

Self-assessment form June 2024

Section 1: Definition of a complaint

Appendix 3

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
1.2	A complaint must be defined as: <i>'an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the landlord, its own staff, or those acting on its behalf, affecting a resident or group of residents.'</i>	Yes	Complaints-Resolution-Customer-Care-Policy.pdf (ids.org.uk) This definition has been used within section 3.1 of the customer resolution and customer care policy	
1.3	A resident does not have to use the word 'complaint' for it to be treated as such. Whenever a resident expresses dissatisfaction landlords must give them the choice to make complaint. A complaint that is submitted via a third party or representative must be handled in line with the landlord's complaints policy.	Yes		This is outlined within our policy and staff are regularly reminded (121's and day to day) that 'complaint' does not need to be used in order to log.
1.4	Landlords must recognise the difference between a service request and a complaint. This must be set out in their complaints policy. A service request is a request from a resident to the landlord requiring action to be taken to put something right. Service requests are	Yes	This is set out section 4.1 of the current policy and will be expanded in the review of the policy due in September 2024.	Staff logging complaints have been trained in the difference between a service request and a complaint.

	not complaints, but must be recorded, monitored and reviewed regularly.			
1.5	A complaint must be raised when the resident expresses dissatisfaction with the response to their service request, even if the handling of the service request remains ongoing. Landlords must not stop their efforts to address the service request if the resident complains.	Yes		A complaint can be made if someone is making a complaint about something that is ongoing. This is covered in the guidance to staff.
1.6	An expression of dissatisfaction with services made through a survey is not defined as a complaint, though wherever possible, the person completing the survey should be made aware of how they can pursue a complaint if they wish to. Where landlords ask for wider feedback about their services, they also must provide details of how residents can complain.	Yes		Any dissatisfied response via a survey is reviewed and followed up/escalated to the appropriate manager to ensure any issues that need investigating and picked up and the resident advised of the ability to raise a complaint if applicable.

Section 2: Exclusions

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
2.1	Landlords must accept a complaint unless there is a valid reason not to do so. If landlords decide not to accept a complaint they must be able to evidence their reasoning. Each complaint must be considered on its own merits	Yes		This is outlined in the policy and a template letter provided if it is the case that a complaint is not accepted.
2.2	<p>A complaints policy must set out the circumstances in which a matter will not be considered as a complaint or escalated, and these circumstances must be fair and reasonable to residents. Acceptable exclusions include:</p> <ul style="list-style-type: none"> • The issue giving rise to the complaint occurred over twelve months ago. • Legal proceedings have started. This is defined as details of the claim, such as the Claim Form and Particulars of Claim, having been filed at court. • Matters that have previously been considered under the complaints policy. 	Yes	Exclusions are outlined within the current policy Section 4.2	
2.3	Landlords must accept complaints referred to them within 12 months of the	No		The current policy outlines that complaints should be

	issue occurring or the resident becoming aware of the issue, unless they are excluded on other grounds. Landlords must consider whether to apply discretion to accept complaints made outside this time limit where there are good reasons to do so.			made within 6 months of the incident occurring, but in practice we will consider complaints within 12 months. This will be reflected in the new policy due for review by September 2024.
2.4	If a landlord decides not to accept a complaint, an 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. If the Ombudsman does not agree that the exclusion has been fairly applied, the Ombudsman may tell the landlord to take on the complaint.	Yes	Covered in section 4.4 of the current policy.	A template letter is available should a complaint not be accepted so the resident can be advised why this is.
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Yes	Section 4.2 of the policy outlines that all complaints will be considered on their own merits.	Included in policy.

