Housing Ombudsman Complaint Handling Code - 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.

Self-Assessment Completed: May 2022.

Section 1 - Definition of a complaint

Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
	A complaint must be defined as:	Yes	Arches Policy has adopted the same definition.
1.2	'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.		
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.		Arches accepts contact from authorised advocates such as councillors or 3 rd parties to provide a summary of events and action and advice on our Complaints Policy.
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	Arches advises advocates of our Complaints Policy and of how to pursue an unresolved matter. Our Policy is clear on the definition of, and routes to making a complaint.
1.7	A landlord must accept a complaint unless there is a valid reason not to do so.	Yes	Arches Policy includes reasons why we would not accept a complaint.

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.	Arches Policy includes reasons why we would not accept 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.		One Complaint refused. Advice sought from the Housing Ombudsman and letter provided to the complainant advising of our decision, and including advice on how to contact the Housing Ombudsman.

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.		Staff have received training on determining what is and is not a 'complaint', and process maps clearly show the triage process for correct treatment of enquiries.
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.		We respond to all respondents who are Dissatisfied or Totally Dissatisfied with our overall service with a call back to discuss the dissatisfaction further. Our Complaints Policy is published on our website.

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	Complaints can be made in a range of ways to ensure the policy is accessible to all, including: Letter Email Telephone Webchat Customer portal Via social media - Facebook
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	Clear policy which provides definitions, and stages of the process. We make use of telephone interpreting services when required.
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	Page on website under the Contact Us section, which provides a summary of the process stages, and contact details for the Housing Ombudsman, with links to our Policy.
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	Statement on Reasonable Adjustments included in the Policy. All staff have access to interpreting services via Language Line.
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 learning from complaints in tenant newsletters. Webpage of advice for customers on the website, including advice about the Housing Ombudsman's role and contact details, and hyperlink direct to HO.

2.7	Landlords must provide residents with contact information for the Ombudsman as part of its regular correspondence with residents.	Yes	All out-bound complaint letters at acknowledgement, and at each stage, include the contact details for the Housing Ombudsman, as does our website.
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	All out-bound complaint letters at each stage include the contact details for the Housing Ombudsman, as does our website.

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	Staff are trained in maintaining privacy and confidentiality when receiving contact via social media. Staff receive regular training in GDPR.

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	This duty is managed within the role of Corporate & HR Manager.
3.2	the complaint handler appointed must have appropriate complaint handling skills and no conflicts of interest.	Yes	The Corporate & HR Manager is experienced in Housing, and in complaint handling, and is impartially placed outside of operational functions.

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
3.3	 Complaint handlers should: 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	Due to organisation size complaints are investigated within the responsible team by an impartial manager. Clear guidance on how complaints will be allocated to ensure impartiality. Complaint officer role is to ensure the outcome and decision is fair, and responses are produced to a high quality.

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 'precomplaint 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 includes a Feedback stage to allow for customers who do not want a formal investigation where this would delay a fast response to a simple and easy to remedy issue. Customers are made aware that they can make a complaint formal should they wish at any point. Feedback logged and dealt with same day in most cases. Our Policy expects that feedback, where unresolved quickly, is escalated to a formal complaint. Formal complaints are logged within 3 days of receipt. Systems allow for the full documenting of action taken
			in feedback resolutions and complaint investigations.

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	Complaints are acknowledged in writing within 3 days of receipt, including our understanding of the cause for complaint. Due to resources limitation (due to size of organisation) the responsibility for fully determining the cause for complaint and preferred outcome is handled by the case investigating manager and is confirmed in writing in the outcome letter.
4.6	A complaint investigation must be conducted in an impartial manner.	Yes	Investigating manager must have no prior involvement/knowledge in the issue, as set-out in our Policy.
4.7	 The complaint handler must: deal with complaints on their merits act independently and have an open mind take measures to address any actual or perceived conflict of interest consider all information and evidence carefully keep the complaint confidential as far as possible, with information only disclosed if necessary to properly investigate the matter. 	Yes	This is managed through quality assurance of all outgoing letters, and of best practice sharing amongst investigating managers via monthly Learning from Complaints meetings. Stage 2 complaints include reflection on the handling of the stage 1 complaint in respect of due diligence and fairness of outcome.
4.11	Landlords must adhere to any reasonable arrangements agreed with residents in terms of frequency and method of communication	Yes	Investigators take a very person-centred approach regarding timescales, taking into consideration personal circumstances, and maintain good contact throughout, confirming reasons for delay to the target time where this is incurred as a result.
4.12	The resident, and if applicable any staff member who is the subject of the complaint, must also be given a fair chance to: • set out their position • comment on any adverse findings before a final decision is made.	Yes	Before a decision is finalised and confirmed in writing investigators are expected to discuss the findings with the customer and take their response into consideration. Complaints about personnel are investigated and if founded will then be subject to HR Policy action. Responses to complaints about personnel will not disclose action arising with individual employees due to GDPR.
4.13	A landlord must include in its complaints policy its timescales for a resident to request escalation of a complaint	Yes	Clear timescales are included in our Policy for escalating and responding to complaints.
4.14	A landlord must not unreasonably refuse to escalate a complaint through all stages of the complaints procedure and must have	Yes	Clear advice is given in the Policy about policy exclusions.

