Appendix B – Self-Assessment Form – Covering the Financial Year 2022-2023

This self-assessment form should be completed by the complaints officer and discussed at the landlord's governing body annually.

Evidence should be included to support all statements with additional commentary as necessary.

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

Section 1 - Definition of a complaint

Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
1.2	A complaint must be defined as: '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	In both the internal policy and customer complaint leaflet.
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	Policy statement "anyone who uses our service". Company register records who the complaints comes from.
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	Demonstrated on the complaints register
1.7	A landlord must accept a complaint unless there is a valid reason not to do so.	Yes	Covered under persistent, vexatious or malicious complaints complainants section of the complaint policy

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	Covered in the policy
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	Covered in the procedure

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	2 tier check on dis-satisfaction to ensure consistency where required or uncertain.
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	Overall satisfaction is measured on the tenant satisfaction survey. Evidence showing repairs have highest level of dis-satisfaction, property & repairs are included in the annual Customer Satisfaction survey. Analysis by scheme is undertaken following the survey.

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	Included in the policy, procedure and customer complaints leaflet. Additionally, 2 weekly IHM visits see customers giving the opportunity to raise any complaints or concerns.
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	On the customer and external website
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	External website
2.5	Landlords must comply with the Equality Act 2010 and may need to adapt normal policies, procedures, or processes to accommodate an individual's needs. Landlords must satisfy themselves that their policy sets out how they will respond to reasonable adjustments requests in line with the Equality Act and that complaints handlers have had appropriate training to deal with such requests.	Yes	Reference Equality Act 2010 on the policy and includes equality and diversity section
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	Included in the policy and customer complaints leaflet. Further action is to include in the tenant newsletters

2.7	Landlords must provide residents with contact information for the Ombudsman as part of its regular correspondence with residents.		Included in the policy, procedure and customer complaints leaflet
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	Included in the procedure

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.		Included in the policy, procedure and customer complaints leaflet

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	Referred to Business Manager
3.2	the complaint handler appointed must have appropriate complaint handling skills and no conflicts of interest.	Yes	Referred to Business Manager

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	New employee induction training

Section 4 - Complaint handling principles Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
4.1	Any decision to try and resolve a concern must be taken in agreement with the resident and a landlord's audit trail/records should be able to demonstrate this. Landlords must ensure that efforts to resolve a resident's concerns do not obstruct access to the complaints procedure or result in any unreasonable delay. It is not appropriate to have extra named stages (such as 'stage 0' or 'pre-complaint stage') as this causes unnecessary confusion for residents. When a complaint is made, it must be acknowledged and logged at stage one of the complaints procedure within five days of receipt.	Yes	Stage 1 and in the policy Employees are available to customers and aspire to resolve grumbles before Stage 1

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	Included in the procedure
4.6	A complaint investigation must be conducted in an impartial manner.	Yes	Conflicts assessed by Business Manager
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	Best practice embedded
4.11	Landlords must adhere to any reasonable arrangements agreed with residents in terms of frequency and method of communication	Yes	Best practice embedded
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	Best practice embedded
4.13	A landlord must include in its complaints policy its timescales for a resident to request escalation of a complaint	Yes	Included in the policy
4.14	A landlord must not unreasonably refuse to escalate a complaint through all stages of the complaints	Yes	Included in the policy

	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.		
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	Company complaint register held
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	Included in the policy and customer complaints leaflet.

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	Best practice embedded
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	Company complaint register held
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	Included in the policy
4.8	Where a key issue of a complaint relates to the parties' legal obligations landlords should clearly set out their understanding of the obligations of both parties.	Yes	Best practice embedded

4.9	Communication with the resident should not generally identify individual members of staff or contractors.	Yes	Best practice embedded
4.10	Landlords should keep residents regularly updated about the progress of the investigation.	Yes	Best practice embedded
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	Included in the Customer Satisfaction Survey, IHM visits and a variety ways to log a complaint
4.17	Landlords should recognise the impact that being complained about can have on future service delivery. Landlords should ensure that staff are supported and engaged in the complaints process, including the learning that can be gained	Yes	Best practice embedded and training
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	Included in the policy

