

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

Mandatory ‘must’ requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
1.2	A complaint must be defined as: <i>‘An expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the organisation, its own staff, or those acting on its behalf, affecting an individual resident or group of residents.</i>	Yes	Our definition is “Any expression of dissatisfaction, whether justified or not. This could be about a service that the Council delivers or is responsible for (e.g. a service delivered on behalf of the council by a contractor).” This definition is comparable, this is evidenced by the policy itself which demonstrates that we will accept a complaint whatever channel is used. Evidence: SCC Policy 1.4, 2.2, 2.3, 3.1
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	We are compliant. Evidence: SCC Policy 9.3
1.6	... if further enquiries are needed to resolve the matter, or if the resident requests it, the issue must be logged as a complaint.	Yes	Our procedure says that we ask the individual if they want their issue treating as a complaint. If a customer has to chase a request for service this would be logged as a complaint.
1.7	A landlord must accept a complaint unless there is a valid reason not to do so.	Yes	Our policy is clear that we will deal with all complaints through the agreed process unless certain conditions apply. Evidence: SCC Policy section 3

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	Paragraphs 3.8 – 3.11 of our Complaints Policy outline matters that have other dedicated routes for consideration; matters that fall outside of the scope of the policy or situations where we would not consider a complaint under the complaints policy. Exclusions exist where there are legitimate and justifiable reasons. Page 11 of the process (“Best Practice”) requires us to always explain to the customer our reasons for rejecting.
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	We rarely reject a complaint – at times we may refer to other routes where this is applicable, and the reasons for this explained to the customer.

Best practice ‘should’ requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
1.4	Landlords should recognise the difference between a service request, where a resident may be unhappy with a situation that they wish to have rectified, and a complaint about the service they have/have not received.	Yes	We are compliant – if any doubt we will log a complaint
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.	Partially	Automated responses for completed text surveys signpost to complaints info. These needs adding to online and telephone surveys.

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	Customers can make a complaint through our website (on-line form), by email, by telephone, in writing or in person. We do not require customers to make their complaint in writing. Evidence: SCC Policy 1.4

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	Evidence: https://www.sheffield.gov.uk/home/your-city-council/complaints The complaints policy and process are published on the website and cover all the required elements. (Links to 2.6 below)
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	Evidence: https://www.sheffield.gov.uk/home/your-city-council/complaints There is a dedicated page on the website, which comes up at the top of the search results if a customer searches for 'complaints.'
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	Evidence: https://www.sheffield.gov.uk/home/your-city-council/access-disabled-people The above link outlines the Council's general approach to equalities and reasonable adjustments. SCC Complaints Policy states that we will aim to ensure that individual needs are considered when dealing with complaints. The complaints info on the website also signposts customers to our policy on reasonable adjustments. The complaints process refers to reasonable adjustments and gives guidance on how to deal with them and the process tells staff to "Consider whether the complainant needs support understanding your decision. This may be a meeting to discuss the findings" Equalities training is mandatory for all staff to ensure equalities are considered in all aspects of our work.
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.	Partially	Complaints information is clearly published on the website, and complaints correspondence to customers references the Housing Ombudsman. But we could do more on this, using existing communications channels (e.g. tenant bulletins and our Facebook page).
2.7	Landlords must provide residents with contact information for the Ombudsman as part of its regular correspondence with residents.	Yes	This information is available on the SCC website and our templates have been amended to ensure complainants are advised that they have this right of access on at all stages of the process.

2.8	Landlords must provide early advice to residents regarding their right to access the Housing Ombudsman Service throughout their complaint, not only when the landlord's complaints process is exhausted.	Yes	All relevant templates have this info included.
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Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
2.2	Where a landlord has set up channels to communicate with its residents via social media, then it should expect to receive complaints via those channels. Policies should contain details of the steps that will be taken when a complaint is received via social media and how confidentiality and privacy will be maintained	Yes	We do accept complaints via our Face Book page. And complaints received this way are subject to the same handling as all other complaints.

