Populo Homes Self-Assessment Form April 2023

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

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

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

# Section 1 - Definition of a complaint

## Mandatory ‘must’ requirements

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| **Code section** | **Code requirement** | **Comply:**  **Yes/No** | **Evidence, commentary and any explanations** |
| **1.2** | A complaint must be defined as:  ‘*an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the organisation, its own staff, or those acting on its behalf, affecting an individual resident or group of residents*. | Yes | Populo Homes has a complaints policy fully in line with the HOS complaint Handling Code and which defines complaints for residents and staff. |
| **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 | See above, complaints are also picked up through various sources, logged and treated in line with Policy. |
| **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 | This is in line with policy. |
| **1.7** | A landlord must accept a complaint unless there is a valid reason not to do so. | Yes | This is in line with Policy and there are no examples of complaints being refused. |
| **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 | This is outlined in the complaints Policy and is in line with the HOS complaint handling code. |
| **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 | This is within our Policy. |

## Best practice ‘should’ requirements

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| **Code section** | **Code requirement** | **Comply:**  **Yes/No** | **Evidence, commentary and any explanations** |
| **1.4** | Landlords should recognise the difference between a **service request**, where a resident may be unhappy with a **situation** that they wish to have rectified, and a **complaint** about the **service** they have/have not received. | Yes | Dealt with in Policy and in addition all staff have undertaken the HOS online complaint handling course. Additional in depth training is being organised for 23/24, |
| **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. | No | We are introducing TSM surveys and transactional surveys, where a resident has provided feedback we will follow up with details of our complaints process and how to go about raising a complaint. |

# Section 2 - Accessibility and awareness

## Mandatory ‘must’ requirements

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| **Code section** | **Code requirement** | **Comply:**  **Yes/No** | **Evidence, commentary and any explanations** |
| **2.1** | Landlords must make it easy for residents to complain by providing different channels through which residents can make a complaint such as in person, over the telephone, in writing, by email and digitally. While the Ombudsman recognises that it may not be feasible for a landlord to use all of the potential channels, there must be more than one route of access into the complaints system. | Yes | Complaints can be made in a number of ways:  • By phone through our customer service team on  • By email to  • Completing the complaints form on-line at  • Via social media – POPULO Facebook and Twitter  • In writing to Customer Services,  • Directly to any of our colleagues in person  • Via a representative or advocate (we must have written permission from the customer) |
| **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 complaints Policy is available on our website and provided to residents on request. In future we will provide our complaints policy as part of our tenants moving in pack. |
| **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 | This is clearly signposted on our website |
| **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 | Chapter in the policy titled “Equality and Diversity” details how we’ll ensure residents are not disadvantaged and that reasonable adjustments will be made |
| **2.6** | Landlords must publicise the complaints policy and process, the Complaint Handling Code and the Housing Ombudsman Scheme in leaflets, posters, newsletters, online and as part of regular correspondence with residents. | Yes | We Publicise our complaints via our website and are developing other channels such as leaflets annually. |
| **2.7** | Landlords must provide residents with contact information for the Ombudsman as part of its regular correspondence with residents. | Yes | Our complaints correspondence and Policy signposts residents to the HOS. |
| **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 | At each stage of the complaint correspondence signposts residents to the HOS. |

## Best practice ‘should’ requirements

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| **Code section** | **Code requirement** | **Comply:**  **Yes/No** | **Evidence, commentary and any explanations** |
| **2.2** | Where a landlord has set up channels to communicate with its residents via social media, then it should expect to receive complaints via those channels. Policies should contain details of the steps that will be taken when a complaint is received via social media and how confidentiality and privacy will be maintained. | Yes | Policy Updated PH should not disclose any information relating to that complaint in the public forum and where anonymous appropriate contact channels are provided in the response. |

