Appendix B – Self-Assessment Form (2022-2023)

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.

Please note: Cambridge City Council's <u>Complaints Policy</u> (CCCC Policy), <u>How to Complain leaflet</u> and <u>Unreasonable and</u> <u>Unreasonably Persistent Complainants Policy</u> provide further evidence of our compliance.

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: '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	Cambridge City Council uses the Housing Ombudsman's complaint definition in our <u>Complaints</u> <u>Policy (CCC Policy)</u> , <u>How to Complain leaflet</u> . The definition used is universal across our complaints service and applies to both Housing and non-Housing related complaints.
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	Customers do not have to use the word complaint; they can be unhappy with the service they have received or not had an issue resolved satisfactorily.
1.6	if further enquiries are needed to resolve the matter, or if the resident requests it, the issue must be logged as a complaint.	Yes	Our process asks an individual if they want their issue treating as a complaint. If a customer has to chase a service request this would be logged as a complaint.
1.7	A landlord must accept a complaint unless there is a valid reason not to do so.	Yes	CCCC policy is clear that we deal with all complaints through the agreed process unless certain conditions apply.

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	CCCC Policy outlines matters that have other dedicated routes for consideration; matters that fall outside of the scope of the policy or situations where we would not consider a complaint under the complaints policy. Exclusions exist where there are legitimate and justifiable reasons.
1.9	If a landlord decides not to accept a complaint, a detailed explanation must be provided to the resident setting out the reasons why the matter is not suitable for the complaints process and the right to take that decision to the Ombudsman.	Yes	We rarely reject a complaint – at times we may refer to other routes where this is applicable, and the reasons for this explained to the resident. We also provide a response including the rights to take the decision to the Ombudsman and the contact details.

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
1.4	Landlords should recognise the difference between a service request , where a resident may be unhappy with a situation that they wish to have rectified, and a complaint about the service they have/have not received.	Yes	We set out the difference in CCCC Policy, and are compliant – if any doubt we will log a complaint
1.5	Survey feedback may not necessarily need to be treated as a complaint, though, where possible, the person completing the survey should be made aware of how they can pursue their dissatisfaction as a complaint if they wish to.	Partially	We advise customers how to pursue dissatisfaction as if they wish following a complaint. We aim to send automated satisfaction surveys regarding complaints handling to each complainant after a case is closed.

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	As stated in our CCCC Policy and How to Complain leaflet, customers can make a complaint through our website (on-line form), by email, by telephone, in writing or in person. We do not require customers to make their complaint in writing.
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	Our <u>Complaints Policy</u> , <u>How to Complain leaflet</u> are published on the website and cover all the required elements.
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	We have a dedicated page on our website, which comes up at the top of the search results of a costumer search for 'complaints'. See: <u>Compliments, complaints and suggestions -</u> <u>Cambridge City Council</u>
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	CCCC Policy aims to ensure that individual needs are considered when dealing with complaints, "Where a customer is unable to complete the complaints form themselves, Council staff should assist complainants to record their case." Our How to Complain leaflet signposts customers to further assistance in making a complaint if needed. Equalities training is mandatory for all staff to ensure equalities are considered in all aspects of our work.
2.6	Landlords must publicise the complaints policy and process, the Complaint Handling Code and the Housing Ombudsman Scheme in leaflets, posters, newsletters, online and as part of regular correspondence with residents.	Yes	Complaints information is clearly published on the website, and complaints correspondence to customers references the Housing Ombudsman.

2.7	Landlords must provide residents with contact information for the Ombudsman as part of its regular correspondence with residents.	Yes	This information is available on the CCC website, our Complaints Policy and How to Complain leaflet. Our response templates have been amended to ensure complainants are advised that they have this right of access on at all stages of the process.
2.8	Landlords must provide early advice to residents regarding their right to access the Housing Ombudsman Service throughout their complaint, not only when the landlord's complaints process is exhausted.	Yes	Our response templates have this info included.

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 accept complaints via our social media pages but ask the customer to enter their complaint into our complaints portal if they are able to. If not, we log it via this route. Complaints received this way are subject to the same handling as all other complaints.

Section 3 - Complaint handling personnel

Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
3.1	Landlords must have a person or team assigned to take responsibility for complaint handling to ensure complaints receive the necessary attention, and that these are reported to the governing body. This Code will refer to that person or team as the "complaints officer".	Yes	The Business & Development Manager in Customer Services is the dedicated complaints officer. Supported by the Business & Development Officer and Executive Support Officers to handle and administer complaints for resolution.
3.2	the complaint handler appointed must have appropriate complaint handling skills and no conflicts of interest.	Yes	There are no conflicts of interest and staff do not investigate complaints relating to themselves. Complaints handlers are required to attend corporate training.

