay the response, the new issues must be logged as a new complaint.			
6.9	Landlords must confirm the following in writing to the resident at the completion of stage 1 in clear, plain language: a. the complaint stage; b. the complaint definition; c. the decision on the complaint; d. the reasons for any decisions made; e. the details of any remedy offered to put things right; f. details of any outstanding actions; and g. details of how to escalate the matter to stage 2 if the individual is not satisfied with the response.	N	Previously template letters include some of this information but not all of it.	Template to be reviewed and additional information included for complaint handlers to utilise.

Stage 2

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	If all or part of the complaint is not		All complaints are escalated if	
	resolved to the resident's satisfaction at		complainant is not happy with the	
6.10	stage 1, it must be progressed to stage	Υ	outcome of the first stage of the	
	2 of the landlord's procedure. Stage 2 is		complaint. Complaints Officer	
	the landlord's final response.		reviews all complaint outcomes.	
6.11	Requests for stage 2 must be	NI	This is not in old policy but has	Revised policy awaiting sign
0.11	acknowledged, defined and logged at	IN	been added to revised policy	off.

	stage 2 of the complaints procedure within five working days of the escalation request being received. Residents must not be required to			
6.12	explain their reasons for required to stage 2 consideration. Landlords are expected to make reasonable efforts to understand why a resident remains unhappy as part of its stage 2 response.	N	This is not in old policy but has been added to revised policy	Revised policy awaiting sign off.
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Y	We always allocate an independent investigation or escalation complaint handler to ensure transparency and fairness.	
6.14	Landlords must issue a final response to the stage 2 <u>within 20 working days</u> of the complaint being acknowledged.	Υ	Our current policy state 15 days. Revised policy has bene amended to state 20 days.	
6.15	Landlords must decide whether an extension to this timescale is needed when considering the complexity of the complaint and then inform the resident of the expected timescale for response. Any extension must be no more than 20 working days without good reason, and the reason(s) must be clearly explained to the resident.	Y	Communication for not meeting timelines is standard practice. Revised policy states the addition of no longer than additional 20 days	To strengthen this letter templates will be created that state the expected time frames.
6.16	When an organisation informs a resident about an extension to these timescales, they must be provided with the contact details of the Ombudsman.	N	This has not previously been provided at this stage but will be going forward.	Need to add an extension template letter that includes the information for the team to use.

6.17	A complaint response must be provided 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 promptly with appropriate updates provided to the resident.	Y	This is done as standard practice by complaint handlers.	To strengthen this it has been included as a point in the new training for all staff
6.18	Landlords must address all points raised in the complaint definition and provide clear reasons for any decisions, referencing the relevant policy, law and good practice where appropriate.	Y	All complaints are broken down and each point is addressed individually with an explanation and outcome.	
6.19	Landlords must confirm the following in writing to the resident at the completion of stage 2 in clear, plain language: a. the complaint stage; b. the complaint definition; c. the decision on the complaint; d. the reasons for any decisions made; e. the details of any remedy offered to put things right; f. details of any outstanding actions; and g. details of how to escalate the matter to the Ombudsman Service if the individual remains dissatisfied.	Z	Previously template letters include some of this information but not all of it.	Template to be reviewed and additional information included for complaint handlers to utilise.

6.20	Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.	Y	The Complaints Officer has the authority to sign off final responses. However, the CEO or other appropriate directors are also consulted with as necessary.	
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Section 7: Putting things right

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
7.1	 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. These can include: Apologising; Acknowledging where things have gone wrong; Providing an explanation, assistance or reasons; Taking action if there has been delay; Reconsidering or changing a decision; Amending a record or adding a correction or addendum; Providing a financial remedy; Changing policies, procedures or practices. 	Y	Life takes responsibility for its actions and always tries to ensure the appropriate information is shared to minimise frustrations and manage expectations. Life will admit if they have not got something right in order to create open communication so we can try to rectify it and not make the same mistakes.	
7.2	Any remedy offered must reflect the impact on the resident as a result of any	Y	We work in a trauma informed way and will always consider and	

	fault identified.		recognised the impact on the complainant when offering a suitable solution.	
7.3	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.	Y	A plan of action is always discussed and agreed with the complainant if action is required and it is appropriate to do so.	
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Y	The guidance on remedies has been provided as part of the revised training written for staff.	Revised training to be provided to staff