# Section 3 - Complaint handling personnel

## Mandatory ‘must’ requirements

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| **Code section** | **Code requirement** | **Comply:**  **Yes/No** | **Evidence, commentary and any explanations** |
| **3.1** | Landlords must have a person or team assigned to take responsibility for complaint handling to ensure complaints receive the necessary attention, and that these are reported to the governing body. This Code will refer to that person or team as the “complaints officer”. | Yes | Whilst Populo does not employ a dedicated complaints officer, for the purposes of the code the Customer service Manager oversee’s and monitors the handling of complaints. |
| **3.2** | …the complaint handler appointed must have appropriate complaint handling skills and no conflicts of interest. | Yes | The officer designated has received appropriate training and support. |

## Best practice ‘should’ requirements

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| **Code section** | **Code requirement** | **Comply:**  **Yes/No** | **Evidence, commentary and any explanations** |
| **3.3** | Complaint handlers should:   * be able to act sensitively and fairly * be trained to handle complaints and deal with distressed and upset residents * have access to staff at all levels to facilitate quick resolution of complaints * have the authority and autonomy to act to resolve disputes quickly and fairly. | Yes | All staff who handle complaints have undertaken training on the complaint handling code and how to deal with residents in difficult circumstance with empathy and professionalism. |

# Section 4 - Complaint handling principles

**Mandatory ‘must’ requirements**

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| **Code section** | **Code requirement** | **Comply:**  **Yes/No** | **Evidence, commentary and any explanations** |
| **4.1** | Any decision to try and resolve a concern must be taken in agreement with the resident and a landlord’s audit trail/records should be able to demonstrate this. Landlords must ensure that efforts to resolve a resident’s concerns do not obstruct access to the complaints procedure or result in any unreasonable delay. It is not appropriate to have extra named stages (such as ‘stage 0’ or ‘pre-complaint stage’) as this causes unnecessary confusion for residents. When a complaint is made, it must be acknowledged and logged at stage one of the complaints procedure **within five days of receipt**. | Yes | This is dealt with in our complaints Policy |
| **4.2** | Within the complaint acknowledgement, landlords must set out their understanding of the complaint and the outcomes the resident is seeking. If any aspect of the complaint is unclear, the resident must be asked for clarification and the full definition agreed between both parties. | Yes | As outlined in our complaints policy |
| **4.6** | A complaint investigation must be conducted in an impartial manner. | Yes | As outlined in our complaints policy |
| **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 | As outlined in our complaints policy |
| **4.11** | Landlords must adhere to any reasonable arrangements agreed with residents in terms of frequency and method of communication | Yes | As outlined in our complaints policy |
| **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 outlined in our complaints policy |
| **4.13** | A landlord must include in its complaints policy its timescales for a resident to request escalation of a complaint | Yes | As outlined in our complaints policy |
| **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 | As outlined in our complaints policy |
| **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 correspondence is logged in a database which is updated to reflect the dates/ stages and resolution offered. In addition all contact/ correspondence is uploaded to our in house Management system Yardi |
| **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 | We have a violence and aggression Policy in Place |

## Best practice ‘should’ requirements

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| **Code section** | **Code requirement** | **Comply:**  **Yes/No** | **Evidence, commentary and any explanations** |
| **4.3** | Landlords should manage residents’ expectations from the outset, being clear where a desired outcome is unreasonable or unrealistic | Yes | Covered in HOS training and Guidance |
| **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 | This is in line with Complaints Policy |
| **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 | This is in Line with Complaints Policy |
| **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 | This would be done in any relevant cases with staff currently supported by our legal advisors and via training in future. |
| **4.9** | Communication with the resident should not generally identify individual members of staff or contractors. | Yes | Where a member of staff is identified in name all responses will refer to them as ‘the staff member’ |
| **4.10** | Landlords should keep residents regularly updated about the progress of the investigation. | Yes | This is in line with Complaints Policy |
| **4.16** | Landlords should seek feedback from residents in relation to the landlord’s complaint handling as part of the drive to encourage a positive complaint and learning culture. | Yes | Feedback is requested following complaint closure. |
| **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 | Senior managers review complaints to understand trends and them This is in line with Complaints Policy es and learning, this will be strengthened in 2023 with a Complaint Monitoring and Learning Group. |
| **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 | Contained withing Dealing with Violence and aggression at work Policy. |

