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:	Yes	Stated in the Complaints Policy (4.0).
	<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>		Policy is available online or upon request.
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	Stated in the complaints policy (5.0 and 6.0).
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	Process stated within the policy surrounding how we log and progress a complaint.
1.7	A landlord must accept a complaint unless there is a valid reason not to do so.	Yes	Stated within the complaints policy under section 10.2.

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	Stated within the complaints policy under section 10.0.
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	Included in complaints policy under section 10.2.

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	Stated within the complaints policy under section 5.0.
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	Colleagues are aware of the Customer Voice Team and the role the team plays. A 'feedback' email inbox is available for colleagues to email potential complaints to the Customer Voice Team for review. Complaints can also be passed through using our internal CRM system. The Customer Voice Team host road show events within the business to talk about and review complaints.

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	Stated in the complaints policy section 5.0. It is also located on the website using the following link: <u>https://www.gentoogroup.com/contact/complaints-</u> procedure/
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	Complaints Policy is available online (see above link). Policy can also be requested by customers who do not have online access. Also covered in the Accessibility Statement.
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	Located under the 'Contact' section of the website. See above link.
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	Accessibility Statement details Gentoo's response.

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	Complaints process is online under contact section. Published information on social media around complaints handled. Advertised in the local offices. Customer friendly complaints process leaflet is being created and will be accessible to all customers.
2.7	Landlords must provide residents with contact information for the Ombudsman as part of its regular correspondence with residents.	Yes	As part of the complaints process, both stage 1 and stage 2 acknowledgement and response letters include details of how to contact the Housing Ombudsman.
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 promoted on our website as well as letters from the Customer Voice Team. <u>https://www.gentoogroup.com/contact/complaints-procedure/</u> Customer Voice Partners discuss escalation routes and processes during initial conversations to ensure transparency. Evidenced by call recording and case notes.

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
2.2	Where a landlord has set up channels to communicate with its residents via social media, then it should expect to receive complaints via those channels. Policies should contain details of the steps that will be taken when a complaint is received via social media and how confidentiality and privacy will be maintained.	Yes	We process complaints from social media, our reviewed Complaints and Compliments Policy has covered incoming complaints via social media.

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 Customer Voice team was set up in 2021 to manage complaints for Gentoo. The team sit outside of a service area to ensure impartiality. Dedicated Customer Voice Partners investigate Stage 1 complaints. Customer Voice Leads investigate Stage 2 complaints.
			Regular reports are presented to all service areas and to the Group Board.
3.2	the complaint handler appointed must have appropriate complaint handling skills and no conflicts of interest.	Yes	The Customer Voice Team was set up in 2021 to manage complaints for the Group. The team sit outside of a service area to ensure impartiality.
			Customer Voice Leads oversee complaint responses of team members and currently undergoing review to implement quality checks.
			Regular updates given on best practice in team meetings.

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any
		res/no	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 	Yes	The Customer Voice Team was set up in 2021 to manage complaints for the Group. The team sit outside of a service area to ensure impartiality.
	 resolution of complaints have the authority and autonomy to act to resolve disputes quickly and fairly. 		Partners handle Stage 1 complaints. Leads handle Stage 2 complaints as well as oversee Stage 1 complaint responses. Staff have completed complaint handling training delivered by an external body to
			training delivered by an external body to ensure regular staff training.

Section 4 - Complaint handling principles Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
4.1	Any decision to try and resolve a concern must be taken in agreement with the resident and a landlord's audit trail/records should be able to demonstrate this. Landlords must ensure that efforts to resolve a resident's concerns do not obstruct access to the complaints procedure or result in any unreasonable delay. It is not appropriate to have extra named stages (such as 'stage 0' or 'pre-complaint stage') as this causes unnecessary confusion for residents. When a complaint is made, it must be acknowledged and	Yes	 The complaints policy details each stage and timeframes for contacting customers. Includes contact with the complainant to agree investigation and discuss expected resolution. Gentoo will acknowledge complaints within 5 working days.
	logged at stage one of the complaints procedure within five days of receipt.		Complaints process is only 2 stages.
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	Yes	Complaints policy details how and when we acknowledge complaints.

	clarification and the full definition agreed between both parties.		Letter templates guide colleagues in response writing.
4.6	A complaint investigation must be conducted in an impartial manner.	Yes	The Customer Voice Team was set up in 2021 to manage complaints for the Group. The team sit outside of a service area to ensure impartiality. Partners handle Stage 1 complaints. Leads handle Stage 2 complaints.
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	Complaint policy and process evidence this. All stage 1 cases include an informal conversation with the complainant to agree investigation parameters before a response is completed. Annual GDPR training is undertaken by all colleagues.
4.11	Landlords must adhere to any reasonable arrangements agreed with residents in terms of frequency and method of communication.	Yes	Detailed in the complaints policy under section 9.0.
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	As part of the investigation, all parties mentioned in the complaint are spoken to allowing them to give their position and comment. This is set out within the complaints policy.

4.13	A landlord must include in its complaints policy its timescales for a resident to request escalation of a complaint.	Yes	This is stated within the complaints policy and included in letters sent from stage 1 through to closure letters.
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	Stated within the complaints policy under section 9.0 and 10.0.
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 notes and contacts are logged on the internal housing 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	This is within the complaints policy and supported by the Community Safety & Anti-Social Behaviour Policy.

