

September 2023

Self-Assessment Form

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

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

Section 1 - Definition of a complaint

Mandatory must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
1.2	A complaint must be defined as: <i>'an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the organisation, its own staff, or those acting on its behalf, affecting an individual resident or group of residents.'</i>	Yes	Our complaints policy reflects this definition.
1.3	The resident does not have to use the word 'complaint' for it to be treated as such. A complaint that is submitted via a third party or representative must still be handled in line with the landlord's complaints policy.	Yes	Our complaints policy confirms this is the case and is reinforced in training and guidance.
1.6	... if further enquiries are needed to resolve the matter, or if the resident requests it, the issue must be logged as a complaint.	Yes	Our complaints policy confirms this is the case and is confirmed in our training and guidance.
1.7	A landlord must accept a complaint unless there is a valid reason not to do so.	Yes	Our complaints policy confirms this is the case and is confirmed in our training and guidance.

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	Our complaints policy details the circumstances that a matter will not be considered a complaint.
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	Our complaints policy confirms this is the case and our processes ensure this is clearly communicated.

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	A training plan and guidance documents which distinguish between a service request and a complaints is in place.
1.5	Survey feedback may not necessarily need to be treated as a complaint, though, where possible, the person completing the survey should be made aware of how they can pursue their dissatisfaction as a complaint if they wish to.	No	Residents who respond negatively to tenant satisfaction measures are given the option of a callback to resolve matters and given details of their right to pursue a complaint where applicable. We aim to rollout a similar process for transactional feedback in the future.

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	Multiple channels are available for tenants to make complaints, including our website, livechat, telephone, mail and face to face options.
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	Our complaints policy is available on our website and is also signposted to tenants at commencement of their tenancy.
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	This information is fully accessible on our 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	Reasonable adjustments policy in place and forms part of complaints handling training programme. All training is recorded on our learning management system to evidence this. All teams have been trained on Equity, Diversity and Inclusion.

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	These resources are signposted on our websites, available in leaflet and poster form where required and included in our tenant communication plan. We also have an internal doc called Complaints 101 which staff can read, so that they're confident in giving out accurate info in their conversations with tenants.
2.7	Landlords must provide residents with contact information for the Ombudsman as part of its regular correspondence with residents.	Yes	This information is included as part of our evidence in response to section 2.6.
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	This is set out at the start of the complaints process when acknowledging a complaint.

Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
2.2	Where a landlord has set up channels to communicate with its residents via social media, then it should expect to receive complaints via those channels. Policies should contain details of the steps that will be taken when a complaint is received via social media and how confidentiality and privacy will be maintained.	Yes	Whilst social media channels are not primary inlets for communication, Twitter is monitored by our customer services team during their working hours and used as an inbound communication channel, any complaints raised via Twitter will enter the complaints process and policy. Our Comms team also have access to these channels and can assist with sensitive messaging if required.

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	Local Tenant Voice Teams ensure complaints receive the necessary attention and Flagship Group's Customer Experience Team (complaints officer) will ensure regular reporting and compliance with the Code.
3.2	...the complaint handler appointed must have appropriate complaint handling skills and no conflicts of interest.	Yes	All complaints teams are thoroughly trained (please see 3.3). All staff complete an annual declarations of interest which have plans in place to prevent conflict. Tenant Voice Officers are trained to flag if they know the complainant to ensure it can be passed to another officer.

Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
3.3	Complaint handlers should: <ul style="list-style-type: none"> • be able to act sensitively and fairly • be trained to handle complaints and deal with distressed and upset residents • have access to staff at all levels to facilitate quick resolution of complaints • have the authority and autonomy to act to resolve disputes quickly and fairly. 	Yes	Our Tenant Voice Teams have the requisite skills and training set out by the code to handle complaints and have a training programme in place to support this. The team are continually supported in the day job by the Tenant Voice Manager and have access to all departments and support of the senior leadership team to access the people they need to quickly resolve complaints.