# Section 5 - Complaint stages

## Mandatory ‘must’ requirements

## Stage 1

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| **Code section** | **Code requirement** | **Comply:**  **Yes/No** | **Evidence, commentary and any explanations** |
| **5.1** | Landlords must respond to the complaint **within 10 working days** of the complaint being logged. Exceptionally, landlords may provide an explanation to the resident containing a clear timeframe for when the response will be received. This should not exceed a further 10 days without good reason. | Yes | policy states 10 working days |
| **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 | This is covered in the Policy and in Guidance |
| **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 | Included within training and guidance. |
| **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 | Included within training and guidance. Response letters reviewed by managers and new templates are being introduced to further strengthen this area. |

## Stage 2

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| **Code section** | **Code requirement** | **Comply:**  **Yes/No** | **Evidence, commentary and any explanations** |
| **5.9** | If all or part of the complaint is not resolved to the resident’s satisfaction at stage one it must be progressed to stage two of the landlord’s procedure, unless an exclusion ground now applies. In instances where a landlord declines to escalate a complaint it must clearly communicate in writing its reasons for not escalating as well as the resident’s right to approach the Ombudsman about its decision. | Yes | Complaint Policy |
| **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 | Outlined in Training and guidance |
| **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 complaints Policy |
| **5.12** | The person considering the complaint at stage two, must not be the same person that considered the complaint at stage one. | Yes | This is outlined in Complaints Policy |
| **5.13** | Landlords must respond to the stage two complaint **within 20 working days** of the complaint being escalated. Exceptionally, landlords may provide an explanation to the resident containing a clear timeframe for when the response will be received. This should not exceed a further 10 days without good reason. | Yes | This is outlined in Complaints Policy |
| **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 | This is outlined in Complaints Policy |

## Stage 3

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| **Code section** | **Code requirement** | **Comply:**  **Yes/No** | **Evidence, commentary and any explanations** |
| **5.17** | Two stage landlord complaint procedures are ideal. This ensures that the complaint process is not unduly long. If landlords strongly believe a third stage is necessary, they must set out their reasons for this as part of their self-assessment. A process with more than three stages is not acceptable under any circumstances. | Yes | Complaints Policy is 2 stage but offer residents the assurance of a further review by executives however this does not impeded the residents option to escalate to the Ombudsman and residents are advised of this. |
| **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 | N/A |

## Best practice ‘should’ requirements

## Stage 1

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| **Code section** | **Code requirement** | **Comply:**  **Yes/No** | **Evidence, commentary and any explanations** |
| **5.2** | If an extension beyond 20 working days is required to enable the landlord to respond to the complaint fully, this should be agreed by both parties. | Yes | Policy Updated to read” Should PH require an extension longer than 10 working days at Stage 1, this can be extended by an additional 10 working days, however a written explanation to the resident must be sent. Should a longer extension be required this would have to be in agreement with both parties.” |
| **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 | Updated policy with “Where agreement over an extension period cannot be reached, PFH 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. |
| **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 | Monitored by senior management and in 2023 to be monitored by Complaints Monitoring and Learning group |
| **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 | This is contained within Training and guidance |

## Stage 2

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| **Code section** | **Code requirement** | **Comply:**  **Yes/No** | **Evidence, commentary and any explanations** |
| **5.14** | If an extension beyond 10 working days is required to enable the landlord to respond to the complaint fully, this should be agreed by both parties. | Yes | Policy update ; Should PH require an extension longer than 20 working days at Stage 2, this can be extended by an additional 10 working days, however a written explanation to the resident must be sent. Should a longer extension be required this would have to be in agreement with both parties. Where agreement over an extension period cannot be reached, PFH 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. |
| **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 | Updated policy with “Where agreement over an extension period cannot be reached, PFH 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. |

