

## Appendix 2 – 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 ‘word for word’ is used in OVH’s website, leaflet and 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	We will take complaints from advocates and authorised contacts that are on customers file. All front facing staff have been informed that the terminology ‘complaint’ does not necessarily need to be used.
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	Where a customer remains unhappy with first point of contact resolution a complaint will be logged.  So that OVH are fully compliant with this training has been completed with the Customer Service Centre and Investigating Officers.
1.7	A landlord must accept a complaint unless there is a valid reason not to do so.	Yes	OVH can refused to log a complaint by following the exemptions points in the Policy. It is extremely rare that OVH refuse to log a complaint.

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	Please see in OVH's Complaints Policy, section: 3.1.5.4 - 3.1.11 and 3.1.12
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	Please see in OVH's Complaints Policy, section: 3.1.10 - 3.1.12. In the 1 case that OVH has refused to log a complaint, an email was sent to the customer explaining in full why their complaint could not be logged.

### 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 <b>service request</b> , where a resident may be unhappy with a <b>situation</b> that they wish to have rectified, and a <b>complaint</b> about the <b>service</b> they have/have not received.	Yes	Training has been completed with the Customer Service Centre when they join the business and further specific training completed by the Complaint Coordinator. However, where contact raised as a complaint that isn't there is a Complaint Coordinator acting like a triage and will forward to relevant staff if it is just a request for service. For example – Anti-social behaviour 'complaint' is a request for help with being the victim of anti-social behaviour. Also, OVH has a separate appeal process where a customer is unhappy with a decision that has been made but there is no service failure, for example the year a kitchen is due for renewal.
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	To be fully compliant training has been completed with the Survey Assistants to remind them that if they are dissatisfied with a service that has been provided, they can raise a complaint for the customer or sign post the customer how to raise a complaint.  Survey Assistants also email relevant staff member about any dissatisfaction where the

		customer does not want a formal complaint, but the feedback can help shape change to the service.
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## 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	A complaint can be taken in any form including: phone, email, letter, person, SMS, social media.
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	Please see Policy on OVH's website. Other formats can be made available on request.
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	OVH has a dedicated page to complaints which includes all necessary information: <a href="http://Ovh.org.uk/complaints">Ovh.org.uk/complaints</a> . A digital mystery shop with involved tenants was completed, the results show that the information is clear and avoids jargon.
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	For OVH to be compliant the Reasonable Adjustment section of the OVH Complaint Policy has been improved.  Equality training has recently been completed by the Complaint Coordinator and all Investigating Officers. OVH also has access to a Equality and Diversity member of staff for help if needed.
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	The Policy is publicised on OVH's website. The process is publicised on OVH's website and leaflet. For OVH to be fully compliant more information about the process, performance and the Ombudsman service will be included in the next Invision (tenant newsletter).

2.7	Landlords must provide residents with contact information for the Ombudsman as part of its regular correspondence with residents.	Yes	For OVH to be compliant all complaint correspondence now includes the Ombudsman information. Previously, only the Stage 2 outcome letter and the website included it.
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	As above

### 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	Please see OVH Complaint Policy, section: 3.2

### 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	OVH has a dedicated Complaint Coordinator.
3.2	...the complaint handler appointed must have appropriate complaint handling skills and no conflicts of interest.	Yes	Complaint Coordinator continually receives up to date training and attends appropriate webinars and conferences. The Complaint Coordinator then shares best practice with Investigating Officers, Customer Service Centre, and other members of staff where appropriate. A Declaration Of Interest is completed yearly by all staff.

### 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"> <li>• be able to act sensitively and fairly</li> <li>• be trained to handle complaints and deal with distressed and upset residents</li> <li>• have access to staff at all levels to facilitate quick resolution of complaints</li> <li>• have the authority and autonomy to act to resolve disputes quickly and fairly.</li> </ul>	Yes	<p>The Investigating Officers receive training and updates on a quarterly basis from the Complaint Coordinator.</p> <p>Investigating Officers are given the autonomy to resolve complaints and to speak with any member of staff needed.</p> <p>Complaint Review meeting is completed quarterly with Directors and Managers – Investigating Officers can feedback into this meeting.</p> <p>Investigating Officers have autonomy over how much compensation is offered, if needed.</p> <p>E-Learning training completed regularly by all Investigating Officers – 'Equality and Diversity and Complaint Handling'.</p>