Section 3: Accessibility and Awareness

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
3.1	Landlords must make it easy for residents to complain by providing different channels through which they can make a complaint. Landlords must consider their duties under the Equality Act 2010 and anticipate the needs and reasonable adjustments of residents who may need to access the complaints process.	Yes	Section 1.3 of the current policy outlines our duties under the Equality Act 2010	Residents can complain to us in person, via email, via the resident portal, in writing or via a third party. Links are available on our website to advise how a complaint can be made.
3.2	Residents must be able to raise their complaints in any way and with any member of staff. All staff must be aware of the complaints process and be able to pass details of the complaint to the appropriate person within the landlord.	Yes		All staff are reminded the seriousness of taking and logging complaints via team meetings, 121 meetings and training opportunities.
3.3	High volumes of complaints must not be seen as a negative, as they can be indicative of a well-publicised and accessible complaints process. Low complaint volumes are potentially a sign that residents are unable to complain.	Yes	Opportunity for continuous learning is outlined in section 1.2 of the current policy.	Complaint volumes are regularly monitored at department, executive, and committee level with regular discussions about what complaint volumes teach us.
3.4	Landlords must make their complaint policy available in a clear and accessible format for all residents. This will detail the two stage process, what will happen at each stage, and the	Yes	Complaint-flyer-for-residents.png (1414x2000) (ids.org.uk)	The policy sets out the ways in which a complaint can be made and the process with attached time scales for responses. A flyer is

	timeframes for responding. The policy must also be published on the landlord's website.			distributed at sign up and available on our website. The policy is published on the website and there are multiple routes to the complaints page so it is easily accessible.
3.5	The policy must explain how the landlord will publicise details of the complaints policy, including information about the Ombudsman and this Code.	No		The policy is due for review in September 2024 when this explanation will be included. In practice information about the Ombudsman's service is included in estate based newsletters at least once every 12 months and the policy will formalise this.
3.6	Landlords must 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.	Yes	Section 5.1 of the current policy outlines the recognition of third parties	We will include the ability for 3 rd parties to assist throughout the process when the current policy is next reviewed in September 2024.
3.7	Landlords must provide residents with information on their right to access the Ombudsman service and how the individual can engage with the Ombudsman about their complaint.	Yes		This is available on our website, in the policy, in resident estate based newsletters, complaints leaflet and at each stage of the complaints process.

Section 4: Complaint Handling Staff

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
4.1	Landlords must have a person or team assigned to take responsibility for complaint handling, including liaison with the Ombudsman and ensuring complaints are reported to the governing body (or equivalent). This Code will refer to that person or team as the 'complaints officer'. This role may be in addition to other duties.	Yes		The Head of Housing has this position within IDS.
4.2	The complaints officer must have access to staff at all levels to facilitate the prompt resolution of complaints. They must also have the authority and autonomy to act to resolve disputes promptly and fairly.	Yes		Communication channels are available to all staff members when dealing with a complaint and its investigation. Two weekly meetings are held with all service managers involved in complaint handling empowering staff to resolve complaints.
4.3	Landlords are expected to prioritise complaint handling and a culture of learning from complaints. All relevant staff must be suitably trained in the importance of complaint handling. It is important that complaints are seen as a	Yes		All appropriate staff have sufficient time allowed within their general duties to appropriately deal with complaints. Regular time is

	core service and must be resourced to handle complaints effectively.			set out each week to discuss complaints and keep all on track.
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Section 5: The Complaint Handling Process

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
5.1	Landlords must have a single policy in place for dealing with complaints covered by this Code. Residents must not be treated differently if they complain.	Yes		A single policy is in place
5.2	The early and local resolution of issues between landlords and residents is key to effective complaint handling. It is not appropriate to have extra named stages (such as 'stage 0' or 'informal complaint') as this causes unnecessary confusion.	Yes	Section 6 of the policy.	The policy sets out a two stage process starting at stage 1
5.3	A process with more than two stages is not acceptable under any circumstances as this will make the complaint process unduly long and delay access to the Ombudsman.	Yes	Section 6 of the policy.	The policy sets out a two stage process
5.4	Where a landlord's complaint response is handled by a third party (e.g. a contractor or independent adjudicator)	Yes		The complaints process sets out that all complaints will be handled by an IDS member

	at any stage, it must form part of the two stage complaints process set out in this Code. Residents must not be expected to go through two complaints processes.			of staff.
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Yes		This is not applicable as our policy states all complaints are handled by an IDS member of staff.
5.6	When a complaint is logged at Stage 1 or escalated to Stage 2, landlords must set out their understanding of the complaint and the outcomes the resident is seeking. The Code will refer to this as “the complaint definition”. If any aspect of the complaint is unclear, the resident must be asked for clarification.	Yes		Template letters are provided so that the complaint and outcomes being sought are addressed. Every complainant is contacted by phone or email, whichever their preference, to confirm their complaint details, and desired outcomes, as part of the investigation.
5.7	When a complaint is acknowledged at either stage, landlords must be clear which aspects of the complaint they are, and are not, responsible for and clarify any areas where this is not clear.	Yes		This is included in the complaint template letters.
5.8	At each stage of the complaints process, complaint handlers must: <ul style="list-style-type: none"> a. deal with complaints on their merits, act independently, and have an open mind; 	Yes		This is included in guidance given to staff that deal with complaints.