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	There are two Complaints Managers within the Customer Services Team which provide this support. There are a number of Complaints Investigating/ Accountable Managers in Housing and Neighbourhood Service (H&NS) and Repairs and Maintenance Service (R&M).
3.2	...the complaint handler appointed must have appropriate complaint handling skills and no conflicts of interest.	Yes	There are no conflicts of interest and staff do not investigate complaints relating to themselves. Complaints handlers are required to attend the corporate training. Corporate HR policy requires all staff to sign and complete the 'declaration of interest' form annually.

Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
3.3	<p>Complaint handlers should:</p> <ul style="list-style-type: none"> be able to act sensitively and fairly be trained to handle complaints and deal with distressed and upset residents have access to staff at all levels to facilitate quick resolution of complaints have the authority and autonomy to act to resolve disputes quickly and fairly. 	Yes	We are compliant and all these requirements are covered in complaints 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	<p>New Customer Relationship Management (CRM) complaints module went live November 2021. All problem solved complaints are now recorded. Where complaints are not problem solved, they are logged for investigation and acknowledgment letter sent within 3-5 days.</p> <p>Page 8 of the Procedure confirms our timescales meet this. If complaints are 'problem solved' this is done within 3 working days, so still compliant.</p>
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.	Partially	Page 11 of the procedure explains how staff will define / verify the complaint with the individual. However, our acknowledgement letters could be more detailed in their explanation of the complaint and the outcomes wanted.
4.6	A complaint investigation must be conducted in an impartial manner.	Yes	Our complaints policy ensures that this is the case: https://www.sheffield.gov.uk/home/your-city-

			<p><u>council/complaints</u></p> <p>2.4 in the Policy describes our overall approach to handling complaints.</p>
4.7	<p>The complaint handler must:</p> <ul style="list-style-type: none"> • deal with complaints on their merits • act independently and have an open mind • take measures to address any actual or perceived conflict of interest • consider all information and evidence carefully • keep the complaint confidential as far as possible, with information only disclosed if necessary to properly investigate the matter. 	Yes	<p>Our complaints policy ensures that this is the case: <u>Corporate Complaints Procedure: Effective Complaint Handling Guide (sheffield.gov.uk)</u></p> <p>Section 9 of the Policy explains how we maintain confidentiality</p>
4.11	Landlords must adhere to any reasonable arrangements agreed with residents in terms of frequency and method of communication	Yes	<p>Our policy states that we will keep customers regularly updated on the progress of their complaints.</p> <p>Page 4 of the Procedure references giving ‘regular updates’</p>
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	<p>Investigation responses inform resident of landlord’s position and gives the customer the right to respond and request a review of the complaint investigation by a more senior manager. Where the complaint is about a particular staff member, the Investigating Officer will talk to that person as part of their investigation.</p>
4.13	A landlord must include in its complaints policy its timescales for a resident to request escalation of a complaint	Yes	<p>Our policy makes this clear.</p> <p>Evidence: <u>https://www.sheffield.gov.uk/home/your-city-council/complaints</u></p>
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	<p>Paragraphs 3.8 – 3.11 of the Complaints Policy clearly outline the circumstances in which we would not accept a complaint.</p>
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	<p>A new Complaints Recording Management system was implemented in November 2021 – where this information is recorded</p>
4.18	Landlords must have policies and procedures in place for managing unacceptable behaviour from residents and/or their	Yes	<p>This is included in our Complaints policy: <u>https://www.sheffield.gov.uk/home/your-city-council/complaints</u></p>

	representatives when pursuing a complaint.		Section 11 of the Policy covers this, as does page 18 of the process.
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Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
4.3	Landlords should manage residents' expectations from the outset, being clear where a desired outcome is unreasonable or unrealistic	Yes	Page 11 of the complaints process references the requirement on staff to 'manage expectations' and this is also made clear in the guidance for effective complaints handling.
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 problem-solving stage gives us this opportunity and our process is designed to do exactly this. (4.2 – 4.3 of the Policy).
4.5	Landlords should give residents the opportunity to have a representative deal with their complaint on their behalf, and to be represented or accompanied at any meeting with the landlord where this is reasonable.	Yes	We are compliant as long as we have the authority to discuss with a representative. 9.3 of the policy covers this in part
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.	Partially	We do engage our Legal Team in complaints responses where necessary.
4.9	Communication with the resident should not generally identify individual members of staff or contractors.	Yes	We are compliant unless the complaint is about a staff member.
4.10	Landlords should keep residents regularly updated about the progress of the investigation.	Yes	Page 12 of the Process requires staff to "Keep the complainant informed at all stages of the investigation, especially if there is a delay"
4.16	Landlords should seek feedback from residents in relation to the landlord's complaint handling as part of the drive to encourage a positive complaint and learning culture.	Yes	We include complaints-related questions as part of its regular 'Neighbourhood Survey' (these are perception surveys, as required by the regulator) Corporate complaints team also undertake their own satisfaction surveys.
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.	Partially	Our new CRM system will support us to achieve this. Performance reports will soon be circulated to Directors to enable them to identify key issues / trends, etc. All staff are offered training on 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	Section 11 of the Policy and Page 18 of the Process explain our policy re unacceptable behaviour. Also clearly covers how any special needs / equalities issues should be considered.

Section 5 - Complaint stages
Mandatory 'must' requirements
Stage 1

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
5.1	Landlords must respond to the complaint 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	The timescales set down in our complaints process are compliant with this.
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.	Partially	Our timescales are set out in the policy. We need to improve communication with the resident when responding to complaints
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	We are compliant and have letter templates for staff to use and refer to.
5.8	Landlords must confirm the following in writing to the resident at the completion of stage one in clear, plain language: <ul style="list-style-type: none"> • the complaint stage • the decision on the complaint • the reasons for any decisions made • the details of any remedy offered to put things right • details of any outstanding actions • details of how to escalate the matter to stage two if the resident is not satisfied with the answer 	Yes	We are compliant and have letter templates for staff to use and refer to.

Stage 2

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
5.9	If all or part of the complaint is not resolved to the resident's satisfaction at stage one it must be progressed to stage two of the landlord's procedure unless an exclusion ground now applies. In instances where a landlord declines to escalate a complaint it must clearly communicate in writing its reasons for not escalating as well as the resident's right to approach the Ombudsman about its decision.	Yes	Our policy and process demonstrate compliance.

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	Our policy is compliant with this
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	We are compliant. The policy and process both demonstrate this.
5.12	The person considering the complaint at stage two, must not be the same person that considered the complaint at stage one.	Yes	We are compliant. The policy and process both demonstrate this.
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	The timescales set out in our complaints policy and process.
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	We are compliant

Best practice ‘should’ requirements Stage 1

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
5.2	If an extension beyond 20 working days is required to enable the landlord to respond to the complaint fully, this should be agreed by both parties.	Yes	We do this as part of our process.
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.	No	We currently do not include this information in our letters, so our templates need amending.
5.4	Where the problem is a recurring issue, the landlord should consider any older reports as part of the background to the	Yes	Investigating Managers will review all the history of a case as part of their investigation.

	complaint if this will help to resolve the issue for the resident.		
5.7	Where residents raise additional complaints during the investigation, these should be incorporated into the stage one response if they are relevant, and the stage one response has not been issued. Where the stage one response has been issued, or it would unreasonably delay the response, the complaint should be logged as a new complaint.	Yes	We are compliant

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	We are compliant
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	No	We currently do not include this information in our correspondence.

