Tring Charities – Self-Assessment Form

Compliance with the Housing Ombudsman Code for Complaint Handling

Housing Ombudsman Service notes:

This self-assessment form should be completed by the complaints officer and discussed with the Trustee 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.

(N.B. To assist Trustees, questions have been in the "evidence, commentary and any explanations" but these should be replaced by answers from the Trustees themselves.)

Section 1 - Definition of a complaint

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
1.1	A complaint must be defined as:		Complaints Policy and Procedure Point 1.2
	'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	
1.2	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 Charity's complaints policy.	Yes	Complaints Policy and Procedure Point 1.3
1.3	if further enquiries are needed to resolve the matter, or if the resident requests it, the issue must be logged as a complaint.	Yes	Complaints Policy and Procedure Point 1.5

1.4	A landlord must accept a complaint unless there is a valid	Yes	Complaints Policy and Procedure
	reason not to do so.		Point 2.1
1.5	A complaints policy must clearly set out the circumstances in		Complaints Policy and Procedure
	which a matter will not be considered, and these	Yes	Point 2.2
	circumstances should be fair and reasonable to residents.		
1.6	If a landlord decides not to accept a complaint, a detailed		Complaints Policy and Procedure
	explanation must be provided to the resident setting out the	Yes	Point 2.4
	reasons why the matter is not suitable for the complaints		
	process and the right to take that decision to the		
	Ombudsman.		

Section 2 - Definition of a service request

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
2.1	A service request must be defined as: 'a requirement to put something right (e.g., to carry out routine maintenance etc.')	Yes	Complaints Policy and Procedure Point 1.4
2.2	Landlords must recognise the difference between a service request and a complaint . This must be set out in their complaints policy. Service requests are not complaints, but must be recorded, monitored and reviewed regularly.	Yes	Complaints Policy and Procedure Point 1.2 & 1.3
2.3	if further enquiries are needed to resolve the matter, or if the resident requests it, the issue must be logged as a complaint.	Yes	Complaints Policy and Procedure Point 1.5

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
2.4	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	Complaints Policy and Procedure Point 1.5
2.5	Survey feedback may not necessarily need to be treated as a complaint, though, where possible, the person completing the survey should be made aware of how they can pursue their dissatisfaction as a complaint if they wish to.	Yes	Complaints Policy and Procedure Point 1.6 NB: As an almshouse charity we do not have tenants. Our residents are legal beneficiaries appointed under licence to occupy the accommodation. As such, surveys for the Tenant Satisfaction Measures Standard do not apply.

Section 3 - Accessibility and awareness

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
3.1	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 Policy and Procedure Point 5.1

3.2	Landlords must make their complaint policy available in a clear and accessible format for all residents. This will detail the number of stages involved, what will happen at each stage and the timeframes for responding.	Yes	Complaints Policy and Procedure Point 3.4 Summarised in the Handbook, Policy available online, given to all new residents and explained by Secretary. Trustee visits carried out every six months.
3.3	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	Yes, policy on the website
3.4	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	Complaints Policy and Procedure Point 3.1, 3.2
3.5	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	On website, summarised in Handbook, new version sent out to residents October 24
3.6	Landlords must provide residents with contact information for the Ombudsman as part of its regular correspondence with residents.	Yes	On website and details in Resident Handbook
3.7	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.		Complaints Policy and Procedure Point 1.1, 2.4, 2.5c, 5.4,6.5.6.6g,10

Code section	Code requirement	Comply:	Evidence, commentary and any explanations
		Yes/No	
3.8	Where a landlord has set up channels to communicate with	N/A	
	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.		

Section 4 - Complaint handling

Section 4.1 - Complaint handling personnel

Code section	Code requirement	Comply:	Evidence, commentary and any explanations
		Yes/No	
4.11	Landlords must have a person or team assigned to take	Yes	Complaints Policy and Procedure
	responsibility for complaint handling to ensure complaints		Point 4
	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".		
4.12	the complaint handler appointed must have appropriate	Yes	Complaints Policy and Procedure
i	complaint handling skills and no conflicts of interest.		Point 4

Code section	Code requirement	Comply:	Evidence, commentary and any explanations
		Yes/No	
	Complaint handlers should:		Complaints Policy and Procedure
	 be able to act sensitively and fairly be trained to handle complaints and deal with 		Point 5.5, 5.6, 5.7, 5.8
4.13	 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	Complaints Officer and Trustees to access workshops and/or Elearning run by the Almshouse Association and Housing Ombudsman Service?