	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.	
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.	All complaints are documented in the case record held in our Housing Management database relative to the tenant/property.
4.18	Landlords must have policies and procedures in place for managing unacceptable behaviour from residents and/or their representatives when pursuing a complaint.	Policy includes advice on unacceptable behaviour, including how we define this, what we expect, and how we will deal with it in terms of access to the Policy.

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	We have clear policies regarding service standards and delivery, including Repairs Policy, Tenancy Policy, and Customer Feedback and Complaints Policy, and refer to this in discussions with the complainant, and cite Policy where relevant in complaint responses.
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	We have stretching timescales to ensure investigations progress and are brought to an end as soon as possible. We take action where issues are found, and handle this independently of the Complaint investigation.
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	We allow for this within our Policy where it is a family member or other advocacy agent.
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	We set-out the Policy Exceptions which are the circumstances where we would be obliged to follow a different course of action, including where the law requires this.

4.9	Communication with the resident should not generally identify individual members of staff or contractors.	Yes	Our responses only refer to individuals where they have been named by the complainant, but we do not confirm the outcome of the investigation in terms of HR action due to GDPR, and we state this in our Policy.
4.10	Landlords should keep residents regularly updated about the progress of the investigation.	Yes	We maintain regular communication throughout.
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	We invite feedback via satisfaction survey which is available in print, or on-line.
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	Staff receive regular training on the approach to complaints and regulatory regime, including the systems we have in place for learning, and value of feedback in our continuous improvement framework.
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	Policy has a reasonable adjustment section. No cases to date have required restrictions be placed on complainant contact that have concerned reasonable adjustments or Equality Act 2010 issues.

Section 5 - Complaint stages

Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
5.1	Landlords must respond to the complaint within 10 working days 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.		Complaints are acknowledged within 3 working days. Where complaint outcomes exceed 10 days this is done with the customers agreement and confirmed in the final response letter.

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	Actions required do not prevent a complaint from closing and will continue to be monitored after the response has been sent to ensure actions are completed.
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	All letters are produced to standardised templates and are quality assured by the Complaints Officer.
5.8	Landlords must confirm the following in writing to the resident at the completion of stage one in clear, plain language: the complaint stage the decision on the complaint the reasons for any decisions made the details of any remedy offered to put things right details of any outstanding actions details of how to escalate the matter to stage two if the resident is not satisfied with the answer	Yes	All letters are produced to standardised templates which includes all of the requirements, and are quality assured by the Complaints Officer.

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	Complainants are asked to provide a reason for escalation for consideration of the review of Stage 1.
5.10	On receipt of the escalation request, landlords must set out their understanding of the issues outstanding and the outcomes outcomes the resident is seeking. If any aspect of the complaint Is unclear, the resident must be asked for clarification and the full definition must be agreed between both parties.		Our Policy requires the investigating manager to contact the complainant within 3 days to discuss the complaint and escalation in full from the offset.
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	

5.12	The person considering the complaint at stage two, must not be the same person that considered the complaint at stage one.	Yes	
5.13	working days of the complaint being escalated. Exceptionally,		Current Typically, complaint investigations at this stage have required a longer timescale. However, the customer is kept informed throughout and any extension is done to with the complainants understanding.
5.16	Landlords must confirm the following in writing to the resident at the completion of stage two in clear, plain language: • 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 • 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	All letters are produced to standardised templates and are quality assured by the Complaints Officer.

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	N/A - Arches Policy is a 2 Stage process.
5.20		N/A	N/A - Arches Policy is a 2 stage process.