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. 		We are compliant and all these requirements are covered in complaints training.

Section 4 - Complaint handling principles Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
4.1	Any decision to try and resolve a concern must be taken in agreement with the resident and a landlord's audit trail/records should be able to demonstrate this. Landlords must ensure that efforts to resolve a resident's concerns do not obstruct access to the complaints procedure or result in any unreasonable delay. It is not appropriate to have extra named stages (such as 'stage 0' or 'pre-complaint stage') as this causes unnecessary confusion for residents. When a complaint is made, it must be acknowledged and logged at stage one of the complaints procedure within five days of receipt .	Yes	When a complaint is raised an automatic response is sent from the Case Tracker system which will inform the complainant of their unique case number and the target date for a response from the Council. We have a two stage complaints procedure which is clearly set out on our web page in a policy document and in an easy read format. Complainants are offered the chance to escalate their case further if the Council's efforts to resolve their issue do not meet their expectations.

4.2 4.6	 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. A complaint investigation must be conducted in an impartial manner. 	t Yes Yes	The response template sets out the understanding of the complaint and the outcomes the resident is seeking. CCC also seeks to contact the customer to discuss the complaint and agree the actions.
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	CCCC Policy ensures compliance in this aspect.
4.11	Landlords must adhere to any reasonable arrangements agreed with residents in terms of frequency and method of communication.	Yes	The complaints form asks the customer to choose a preferred contact method (telephone, email, postal letter), this is then highlighted to the investigating officer on the case screen. Should a customer request an update regarding the progress of their case, the Council will provide it.
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	Complaints about a resident will not be managed via the CCCC Policy as it is not a service the Council has delivered or failed to deliver. Staff members who are the subject of a complaint will be interviewed as part of the investigation process.
4.13	A landlord must include in its complaints policy its timescales for a resident to request escalation of a complaint	Yes	This is set out in CCCC Policy and How to Complain leaflet.
4.14	A landlord must not unreasonably refuse to escalate a complaint through all stages of the complaints	Yes	This is included within CCCC Policy, we also have a clear response template that is used specifically for explaining reasons why we would not escalate a complaint.

	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.		
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.		All records of complaints and original documents are logged and filed in Casetracker. Any reviews, outcomes or other relevant correspondence relating to the complaints are also logged and recorded against the cases.
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 outlined in both our CCCC Policy and Unreasonable and Unreasonably Persistent Complainants 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	CCCC Policy involves contacting the customer if cases are considered as particularly complex.
4.4	A complaint should be resolved at the earliest possible opportunity, having assessed what evidence is needed to fully consider the issues, what outcome would resolve the matter for the resident and whether there are any urgent actions required.	Yes	We have a ten working day target time to resolve a complaint. The officer handling a case is sent a daily reminder that they have a case and chased further by Executive Support Officers three working days after being allocated a case.
4.5	Landlords should give residents the opportunity to have a representative deal with their complaint on their behalf, and to be represented or accompanied at any meeting with the landlord where this is reasonable.	Yes	We are compliant as long as we have the consent to discuss all details of a customer's case with a representative.
4.8	Where a key issue of a complaint relates to the parties' legal obligations landlords should clearly set out their understanding of the obligations of both parties.	Yes	Yes, this is established practice, we engage our legal team in complaints responses where necessary.

4.9	Communication with the resident should not generally identify individual members of staff or contractors.	Yes	Generally this will not happen unless the context of the response requires it. All details disclosed comply with GDPR requirements
4.10	Landlords should keep residents regularly updated about the progress of the investigation.	Partially	If requested by the complainant, the Council will provide an update into case progress.
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.	Partially	We include complaints-related questions as part of our tenant and leaseholder satisfaction surveys (these are perception surveys, as required by the regulator). However, there is more we could do in relation to transactional surveys with a customer after a complaint has been made.
4.17	Landlords should recognise the impact that being complained about can have on future service delivery. Landlords should ensure that staff are supported and engaged in the complaints process, including the learning that can be gained	Yes	We take complaints data seriously at CCC and performance reports are circulated on a quarterly basis to Heads of Service to enable them to identify key issues and trends for future improvement.
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	Any restrictions placed on customers are done so in line with the Council's Persistent and Unreasonably Persistent Complainant policy and reviewed regularly.

