Appendix B – 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

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 organisation, its own staff, or those acting on its behalf, affecting an individual resident or group of residents.	Yes	Defined on our website. See section 2. What is a complaint? https://www.norwich.gov.uk/info/20233/customer_f eedback/1572/complaints/4
1.3	The resident does not have to use the word 'complaint' for it to be treated as such. A complaint that is submitted via a third party or representative must still be handled in line with the landlord's complaints policy.	Yes	All service issues are currently treated as complaints via the complaints process. Complaints can be made through a representative and still be treated as a complaint. Complaining on behalf of others Complaints Norwich City Council
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	As above.
1.7	A landlord must accept a complaint unless there is a valid reason not to do so.	Yes	Corporate policy confirms this. Complaints process Complaints Norwich City Council

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	Circumstances are documented in the corporate policy. See section 4. Exclusions . Corporate complaints policy Complaints Norwich City Council
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	No rejections are currently made by NCC, as all issues are processed as complaints via the complaints process.

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	All issues reported through the complaints process are investigated. Processes are reassigned as service requests as appropriate.
1.5	Survey feedback may not necessarily need to be treated as a complaint, though, where possible, the person completing the survey should be made aware of how they can pursue their dissatisfaction as a complaint if they wish to.	Yes	The respondent is not notified on the survey of the complaint process, however, should an issue be raised on a survey there is a written procedure for notifying relevant service areas of any issues raised, with the consent of the respondent.

Section 2 - Accessibility and awareness

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	Information on how to make complaints through various channels is available on our website: How to make a complaint Complaints Norwich City Council
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	The policy is available to download from our website and the process is explained in section 3. Complaints Process Corporate complaints policy Complaints Norwich City Council
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	Information on how to make complaints and policy is available to download from our website: How to make a complaint Complaints Norwich City Council
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	As mentioned in the corporate policy, see section 7. Equality Act 2010 Corporate complaints policy Complaints Norwich City Council All managers and team leaders are required to read the NCC Equalities policy and have mandatory training on leading equality and diversity.

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	Regular references are made to this in our tenant and leaseholder magazine (TLC). For example, Summer 2021 edition of TLC included references to these. TLC magazine Norwich City Council There is a detailed section on complaints on the NCC website. Corporate complaints policy Complaints Norwich City Council
2.7	Landlords must provide residents with contact information for the Ombudsman as part of its regular correspondence with residents.	Yes	Contact information is provided on NCC website and promoted in the tenants and leaseholders magazine TLC. Summer 2021 edition of TLC TLC magazine Norwich City Council
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	Details on how to contact the housing ombudsman are available on our website before the complaint is made. More specifically "you have the right to contact the ombudsman at any time." Housing Complaints Complaints Norwich City Council

Code section	Code requirement	Comply:	Evidence, commentary and any explanations
		Yes/No	
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.	In progress	We do not currently accept complaints via social media and instead direct users to our website as it is more effective for us to assist using email or webform. However, this will be reviewed.

Section 3 - Complaint handling personnel

Mandatory 'must' requirement

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	As per the HO code "Landlords must have a person or team assigned to take responsibility for complaint handling to ensure complaints receive the necessary attention For some organisationsthe Ombudsman recognises that this role may be in addition to other duties." All managers and team leaders in the service have responsibility for handling their own complaints.
3.2	the complaint handler appointed must have appropriate complaint handling skills and no conflicts of interest.	Yes	There were training days held in October 2021 for managers and team leaders on how to handle complaints. Template HO letters have been shared with managers and team leaders.

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	Training has been provided to those persons with a responsibility for handling complaints via drop-in sessions during March 2021, formal training sessions during October and November 2021 and the Local Gvt Ombudsman provided training sessions attended by NCC staff in November 2021.

Section 4 - Complaint handling principles

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	In line with HO requirements there are only 2 stages to the NCC complaints process. https://www.norwich.gov.uk/info/20233/customer_fe_edback/1572/complaints/3 If a full response cannot be provided within five working days, an acknowledgement letter is sent.
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	Currently only a basic automated response is sent when a complaint is made through NCC website. However, a further letter of acknowledgement is sent by the officer handling the complaint.
4.6	A complaint investigation must be conducted in an impartial manner.	Yes	Section 8. Responsibility sets out who is responsible for dealing with complaints. . Corporate complaints policy Complaints Norwich City Council All complaint handlers are expected to conduct investigations impartially.

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	Training has been provided to those persons with a responsibility for handling complaints via drop-in sessions during March 2021, formal training sessions during October and November 2021 and the Local Gvt ombudsman provided training sessions attended by NCC staff in November 2021.
4.11	Landlords must adhere to any reasonable arrangements agreed with residents in terms of frequency and method of communication	Yes	Complaint handlers are trained to respond in the same manner of communication in which the complaint has been raised. Complaint handlers have visibility of preferred contact methods in the Customer Relationship Management system.
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	Complaint handlers will liaise with any named staff members as part of the investigation. The stage 1 response offers an opportunity for the complainant to respond on any adverse findings, either by providing additional information or by progressing to stage 2, before a final decision is made.
4.13	A landlord must include in its complaints policy its timescales for a resident to request escalation of a complaint	Yes	Timescales are set out in the corporate policy, see section 9. Complaint process . Corporate complaints policy Complaints Norwich City Council
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	Reasons to decline escalating a complaint is set out in the corporate policy, see section 9. Complaint process <u>Corporate complaints policy Complaints Norwich City Council</u>