### Section 4 - Complaint handling principles

#### Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
4.1	<p>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 <b>within five days of receipt</b>.</p>	<p>Yes – acknowledgment</p> <p>Yes</p>	<p>In OVH's Policy it stated acknowledgement should be received within 2 working days of receipt.</p> <p>Training has been completed with the Customer Service Centre so that staff will try to resolve all dissatisfaction but know to raise as a formal complaint if they are unable to resolve at first point of contact.</p> <p>Refresher training will be provided yearly.</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.	Yes	So that OVH are fully compliant new letter templates have been made which include a sentence that details OVH understands what the outcome is that the customer is seeking.
4.6	A complaint investigation must be conducted in an impartial manner.	Yes	All staff complete a Declaration of Interest yearly. Staff always remain impartial and admit when an error has been made and put it right for the customer. A Stage 2 is investigated by a senior member of staff. Dissatisfied and escalated complaints are reviewed by Performance and Customer Insight team as part of 'end to end audits'.
4.7	The complaint handler must: <ul style="list-style-type: none"> <li>• deal with complaints on their merits</li> <li>• act independently and have an open mind</li> <li>• take measures to address any actual or perceived conflict of interest</li> <li>• consider all information and evidence carefully</li> <li>• keep the complaint confidential as far as possible, with information only disclosed if necessary to properly investigate the matter.</li> </ul>	Yes	As above.
4.11	Landlords must adhere to any reasonable arrangements agreed with residents in terms of frequency and method of communication	Yes	Where the customer has stipulated any frequency or communication methods this is added to the key information section of pentana.
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"> <li>• set out their position</li> <li>• comment on any adverse findings before a final decision is made.</li> </ul>	Yes	Personal contact is made within 3 working days to allow customer to set out their position.  To make OVH compliant training has been completed with the Investigating Officers to make sure they are making contact before closing the complaint down.

<b>4.13</b>	A landlord must include in its complaints policy its timescales for a resident to request escalation of a complaint	Yes	See OVH's Complaint Policy - Within 6 months
<b>4.14</b>	A landlord must not unreasonably refuse to escalate a complaint through all stages of the complaints	Yes	See OVH's Complaint Policy, section: 3.1.5.4 - 3.1.11 and 3.1.12



	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.		
<b>4.15</b>	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	Pentana is OVH's centralised complaint system.
<b>4.18</b>	Landlords must have policies and procedures in place for managing unacceptable behaviour from residents and/or their representatives when pursuing a complaint.	Yes	Unacceptable Behaviour Policy accessible for all staff to use in any situation not just in relation of complaints.

### Best practice 'should' requirements

<b>Code section</b>	<b>Code requirement</b>	<b>Comply: Yes/No</b>	<b>Evidence, commentary and any explanations</b>
<b>4.3</b>	Landlords should manage residents' expectations from the outset, being clear where a desired outcome is unreasonable or unrealistic	Yes	See 4.2 and training has been completed with the Investigating Officers and the Customer Service Centre to make sure OVH manage expectations from the start and be clear whether it is realistic or not.
<b>4.4</b>	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	Complaints are all closed within 10 working days unless an extension is required which needs to be signed by a Director and relevant extension form completed, and agreed by customer. Internal average number of days target is 8.
<b>4.5</b>	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	A complaint can be taken in any form, from anyone including advocates/friends/family. OVH offers the help of Complaint champions which are involved tenants that offer a 'friendly ear' for customers when they have a complaint.
<b>4.8</b>	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	

4.9	Communication with the resident should not generally identify individual members of staff or contractors.	Yes	Staff members only referred to if relevant to the complaint (staff attitude or if something specific has been agreed).
4.10	Landlords should keep residents regularly updated about the progress of the investigation.	Yes	Refresher training has been completed with Investigating Officers to make sure they keep customers regularly updated throughout their complaint.
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	Full census survey completed
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	The Performance Team completed Service Feedback Meetings quarterly with relevant managers. The Complaint Coordinator conducts quarterly Investigating Officer meeting which includes performance data, training, updates and allows Investigating Officers to raise any issues or queries. A Complaint review meeting is completed quarterly which involves all managers and directors to discuss performance and the management of complaints and where any improvements can be made. Quarterly Complaint Reports are completed, circulated and published on OVH's website.
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	See relevant Policy/letter templates

## 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 <b><u>within 10 working days</u></b> 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	Yes	Unless extension is required – customer kept informed and signed extension form completed by Director of the service.