## Stage 3

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| **Code section** | **Code requirement** | **Comply:**  **Yes/No** | **Evidence, commentary and any explanations** |
| **5.18** | Complaints should only go to a third stage if the resident has actively requested a third stage review of their complaint. Where a third stage is in place and has been requested, landlords must respond to the stage three complaint **within 20 working days** of the complaint being escalated. Additional time will only be justified if related to convening a panel. An explanation and a date for when the stage three response will be received should be provided to the resident. | N/A | We have a 2 stage complaints 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 | No stage 3 |

# Section 6 - Putting things right

## Mandatory ‘must’ requirements

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| **Code section** | **Code requirement** | **Comply:**  **Yes/No** | **Evidence, commentary and any explanations** |
| **6.1** | Effective dispute resolution requires a process designed to resolve complaints. Where something has gone wrong a landlord must acknowledge this and set out the actions it has already taken, or intends to take, to put things right. | Yes | Response letters checked by managers to ensure they are reflective of this. |
| **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 | All complaints reviewed against policy and also in line with code, also through guidance to teams around managing expectations. |
| **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 | Response letters outline agreed actions, next steps and timescales. |
| **6.6** | In awarding compensation, a landlord must consider whether any statutory payments are due, if any quantifiable losses have been incurred, the time and trouble a resident has been put to as well as any distress and inconvenience caused. | Yes | Compensation is outlined within our Policy. |

## Best practice ‘should’ requirements

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| **Code section** | **Code requirement** | **Comply:**  **Yes/No** | **Evidence, commentary and any explanations** |
| **6.3** | Landlords should look beyond the circumstances of the individual complaint and consider whether anything needs to be ‘put right’ in terms of process or systems to the benefit of all residents. | Yes | Contained within our policy |
| **6.7** | In some cases, a resident may have a legal entitlement to redress. The landlord should still offer a resolution where possible, obtaining legal advice as to how any offer of resolution should be worded. | Yes | Reviewed case by case and following HOS guidance on suitable financial redress. |

# Section 7 - Continuous learning and improvement

**Mandatory ‘must’ requirements**

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| **Code section** | **Code requirement** | **Comply:**  **Yes/No** | **Evidence, commentary and any explanations** |
| **7.2** | Accountability and transparency are integral to a positive complaint handling culture. Landlords must report back on wider learning and improvements from complaints in their annual report and more frequently to their residents, staff and scrutiny panels. | No | Due to limited stock size and low complaints this was not completed prior but is now in place for 2023. |

**Best practice ‘should’ requirements**

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| **Code section** | **Code requirement** | **Comply:**  **Yes/No** | **Evidence, commentary and any explanations** |
| **7.3** | A member of the governing body should be appointed to have lead responsibility for complaints to support a positive complaint handling culture. This role will be responsible for ensuring the governing body receives regular information on complaints that provides insight to the governing body on the landlord’s complaint handling performance. | No | We have not as yet appointed a Board member but are developing this alongside a resident group. |
| **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 | Reported annually but more regular KPI’s to be reported during 2023 as our stock has grown. |
| **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 | Regular Senior management reviews are undertaken but to be replaced by monthly CMLG. |
| **7.6** | Landlords should have a standard objective in relation to complaint handling for all employees that reflects the need to:   * have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments * take collective responsibility for any shortfalls identified through complaints rather than blaming others * act within the Professional Standards for engaging with complaints as set by the Chartered Institute of Housing. | Yes | Outlined within our complaints Policy |

# Section 8 - Self-assessment and compliance

## Mandatory ‘must’ requirements

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| **Code section** | **Code requirement** | **Comply:**  **Yes/No** | **Evidence, commentary and any explanations** |
| **8.1** | Landlords must carry out an annual self-assessment against the Code to ensure their complaint handling remains in line with its requirements. | No | 21/22 completed but not Published 22/23 to be published and subsequent years to be published on our website |
| **8.2** | Landlords must also carry out a self-assessment following a significant restructure and/or change in procedures. | Yes | N/A at present |
| **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 | 22/23 to be reported to PH board and included in annual complaints performance report. |