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	Partners/Leads contact customers at both stage 1 and 2 to discuss cases, agreeing actions before responding. Letters include confirmation of contact date and time.

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	In individual cases Partners and Leads discuss the outcome desired to resolve the complaint.
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	Complaints can be made on behalf of a customer by representatives. When third party consent is given, 'permission to discuss' forms are completed and logged. Responses can be provided to the representative. Customers can be accompanied at meetings where reasonably practicable.
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	As part of the investigation process, Partners and Leads speak to the relevant areas of the business, including legal if applicable and provide this information to the complainant.
4.9	Communication with the resident should not generally identify individual members of staff or contractors.	Yes	Partners and Leads do not directly refer to individuals when dealing with complaints, rather the service area.
4.10	Landlords should keep residents regularly updated about the progress of the investigation.	Yes	A discussion is held with the customer at the beginning of the complaint to agree communication method preference. Any updates are provided to the customer and recorded using internal case monitoring systems.
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	At the end of each response letter, complainants are invited to complete a survey to give feedback on their experience.

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	Reporting is carried out quarterly (as a minimum) to senior leaders and Gentoo Board.
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	Outlined in the complaints policy. Outlined in the Community and ASB Policy.

Section 5 - Complaint stages

Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
5.1	Landlords must respond to the complaint <u>within 10 working</u> <u>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	Timescales are set out in the complaints policy and procedure.
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	Outlined in the complaints policy and procedure. Mutually Agreed Resolution Date (MARD) can be used if the customer would like further clarification or updates surrounding certain aspects of the complaint.

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	Partners detail all points in any response to complaint points or actions.
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	Letter templates are set up for Partners to complete.

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	Complaints policy and procedure includes: A complainant can escalate a complaint to stage 2 within 15 working days of the stage 1 response. If a refusal to escalate is issued, this is in writing and the reasons for refusal are given.

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	This is clarified by the Customer Voice Lead during initial discussions with the complainant. Evidenced through call recording, the case notes on the system and documented in the formal response. Discussion includes reason for escalation and how the complainant sees the complaint being resolved satisfactorily.
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	Outlined in the complaints policy and process.
5.12	The person considering the complaint at stage two, must not be the same person that considered the complaint at stage one.	Yes	All Stage 2 complaints are dealt with by Leads or a Head of Service as required.
5.13	Landlords must respond to the stage two complaint <u>within 20</u> <u>working days</u> 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 is outlined in the policy and process maps.
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 	Yes	This is covered in the process maps and letter templates act as a guide.

 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.	

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	
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 	N/A	

Best practice 'should' requirements

Code section	Code requirement	Comply:	Evidence, commentary and any
		Yes/No	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	Currently we send a Mutually Agreed Resolution Date (MARD) Referred to as Good Practice by Gentoo by the Housing Ombudsman.
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	Covered within the complaints policy section 9.9.
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	This is covered in the process when completing complaint investigations.
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	Covered within complaints policy section 9.7.

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	Policy and process states 10 days for a Stage 1 and 20 days for a Stage 2 with the option of extension. If required and agreed by the complainant. This is detailed within the complaints policy section 9.0.

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	Covered within the complaints policy section 9.9.
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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 <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	
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

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	As part of the acknowledgement / response letters, details of the complaints and actions to resolve are included.

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	Resolution is determined by the level of service failure and is detailed in the response to all complaints where applicable.
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.	No	Completing an internal review of service delivery. On 26 February 2024, a training session is scheduled to reinforce this action.
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.	No	This will be reviewed in line with the update of the Compensation Policy which is scheduled to be updated by May 2024. Public Liability is covered within 10.1 of the revised complaints policy.

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	Themes of complaints are received, and different service areas are made aware. A 'You Said, We Did' approach is then used to feedback to customers.
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.	No	Gentoo does have a compensation policy but is not specific to formal complaints. This is currently being reviewed and will be updated in May 2024.

Section 7 - Continuous learning and improvement Mandatory 'must' requirements

Code section	Code requirement	Comply:	Evidence, commentary and any
		Yes/No	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	Yes	Details are included in Board reports and the Gentoo Customer Committee have the authority to look at any issues they deem appropriate.
	panels.		

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.	No	The Member Responsible for Complaints will be appointed and in place by March 2024.
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	Reports are shared with senior leaders and Gentoo Board quarterly (as a minimum). Updates provided to the Customer Committee for their review.

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	Damp and Mould has recently gone through a deep dive to establish a new process for the new CRM system. This was implemented in October 2023. Wider staff training of this process has also been implemented.
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. 	No	Complaint handling training will be delivered to customer facing colleagues and this will also be implemented within their job description to ensure compliance and responsibility to address customer concerns/complaints.

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	Review has taken place annually, last review June 2023 but updated following internal service improvements in February 2024.
8.2	Landlords must also carry out a self-assessment following a significant restructure and/or change in procedures.	Yes	Due to service improvements- updated in February 2024.
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	This was included within the Annual Compliance report to Gentoo Board in July 2023.