	<ul style="list-style-type: none"> b. give the resident a fair chance to set out their position; c. take measures to address any actual or perceived conflict of interest; and d. consider all relevant information and evidence carefully. 			
5.9	Where a response to a complaint will fall outside the timescales set out in this Code, the landlord must agree with the resident suitable intervals for keeping them informed about their complaint.	Yes	Section 6.2 of the policy	Where complaints are unable to be completed within the agreed timescale, the resident will be contacted to agree an extension. This has happened when a complaint has been about a member of staff who has been away from work so a full investigation hasn't been able to be carried out before their return to work.
5.10	Landlords must make reasonable adjustments for residents where appropriate under the Equality Act 2010. Landlords must keep a record of any reasonable adjustments agreed, as well as a record of any disabilities a resident has disclosed. Any agreed reasonable adjustments must be kept under active review.	Yes	Section 1.3 of the policy outlines the reasonable adjustments IDS will make in regard of the Equality Act 2010.	Where reasonable adjustments are made, a note is made on the record of complaint.

5.11	Landlords must not refuse to escalate a complaint through all stages of the complaints procedure unless it has valid reasons to do so. Landlords must clearly set out these reasons, and they must comply with the provisions set out in section 2 of this Code.	Yes	This is outlined within section 6.3 of the policy	Template letters are available should this be the case
5.12	A full record must be kept of the complaint, 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 relevant supporting documentation such as reports or surveys.	Yes		Online shared folders are created for each complaint with the original complaint, any linked documents or investigatory documents and the response. The case is also logged on our housing management system.
5.13	Landlords must have processes in place to ensure a complaint can be remedied at any stage of its complaints process. Landlords must ensure appropriate remedies can be provided at any stage of the complaints process without the need for escalation.	Yes		Service managers are empowered to remedy a complaint as quickly as possible. Two weekly meetings are held for consistency and discussion of cases where required. Managers are available for assistance between meetings for guidance on remedies.
5.14	Landlords must have policies and procedures in place for managing unacceptable behaviour from residents and/or their representatives. Landlords	No		A new unacceptable behaviour policy is currently in draft, due to be approved by July 2024.

	must be able to evidence reasons for putting any restrictions in place and must keep restrictions under regular review.			
5.15	Any restrictions placed on contact due to unacceptable behaviour must be proportionate and demonstrate regard for the provisions of the Equality Act 2010.	Yes		As above. In practice, any restrictions will take into account the customers circumstances.

Section 6: Complaints Stages

Stage 1

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
6.1	Landlords must have processes in place to consider which complaints can be responded to as early as possible, and which require further investigation. Landlords must consider factors such as the complexity of the complaint and whether the resident is vulnerable or at risk. Most stage 1 complaints can be resolved promptly, and an explanation, apology or resolution provided to the resident.	Yes		Timescales for complaint handling are set out within the policy. Focus is always on quick resolution wherever possible.
6.2	Complaints must be acknowledged, defined and logged at stage 1 of the complaints procedure <u>within five working days of the complaint being received.</u>	Yes	Section 6.1 of the policy states we will log and acknowledge any complaint within this time scale.	
6.3	Landlords must issue a full response to stage 1 complaints <u>within 10 working days</u> of the complaint being acknowledged.	Yes	Section 6.2 of the policy sets out this timeline for responses to stage 1.	Reminders are triggered to the investigating manager after 5 days and all cases are reviewed at two weekly meetings to ensure timescales are met.
6.4	Landlords must decide whether an extension to this timescale is needed when considering the complexity of the complaint and then inform the resident	Yes	This is outlined within the policy in section 6.2.	

