Look Ahead Care and Support – Self-Assessment Form. Updated February 2023

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

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

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

# Section 1 - Definition of a complaint

## Mandatory ‘must’ requirements

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| **Code section** | **Code requirement** | **Comply:**  **Yes/No** | **Evidence, commentary and any explanations** |
| **1.2** | A complaint must be defined as:  ‘*an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the organisation, its own staff, or those acting on its behalf, affecting an individual resident or group of residents*. | Yes | Look Ahead has adopted the Housing Ombudsman definition of a complaint and is available on our website. www.lookahead.org.uk/complaintpolicy |
| **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 | It is clear in the complaint policy that we will accept complaints from customers, advocates, neighbours, MP’s etc and we do not require the use of the word complaint to be treated as such |
| **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 | Without exception we log dissatisfaction as a complaint for audit trail purposes and for identifying trends and patterns |
| **1.7** | A landlord must accept a complaint unless there is a valid reason not to do so. | Yes | With the exceptions of any matters not deemed to be a complaint under the Complaint policy, |
| **1.8** | A complaints policy must clearly set out the circumstances in which a matter will not be considered, and these circumstances should be fair and reasonable to residents. | Yes | Exceptions as provided under our Complaint policy and in particular:   * A request for a service * A report of ASB behaviour * Complaints made by Look Ahead Staff * Complaints outside of Look Ahead’s remit i.e., complaint about service of another organisation. * Complaints that become part of a legal process i.e., a legal disrepair case reported through a solicitor. * Appeals against warning, notices to quit or evictions. * Complaints arising from incidents more than 6 months old unless there is a pattern of concern, a potential breach of the Equalities Act or linked to regulated activity. |
| **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 have other policies that manage and cover these areas, for example ASB policy Failure to deliver a service including a request will be subject to our complaints procedure. We will ensure that all customers have clear, simple and accessible process and if matter is not suitable for the complaint process an alternative offer will be provided. As a last resort details regarding the Ombudsman details are provided in letter templates |

## Best practice ‘should’ requirements

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| **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 | Staff both in Head office and Operational are trained and clear about a service request and 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. | Yes | We provide leaflets and posters which provide explain the process available for survey feedback. |

# Section 2 - Accessibility and awareness

## Mandatory ‘must’ requirements

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| **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 | Section 7.1 of the policy sets out the available routes and these channels are fully operational and monitored. |
| **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 | This is readily available in our complaint policy on our website, leaflets and the tenant’s handbook. |
| **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 | Also available are:  Service standards  Link to HO website  Website- complaint and feedback form |
| **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 | Yes, we have a “reasonable adjustment policy” |
| **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 | We do this via:   * Tenancy sign-up * Support Staff * Leaflets * Website * Newsletter * Tenant and Landlord Panel |
| **2.7** | Landlords must provide residents with contact information for the Ombudsman as part of its regular correspondence with residents. | Yes | This is provided in our policy and any letter templates responses to complaints. |
| **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 | This is provided as part of our complaint handing process stage and letter templates. |

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## Best practice ‘should’ requirements

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| **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 | Our Communications team have an oversight of all Social Media Platforms and will engage with our Customer Experience Directorate to ensure accountability and confidentiality are in place to address matters through this channel. |

# Section 3 - Complaint handling personnel

## Mandatory ‘must’ requirements

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| **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 |  |
| **3.2** | …the complaint handler appointed must have appropriate complaint handling skills and no conflicts of interest. | Yes |  |

## Best practice ‘should’ requirements

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| **Code section** | **Code requirement** | **Comply:**  **Yes/No** | **Evidence, commentary and any explanations** |
| **3.3** | Complaint handlers should:   * be able to act sensitively and fairly * be trained to handle complaints and deal with distressed and upset residents * have access to staff at all levels to facilitate quick resolution of complaints * have the authority and autonomy to act to resolve disputes quickly and fairly. | Yes | Yes, with emphasis that all staff have a clear understanding of our policy by undertaking eLearning courses on Managing and investigating complaint and Managing Complaints and Feedback |