Section 4 - Complaint handling principles

Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
4.1	Any decision to try and resolve a concern must be taken in agreement with the resident and a landlord's audit trail/records should be able to demonstrate this. Landlords must ensure that efforts to resolve a resident's concerns do not obstruct access to the complaints procedure or result in any unreasonable delay. It is not appropriate to have extra named stages (such as 'stage 0' or 'pre-complaint stage') as this causes unnecessary confusion for residents. When a complaint is made, it must be acknowledged and logged at stage one of the complaints procedure within five days of receipt.	Yes	Our policy and procedures set out the requirement for our teams to acknowledge and log complaints within 5 working days of receipt. Our complaints handling system has a field to document where proposal of a resolution has been agreed. No extra stages outside of our policy are used. Between Sept 22 - Aug 23: 98.23% of complaints were acknowledged within 5 days of receipt.
4.2	Within the complaint acknowledgement, landlords must set out their understanding of the complaint and the outcomes the resident is seeking. If any aspect of the complaint is unclear, the resident must be asked for clarification and the full definition agreed between both parties.	Yes	On receipt of the complaint the complaint handler will acknowledge and seek clarity of outcomes until understanding is known. The outcome field will document the desired outcome.
4.6	A complaint investigation must be conducted in an impartial manner.	Yes	Complaint handlers are impartial and do not sit within a service provision department.

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 • keep the complaint confidential as far as possible, with information only disclosed if necessary to properly investigate the matter. 	Yes	Complaint handlers are trained to ensure this is the case. Tenant Voice Managers complete regular checks of cases including the handling and complaint responses. Cases are picked at random across the case type and officer.
4.11	Landlords must adhere to any reasonable arrangements agreed with residents in terms of frequency and method of communication	Yes	Preferred method of communication is captured at the beginning of the complaints process and the next contact dates are communicated with the tenant. Tenants are given a direct telephone number to make contact with the complaint handling team should they need to.
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 • comment on any adverse findings before a final decision is made. 	Yes	Tenant Voice Teams will ensure that all parties are able to set out their position and comment before a resolution is proposed.
4.13	A landlord must include in its complaints policy its timescales for a resident to request escalation of a complaint	Yes	This is recorded within our policy and documented in correspondence.
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	Escalation is available to any complainant that feels their complaint has not been resolved at the preceding stage.

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	Our complaints system captures this information.
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	An unacceptable behaviour policy is in place and referred to as part of our complaints policy.

Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
4.3	Landlords should manage residents' expectations from the outset, being clear where a desired outcome is unreasonable or unrealistic	Yes	Our Tenant Voice Teams manage the expectations of our tenants from the outset, communicating clearly next steps.
4.4	A complaint should be resolved at the earliest possible opportunity, having assessed what evidence is needed to fully consider the issues, what outcome would resolve the matter for the resident and whether there are any urgent actions required.	Yes	Our Tenant Voice Teams are focused on quick resolution and have the support to find the best outcomes for our tenants. We measure this in regular reporting.
4.5	Landlords should give residents the opportunity to have a representative deal with their complaint on their behalf, and to be represented or accompanied at any meeting with the landlord where this is reasonable.	Yes	This is included in our policy.
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	Our in-house legal team provide counsel for our tenant voice team where appropriate in these circumstances.
4.9	Communication with the resident should not generally identify individual members of staff or contractors.	Yes	We redact staff information and refer to "the contractor" or "the housing officer" Tenant Voice Managers complete regular checks of complaint responses to ensure this is consistently adhered to.
4.10	Landlords should keep residents regularly updated about the progress of the investigation.	Yes	At the beginning of the complaint process next contact dates are agreed and communicated with the tenant. Tenants

			are also given a direct telephone number to make contact with the complaint handling team should they need to.
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	A feedback survey is sent out after every closed 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	As outlined in our complaint policy, we are committed to a positive complaint handling culture and learnings are a source of insight used to improve services.
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	Our systems have clear information about any contact restrictions for tenants that are appropriate to their needs.

Section 5 - Complaint stages

Mandatory 'must' requirements Stage 1

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
5.1	Landlords must respond to the complaint <u>within 10 working days</u> of the complaint being logged. Exceptionally, landlords may provide an explanation to the resident containing a clear timeframe for when the response will be received. This should not exceed a further 10 days without good reason.	Yes	This is set out in our policy, any extensions are documented and measured regularly. Between Sept 22 – Aug 23: 93.24% of stage 1 complaints were responded to within 10 working days
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	This is set out in our policy and part of our processes to monitor outstanding actions through to conclusion of the complaint.

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 information is set out in our resolution/closure letter
5.8	Landlords must confirm the following in writing to the resident at the completion of stage one in clear, plain language: <ul style="list-style-type: none"> • the complaint stage • the decision on the complaint • the reasons for any decisions made • the details of any remedy offered to put things right • details of any outstanding actions • details of how to escalate the matter to stage two if the resident is not satisfied with the answer 	Yes	This is included in our resolution communications (we have adopted the key points from the HOS templates) and is part of our policy.

