Housing Ombudsman Complaints Handling Self-Assessment Form

Guidance note from the Housing Ombudsman Service:

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

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

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

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

Section 1 - Definition of a complaint

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
1.2	A complaint must be defined as: 'an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the landlord, its own staff, or those acting on its behalf, affecting a resident or group of residents.	Yes	This definition has been included in the Compliments, Suggestions and Complaints Policy published on the website.
1.3	A resident does not have to use the word 'complaint' for it to be treated as such. Whenever a resident expresses dissatisfaction landlords must give them the choice to make complaint. A complaint that is submitted via a third party or representative must be handled in line with the landlord's complaints policy.	Yes	This is implicit in our policy based on both the definition of a complaint and the ways that a complaint can be made, including things like expressing dissatisfaction on social media
1.4	Landlords must recognise the difference between a service request and a complaint. This must be set out in their complaints policy. A service request is a request from a resident to the landlord requiring action to be taken to put something right. Service requests are not complaints, but must be recorded, monitored, and reviewed regularly.	Yes	This is expressly set out in the Compliments, Suggestions and Complaints Policy published on the website
1.5	A complaint must be raised when the resident expresses dissatisfaction with the response to their service request, even if the handling of the service request remains ongoing. Landlords must not stop their efforts to address the service request if the resident complains.	Yes	This is expressly set out in the Compliments, Suggestions and Complaints Policy published on the website
1.6	An expression of dissatisfaction with services made through a survey is not defined as a complaint, though wherever possible, the person completing the survey should be made aware of how they can pursue a complaint if they wish to. Where landlords ask for wider feedback about their services, they also must provide details of how residents can complain.	Yes	Information on how to submit a complaint will be provided when seeking feedback or conducting services. This information is currently published on our website and residents are signposted to this information by our Project Voice Team.

Section 2 - Exclusions

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
2.1	Landlords must accept a complaint unless there is a valid reason not to do so. If landlords decide not to accept a complaint they must be able to evidence their reasoning. Each complaint must be considered on its own merits	Yes	Reasons for not accepting a complaint are expressly set out in the Compliments, Suggestions and Complaints Policy published on the website
2.2	A complaints policy must set out the circumstances in which a matter will not be considered as a complaint or escalated, and these circumstances must be fair and reasonable to residents. Acceptable exclusions include: • The issue giving rise to the complaint occurred over twelve months ago. • Legal proceedings have started. This is defined as details of the claim, such as the Claim Form and Particulars of Claim, having been filed at court. • Matters that have previously been considered under the complaints policy.	Yes	This is expressly set out in the Compliments, Suggestions and Complaints Policy published on the website
2.3	Landlords must accept complaints referred to them within 12 months of the issue occurring or the resident becoming aware of the issue, unless they are excluded on other grounds. Landlords must consider whether to apply discretion to accept complaints made outside this time limit where there are good reasons to do so.	No	The current policy is due to be amended to reflect the 12 month time limit for complaints and include reference to applying discretion where there are good reasons to do so. Action: Update time limit in policy at next review
2.4	If a landlord decides not to accept a complaint, an explanation must be provided to the resident setting out the reasons why the matter is not suitable for the complaints process and the right to take that decision to the Ombudsman. If the Ombudsman does not agree that the exclusion has been fairly applied, the Ombudsman may tell the landlord to take on the complaint.	Yes	Whilst this is not expressly referred to in our policy this is adopted practice for any complaint that is rejected for one of the reasons expressly set out in the policy. Action: Include expressly in the policy at the next review
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Yes	Each complaint is investigated individually and the procedure for doing so is expressly set out in the Compliments, Suggestions and Complaints Policy published on the website