# Section 4 - Complaint handling principles

**Mandatory ‘must’ requirements**

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| **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 | The policy set a target of 3 working days. |
| **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 | This is highlighted in the acknowledgment template letter and contact is made to seek any clarification before assignment of the complaint. |
| **4.6** | A complaint investigation must be conducted in an impartial manner. | Yes | This is correct and we undertaken dip sample survey to ensure impartiality in our process. |
| **4.7** | The complaint handler must:   * deal with complaints on their merits * act independently and have an open mind * take measures to address any actual or perceived conflict of interest * consider all information and evidence carefully * keep the complaint confidential as far as possible, with information only disclosed if necessary to properly investigate the matter. | Yes | This is standard practice within our policy, highlighted in our eLearning courses and spot checks are undertaken before any final responses are sent. |
| **4.11** | Landlords must adhere to any reasonable arrangements agreed with residents in terms of frequency and method of communication | Yes | Times lines are set for communication and management of expectations. In rare exceptions extensions may be agreed. |
| **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 | This is standard practice that the investigator contacts and discusses any complaint to ensure there is a clear understanding of the issue and manage expectations. |
| **4.13** | A landlord must include in its complaints policy its timescales for a resident to request escalation of a complaint | Yes | This is included in our complaints policy and letter templates. |
| **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 | We do not unreasonable reject escalation and we do encourage a review of a matter at any stage before going to the next steps.  In the current review of the policy, we are reviewing the current wording to ensure that the escalation process is free and fair. |
| **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 | We do this on our Complaint Management System. |
| **4.18** | Landlords must have policies and procedures in place for managing unacceptable behaviour from residents and/or their representatives when pursuing a complaint. | Yes | In our Policy especially pertaining to unreasonable, persistent, and vexatious behaviour. |

## Best practice ‘should’ requirements

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| **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 | Contact with the resident is encouraged to manage expectations as standard practice. |
| **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 | As above from discussions. |
| **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 |  |
| **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 | Advice and counsel will be provided by the relevant internal or external teams. |
| **4.9** | Communication with the resident should not generally identify individual members of staff or contractors. | Yes | Standard Practice. |
| **4.10** | Landlords should keep residents regularly updated about the progress of the investigation. | Yes | This has been enhanced in the policy and subject to monitoring and quality assessment to improve performance. |
| **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 | Feedback links are sent in formal responses. |
| **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 | Service improvement plans highlight trends and patterns and reports provided as appropriate. |
| **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 5 - Complaint stages

## Mandatory ‘must’ requirements

## Stage 1

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| **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. | No | Policy currently is 13 working days and under policy review. |
| **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 | We have strengthened this in the policy “ in any event it is best practice to advise the complainant of the outcome of the complaint and actions to redress prior to a formal response. This enables the complainant to identify any omission, misunderstanding of their complaint or obtain clear understanding of the reasons their complaint isn’t being upheld before formal and final decision is made” |
| **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 | Standard practice |
| **5.8** | Landlords must confirm the following in writing to the resident at the completion of stage one in clear, plain language:   * the complaint stage * the decision on the complaint * the reasons for any decisions made * the details of any remedy offered to put things right * details of any outstanding actions * details of how to escalate the matter to stage two if the resident is not satisfied with the answer | Yes | Standard practice following our template letters |

## Stage 2

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| **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 |  |
| **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 |  |
| **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 |  |
| **5.12** | The person considering the complaint at stage two, must not be the same person that considered the complaint at stage one. | Yes |  |
| **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 | Target is within 18 working days |
| **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 | All stage letters include reference to the Housing Ombudsman. |

## Stage 3

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| **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 | Currently a 3-stage process. |
| **5.20** | Landlords must confirm the following in writing to the resident at the completion of stage three in clear, plain language:   * the complaint stage * the complaint definition * the decision on the complaint * the reasons for any decisions made * the details of any remedy offered to put things right * details of any outstanding actions * details of how to escalate the matter to the Housing Ombudsman Service if the resident remains dissatisfied | Yes | Customers are also on the stage 3 panel to ensure it is fair and transparent. |

## Best practice ‘should’ requirements

## Stage 1

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| **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 | Rare exception unless agreed by both parties. Normally it is 5-day 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 |  |
| **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 | Records are saved as live or archived |
| **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 |  |

