

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	This definition appears in the introduction of AIHA's Complaints Policy.
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	Any 'expression of dissatisfaction' is treated as a complaint.
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	If a dissatisfaction cannot be resolved at the first point of contact it is dealt with as a complaint.
1.7	A landlord must accept a complaint unless there is a valid reason not to do so.	Yes	There are exceptions to the complaints procedure, these are listed in AIHA's Complaints 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	As above.
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	In the event that we are unable to accept a complaint, the tenant will be provided with an explanation and further advice of how they can pursue their dissatisfaction and their right to take this decision to the HO.

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 aim to resolve matters through our servicing and maintenance teams. If a tenant is dissatisfied with the service they received the matter will be considered through the complaints process.
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.	No	This advice is not currently included in our transactional survey. We will seek to implement this by the end of 2023.

Section 2 - Accessibility and awareness

Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
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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	Residents can make a complaint by post, email, telephone, in person.
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	AIHA's Complaint Policy includes a clear description of the stages of our complaints process so that residents can understand what to expect when making a complaint.
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	AIHA Complaints Policy appears on the website www.aiha.org.uk/about-us/our-publications/
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	In our Complaints Policy we offer to make reasonable adjustments in accordance with the needs of the complainant. Complaint handlers receive training on the Equality Act 2010.
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	Information about the complaints process and the Housing Ombudsman is always included in complaints correspondence. We regularly update and refresh the way we promote the complaints process and will look at ways of including the Complaint Handling Code.

2.7	Landlords must provide residents with contact information for the Ombudsman as part of its regular correspondence with residents.	Yes	All correspondence with residents relating to complaints includes contact details for the Housing Ombudsman. General correspondence references the HO but does not include contact details.
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	Complaints letters advise residents of their right to access support from the Housing Ombudsman and information about how to contact them.

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.	N/A	We do not have a social media platform through which we communicate with our tenants.

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	The Head of Tenant Liaison is responsible for complaint handling and reports directly to the board.

3.2	...the complaint handler appointed must have appropriate complaint handling skills and no conflicts of interest.	Yes	<p>The complaint handler has experience in dealing with the public and managing dispute resolution.</p> <p>The complaint handler works independently of all other teams at AIHA and is well placed to handle complaints without conflict of interest in other areas of our work.</p>
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Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
3.3	Complaint handlers should: <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	<p>Complaint handlers at Stage 1 and Stage 2 are team leaders or directors and have authority to act.</p> <p>We frequently review our complaint outcomes to ensure that complaints are dealt with in a fair and sensitive manner.</p>

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	Yes	All complaints are dealt with in accordance with the Housing Ombudsman's Complaints Handling Code. Records are kept of all communication and outcomes.

	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 .		Complaint handlers participate in training to ensure they are kept aware of the standards.
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	If we are unclear about a complaint, the Complaints Officer will contact the customer to discuss and clarify the matter.
4.6	A complaint investigation must be conducted in an impartial manner.	Yes	All investigations follow a process and are dealt with fairly.
4.7	The complaint handler must: <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. 		The complaint handler follows these principles when investigating a complaint.
4.11	Landlords must adhere to any reasonable arrangements agreed with residents in terms of frequency and method of communication	Yes	All timescales detailed in the Complaints Policy are adhered to.
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: <ul style="list-style-type: none"> • set out their position 	Yes	Where a member of staff is the subject of a complaint, we will ask them for their understanding of the circumstances before coming to a resolution.

	<ul style="list-style-type: none"> comment on any adverse findings before a final decision is made. 		We maintain ongoing dialogue with tenants during the complaint investigation and will accept comments, make required amendments and consider additional evidence.
4.13	A landlord must include in its complaints policy its timescales for a resident to request escalation of a complaint	Yes	This guidance is detailed in the Complaints Policy
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	In the event that we are unable to accept a complaint, we will have a discussion with the resident to ensure they understand our position.
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	All correspondence is logged.
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	The Complaints Policy details how we would deal with unacceptable behaviour from residents during the complaints process.

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	We try to manage customers' expectations by setting out what kind of outcome they can hope to achieve and

			whether they are asking for something unreasonable.
4.4	A complaint should be resolved at the earliest possible opportunity, having assessed what evidence is needed to fully consider the issues, what outcome would resolve the matter for the resident and whether there are any urgent actions required.	Yes	We aim to provide a response to a complaint at the earliest opportunity.
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	Our policy lays out the various ways a complaint can be made and advises residents of their right to appoint a representative.
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	If there is a legal obligation on either party, we will advise the tenant about the position.
4.9	Communication with the resident should not generally identify individual members of staff or contractors.	Yes	All complaints are dealt with impartially. Where a complaint is about a specific member of staff or contractor, we will ask the tenant to identify them so that we can investigate and ensure an effective resolution.
4.10	Landlords should keep residents regularly updated about the progress of the investigation.	Yes	All complaints are corresponded to within the timescales listed in our Complaints Policy. If we have additional information of interest this is communicated separately from the formal decision letter.
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.	No	We do not have a formal procedure for gathering this type of feedback. We will seek to implement ways of gathering information.