Section 3 - Accessibility and Awareness

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
3.1	Landlords must make it easy for residents to complain by providing different channels through which they can make a complaint. Landlords must consider their duties under the Equality Act 2010 and anticipate the needs and reasonable adjustments of residents who may need to access the complaints process.	Yes	Residents can complain using our complaints form and handing in to any One YMCA Housing site or submitting in writing or verbally to a member of One YMCA staff Via social media platforms By letter or email to admin@oneymca.org
3.2	Residents must be able to raise their complaints in any way and with any member of staff. All staff must be aware of the complaints process and be able to pass details of the complaint to the appropriate person within the landlord.	Yes	The Compliments, Suggestions and Complaints Policy is shared with all staff and expressly states that a resident may submit their complaint to any member of One YMCA staff. Our designated complaints officer would then be notified of the complaint.
3.3	High volumes of complaints must not be seen as a negative, as they can be indicative of a well-publicized and accessible complaints process. Low complaint volumes are potentially a sign that residents are unable to complain.	Yes	We have incorporated complaints information into our KPI reporting and management information and are exploring ways to share lessons learned with our trustee board. Our focus is on resolving complaints at the earliest stage and responding to complaints within the timescales, rather than just volume which is captured in the KPIs that we are reporting to trustees.
3.4	Landlords must make their complaint policy available in a clear and accessible format for all residents. This will detail the two stage process, what will happen at each stage, and the timeframes for responding. The policy must also be published on the landlord's website.	Yes	This is expressly set out in the Compliments, Suggestions and Complaints Policy published on the website
3.5	The policy must explain how the landlord will publicize details of the complaints policy, including information about the Ombudsman and this Code.	Yes	This is expressly set out in the Compliments, Suggestions and Complaints Policy published on the website
3.6	Landlords must give residents the opportunity to have a representative deal with their complaint on their behalf, and to be represented or accompanied at any meeting with the landlord.	Yes	Our policy expressly states that family members of residents or visitors to the service, health workers, local councilors or other advocates may make a complaint on behalf of a complainant;
3.7	Landlords must provide residents with information on their right to access the Ombudsman service and how the individual can engage with the Ombudsman about their complaint	Yes	Ombudsman information included in policy and the right to contact the Ombudsman also set out. Ombudsman details are also included in our response letters/ correspondence.

Section 4 - Complaint Handling Staff

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
4.1	Landlords must have a person or team assigned to take responsibility for complaint handling, including liaison with the Ombudsman and ensuring complaints are reported to the governing body (or equivalent). This Code will refer to that person or team as the 'complaints officer'. This role may be in addition to other duties.	Yes	We have a designated Complaints Officer and liaison whose roles are expressly set out in the Compliments, Suggestions and Complaints Policy published on the website Action: Update Designated Complaints Officer details at each policy review
4.2	The complaints officer must have access to staff at all levels to facilitate the prompt resolution of complaints. They must also have the authority and autonomy to act to resolve disputes promptly and fairly.	Yes	The Complaints Officer directly reports to the Executive Lead for Complaints, the Director of Housing and Community and has access to all levels of staff to facilitate prompt resolution.
4.3	Landlords are expected to prioritise complaint handling and a culture of learning from complaints. All relevant staff must be suitably trained in the importance of complaint handling. It is important that complaints are seen as a core service and must be resourced to handle complaints effectively.	Yes	This is an internal process as part of the support workers role and following this review of the policy is being delivered again by the SHM. The review of the policy whilst completed by the Heads of Service was shared with the SHM including the reasons for the changes. InForm has a section to record lessons learnt which is completed after each complaint

Section 5 – The Complaint Handling Process

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
5.1	Landlords must have a single policy in place for dealing with complaints covered by this Code. Residents must not be treated differently if they complain.	Yes	the Compliments, Suggestions and Complaints Policy published on the website applies to all residents.
5.2	The early and local resolution of issues between landlords and residents is key to effective complaint handling. It is not appropriate to have extra named stages (such as 'stage 0' or 'informal complaint') as this causes unnecessary confusion.	Yes	Our policy only involves two stages as per the code.
5.3	A process with more than two stages is not acceptable under any circumstances as this will make the complaint process unduly long and delay access to the Ombudsman	Yes	Policy reflects this.