5.12	The person considering the complaint at stage two, must not be the same person that considered the complaint at stage one.	Yes	More senior member of staff reviews Stage 2 as per OVH's Policy
5.13	Landlords must respond to the stage two complaint <b>within 20 working days</b> 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	OVH's Stage 2's responded within 10 working days unless extension needed. Customer has to agree and the extension has to be signed off by a Director.
5.16	Landlords must confirm the following in writing to the resident at the completion of stage two in clear, plain language: <ul style="list-style-type: none"> <li>• the complaint stage</li> <li>• the complaint definition</li> <li>• the decision on the complaint</li> <li>• the reasons for any decisions made</li> <li>• the details of any remedy offered to put things right</li> <li>• details of any outstanding actions</li> </ul> <b>and</b> <ul style="list-style-type: none"> <li>• if the landlord has a third stage, details of how to escalate the matter to stage three</li> <li>• if this was the final stage, details of how to escalate the matter to the Housing Ombudsman Service if the resident remains dissatisfied.</li> </ul>	Yes	Stage 2 letter templates include all these 'pointers' to include all the information needed is provided to the customer.

### 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.	N/A	Only 2 stages

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"> <li>• the complaint stage</li> <li>• the complaint definition</li> <li>• the decision on the complaint</li> <li>• the reasons for any decisions made</li> <li>• the details of any remedy offered to put things right</li> <li>• details of any outstanding actions</li> <li>• details of how to escalate the matter to the Housing Ombudsman Service if the resident remains dissatisfied</li> </ul>	N/A	Only 2 stages
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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	The customers permission is always granted when an extension is needed.
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	To make sure OVH is compliant the 'Not Completed' letters has been amended to include the Ombudsman details.
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	Pentana shows any previous complaints therefore the Complaint Coordinator can see if there is background or if it is a recurring issue.
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	Wherever possible any additional information will be engulfed in to the existing stage 1 so that the customer does not have multiple complaints open and to avoid any delays in a response. However, if the information is totally unrelated a new complaint will be raised.

## 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	See 5.2.
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	See 5.3.

## 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 <b>within 20 working days</b> 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	
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	

## Section 6 – Putting things right

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
<b>6.1</b>	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	Training has been completed with the Investigating Officers to make sure they know to admit when something has gone wrong and make efforts to put it right. The letter template includes a section to be completed in relation to investigation and findings.
<b>6.2</b>	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	Using previous cases, case studies and guidance on the Ombudsman website training has been provided to investigating officers as well as an internal guidance document produced so that Investigating Officers have the autonomy to offer the correct compensation.
<b>6.5</b>	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	OVH has a 'Complaint Tracker' where any promised action following a complaint is logged on Pentana and assigned to the relevant member of staff in the Asset Management team to make sure it is completed.
<b>6.6</b>	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	See 6.2 and OVH's Compensation Policy.

### Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
<b>6.3</b>	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	Wherever possible OVH are always looking for opportunity to improve processes/systems to benefit all customers. For example; a complaint about service charges that affected multiple customers.
<b>6.7</b>	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	Performance Team work closely with Insurance Team/external Solicitors with the assistance of the Investigating Officers.

## 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 report Bi-annual Board report 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	OVH have appointed dedicated Board Member for Complaints.
7.4	As a minimum, governing bodies should receive: <ul style="list-style-type: none"> <li>Regular updates on the volume, categories and outcome of complaints, alongside complaint handling performance including compliance with the Ombudsman's orders</li> <li>Regular reviews of issues and trends arising from complaint handling,</li> <li>The annual performance report produced by the Ombudsman, where applicable</li> <li>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.</li> </ul>	Yes	Board reports



<b>7.5</b>	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	Complaint Review Meeting completed quarterly and minuted.
<b>7.6</b>	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"> <li>• have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments</li> <li>• take collective responsibility for any shortfalls identified through complaints rather than blaming others</li> <li>• act within the Professional Standards for engaging with complaints as set by the Chartered Institute of Housing.</li> </ul>	Yes	Complaints Coordinator ensures that a collaborative approach is taken in terms of resolving and learning from complaints. This includes Service Feedback Meetings and Complaint Review Meetings along with Investigating Officer Meetings.

## Section 8 - Self-assessment and compliance

### Mandatory 'must' requirements

<b>Code section</b>	<b>Code requirement</b>	<b>Comply: Yes/No</b>	<b>Evidence, commentary and any explanations</b>
<b>8.1</b>	Landlords must carry out an annual self-assessment against the Code to ensure their complaint handling remains in line with its requirements.	Yes	
<b>8.2</b>	Landlords must also carry out a self-assessment following a significant restructure and/or change in procedures.	Yes	
<b>8.3</b>	Following each self-assessment, a landlord must: <ul style="list-style-type: none"> <li>• 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</li> <li>• publish the outcome of their assessment on their website if they have one, or otherwise make accessible to residents</li> <li>• include the self-assessment in their annual report section on complaints handling performance</li> </ul>	Yes Yes Yes	Performance information, Ombudsman information and a link to the Self-assessment will be included in the Annual report.