Section 4.2 - Complaint handling principles

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
4.21	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	Yes	Complaints Policy and Procedure Point 5

	stage one of the complaints procedure within 20 days of receipt.		
4.22	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	Complaints Policy and Procedure Point 5.3
4.23	A complaint investigation must be conducted in an impartial manner.	Yes	Complaints Policy and Procedure Point 5.5
4.24	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	Complaints Policy and Procedure Point 4, 4.3
4.25	Landlords must adhere to any reasonable arrangements agreed with residents in terms of frequency and method of communication	Yes	Complaints Policy and Procedure Point 3.2
4.26	 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 Policy and Procedure Point 5.5
4.27	A landlord must include in its complaints policy its timescales for a resident to request escalation of a complaint.	Yes	Complaints Policy and Procedure Point 6
4.28	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	Yes	Complaints Policy and Procedure Point 2.4, 2.5

	be clearly set out in a landlord's complaints policy and must be the same as the reasons for not accepting a complaint.		
4.29	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	Complaints Policy and Procedure Point 5.3
4.30	Landlords must have policies and procedures in place for managing unacceptable behaviour from residents and/or their representatives when pursuing a complaint.	Yes	Complaints Policy and Procedure Point 2.5 Residents' Handbook 4.15 - Anti-Social Behaviour.

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
4.31	Landlords should manage residents' expectations from the outset, being clear where a desired outcome is unreasonable or unrealistic	Yes	Complaints Policy and Procedure Point 5.3
4.32	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	Complaints Policy and Procedure Point 5.4
4.33	Landlords should give residents the opportunity to have a representative deal with their complaint on their behalf, and to be represented or accompanied at any meeting with the landlord where this is reasonable.	Yes	Complaints Policy and Procedure Point 1.3
4.34	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	Complaints Policy and Procedure Point 5.8. Residents Handbook The Almshouse Association The Standards of Almshouse Management

			Legal Advice
4.35	Communication with the resident should not generally identify individual members of staff or contractors.	Yes	Complaints Policy and Procedure Point 5.7
4.36	Landlords should keep residents regularly updated about the progress of the investigation.	Yes	Complaints Policy and Procedure Point 5.4
4.37	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	Questions and feedback invited from residents.
4.38	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	Complaints Policy and Procedure Point 5.5. Follow up from the Trustees
4.39	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	Complaints Policy and Procedure Point 3.1, 3.2

Section 5 - Complaint stages

Mandatory 'must' requirements

Stage 1

Code section	Code requirement	Comply:	Evidence, commentary and any
		Yes/No	explanations
5.1	Landlords must respond to the complaint within 20 working days of		Complaints Policy and Procedure
	the complaint being logged. Exceptionally, landlords may provide an		Point 5.3
	explanation to the resident containing a clear timeframe for when the	Yes	
	response will be received. This should not exceed a further 10 days		
	without good reason.		

5.2	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	Complaints Policy and Procedure Point 5.3d, 5.4
5.3	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. 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	Complaints Policy and Procedure Point 5.5, 5.7, 5.8, 5.12

Stage 2

Code section	Code requirement	Comply:	Evidence, commentary and any
		Yes/No	explanations
5.4	If all or part of the complaint is not resolved to the resident's satisfaction at stage one it must be progressed to stage two of the landlord's procedure, unless an exclusion ground now applies. In instances where a landlord declines to escalate a complaint it must clearly communicate in writing its reasons for not escalating as well as the resident's right to approach the Ombudsman about its decision.	Yes	Complaints Policy and Procedure Point 6.1, 6.6g

5.5	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	Complaints Policy and Procedure Point 6.2, 6.3, 6.4, 6.5
5.6	Landlords must only escalate a complaint to stage two once it has completed stage one and at the request of the resident.	Yes	Complaints Policy and Procedure Point 6.1
5.7	The person considering the complaint at stage two, must not be the same person that considered the complaint at stage one.	Yes	Complaints Policy and Procedure Point 4.2
5.8	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 20 days without good reason.	Yes	Complaints Policy and Procedure Point 6.2,6.3,6.5
5.9	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	Complaints Policy and Procedure Point 6.6 Tring Charities uses a 2 stage process – As recommended by The Almshouse Association.