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	Our policy and procedures cover this – see: Corporate Complaints Procedure: Effective Complaint Handling Guide (sheffield.gov.uk) , page 11 Letter templates also demonstrate this
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	Section 5 of Complaints Policy outlines approach to “Putting things right and learning”. Our approach to remedies are consistent with the key principles used by the Housing Ombudsman. Page 15 of the Process explains in more detail our approach.
6.5	The remedy offer must clearly set out what will happen and by when, in agreement with the resident where appropriate. Any remedy proposed must be followed through to completion.	Yes	Our templates evidence this.

6.6	In awarding compensation, a landlord must consider whether any statutory payments are due, if any quantifiable losses have been incurred, the time and trouble a resident has been put to as well as any distress and inconvenience caused.	Yes	Our guidance on putting things right is clear and detailed (pg. 15 of the procedure). It states that we should 'put the complainant back in the position they would have been had the fault not occurred'. It also incorporates the LGSCO's 'Guidance on Remedies' to ensure we are adhering to those principles, and requires officers to take into account the distress and / or inconvenience caused.
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Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
6.3	Landlords should look beyond the circumstances of the individual complaint and consider whether anything needs to be 'put right' in terms of process or systems to the benefit of all residents.	Partially	A new 'Learning Dashboard' is to be introduced by March 2023. Currently complaints information is shared regularly with managers so that improvements and learning can be identified
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	We are compliant and we do this, where there is a legal element to a complaint.

Section 7 - Continuous learning and improvement

Mandatory 'must' requirement

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.	Partially	We do report on learning from complaints in our annual report, but we need to do this more frequently through other communication channels

Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
7.3	A member of the governing body should be appointed to have lead responsibility for complaints to support a positive complaint handling culture. This role will be responsible for ensuring the governing body receives regular information on complaints that	Yes	Bev Mullooly is the Head of Service and oversee complaints taking reports to meetings with managers and tenant representatives. This self-assessment is being reported to Housing Policy Committee .

	provides insight to the governing body on the landlord's complaint handling performance.		
7.4	<p>As a minimum, governing bodies should receive:</p> <ul style="list-style-type: none"> • Regular updates on the volume, categories and outcome of complaints, alongside complaint handling performance including compliance with the Ombudsman's orders • Regular reviews of issues and trends arising from complaint handling, • The annual performance report produced by the Ombudsman, where applicable • Individual complaint outcomes where necessary, including where the Ombudsman made findings of severe maladministration or referrals to regulatory bodies. The implementation of management responses should be tracked to ensure they are delivered to agreed timescales. • The annual self-assessment against the Complaint Handling Code for scrutiny and challenge. 	Partially	The annual self-assessment is taken to the Housing Policy Committee. We need to provide more information on complaints to the Housing Policy Committee in future
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	Reports are presented to the Housing Leadership Team showing performance and trends and is also reported in the Annual Governance Statement
7.6	<p>Landlords should have a standard objective in relation to complaint handling for all employees that reflects the need to:</p> <ul style="list-style-type: none"> • have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments • take collective responsibility for any shortfalls identified through complaints rather than blaming others • act within the Professional Standards for engaging with complaints as set by the Chartered Institute of Housing. 	Partially	Training emphasises how complaints are 'everyone's business,' and this will be embedded through annual performance reviews and one-to-ones with staff.

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	Completed in December 2020 and December 2021

8.2	Landlords must also carry out a self-assessment following a significant restructure and/or change in procedures.	Yes	Not applicable currently, but we would do this if a change in circumstances required it.
8.3	<p>Following each self-assessment, a landlord must:</p> <ul style="list-style-type: none"> • report the outcome of their self-assessment to their governing body. In the case of local authorities, self-assessment outcomes should be reported to elected members • publish the outcome of their assessment on their website if they have one, or otherwise make accessible to residents • include the self-assessment in their annual report section on complaints handling performance 	Yes	<p>This assessment is to be published once approved by the Housing Policy Committee. The previous assessment undertaken in 2021 is on the website.</p> <p>We also include information about complaints performance in our annual report to tenants.</p>