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	An audit trail of individual complaints and responses is fully documented within the Customer Relationship Management system.
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	Policy and procedures are set out on our website. Unreasonably persistent complainants Complaints Norwich City Council

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	The Stage 1 response letter outlines the complaint understanding, the outcome and any plans to resolve the issues documented
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	The Stage 1 response letter outlines the complaint understanding, the outcome and any plans to resolve the issues documented.
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	Complaints can be made through a representative. Complaining on behalf of others Complaints Norwich City Council See section 5. Who can make a complaint? Corporate complaints policy Complaints Norwich City Council

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	Where necessary complaint responses will include reference to the tenancy agreement or other legal obligations.
4.9	Communication with the resident should not generally identify individual members of staff or contractors.	Yes	Officers will only be identified in the response letter when the resident has already included the name within their initial complaint.
4.10	Landlords should keep residents regularly updated about the progress of the investigation.	In progress	Complaint handlers are in contact with complainants during the course of the investigation as appropriate. The frequency of this will be reviewed.
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.	In progress	A new satisfaction survey on complaint handling will be launched during 2022.
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	Additional resources have been invested in complaint handling in terms of training and capacity. Service improvements are being made to avoid future complaints.
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	Restrictions and warnings are recorded in the Customer Relationship Management system in response to unacceptable behaviour. These are reviewed on a yearly basis. Vexatious complainers are also monitored.

Section 5 - Complaint stages

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 policy sets out the commitment to respond within 10 working days. We are closely monitoring our performance against this and our performance is continuing to improve.
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	A response letter is sent once investigations have been completed and any actions required are tracked until 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	This is included with the response letters, which will ensure that it covers all the points raised.

5.8	Landlords must confirm the following in writing to the resident at the completion of stage one in clear, plain	Yes	A stage 1 complete response letter refers to all 6 points.
	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		

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	Most complaints progress to stage 2 upon request of the complainant. However, if the stage 2 escalation has been rejected, the reasons for this are clearly set out to the complainant along with the HO contact details.
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.		A letter of acknowledgement is sent by the officer handling the complaint.
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	Complaints are not escalated to stage 2 without a request from the complainant.

5.12	The person considering the complaint at stage two, must not be the same person that considered the complaint at stage one.		Different officers investigate stage 1 and stage 2 complaints.
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.	In progress	Complaints policy sets out the commitment to respond within 20 working days. We will monitor our performance against this.
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.		A stage 2 complete response letter refers to all 7 points.

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.	Yes	NCC do not have stage 3
5.20	Landlords must confirm the following in writing to the resident at the completion of stage three 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 • details of how to escalate the matter to the Housing Ombudsman Service if the resident remains dissatisfied	N/A	No stage 3

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
5.2	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.	In progress	We aim to respond within 10 working days. We will add into our procedure to agree any extensions to this with the complainant.
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.	In progress	Housing Ombudsman's details are published on NCC website. We will add into our procedure to provide this separately in the event of needing an extension to fully respond.
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	The full history of any previous complaints is held in the Customer Relationship Management system and is visible to all complaint handlers.
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	Current process is that anything reasonable and relevant is included in the current complaint, otherwise a new complaint is raised.

Stage 2

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
5.14	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.	In progress	We aim to respond within 10 working days. We will add into our procedure to agree any extensions to this with the complainant.
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	In progress	Housing Ombudsman's details are published on NCC website. We will add into our procedure to provide this separately in the event of needing an extension to fully respond.

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 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.		No stage 3
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	No stage 3

Section 6 - Putting things right

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	Process and policy are in place to resolve complaints Both stage response letters include details to any actions that have been taken or need to be taken in order to resolve individual complaints.
6.2	Any remedy offered must reflect the extent of any service failures and the level of detriment caused to the resident as a result. A landlord must carefully manage the expectations of residents and not promise anything that cannot be delivered or would cause unfairness to other residents.	Yes	This is considered by complaint handlers and included in response letters.
6.5	The remedy offer must clearly set out what will happen and by when, in agreement with the resident where appropriate. Any remedy proposed must be followed through to completion.	Yes	This is considered by complaint handlers and included in response letters. Complaint handlers are responsible for following through with any remedies.
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	Compensation information is available online on our website: Housing compensation guide Housing compensation guide Norwich City Council

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.	In progress	The complaint handling process includes a section to record the outcome and lessons learned. Management reports will be reviewed on a regular basis.
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	This is considered by complaint handlers. Compensation information is available online on our website: Housing compensation guide Housing compensation guide Norwich City Council

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.	In progress	Information relating to the volume of complaints is published online and in the annual report. Wider learning and improvements will be regularly captured and reported.

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	Regular information on volumes and response times is shared with the Cabinet member for Housing.
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. 		Regular information on volumes and response times is shared with the Cabinet member for Housing. Information on categories, outcomes, Ombudsman order information, issues and trends, will be improved.
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.	In progress	Capturing themes and trends routinely will be improved.

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. 	In progress complaint is seen as an opportunity for us to put things right, improve our services, and to provide vital intelligence on our performance, culture, and reputation. A standard objective for complaint handlers will be added into the annual appraisal process.
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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.
8.2	Landlords must also carry out a self-assessment following a significant restructure and/or change in procedures.	Yes	Self-assessment will be reviewed when new procedures are brought in or a restructure occurs.
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 the elected Cabinet member for Housing. The outcome will be published on our website and in the next edition of the annual report.