Stage 3

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
5.10	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	Tring Charities uses a 2 stage process – As recommended by The Almshouse Association.

Stage 1

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
5.11	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	Complaints Policy and Procedure Point 6.5
5.12	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	Complaints Policy and Procedure Point 6.6g.
5.13	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	Complaints Policy and Procedure Point 5.7b
5.14	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	Complaints Policy and Procedure Point 5.11

Stage 2

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
5.15	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	Complaints Policy and Procedure Point 5.4
5.16	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	Complaints Policy and Procedure Point 5.4

Section 6 - Putting things right

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	Complaints Policy and Procedure Point 7
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	Complaints Policy and Procedure Point 7.2
6.3	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	Complaints Policy and Procedure Point 7.3

6.4	In awarding compensation, a landlord must consider whether any	Yes	We follow good practice for almshouses in
	statutory payments are due, if any quantifiable losses have been		determining and awarding any financial
	incurred, the time and trouble a resident has been put to as well as		compensation.
	any distress and inconvenience caused.		

Code section	Code requirement	Comply:	Evidence, commentary and any
		Yes/No	explanations
6.5	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	Learning outcomes will be considered and actioned by our Board of Trustees.
6.6	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	We would access legal advice if required to meet our legal obligations. We follow guidance offered by the Almshouse Association.

Section 7 - Continuous learning and improvement

Mandatory 'must' requirements

Code section	Code requirement	Comply:	Evidence, commentary and any
		Yes/No	explanations
7.1	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.	N/A	We are focused on being accountable and transparent in our Trustees' reporting, but almshouses are not required to produce an annual report for residents as social housing landlords are with tenants.

Best practice 'should' requirements

Code section	Code requirement	Comply:	Evidence, commentary and any
		Yes/No	explanations

7.2	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 secretary reports any complaints in the first instance to the Trustee that supports the resident, and if unresolved, to the Board of Trustees.
7.3	 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	Any complaints received are reported to the Trustees as they happen, and formally at the Trustee Meeting. In addition, the Annual Performance Report is presented to the Trustees. The annual Self Assessment will be carried out.
7.4	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	Is done following the Annual Performance Report and as part of the Trustees' response.
7.5	 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. 	N/A	As a small almshouse charity, we do not have teams or departments and are not members of the Chartered Institute of Housing. We align to the Almshouse Association's Standards of Almshouse Management which is evidenced in a collaborative and supportive relationship between your volunteer trustees and members of staff.

Section 8 - Self-assessment and compliance

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	This self-assessment will be provided to the Housing Ombudsman as part of our Annual Submission each year.
8.2	Landlords must also carry out a self-assessment following a significant restructure and/or change in procedures.	Yes	Acknowledged
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	The Annual Performance Report will be presented to the Trustees on an Annual basis and will clearly show any self assessment and outcomes. This will also be published on our website.
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	Noted	We acknowledge and understand the requirement of this provision
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.	Noted	We acknowledge and understand the requirement of this provision

Section 9: Scrutiny & oversight: continuous learning and improvement

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
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	Annual complaint's performance and service improvement report. Learning outcomes will be considered and actioned by our Board of Trustees.
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	Annual complaint's performance and service improvement report. Learning outcomes will be considered and actioned by our Board of Trustees.
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	Residents' Notes, Trustee/Resident Visits, Staff Interaction. Learning outcomes will be considered and actioned by our Board of Trustees.
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	Complaint Policy Section 9
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	Complaint Policy Section 9
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	A brief complaints update will be presented to the Trustees at each Trustee meeting. Trustees visit residents twice a year, any issues are reported at the Trustee meeting. Any other issues are discussed with visiting Trustees as they arise.

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	Standing Item at the Trustee Meeting
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	Regular visits from Trustees to each resident. Residents' welfare, property issues and complaints and service requests are a standing agenda item at trustee meetings.

Self-assessment completed by Board of Trustees at Tring Charities

DATE: