

## Appendix B – Housing Ombudsman Self-Assessment Form 2022

This self-assessment form should be completed by the complaints officer and **discussed at the landlord’s governing body annually**. Evidence should be included to support all statements with additional commentary as necessary.

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

### Section 1 - Definition of a complaint

#### Mandatory ‘must’ requirements

Code section	Code requirement	Comply Yes/No	Evidence, commentary and any explanations (evidence for most of these is in the complaints policy)
1.2	A complaint must be defined as: ‘an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the organisation, its own staff, or those acting on its behalf, affecting an individual resident or group of residents.’	Yes	We will always try to resolve an issue at first point of contact as a service request, however where an issue cannot be resolved, customers can raise a complaint with Connect
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	All staff are advised to identify complaints from all interaction with customers, regardless of the language used. This was reinforced to all staff on 21 <sup>st</sup> April 2022
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	A complaint can be logged at any stage by the customer.
1.7 & 1.8	A landlord must accept a complaint unless there is a valid reason not to do so. 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	Our policy states the reasons why we may not accept a complaint, however we will consider cases that fit this criteria on a case by case basis and recognise that all complaints should be investigated.
1.9	If a landlord decides not to accept a complaint, a detailed explanation must be provided to the resident setting out the reasons why the matter is not suitable for the complaints process and the right to take that decision to the Ombudsman.	Yes	This is clearly stated within our Complaints Policy

## Best practice 'should' requirements

Code section	Code requirement	Comply Yes/No	Evidence, commentary and any explanations
1.4	Landlords should recognise the different between a <b>service request</b> , where a resident may be unhappy with a <b>situation</b> that they wish to have rectified, and a <b>complaint</b> about the <b>service</b> they have/have not received.	Yes	Although we are not required to, we track contacts with customers where they are unhappy to ensure we continue to learn from these issues.
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	We review all customer feedback and contact customers that provide information of service failure. A complaint can be raised through this process.

## Section 2 – Accessibility and awareness

### Mandatory 'must' requirements

Code section	Code requirement	Comply Yes/No	Evidence, commentary and any explanations (evidence for most of these is in the complaints policy)
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	We encourage complaints to be made in writing setting out the nature of the complaint, what the customer feels we have done wrong and what they would like us to do to put things right, however this is not required and a complaint can be made through any channel
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	We also send a leaflet to the customer at each stage of our complaints processes setting out the process and timescales
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	Our complaint policy is published on our website and we have a dedicated complaints page that sets out the policy in customer friendly language. This

			includes how complaints can be raised and a complaint form (see website)
2.5	Landlords must comply with the Equality Act 2010 and may need to adapt normal policies, procedures, or processes to accommodate an individual's needs. Landlords must satisfy themselves that their policy sets out how they will respond to reasonable adjustments requests in line with the Equality Act and that complaints handlers have had appropriate training to deal with such requests.	Yes	Connect is compliant with the Equality Act 2010
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 include the Complaints process frequently in our Connect Magazine to all residents. Complaint reports
2.7	Landlords must provide residents with contact information for the Ombudsman as part of its regular correspondence with residents.	Yes	We send an advice leaflet at each stage of our complaint process that details the customers right to contact HoS and provides an overview of the service
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 complaint process is exhausted.	Yes	We send an advice leaflet at each stage of our complaint process that details the customers right to contact HoS and provides an overview of the service

### Best practice 'should' requirements

Code section	Code requirement	Comply Yes/No	Evidence, commentary and any explanations (evidence for most of these is in the complaints policy)
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.	Partial	Our Complaints Policy clearly states that complaints can be received through Social Media Channels. A social Media policy is in development to ensure we are managing contact in a confidential manner. Although this is managed correctly at the moment, the process is not fully documented.

### 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	The Service Manager Customer Insight is appointed as Complaints Officer in Connect
3.2	...the complaint handler appointed must have appropriate complaint handling skills and no conflicts of interest.	Yes	The Service Manager Customer Insight role has the appropriate complaints handling skills and no conflicts of interest.

#### Best practice ‘should’ requirements

Code section	Code requirement	Comply Yes/No	Evidence, commentary and any explanations
3.3	Complaint handlers: <ul style="list-style-type: none"> <li>• able to act sensitively and fairly</li> <li>• trained to handle complaints &amp; deal with distressed residents</li> <li>• have access to staff at all levels to facilitate quick resolution of complaints</li> <li>• have the authority and autonomy to act to resolve disputes quickly and fairly</li> </ul>	Yes	Stage 1 complaints are managed by Senior Managers who possess the relevant skills and experience. Stage 2 complaints are managed by Directors who possess the relevant skills and experience.

### Section 4 – Complaint handling principles

#### Mandatory ‘must’ requirements

Code section	Code requirement	Comply Yes/No	Evidence, commentary and any explanations (evidence for most of these is in the complaints policy and annual report)
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.</p> <p>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.</p> <p>When a complaint is made, it must be acknowledged and logged at stage one of the complaints procedure <b>within five days of receipt</b>.</p>	Partially	<p>Whilst Connect will try to resolve any issues at first point of contact, there is no obstruction to our complaints procedure where required.</p> <p>Performance in 2021/23 in terms of response time was not where it should be. (see May 2022 Board paper)</p>
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>	Partially	<p>Under the revised policy - Senior Managers will acknowledge complaints within 5 working days, setting out their understanding of the complaints. To date this has not been consistently applied. More quality assurance is being placed on the process in 2022/23</p>
4.6	<p>A complaint investigation must be conducted in an impartial manner.</p>	Yes	<p>This is in line with Connects values which all employees are expected to adhere to</p>
4.7	<p>The complaint handler must:</p> <ul style="list-style-type: none"> <li>• deal with complaints on their merits</li> <li>• act independently and have an open mind</li> <li>• take measures to address actual or perceived conflict of interest</li> <li>• consider all information and evidence carefully</li> <li>• keep the complaint confidential as far as possible with information only disclosed if necessary to properly investigate the matter</li> </ul>	Yes	<p>This is in line with Connects values which all employees are expected to adhere to.</p> <p>Our Complaint system ensures that only those involved with managing the complaint can access information</p>
4.11	<p>Landlords must adhere to any reasonable arrangements agreed with residents in terms of frequency and method of communication.</p>	Partial	<p>This is in line with Connects values which all employees are expected to adhere to and in the policy but a work-in-progress to make sure it happens consistently.</p>

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"> <li>• set out their position</li> <li>• comment on any adverse findings before a final decision is made.</li> </ul>	Yes	<p>Our Stage 1 process encourages customers to provide full information including what they feel Connect has done wrong and what they feel Connect should do to put things right. Our Stage 2 process provides the opportunity for the customer to clearly restate their position. As part of any investigation into the conduct of a staff member, we would expect that staff member to have the opportunity to set out their position and comment on any adverse findings. Comments about other residents are normally dealt with under ASB processes rather than complaints but in those processes are given the opportunity to set out their position</p>
4.13	<p>A landlord must include in its complaints policy its timescales for a resident to request escalation of a complaint.</p>	Yes	<p>We send an advice leaflet at each stage of our complaint process that details the relevant timescales of the Complaint policy</p>
4.14	<p>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.</p>	Yes	<p>This is clearly stated within our Complaints Policy</p>
4.15	<p>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.</p>	Yes	<p>Our Complaint Management System facilitates this.</p>
4.18	<p>Landlords must have policies and procedures in place for managing unacceptable behaviour from residents and/or their representatives when pursuing a complaint.</p>	Yes	<p>This is clearly stated within our Complaints Policy and follows the HoS guidelines</p>

## Best practice 'should' requirements

<b>Code section</b>	<b>Code requirement</b>	<b>Comply Yes/No</b>	<b>Evidence, commentary and any explanations</b> (evidence for most of these is in the complaints policy)
4.3	Landlords should manage residents' expectations from the outset, being clear where a desired outcome is unreasonable or unrealistic.	Yes	This would be our approach when dealing with any enquiry, including complaints.
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	This would be our approach when dealing with any enquiry, including complaints.
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 would be our approach when dealing with any enquiry, including complaints.
4.8	Where a key issue of a complaint relates to the parties' legal obligations landlords should clearly set out their understanding of the obligations of both parties.	Yes	This would be our approach when dealing with any enquiry, including complaints.
4.9	Communication with the resident should not generally identify individual members of staff or contractors.	Yes	This would be our approach when dealing with any enquiry, including complaints.
4.10	Landlords should keep residents regularly updated about the progress of the investigation.	Partial	This is in our complaints policy and customer care approach but feedback suggests it is not always consistently applied.
4.16	Landlords should seek feedback from residents in relation to the landlord's complaint handling as part of the drive to encourage a positive complaint and learning culture.	Yes	When a complaint is closed, the customer is invited to provide feedback via an online survey. Where access to an online survey is not available, an outbound call is made. This is regardless of the outcome of the complaint.
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	Lessons learned are captured as part of the complaint management system. Where it is identified that staff need to be aware, retrained or engaged in an issue, this is implemented.
4.19	Any restrictions placed on a resident's contact due to unacceptable behaviour should be appropriate to their needs and should demonstrate regard to the provisions of the Equality Act 2010.	Yes	This would be our approach when dealing with any enquiry, including complaints.