5.4	Where a landlord's complaint response is handled by a third party (e.g. a contractor or independent adjudicator) at any stage, it must form part of the two stage complaints process set out in this Code. Residents must not be expected to go through two complaints processes.	N/A	We handle complaints internally without the use of third parties and have no plans to change this.
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	N/A	We handle complaints internally without the use of third parties and have no plans to change this.
5.6	When a complaint is logged at Stage 1 or escalated to Stage 2, landlords must set out their understanding of the complaint and the outcomes the resident is seeking. The Code will refer to this as "the complaint definition". If any aspect of the complaint is unclear, the resident must be asked for clarification.	Yes	This is current practice when responding to a complaint
5.7	When a complaint is acknowledged at either stage, landlords must be clear which aspects of the complaint they are, and are not, responsible for and clarify any areas where this is not clear.	Yes	This is current practice when responding to a complaint
5.8	At each stage of the complaints process, complaint handlers must: a. deal with complaints on their merits, act independently, and have an open mind; b. give the resident a fair chance to set out their position; c. take measures to address any actual or perceived conflict of interest; and d. consider all relevant information and evidence carefully.	Yes	This is current practice when responding to a complaint
5.9	Where a response to a complaint will fall outside the timescales set out in this Code, the landlord must agree with the resident suitable intervals for keeping them informed about their complaint.	Yes	This is expressly set out in the Compliments, Suggestions and Complaints Policy published on the website
5.10	Landlords must make reasonable adjustments for residents where appropriate under the Equality Act 2010. Landlords must keep a record of any reasonable adjustments agreed, as well as a record of any disabilities a resident has disclosed. Any agreed reasonable adjustments must be kept under active review.	Yes	This is expressly set out in the Compliments, Suggestions and Complaints Policy published on the website
5.11	Landlords must not refuse to escalate a complaint through all stages of the complaints procedure unless it has valid reasons to do so. Landlords must clearly set out these reasons, and they must comply with the provisions set out in section 2 of this Code.	Yes	This is current practice when responding to a complaint
5.12	A full record must be kept of the complaint, and the outcomes at each stage. This must include the original complaint and the date received, all correspondence with the resident, correspondence with other parties, and any relevant supporting documentation such as reports or surveys.	Yes	All records are kept on inform as expressly set out in the Compliments, Suggestions and Complaints Policy published on the website

5.13	Landlords must have processes in place to ensure a complaint can be remedied at any stage of its complaints process. Landlords must ensure appropriate remedies can be provided at any stage of the complaints process without the need for escalation.	Yes	Our stated policy aims are to resolve complaints at the earliest opportunity and complaints handlers are provided with the resources to fulfil this commitment. We have a high proportion of complaints being resolved at stage 1.
5.14	Landlords must have policies and procedures in place for managing unacceptable behaviour from residents and/or their representatives. Landlords must be able to evidence reasons for putting any restrictions in place and must keep restrictions under regular review.	Yes	We have an Anti-social Behaviour, Harassment, and Resident Behaviour Management Procedure
5.15	Any restrictions placed on contact due to unacceptable behaviour must be proportionate and demonstrate regard for the provisions of the Equality Act 2010.	Yes	Due regard for the Equality Act 2010 is taken in all our policies and procedures.

Section 6 - Complaint Stages

Stage 1

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
6.1	Landlords must have processes in place to consider which complaints can be responded to as early as possible, and which require further investigation. Landlords must consider factors such as the complexity of the complaint and whether the resident is vulnerable or at risk. Most stage 1 complaints can be resolved promptly, and an explanation, apology or resolution provided to the resident.	Yes	Complaints Officer reviews and provides appropriate guidance. Small numbers of complaints being escalated to stage 2.
6.2	Complaints must be acknowledged, defined and logged at stage 1 of the complaints procedure within five working days of the complaint being received.	Yes	This is expressly set out in the Compliments, Suggestions and Complaints Policy published on the website
6.3	Landlords must issue a full response to stage 1 complaints within 10 working days of the complaint being acknowledged.	Yes	This is expressly set out in the Compliments, Suggestions and Complaints Policy published on the website
6.4	Landlords must decide whether an extension to this timescale is needed when considering the complexity of the complaint and then inform the resident of the expected timescale for response. Any extension must be no more than 10 working days without good reason, and the reason(s) must be clearly explained to the resident.	Yes	This is expressly set out in the Compliments, Suggestions and Complaints Policy published on the website.
6.5	When an organisation informs a resident about an extension to these timescales, they must be provided with the contact details of the Ombudsman.	Yes	Where we respond to residents to provide a revised date per our policy, ombudsman details are included in our correspondence

			Action: Update templates to ensure that Ombudsman details are included on timescale extensions
6.6	A complaint response must be provided to the resident when the answer to the complaint is known, not when the outstanding actions required to address the issue are completed. Outstanding actions must still be tracked and actioned promptly with appropriate updates provided to the resident.	Yes	This is current practice when responding to a complaint
6.7	Landlords must address all points raised in the complaint definition and provide clear reasons for any decisions, referencing the relevant policy, law and good practice where appropriate.	Yes	This is current practice when responding to a complaint Outcome template letters remind managers of the points they need to cover in a response.
6.8	Where residents raise additional complaints during the investigation, these must be incorporated into the stage 1 response if they are related and the stage 1 response has not been issued. Where the stage 1 response has been issued, the new issues are unrelated to the issues already being investigated or it would unreasonably delay the response, the new issues must be logged as a new complaint.	Yes	This is current practice when responding to a complaint
6.9	Landlords must confirm the following in writing to the resident at the completion of stage 1 in clear, plain language: a. the complaint stage; b. the complaint definition; c. the decision on the complaint; d. the reasons for any decisions made; e. the details of any remedy offered to put things right; f. details of any outstanding actions; and g. details of how to escalate the matter to stage 2 if the individual is not satisfied with the response.	Yes	A template outcome letter has been set up, ensuring that complaints handlers include these points.