Stage 2

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
5.9	If all or part of the complaint is not resolved to the resident's satisfaction at stage one it must be progressed to stage two of the landlord's procedure, unless an exclusion ground now applies. In instances where a landlord declines to escalate a complaint it must clearly communicate in writing its reasons for not escalating as well as the resident's right to approach the Ombudsman about its decision.	Yes	This is set out in our policy.
5.10	On receipt of the escalation request, landlords must set out their understanding of issues outstanding and the outcomes the resident is seeking. If any aspect of the complaint is unclear, the resident must be asked for clarification and the full definition agreed between both parties.	Yes	This is recorded on our systems as part of an escalation request.
5.11	Landlords must only escalate a complaint to stage two once it has completed stage one and at the request of the resident.	Yes	This is included 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	Stage 2 complaints are dealt with by a manager who has not been part of handling the Stage 1 complaint.
5.13	Landlords must respond to the stage two complaint within 20 working days of the complaint being escalated. Exceptionally, landlords may provide an explanation to the resident 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 set out in our complaints policy, documented on systems and measured. Between Sept 22 – Aug 23: 95.41% of stage 2 complaints were responded to within 20 workings days
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	This is incorporated in our complaints policy and covered in our response communications.

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	Our policy reflects a two stage process only.

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	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 set out in our policy and any agreed extension beyond 20 days are documented and measured regularly.
5.3	Where agreement over an extension period cannot be reached, landlords should provide the Housing Ombudsman’s contact details so the resident can challenge the landlord’s plan for responding and/or the proposed timeliness of a landlord’s response.	Yes	All communications within our complaints process provide the HOS contact details.
5.4	Where the problem is a recurring issue, the landlord should consider any older reports as part of the background to the complaint if this will help to resolve the issue for the resident.	Yes	Records are checked for historic issues and considered as part of the complaint fact find.
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	New complaints will form part of the current complaint if they precede the full response date and are relevant.

Stage 2

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
5.14	If an extension beyond 10 working days is required to enable the landlord to respond to the complaint fully, this should be agreed by both parties.	Yes	This is agreed with the tenant and recorded.
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	All communications within our complaints process provide the HOS contact details.

Stage 3

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

September 2023

Section 6 - Putting things right

Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
6.1	Effective dispute resolution requires a process designed to resolve complaints. Where something has gone wrong a landlord must acknowledge this and set out the actions it has already taken, or intends to take, to put things right.	Yes	This is communicated at resolution stage and followed up in a letter at stage 1 and 2 if appropriate.
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	Our Tenant Voice Teams are impartial and have the autonomy and business understanding to resolve complaints fairly.
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	Our Tenant Voice Teams will agree verbally the proposed resolution and follow this up in writing, they will track any actions agreed through to completion.
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	Our discretionary payments policy and internal guidance enables our Tenant Voice Team to make fair and reasonable payments with parameters around quantifiable losses and inconvenience payments. Discretionary payments are reviewed monthly by the TVMs

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	Learnings from complaints are considered at senior leadership level and actions put in place to deal with systemic issues. Quarterly tenant scrutiny meetings review case studies and insight and learnings and improvement actions logged. Initiatives to deal with the root cause of issues are assigned and managed through to completion. You said, We did communications are published on our website quarterly.
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	Where a resident may have legal entitlement to redress we will liaise with our in house legal team and ensure the tenant is kept up to date.

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	Complaints information is provided in annual reports, on websites, to Boards, Local Housing Boards an engaged residents panel and staff.

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	A member of our Governing Body has been appointed to have lead responsibility and to support a positive complaints culture. Regular complaints information is provided to both the Group and Local Housing Boards.
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	This information is supplied to Group and Local Housing boards.
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	Learning and improvement activities are recorded, monitored and reported on. The Head of Customer Experience reviews any systemic issues and ensures these are built into continuous improvement plans and expedited.

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	This information is contained without our training for all staff.
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Section 8 - Self-assessment and compliance

Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
8.1	Landlords must carry out an annual self-assessment against the Code to ensure their complaint handling remains in line with its requirements.	Yes	This document was approved by Flagship Group Board on 29 September 2023.
8.2	Landlords must also carry out a self-assessment following a significant restructure and/or change in procedures.	Yes	N/A
8.3	<p>Following each self-assessment, a landlord must:</p> <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	<ul style="list-style-type: none"> - This self assessment has been conducted, and outcomes approved by the Flagship Group Board on 29 September 2023. - The assessment has been published on our websites. - An excerpt has been published in the annual report (year end 2022) where the full self-assessment is signposted.