## Section 5 – Complaint stages

### Mandatory ‘must’ requirements

#### Stage 1

Code section	Code requirement	Comply Yes/No	Evidence, commentary and any explanations (evidence for most of these is in the complaints policy)
5.1	Landlords must respond to the complaint <b>within 10 working days</b> 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.	Partially	This is clearly stated within our Complaints Policy and tracked and reported on. Performance in 2021/23 in terms of response time was not where it should be. (see May 2022 Board paper)
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.	Partially	This is now clearly stated within our Complaints Policy. Our complaint Management system tracks outstanding actions through to closure. Performance in 2021/23 in terms of response time was not where it should be. (see May 2022 Board paper)
5.6	Landlords must address all points raised in the complaint and provide clear reasons for any decisions, referencing the relevant policy, law and good practice where appropriate.	Yes	This would be our approach when dealing with any enquiry, including complaints. Customers can escalate a complaint to Stage 2 of our process where we fail to address all points raised in our response,
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"> <li>• the complaint stage</li> <li>• the decision on the complaint</li> <li>• the reasons for any decisions made</li> <li>• the details of any remedy offered to put things right</li> <li>• details of any outstanding actions</li> <li>• details of how to escalate the matter to stage two if the resident is not satisfied with the answer</li> </ul>	Yes	All Complaint responders have been informed of this process.  An advice leaflet confirming the available options is provided to the customers with the Stage 1 response.

## Stage 2

Code section	Code requirement	Comply Yes/No	Evidence, commentary and any explanations (evidence for most of these is in the complaints policy)
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.	Yes	This is clearly stated within our Complaints Policy and tracked and reported on.
5.10	On receipt of the escalation request, landlords must set out their understanding of issues outstanding and the outcomes the resident is seeking. If any aspect of the complaint is unclear, the resident must be asked for clarification and the full definition agreed between both parties.	Yes	This is clearly stated within our Complaints Policy.
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 clearly stated within our Complaints Policy.
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 clearly stated within our Complaints Policy.
5.13	Landlords must respond to the stage two complaint <b><u>within 20 working days</u></b> 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 clearly stated within our Complaints Policy. Performance in 2021/23 in terms of response time was not where it should be. (see May 2022 Board paper
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"> <li>• the complaint stage</li> <li>• the complaint definition</li> <li>• the decision on the complaint</li> <li>• the reasons for any decisions made</li> <li>• the details of any remedy offered to put things right</li> <li>• details of any outstanding actions</li> </ul> <b>and</b> <ul style="list-style-type: none"> <li>• if this was the final stage, details of how to escalate the matter to the Housing Ombudsman Service if the resident remains dissatisfied.</li> </ul>	Yes	All Complaint responders have been informed of this process.  An advice leaflet confirming the available options is provided to the customers with the Stage 2 response.

## Best practice 'should' requirements

## Stage 1

<b>Code section</b>	<b>Code requirement</b>	<b>Comply Yes/No</b>	<b>Evidence, commentary and any explanations</b> (evidence for most of these is in the complaints policy)
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 clearly stated within our Complaints Policy.
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 the landlord's response.	Yes	This is clearly stated within our Complaints Policy.
5.4	Where the problem is a recurring issue, the landlord should consider any older reports as part of the background to the complaint if this will help to resolve the issue for the resident.	Yes	This would be our approach when dealing with any enquiry, including complaints.
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 would be our approach when dealing with any enquiry, including complaints

## Stage 2

<b>Code section</b>	<b>Code requirement</b>	<b>Comply Yes/No</b>	<b>Evidence, commentary and any explanations</b> (evidence for most of these is in the complaints policy)
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.	Partially	This is clearly stated within our Complaints Policy. We always notify but it is not always with prior agreement.