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</u> <u>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	The timescales set down in CCCC Policy is compliant with this.
5.5	A complaint response must be sent to the resident when the answer to the complaint is known, not when the outstanding actions required to address the issue, are completed. Outstanding actions must still be tracked and actioned expeditiously with regular updates provided to the resident.	Yes	CCCC Policy is compliant with this.

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	CCCC Policy is compliant with this.
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	CCCC Policy and complaints response templates are compliant with this.

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.		Reasons for not escalating a complaint and the right to approach the Housing Ombudsman, are set out clearly to the customer in writing using our response template.
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	CCCC Policy is compliant with this.
5.11	Landlords must only escalate a complaint to stage two once it has completed stage one and at the request of the resident.	Yes	CCCC Policy is compliant with this.

5.12	The person considering the complaint at stage two, must not be the same person that considered the complaint at stage one.	Yes	CCCC Policy is compliant with this.
5.13	Landlords must respond to the stage two complaint <u>within 20</u> 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.		Our target time for stage two is ten working days. If an extension is required this must be first agreed with the resident.
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	CCCC Policy and complaints response templates are compliant with this.

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	CCC has a two-stage complaint 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 	N/A	CCC has a two-stage complaint process.
	Ombudsman Service if the resident remains dissatisfied		

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	All extensions are agreed with customers and followed up by confirming the agreement in writing.
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	We would comply should this situation arise.
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	Executive Support are notified of new cases and where there is repeat contact they will link the new case to the relevant previous ones.
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	If the new contact includes new information relating to the original complaint, this will be merged into the original case by Executive Support. If the further contact is about a separate issue, this will be logged as a new complaint.

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.		All extensions are agreed with customers and followed up by confirming the agreement in writing.
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	Should the situation arise, we would comply with this.

Code	Code requirement	Comply:	Evidence, commentary and any explanations
section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
5.18	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.		CCC has a two-stage complaint process.
5.19	Where agreement over an extension period cannot be reached, landlords should provide the Housing Ombudsman's contact details so the resident can challenge the landlord's plan for responding and/or the proposed timeliness of a landlord's response.	N/A	CCC has a two-stage complaint process.

Section 6 - Putting things right

Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
6.1	Effective dispute resolution requires a process designed to resolve complaints. Where something has gone wrong a landlord must acknowledge this and set out the actions it has already taken, or intends to take, to put things right.	Yes	Our response templates guide the case handler to acknowledge what has gone wrong, set out actions taken and what we will do to put things right.
6.2	Any remedy offered must reflect the extent of any service failures and the level of detriment caused to the resident as a result. A landlord must carefully manage the expectations of residents and not promise anything that cannot be delivered or would cause unfairness to other residents.	Yes	Our approach to remedies is consistent with the key principles used by the Housing Ombudsman, and we are clear about how we assess compensation settlements.
6.5	The remedy offer must clearly set out what will happen and by when, in agreement with the resident where appropriate. Any remedy proposed must be followed through to completion.	Yes	Our response templates demonstrate this.
6.6	In awarding compensation, a landlord must consider whether any statutory payments are due, if any quantifiable losses have been incurred, the time and trouble a resident has been put to as well as any distress and inconvenience caused.	Partially	Compensation payments are made at Heads of Service discretion and take all factors in the case into account

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.		We could review the way we learn from individual circumstances to achieve improvements across our system.
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.		We are compliant where there is a legal element to a complaint.

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.	Partially	We do report on learning from complaints, but we could develop a clearer audit trail to show how we have taken complaints learning on board.

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	The lead complaints officer is the Business & Development Manager within Customer Services who ensures smooth running of the complaints process and refreshing knowledge or providing training where required.
7.4		Yes	The lead complaints officer supplies quarterly reports to Heads of Service, Directors and Chief Executive which include volume of complaints, percentage of complaints responded to within target time and any themes and trends. These reports are then compiled into an annual complaints and feedback report with commentary from Heads of Service to provide context into the numbers. This report is then presented to Members and made available to the general public on the Council website.

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	Following our quarterly complaints reports, all themes and trends are reviewed by Heads of Service, and necessary changes or additions to policies, procedures are 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. 		There is a way of working for all staff that work with complaints, however not all staff at the Council do work with complaints. Any staff who deal with complaints or potential complainants are trained before they will do so, and knowledge is regularly refreshed.

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	CCC carry out this self-assessment annually.
8.2	Landlords must also carry out a self-assessment following a significant restructure and/or change in procedures.	Yes	When this situation arises CCC will be compliant.
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 self-assessment will be reported to Members during the next annual complaints report. It will also be reported to Senior Management during the next quarterly reports. Following submission to the Ombudsman and reporting to Senior Management, the assessment will be published on the relevant web page.