Stage 2

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
6.10	If all or part of the complaint is not resolved to the resident's satisfaction at stage 1, it must be progressed to stage 2 of the landlord's	Yes	This is expressly set out in the Compliments, Suggestions and Complaints Policy published on the website
	procedure. Stage 2 is the landlord's final response	. 30	

6.11	Requests for stage 2 must be acknowledged, defined and logged at stage 2 of the complaints procedure within five working days of the escalation request being received.	Yes	Whilst this is not expressly set out in the policy, this is current practice Action: Include expressly in policy at next review
6.12	Residents must not be required to explain their reasons for requesting a stage 2 consideration. Landlords are expected to make reasonable efforts to understand why a resident remains unhappy as part of its stage 2 response.	Yes	As stated in policy, residents may ask for a review if they are not satisfied with the outcome. The grounds for appeal are very broad and do not require a explanation.
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Yes	This is expressly set out in the Compliments, Suggestions and Complaints Policy published on the website
6.14	Landlords must issue a final response to the stage 2 within 20 working days of the complaint being acknowledged.	Yes	This is expressly set out in the Compliments, Suggestions and Complaints Policy published on the website
6.15	Landlords must decide whether an extension to this timescale is needed when considering the complexity of the complaint and then inform the resident of the expected timescale for response. Any extension must be no more than 20 working days without good reason, and the reason(s) must be clearly explained to the resident.	Yes	This is expressly set out in the Compliments, Suggestions and Complaints Policy published on the website
6.16	When an organisation informs a resident about an extension to these timescales, they must be provided with the contact details of the Ombudsman.	Yes	Where we respond to residents to provide a revised date per our policy, ombudsman details are included in our correspondence Action: Update templates to ensure that Ombudsman details are included on timescale extensions
6.17	A complaint response must be provided to the resident when the answer to the complaint is known, not when the outstanding actions required to address the issue are completed. Outstanding actions must still be tracked and actioned promptly with appropriate updates provided to the resident.	Yes	This is current practice when responding to a complaint
6.18	Landlords must address all points raised in the complaint definition and provide clear reasons for any decisions, referencing the relevant policy, law and good practice where appropriate.	Yes	This is current practice when responding to a complaint Outcome template letters remind managers of the points they need to cover in a response.

6.19	Landlords must confirm the following in writing to the resident at the completion of stage 2 in clear, plain language: a. the complaint stage; b. the complaint definition; c. the decision on the complaint; d. the reasons for any decisions made; e. the details of any remedy offered to put things right; f. details of any outstanding actions; and g. details of how to escalate the matter to the Ombudsman Service if the individual remains dissatisfied.	Yes	A template outcome letter has been set up, ensuring that complaints handlers include these points.
6.20	Stage 2 is the landlord's final response and must involve all suitable		Our policy and practice is in line with the code.
0.23	staff members needed to issue such a response.	Yes	Our outcome letters explains to the complainant that this is the final stage and reminds them of their right to contact the Ombudsman if our response does still not fully address/ resolve their complaint.

Section 7 - Putting Things Right

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
7.1	Where something has gone wrong a landlord must acknowledge this and set out the actions it has already taken, or intends to take, to put things right. These can include: • Apologising; • Acknowledging where things have gone wrong; • Providing an explanation, assistance or reasons; • Taking action if there has been delay; • Reconsidering or changing a decision; • Amending a record or adding a correction or addendum; • Providing a financial remedy; • Changing policies, procedures or practices.	Yes	This is expressly set out in the Compliments, Suggestions and Complaints Policy published on the website. However, this does not reflect the full list of potential remedies set out here. Action: Include all the remedies under Code Section 7.1 in the policy at the next review
A7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Yes	Complaints handlers consider what impact any fault on our part had on the resident when considering the remedy offered. This can be evidenced through our outcome letters.
7.3	The remedy offer must clearly set out what will happen and by when, in agreement with the resident where appropriate. Any remedy proposed must be followed through to completion.	Yes	This is monitored by the Designated Complaints Officer and included in the report to trustees

7.4	Landlords must take account of the guidance issued by the Ombudsman		The Designated Complaints Officer and Executive Lead for Complaints
	when deciding on appropriate remedies.	Yes	support complaint handlers with this as required.