## Stage 2

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| **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 |  |
| **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 |  |

## Stage 3

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| **Code section** | **Code requirement** | **Comply:**  **Yes/No** | **Evidence, commentary and any explanations** |
| **5.18** | Complaints should only go to a third stage if the resident has actively requested a third stage review of their complaint. Where a third stage is in place and has been requested, landlords must respond to the stage three complaint **within 20 working days** of the complaint being escalated. Additional time will only be justified if related to convening a panel. An explanation and a date for when the stage three response will be received should be provided to the resident. | Yes | As per our policy and leaflet. |
| **5.19** | Where agreement over an extension period cannot be reached, landlords should provide the Housing Ombudsman’s contact details so the resident can challenge the landlord’s plan for responding and/or the proposed timeliness of a landlord’s response. | Yes |  |

# Section 6 - Putting things right

## Mandatory ‘must’ requirements

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| **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 |  |
| **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 |  |
| **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 |  |
| **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 |  |

## Best practice ‘should’ requirements

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| **Code section** | **Code requirement** | **Comply:**  **Yes/No** | **Evidence, commentary and any explanations** |
| **6.3** | Landlords should look beyond the circumstances of the individual complaint and consider whether anything needs to be ‘put right’ in terms of process or systems to the benefit of all residents. | Yes | Improvements include:   * Repairs and Maintenance performance and complaint case management. * Look and feel of rent statements. * New customer reward and recognition policy. * Improved ASB policy and framework. * Developed an investigation guide. * Reviewed our ending tenancy and evictions policy- improved oversight of process by senior managers and strengthened approval protocols. * Further improvements can be found on the performance age of our website and our service improvement plan. |
| **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 | Legal advice will be sought in these circumstances. |

# Section 7 - Continuous learning and improvement

**Mandatory ‘must’ requirements**

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| **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 | We have a complaints service improvement plan which we report to our Boad, Senior Management Team and Customers.  We have created a performance page on our website.  We include learning in our customer “Heads up” newsletter.  We share “You Said, We Did” themes in our annual customer reports and on the performance page of our website, which sits within our online Tenant Handbook. |

**Best practice ‘should’ requirements**

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| **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 | With the Executive Director for Customer Experience and Safeguarding supported by the Head of Customer Service |
| **7.4** | As a minimum, governing bodies should receive:   * Regular updates on the volume, categories and outcome of complaints, alongside complaint handling performance including compliance with the Ombudsman’s orders * Regular reviews of issues and trends arising from complaint handling, * The annual performance report produced by the Ombudsman, where applicable * Individual complaint outcomes where necessary, including where the Ombudsman made findings of severe maladministration or referrals to regulatory bodies. The implementation of management responses should be tracked to ensure they are delivered to agreed timescales. The annual self-assessment against the Complaint Handling Code for scrutiny and challenge. | Yes | SMT, SLT, Board and Annual reports |
| **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 |  |
| **7.6** | Landlords should have a standard objective in relation to complaint handling for all employees that reflects the need to:   * have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments * take collective responsibility for any shortfalls identified through complaints rather than blaming others * act within the Professional Standards for engaging with complaints as set by the Chartered Institute of Housing. | Yes |  |

# Section 8 - Self-assessment and compliance

## Mandatory ‘must’ requirements

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| **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 | As published on our website. |
| **8.2** | Landlords must also carry out a self-assessment following a significant restructure and/or change in procedures. | Yes | These have included:   * Monitoring on reporting on extensions and delays * Introduced KPIs * Emphasis on putting things right and not passing customers onto other colleagues and departments. * Improved monitoring and follow up of agreed actions. * Case management approach – joined up organisational approach to complex cases. * Options to review outcomes at stage 1 and stage 2 in terms of case review. Mediation and restorative justice. * Enhanced information on our website and accessibility. |
| **8.3** | Following each self-assessment, a landlord must:   * report the outcome of their self-assessment to their governing body. In the case of local authorities, self-assessment outcomes should be reported to elected members * publish the outcome of their assessment on their website if they have one, or otherwise make accessible to residents * include the self-assessment in their annual report section on complaints handling performance | Yes | Report to Senior Leadership Team, Board, Annual Report and website. |