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 with both parties.	Yes	Extensions, where required by either party, are agreed and confirmed in writing in the response letter.
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	The complainant is advised at all stages that they can contact the Housing Ombudsman at any time for advice or assistance.
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	Regular Learning from Customer meetings explore trends and precedents which inform future complaint decisions.
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	We agree the scope of the complaint at the off set with the investigating manager, and agree to incorporate additional relevant concerns to the point of providing the written response.

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 complainant fully, this should be agreed by both parties.	Yes	Extensions, where required by either party, are agreed and confirmed in writing in the response letter.
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		The complainant is advised at all stages that they can contact the Housing Ombudsman at any time for advice or assistance.

Stage 3

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
5.18	actively requested a third stage review of their complaint. Where a third stage is in place and has been requested, landlords must respond to the stage three complaint within 20 working days of the complaint being escalated. Additional time will only be justified if related to convening a panel. An explanation and a date for when the stage three response will be received should be provided to the resident.		Arches Policy is a 2 stage process
5.19	Where agreement over an extension period cannot be reached, landlords should provide the Housing Ombudsman's contact details so the resident can challenge the landlord's plan for responding and/or the proposed timeliness of a landlord's response.	N/A	Arches Policy is a 2 stage process.

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	All letters are produced to standardised templates in-line with the HO Code and are quality assured by the Complaints Officer.
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	Managers are given clear guidance on determining the outcome of a complaint based on our Policies procedures and service standards, to prove or disprove alleged failings. Where detriment is found there are clear guidelines on suitable redress within our Compensation Policy.
6.5	The remedy offer must clearly set out what will happen and by when, in agreement with the resident where appropriate. Any remedy proposed must be followed through to completion.	Yes	Clear actions are agreed, and responsible person named in response letters.

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.		Where detriment is found, or a Duty is owed, there are clear guidelines on suitable redress within our Compensation Policy.
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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 of system to the benefit of all residents,		Monthly Learning from Customers meetings take place to explore all closed complaints, explore themes by root cause analysis, and log action agreed to prevent further similar complaints through systems and performance improvements.
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.		Where this is an exception to our Policy, Managers work to resolve the dispute, seeking to avoid legal prolongation where possible.

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	Learning from Complaints is reported in quarterly customer newsletters, and via out website. An annual report is provided to Board each April as a summary of complaints and learning.
			Scrutiny exercises receive a summary of complaints relevant to the nature of the scrutiny exercise.

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 received regular information on complaints that provides insight to the governing body on the landlord's complaint handling performance.	Yes	Reports on Complaints are provided to the Board of Management at Quarterly intervals, together with Complaints performance and learning from complaints. A Board Member is part of the emerging Neighbourhood Network which includes the lead board member role for customer complaints, within the overall role for lead on customer voice.
7.4	 As a minimum, governing bodies should receive: 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	Reports on Complaints are provided to the Board of Management at Quarterly intervals, together with Complaints performance and learning from complaints. Annual Ombudsman's reports would be shared where they are available. Spotlight Reports from the Ombudsman are shared as further reading for Board members. Where cases reach the Ombudsman we would share with Board members, including the Learning outcomes and position on implementation of changes. No HO cases to-date.
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	Monthly Learning from Customers meetings take place to explore all closed complaints, explore themes by root cause analysis, and log action agreed to prevent further similar complaints through systems, Policy, and performance improvements.

7.6	 Landlords should have a standard objective in relation to complaint handling for all employees that reflects the need to: 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. 		Staff receive regular training on the approach to complaints and regulatory regime, including the systems we have in place for learning, and value of feedback in our continuous improvement framework. Organisation Values and Behaviours encourage a no-blame culture which recognises that complaints are an opportunity to grow. Staff will be briefed on the CIH Professional Standards and engaging with complaints in current year ending March 2023.
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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 is the second self-assessment completed since the implementation of the Housing Ombudsman Complaint Handling Code. This self-assessment has identified further opportunities to improve our learning from complaints culture through supporting greater inclusion and ownership by the Board.
8.2	Landlords must also carry out a self-assessment following a significant restructure and/or change in procedures.	N/A	No restructure has taken place.
8.3	 Following each self-assessment, a landlord must: 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	Self-assessments are reported to Board within the annual Compliance suite of papers. An annual summary of complaints is presented within the Compliance suite. Self-assessments are published on our website after consideration/approval by the Board.