Section 8 – Self-Assessment, Reporting and Compliance

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
8.1	Landlords must produce an annual complaints performance and service improvement report for scrutiny and challenge, which must include: a. the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements; b. a qualitative and quantitative analysis of the landlord's complaint handling performance. This must also include a summary of the types of complaints the landlord has refused to accept; c. any findings of non -compliance with this Code by the Ombudsman; d. the service improvements made as a result of the learning from complaints; e. any annual report about the landlord's performance from the Ombudsman; and f. any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord.	Yes	This annual self-assessment has been carried out against the new code and the actions identified will be monitored and implemented. Complaints handling performance reports are produced on a quarterly basis for Governance and People Committee, as well as being incorporated into regular KPI / Management Information. An annual complaints report was presented to the Governance and People Committee for their scrutiny. This report will instead be presented to the Board this year and a copy of the Self-Assessment as well as more written qualitative analysis on handling performance included. The report will also include the annual self-assessment Action: Make improvements to the Annual Complaints Performance Report and incorporate the Annual Self-Assessment into this report.
8.2	The annual complaints performance and service improvement report must be reported to the landlord's governing body (or equivalent) and published on the on the section of its website relating to complaints. The governing body's response to the report must be published alongside this.	Yes	This is published on our website in a section for complaints.
8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	Yes	Noted.
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	Yes	Noted.
8.5	If a landlord is unable to comply with the Code due to exceptional circumstances, such as a cyber incident, they must inform the Ombudsman, provide information to residents who may be affected, and publish this on their website Landlords must provide a timescale for returning to compliance with the Code.	Yes	Noted.

Section 9 – Scrutiny & Oversight: Continuous Learning and Improvement

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
9.1	Landlords must look beyond the circumstances of the individual complaint and consider whether service improvements can be made as a result of any learning from the complaint.	Yes	This will be achieved through our regular reporting on complaints and lessons learned including regular scrutiny by the Governance and People Committee
9.2.	A positive complaint handling culture is integral to the effectiveness with which landlords resolve disputes. Landlords must use complaints as a source of intelligence to identify issues and introduce positive changes in service delivery.	Yes	This will be achieved through our regular reporting on complaints and lessons learned including regular scrutiny by the Governance and People Committee
9.3	Accountability and transparency are also integral to a positive complaint handling culture. Landlords must report back on wider learning and improvements from complaints to stakeholders, such as residents' panels, staff and relevant committees.	Yes	This will be achieved through our regular reporting on complaints and lessons learned including regular scrutiny by the Governance and People Committee
9.4	Landlords must appoint a suitably senior lead person as accountable for their complaint handling. This person must assess any themes or trends to identify potential systemic issues, serious risks, or policies and procedures that require revision.	Yes	Responsible for this is held by the Director of Housing and Community
9.5	In addition to this a member of the governing body (or equivalent) must be appointed to have lead responsibility for complaints to support a positive complaint handling culture. This person is referred to as the Member Responsible for Complaints ('the MRC').	No	General responsibility for Complaints is assigned to the Governance and People Committee and specific trustees hold complaints responsibilities in the Compliments, Suggestions and Complaints Policy. However, A Member Responsible for Complaints is due to be appointed by the Trustees in October Action: Include details of the Member Responsible for Complaints at the next policy review
9.6	The MRC will be responsible for ensuring the governing body receives regular information on complaints that provides insight on the landlord's complaint handling performance. This person must have access to suitable information and staff to perform this role and report on their findings.	Yes	

9.7	As a minimum, the MRC and the governing body (or equivalent) must receive: a. regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance; b. regular reviews of issues and trends arising from complaint handling; c. regular updates on the outcomes of the Ombudsman's investigations and progress made in complying with orders related to severe maladministration findings; and d. annual complaints performance and service improvement report.	Yes	Regular reporting is provided to the Governance and People Committee
9.8	Landlords must have a standard objective in relation to complaint handling for all relevant employees or third parties that reflects the need to: a. have a collaborative and cooperative approach towards resolving complaints, working with colleagues across teams and departments; b. take collective responsibility for any shortfalls identified through complaints, rather than blaming others; and c. act within the professional standards for engaging with complaints as set by any relevant professional body.	Yes	These commitments are expressly set out in the Compliments, Suggestions and Complaints Policy published on the website