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	We use complaints as an opportunity to learn and drive positive change. Staff receive ongoing support and are encouraged to welcome complaints as this helps improve the service we provide.
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	Staff receive training on the Equality Act 2010. Being mindful of individual needs and vulnerabilities is central to how we treat our tenants.

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 <u>within 10 working days</u> 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	As detailed in our Complaints Policy, we aim to respond to all complaints within 10 days. If we require more time to reach a resolution, a request for an extension will be made.
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	The decision letter will outline the resolution of a complaint and includes information about how the work/compensation will be processed. The complaints officer will still monitor performance to ensure efficient delivery and timeliness.
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	Decision letter templates require all respective information to be included.
5.8	Landlords must confirm the following in writing to the resident at the completion of stage one in clear, plain language:	Yes	All respective information is included in our stage 1 template letter.

	<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 		
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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	The process of progressing a complaint to the stage 2 and the right to contact the HO for support are both detailed in our Complaints Policy.
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	If a matter is unclear the investigating officer will contact the tenant to clarify the issue.
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	A complaint will be escalated to stage 2 upon request only if it has first been through stage 1. In exceptional circumstances we may initially escalate a complaint to stage 2.
5.12	The person considering the complaint at stage two, must not be the same person that considered the complaint at stage one.	Yes	Stage 2 complaints are investigated by the CEO.

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	This forms part of our complaint handling process and is published in AIHA's Complaints Policy.
5.16	<p>Landlords must confirm the following in writing to the resident at the completion of stage two in clear, plain language:</p> <ul style="list-style-type: none"> • 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 <p>and</p> <ul style="list-style-type: none"> • 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	Stage 2 decision letters include all respective information. All complaints are responded to in writing. Where a decision is communicated over the phone it will follow with a decision letter.

Stage 3

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	Residents that are still dissatisfied after a Stage 2 decision may choose to resolve their issue with support from a Beis Din (Jewish Court) or the Housing Ombudsman. We do not consider this an additional stage.
5.20	<p>Landlords must confirm the following in writing to the resident at the completion of stage three in clear, plain language:</p> <ul style="list-style-type: none"> • the complaint stage 	N/A	We do not have a stage 3 in our complaints process.

	<ul style="list-style-type: none"> • 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 		
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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 will always communicate with tenants and ensure they are agreeable to our need for an extension.
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	All complaints correspondence includes advice on the option to seek support from the Housing Ombudsman and contact details are provided.
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	As part of a complaint investigation we review the history of the relevant property as this helps us better understand the matter and assists in finding a resolution.
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	These matters are dealt with on a case-by-case basis. If we are unable to incorporate the complaint or raise an additional complaint, we will raise this with the tenant.

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	A request for an extension is always discussed and agreed to with the tenant prior.
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	Tenants are always advised of the option to seek support from the Housing Ombudsman and contact details are provided.

Stage 3

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 <u>within 20 working days</u> 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.	N/A	We do not have a stage 3 in our complaints process.
5.19	Where agreement over an extension period cannot be reached, landlords should provide the Housing Ombudsman's contact details so the resident can challenge the landlord's plan for responding and/or the proposed timeliness of a landlord's response.	N/A	We do not have a stage 3 in our complaints process.

Section 6 - Putting things right

Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
6.1	Effective dispute resolution requires a process designed to resolve complaints. Where something has gone wrong a landlord must acknowledge this and set out the actions it has already taken, or intends to take, to put things right.	Yes	Where we identify a service failure we will provide an apology and seek to put things right.
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	Remedies are dealt with on a case-by-case basis. We aim to offer fair and proportionate redress that considers the nature of the complaint and the individual circumstances of the complainant.
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	The decision letter will outline the resolution of a complaint and includes information about how the work/compensation will be processed. The complaints officer will still monitor performance to ensure efficient delivery and timeliness.
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	This forms part of our complaint handling process alongside our Compensation Policy.

Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
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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	We regularly review complaints records to identify trends and take lessons of past service failure. The outcomes are shared across all departments.
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	Where appropriate a complaint will be referred to our legal team for advice and guidance.

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	Quarterly reports are produced for review by the board. Any learning and improvements resulting from the complaints procedure are shared to the full team. We will seek to include a section on complaints in our next annual report.

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 provides insight to the governing body on the landlord's complaint handling performance.	Yes	We have a designated board member who is responsible for complaint handling.
7.4	As a minimum, governing bodies should receive: <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 	Yes	A quarterly report on complaints performance is produced for review by the board.

	<ul style="list-style-type: none"> 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. 		
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	The senior management team is apprised of each complaint. This ensures any learning and improvements resulting from the complaints procedure are shared across all departments.
7.6	Landlords should have a standard objective in relation to complaint handling for all employees that reflects the need to: <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. 	Yes	All employees involved in tenant services work in collaboration to help resolve complaints. This helps ensure we achieve the right outcome. AIHA takes responsibility when a service failure is identified and will offer an apology and any due compensation.

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	An annual self-assessment is carried out against the Housing Ombudsman Code. However, an additional assessment may

			be carried out to reflect any changes that occur as a result of changes to our complaints process or the HOC.
8.2	Landlords must also carry out a self-assessment following a significant restructure and/or change in procedures.	Yes	As above.
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>We report the outcome of the self-assessment to the Board and publish the document on our website.</p> <p>We will seek to include this in the next annual report.</p>