	of the expected timescale for response. Any extension must be no more than 10 working days without good reason, and the reason(s) must be clearly explained to the resident.			
6.5	When an organisation informs a resident about an extension to these timescales, they must be provided with the contact details of the Ombudsman.	Yes	Outlined in section 6.2 of the policy.	The Ombudsman contact details are provided at the point in which an extension is discussed.
6.6	A complaint response must be provided 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 promptly with appropriate updates provided to the resident.	Yes		The complaint is responded to within the time frames and the complaint details are added to our complaints action tracker until satisfactorily resolved.
6.7	Landlords must address all points raised in the complaint definition and provide clear reasons for any decisions, referencing the relevant policy, law and good practice where appropriate.	Yes		Template letters are provided to ensure these points are met for each complaint response to guide the investigating officer.
6.8	Where residents raise additional complaints during the investigation, these must be incorporated into the stage 1 response if they are related and the stage 1 response has not been issued. Where the stage 1 response has been issued, the new issues are unrelated to the issues already being	Yes		This is set out within the guidance to staff.

	investigated or it would unreasonably delay the response, the new issues must be logged as a new complaint.			
6.9	Landlords must confirm the following in writing to the resident at the completion of stage 1 in clear, plain language: <ul style="list-style-type: none"> a. the complaint stage; b. the complaint definition; c. the decision on the complaint; d. the reasons for any decisions made; e. the details of any remedy offered to put things right; f. details of any outstanding actions; and g. details of how to escalate the matter to stage 2 if the individual is not satisfied with the response. 	Yes		This is included in the complaint response template.

Stage 2

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
6.10	If all or part of the complaint is not resolved to the resident's satisfaction at stage 1, it must be progressed to stage 2 of the landlord's procedure. Stage 2 is the landlord's final response.	Yes	Section 6.3 sets out the two stage process	Template letters at stage 1 state the ability to escalate to stage 2 where the customer remains unsatisfied.
6.11	Requests for stage 2 must be acknowledged, defined and logged at stage 2 of the complaints procedure	Yes		This time scale will be reflected in the review of the policy in September 2024 for

	within five working days of the escalation request being received.			clarity, as this is built into our process.
6.12	Residents must not be required to explain their reasons for requesting a stage 2 consideration. Landlords are expected to make reasonable efforts to understand why a resident remains unhappy as part of its stage 2 response.	Yes		When a complaint is escalated to stage 2, the investigating officer will make every effort to speak to the resident to fully understand the dissatisfaction.
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Yes		It is set out in the policy that stage 1 is investigated by a service manager and stage 2 is investigated by a member of the Corporate Management Team.
6.14	Landlords must issue a final response to the stage 2 within 20 working days of the complaint being acknowledged.	Yes	Set out in section 6.3 of the policy.	
6.15	Landlords must decide whether an extension to this timescale is needed when considering the complexity of the complaint and then inform the resident of the expected timescale for response. Any extension must be no more than 20 working days without good reason, and the reason(s) must be clearly explained to the resident.	Yes		This has not been applicable within the last 12 months but is set out in section 6.3 of the policy should it be required.
6.16	When an organisation informs a resident about an extension to these timescales, they must be provided with the contact details of the Ombudsman.	Yes		This is included in the letter templates.

6.17	A complaint response must be provided 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 promptly with appropriate updates provided to the resident.	Yes		This is part of our procedure and a separate tracking document is in place to monitor actions that remain outstanding after a response is provided.
6.18	Landlords must address all points raised in the complaint definition and provide clear reasons for any decisions, referencing the relevant policy, law and good practice where appropriate.	Yes		This is set out within the policy and letter template.
6.19	Landlords must confirm the following in writing to the resident at the completion of stage 2 in clear, plain language: a. the complaint stage; b. the complaint definition; c. the decision on the complaint; d. the reasons for any decisions made; e. the details of any remedy offered to put things right; f. details of any outstanding actions; and g. details of how to escalate the matter to the Ombudsman Service if the individual remains dissatisfied.	Yes		This is set out in the letter templates.

6.20	Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.	Yes	This is outlined in section 6.3 of the policy.	This is coordinated by a senior manager with access to all relevant staff.
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Section 7: Putting things right

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
7.1	<p>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. These can include:</p> <ul style="list-style-type: none"> • Apologising; • Acknowledging where things have gone wrong; • Providing an explanation, assistance or reasons; • Taking action if there has been delay; • Reconsidering or changing a decision; • Amending a record or adding a correction or addendum; • Providing a financial remedy; • Changing policies, procedures or practices. 	Yes		<p>This is in place with appropriate guidance provided to staff dealing with complaints. All resident facing housing staff have completed the Ombudsman's Dispute Resolution training within the last 12 months.</p>
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Yes		This is reflected within the compensation policy.