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 clearly stated within our Complaints Policy.  An advice leaflet confirming the available options is provided to the customers with the Stage 1 response.
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## Section 6 – Putting things right

### Mandatory 'must' requirements

Code section	Code requirement	Comply Yes/No	Evidence, commentary and any explanations (evidence for most of these is in the complaints and compensation policies)
6.1	Effective dispute resolution requires a process designed to resolve complaints. Where something has gone wrong a landlord must acknowledge this and set out the actions it has already taken, or intends to take, to put things right.	Yes	This would be our approach when dealing with any enquiry, including complaints
6.2	Any remedy offered must reflect the extent of any service failures and the level of detriment caused to the resident as a result. A landlord must carefully manage the expectations of residents and not promise anything that cannot be delivered or would cause unfairness to other residents.	Yes	This would be our approach when dealing with any enquiry, including complaints
6.5	The remedy offer must clearly set out what will happen and by when, in agreement with the resident where appropriate. Any remedy proposed must be followed through to completion.	Yes	This would be our approach when dealing with any enquiry, including complaints
6.6	In awarding compensation, a landlord must consider whether any statutory payments are due, if any quantifiable losses have been incurred, the time and trouble a resident has been put to as well as any distress and inconvenience caused.	Yes	This would be our approach when dealing with any enquiry, including complaints

### Best practice 'should' requirements

Code section	Code requirement	Comply Yes/No	Evidence, commentary and any explanations (evidence for most of these is in the complaints policy and annual report)
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6.3	Landlords should look beyond the circumstances of the individual complaint and consider whether anything needs to be 'put right' in terms of process or systems to the benefit of all residents.	Yes	This would be our approach when dealing with any enquiry, including complaints
6.7	In some cases, a resident may have a legal entitlement to redress. The landlord should still offer a resolution where possible, obtaining a legal advice as to how any offer of resolution should be worded.	Yes	This would be our approach when dealing with any enquiry, including complaints

## 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	Lessons Learned are shared on an ongoing basis. Complaints are including in the annual tenant report

### 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.	No	The Board considered this in May 2022 and decided against having a single person as a lead. This is in line with an independent Governance review of 2017 that recommended not using lead Board members. This was reviewed and further confirmed in 2021. Instead, Board will continue to review complaint performance as outlined at 7.4. The Chairs of our Board and Committees help set the agenda for this.
7.4	As a minimum, governing bodies should receive: <ul style="list-style-type: none"> <li>Regular updates on the volume, categories and outcome of complaints, alongside complaint handling performance including compliance with the Ombudsman's orders</li> <li>Reviews of issues and trends arising from complaint handling</li> </ul>	Partially	Complaints are reported quarterly to board and HoS cases are raised as required. Annual Complaint reporting goes to Board each year. Self-Assessment is approved by Board prior to

	<ul style="list-style-type: none"> <li>The annual performance report produced by the Ombudsman, where applicable</li> <li>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.</li> </ul>		<p>publication</p> <p>HOS findings are reported in the subsequent Leadership Team report.</p> <p>Management Responses have not been tracked by the Board. It seems too operational to do this.</p>
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	This would be our approach when dealing with any issues, including complaints. Leadership Team receives monthly reports
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"> <li>have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments</li> <li>take collective responsibility for any shortfalls identified through complaints rather than blaming others</li> <li>act within the Professional Standards for engaging with complaints as set by the Chartered Institute of Housing</li> </ul>	Partially	Our values and corporate strategy support these statements and we have varying clauses in JDs but it will not include this specific wording. We will consider how appropriate this is in 2022.

## 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	Last completed – March 2021 Reviewed and updated – May 2022
8.2	Landlords must also carry out a self-assessment following a significant restructure and/or change in procedures.	Will do when it happens	Not applicable but noted and we would undertake this if required.

8.3	Following each self-assessment, a landlord must: <ul style="list-style-type: none"><li>• 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</li><li>• publish the outcome of their assessment on their website if they have one, or otherwise make accessible to residents</li><li>• include the self-assessment in their annual report section on complaints handling performance</li></ul>	Yes	To be published on approval from Board – June 2022
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