Section 8: Putting things right

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
8.1	Landlords must produce an annual complaints performance and service improvement report for scrutiny and challenge, which must include: a. the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements. b. a qualitative and quantitative analysis of the landlord's complaint handling performance. This must also include a summary of the types of complaints the landlord has refused to accept; c. any findings of non-compliance with this Code by the Ombudsman; d. the service improvements made as a result of the learning from complaints; e. any annual report about the landlord's performance from the Ombudsman; and f. any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord.	Y	This has been introduced this year and published on our website.	

8.2	The annual complaints performance and service improvement report must be reported to the landlord's governing body (or equivalent) and published on the on the section of its website relating to complaints. The governing body's response to the report must be published alongside this.	Y	This has been introduced this year and published on our website.	
8.3	Landlords must also carry out a self- assessment following a significant restructure, merger and/or change in procedures.	Y	We would carry this out as necessary.	
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	Y	We would be happy to comply	
8.5	If a landlord is unable to comply with the Code due to exceptional circumstances, such as a cyber incident, they must inform the Ombudsman, provide information to residents who may be affected, and publish this on their website Landlords must provide a timescale for returning to compliance with the Code.	Y	We would comply if this arose	

Section 9: Scrutiny & oversight: continuous learning and improvement

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
9.1	Landlords must look beyond the circumstances of the individual complaint and consider whether service improvements can be made as a result of any learning from the complaint.	Y	Life gathers feedback and in many ways including complaints. All of this information is used to feed in to changes in policy and practice. This is reviewed quarterly and now annually	
9.2	A positive complaint handling culture is integral to the effectiveness with which landlords resolve disputes. Landlords must use complaints as a source of intelligence to identify issues and introduce positive changes in service delivery.	Y	We make every attempt to support staff and service users to view complaints as a way to improve things and not to be viewed negatively. The revised training will provide further consolidation of this.	
9.3	Accountability and transparency are also integral to a positive complaint handling culture. Landlords must report back on wider learning and improvements from complaints to stakeholders, such as residents' panels, staff and relevant committees.	Y	We are developing this further this year by having a quarterly feedback to all staff and service users on 'you said we did'	
9.4	Landlords must appoint a suitably senior lead person as accountable for their complaint handling. This person must assess any themes or trends to identify potential systemic issues, serious risks, or policies and procedures that require revision.	Y	The Director of Housing is responsible for the complaints management, review and feeding relevant information into changes in service/practice. This sis done on a regular basis with improved plans for this year.	

9.5	In addition to this a member of the governing body (or equivalent) must be appointed to have lead responsibility for complaints to support a positive complaint handling culture. This person is referred to as the Member Responsible for Complaints ('the MRC').	Y	An appointed member of the Board of Trustees has taken on the responsibility of being the MRC in 24-25	
9.6	The MRC will be responsible for ensuring the governing body receives regular information on complaints that provides insight on the landlord's complaint handling performance. This person must have access to suitable information and staff to perform this role and report on their findings.	Y	The MRC does have appropriate access to staff and to information which is fully supported by the Complaints Officer and CEO.	
9.7	As a minimum, the MRC and the governing body (or equivalent) must receive: a. regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance; b. regular reviews of issues and trends arising from complaint handling; c. regular updates on the outcomes of the Ombudsman's investigations and progress made in complying with orders related to severe maladministration findings; and d. annual complaints performance and service improvement report.	Y	This has been introduced this year	

9.8	Landlords must have a standard objective in relation to complaint handling for all relevant employees or third parties that reflects the need to: a. have a collaborative and cooperative approach towards resolving complaints, working with colleagues across teams and departments; b. take collective responsibility for any shortfalls identified through complaints, rather than blaming others; and c. act within the professional standards for engaging with complaints as set by any relevant professional body.	Y	Life staff work very collaboratively as one team. There are clear goals around what is trying to be achieved and this is extended to complaints and resolution. The service user is at the centre of everything we do and we all work collectively to ensure the best outcome is achieved.	
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