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.	Yes	Included in the policy, procedure and customer complaints leaflet
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	Included in the procedure

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	Included in the procedure
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	Included in the procedure

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	Included in the policy and procedure
5.10	On receipt of the escalation request, landlords must set out their understanding of issues outstanding and the outcomes the resident is seeking. If any aspect of the complaint is unclear, the resident must be asked for clarification and the full definition agreed between both parties.	Yes	Included in the procedure and standard letters
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	Included in the policy, procedure and customer complaints leaflet

5.12	The person considering the complaint at stage two, must not be the same person that considered the complaint at stage one.	Yes	Included in the policy
5.13	Landlords must respond to the stage two complaint within 20 working days of the complaint being escalated. Exceptionally, landlords may provide an explanation to the resident containing a clear timeframe for when the response will be received. This should not exceed a further 10 days without good reason.	Yes	Included in the policy
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	Included in the procedure and standard letters

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	Inclusion have a 2 stage policy/process.

	Landlords must confirm the following in writing to the resident at the completion of stage three in clear, plain language:	N/A	N/A
	the complaint stagethe complaint definition		
5.00	the complaint definition the decision on the complaint		
5.20	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 		

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
5.2	If an extension beyond 20 working days is required to enable the landlord to respond to the complaint fully, this should be agreed by both parties.	Yes	Included in the procedure
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	Included in the policy and procedure
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	Company complaint register held
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	Included in the procedure

Stage 2

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
5.14	If an extension beyond 10 working days is required to enable the landlord to respond to the complaint fully, this should be agreed by both parties.	Yes	Included in the procedure
5.15	Where agreement over an extension period cannot be reached, landlords should provide the Housing Ombudsman's contact details so the resident can challenge the landlord's plan for responding and/or the proposed timeliness of a landlord's response	Yes	Included in the procedure

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.	Yes	Included in the policy, procedure and standard letters
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.	Yes	Included in the policy, procedure and standard letters

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	Best practice embedded and compensation included in the policy and customer leaflet
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	Best practice and lessons learnt exercise
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	Included in the procedure and standard 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.	Yes	Included in the policy, procedure and standard letters

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
6.3	Landlords should look beyond the circumstances of the individual complaint and consider whether anything needs to be 'put right' in terms of process or systems to the benefit of all residents.	Yes	Best practice embedded
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	Best practice embedded

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	Through lessons learnt and board report

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	Twice yearly board report
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	Twice yearly board report

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	Monitored and managed through escalations
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. 	Yes	Aspire to resolve in ombudsman target time scales and through best practice Refer to Cust sat results, assess schemes with low satisfaction Ensure complaint handling is n line with CIH professional standards; Integrity, Inclusive, Ethical, Knowledgeable, Skilled, Advocate and Leadership

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	Annual board report	
8.2	Landlords must also carry out a self-assessment following a significant restructure and/or change in procedures.	Yes	Annual board report	
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	Annual board report Annual report to embed in next publication	

Inclusion Group overview of complaints from 1st April 2022 to the 31st March 2023



Position Statement

During the reporting period **76** complaints were received in total.

This constitutes an average of 6.3 complaints received per month, an increase against the same period for 2021-22 which reported at 3.6

Performance

The following **complaints** information has been collated:

Department	Qtr. 1	Qtr. 2	Qtr. 3	Qtr. 4	Total
Operations	5	4	3	4	16
Finance	0	0	0	0	0
Business	4	3	1	2	10
Property	12	4	15	19	50
Total	21	11	19	25	76
Ave / Month	7	3.6	6.3	8.3	6.3

Complaints by service area

Property:

- 50 complaints
- 2 which references damp and mould
- 4 relating to repair satisfaction or delays
- 4 regarding lack of heating and hot water / boiler issues
- 1 regarding a lift being out of order due to parts
- 9 related to staff conduct
- 4 related to contractors, either tenants were unhappy with the contractors conduct, reliability or performance.

Remaining complaints were linked to factors such as administrative practices, general facilities / rubbish and rodent related complaints.

Operations:

- 16 complaints
- 1 relating to arrears
- 10 related to concerns about Managing Agent conduct, some of which were investigated under different Inclusion policies, one being an allegation of racism allegedly to a care provider from Inclusions managing agent; the allegation was formally investigated and was not upheld.