7.3	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		This is included in letter templates.
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes		Ombudsman guidance notes are kept under regular review and reported to our board.

Section 8: Self-assessment, reporting and compliance

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
8.1	<p>Landlords must produce an annual complaints performance and service improvement report for scrutiny and challenge, which must include:</p> <ul style="list-style-type: none"> a. the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements. b. a qualitative and quantitative analysis of the landlord's complaint handling performance. This must also include a summary of the types of complaints the landlord has refused to accept; c. any findings of non-compliance with this Code by the Ombudsman; d. the service improvements made as a result of the learning from complaints; e. any annual report about the landlord's performance from the Ombudsman; and f. any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord. 	Yes		<p>Quarterly complaints reports are written and scrutinised by the Operations Committee, which also sees the annual complaints performance and service improvement report.</p>

8.2	The annual complaints performance and service improvement report must be reported to the landlord's governing body (or equivalent) and published on the on the section of its website relating to complaints. The governing body's response to the report must be published alongside this.	Yes		This is reported to our Operations Committee, the IDS board then have oversight of this via the minutes from the meeting. The complaints review and Operations Committee response is published on our website.
8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	Yes		This has not yet been applicable outside of the usual annual review. If this was to take place then a review would be completed.
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	Yes		This has not yet been applicable but would be complied with if it happened.
8.5	If a landlord is unable to comply with the Code due to exceptional circumstances, such as a cyber incident, they must inform the Ombudsman, provide information to residents who may be affected, and publish this on their website Landlords must provide a timescale for returning to compliance with the Code.	Yes		This has not yet been applicable but would be complied with if it happened.

Section 9: Scrutiny & oversight: continuous learning and improvement

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
9.1	Landlords must look beyond the circumstances of the individual complaint and consider whether service improvements can be made as a result of any learning from the complaint.	Yes		Every complaint is considered for learning opportunities, and themes across complaints also considered
9.2	A positive complaint handling culture is integral to the effectiveness with which landlords resolve disputes. Landlords must use complaints as a source of intelligence to identify issues and introduce positive changes in service delivery.	Yes		All resident facing staff are reminded of the importance of complaint handling and why it is important.
9.3	Accountability and transparency are also integral to a positive complaint handling culture. Landlords must report back on wider learning and improvements from complaints to stakeholders, such as residents' panels, staff and relevant committees.	Yes		Operations Committee receive a quarterly report and complaints are reviewed at the monthly management team meetings.
9.4	Landlords must appoint a suitably senior lead person as accountable for their complaint handling. This person must assess any themes or trends to identify potential systemic issues, serious risks, or policies and procedures that require revision.	Yes		Head of Housing holds this position

9.5	In addition to this a member of the governing body (or equivalent) must be appointed to have lead responsibility for complaints to support a positive complaint handling culture. This person is referred to as the Member Responsible for Complaints ('the MRC').	Yes		Chair of the Operations Committee holds this position.
9.6	The MRC will be responsible for ensuring the governing body receives regular information on complaints that provides insight on the landlord's complaint handling performance. This person must have access to suitable information and staff to perform this role and report on their findings.	Yes		Quarterly reports are provided and ad hoc meetings as required can be called by the MRC.
9.7	As a minimum, the MRC and the governing body (or equivalent) must receive: a. regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance; b. regular reviews of issues and trends arising from complaint handling; c. regular updates on the outcomes of the Ombudsman's investigations and progress made in complying with orders related to severe maladministration findings; and d. annual complaints performance and service improvement report.	Yes		All details provided in the quarterly complaints reports presented to the Operations Committee

9.8	Landlords must have a standard objective in relation to complaint handling for all relevant employees or third parties that reflects the need to: a. have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments; b. take collective responsibility for any shortfalls identified through complaints, rather than blaming others; and c. act within the professional standards for engaging with complaints as set by any relevant professional body.	Yes		This is included in our regular reporting framework.
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