Business:

- Received 10 complaints
- In the main these related to our of hours services, delays in repair completions and conduct.

Repairs Escalations

• In 2022 we were challenged by the Ombudsman around our practise to have a three tier complaints process, following consideration the amendments were made to streamline this to a two stage process.

Key Complaint Information

- 6 repairs remain open and continue to be investigated
- Of the 70 closed cases, 52 were actioned within target **(74%)**, some required additional time for investigation; an improvement on last years 62.5%.
- Timescales for resolution do not allow for delays associated with complainants responding back to us, this could be considered for a policy change.
- The 76 complaints were made by:

Care provider x 31
Tenants x 22
Family members x 21
Other 2

It is evident that expectations over property condition remains a challenge to manage and a shortage of skilled key compliance workers is impacting on response times for emergency works such as boiler failure.

The February 2023 Property scorecard shows that YTD 98.5% of repairs orders were completed at first visit (green indicator), very similar performance to the 97% reported in 2022. The average repair took 11.91 days to complete, which is within target.

The database is continually updated to allow patterns to be identified. Inclusion's focus will continue to be on maintaining a preventive approach by delivering excellent services and building strong relationships alongside ongoing repair procedures and planned investment strategies.

Compliments

In addition to the 14 tabled compliments, 7 internal compliments were received (4 in prior year) relating to Inclusion staff and how they have gone over and above to provide great service and support to colleagues; these are noted and also discussed at performance and development review meetings.

2021/22 table of compliments:

Department	Qtr. 1	Qtr. 2	Qtr. 3	Qtr. 4	Total
Operations	2	0	6	2	10
Finance	0	0	0	0	0
Business	1	0	1	0	2
Property	0	0	1	1	2
Total	3	0	8	3	14
Ave / Month	1	0	2.6	1	1.2

Comparison data on compliments has been collated from 2021:

Year	Total External Compliment	Total Internal Compliments
2020/21	9	9
2021/22	20	4
2022/23	14	7

Key Compliment Information

- 8 compliments came from care partners
- 4 came from tenants or family members
- The remaining 2 came from a developer and a Social worker
- The main compliment theme being customer service and how great employees make a difference

3.8 Registered Provider Complaints Index

Driven by the Grenfell enquiry, Inside Housing developed the first "complaints failures index" which reports the number of times RP's have been declared "at fault" by the Housing Ombudsman; the league table accounts for the number of "at fault" reports while taking account of the housing stock associated with each RP.

Inclusion has had **zero** Ombudsman "at fault" reports.

While the league table published on 09th October 2020 did not include Inclusion in their data, the table below presents the published data with Inclusion added in to the ranking, taking account of reports and stock size and resulting in a commendable **15**th **place nationally**, which demonstrates our ability to resolve in full all complaints received into the business:

Lessons learned

Every effort has been made to validate the data and ensure that complaints and compliments made into the service are being logged and dealt with accordingly.

The following should also be considered:

- Managing Agents generally have a strong presence on site, undertaking enhanced housing management to all tenants, and regular scheme visits. The consensus is that the business is dealing with potential complaints at an early stage, preventing, rather than managing once they are apparent. A move to 6 regions is being considered for 2023.
- Property Managers also have an enhanced presence on site; repairs processes and procedures are embedded and target timescales for repairs have been widely communicated, helping to manage expectations. A move to 6 Regions will also contribute positively from 2023.
- Relationships with some of our more challenging providers continue to improve. Working together to support the tenants and their needs is having a positive impact on expectations and the number of complaints coming into the service.
- ASB is being logged and controlled much more robustly; some concerns which may have been raised and logged as a complaint in the past
 would now be categorised as an ASB incident and dealt with accordingly.
- Enhanced complaints management procedures have been introduced to ensure that complaints handlers are prompted and supported to respond and action complaints in a timely manner.

Future

Inclusion continue to seek feedback, be it positive or negative about the services we provide for our customers and stakeholders. Negative feedback enables us to better shape our service delivery while positive feedback will allow best practice to be encouraged and shared across our teams. Inclusion will report to Board twice annually on Complaints.