

Appendix A: Self-assessment form

This self-assessment form should be completed by the complaints officer and it must be reviewed and approved by the landlord's governing body at least annually.

Once approved, landlords must publish the self-assessment as part of the annual complaints performance and service improvement report on their website. The governing body's response to the report must be published alongside this.

Landlords are required to complete the self-assessment in full and support all statements with evidence, with additional commentary as necessary.

We recognise that there may be a small number of circumstances where landlords are unable to meet the requirements, for example, if they do not have a website. In these circumstances, we expect landlords to deliver the intentions of the Code in an alternative way, for example by publishing information in a public area so that it is easily accessible.

Section 1: Definition of a complaint

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	We enclose our current complaints procedure which includes HOS definition. Section 2.	New complaints policy will be in place by April 2026. Procedure will be going through process to change from procedure to 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	We enclose our current complaints procedure which includes HOS definition. We do not have examples for HOS related complaints as we have not received any. However, as we adopt this approach with corporate complaints we could provide examples of this if required.	Zero housing landlord complaints received thus far. However, as part of our corporate complaints procedure we adopt this approach
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	Yes	We enclose our current complaints procedure which includes HOS guidance. The Housing service manager/s review and monitor service requests. Section 4 of procedure.	Under corporate complaints we currently keep a log of any complaints that are ‘rejected’ that may be treated as a service request. This would incorporate housing

	are not complaints, but must be recorded, monitored and reviewed regularly.			landlord complaints. Landlord service requests are recorded against each tenancy.
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	We enclose our current complaints procedure which includes HOS definition. Section 4.	
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	The customer team offer a survey for each caller/webchat that comes into the Council. Any feedback for housing would be relayed to the Housing Team. Feedback can be provided via this link Corporate Feedback - Breckland Council	

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	We have a spreadsheet logging rejected corporate complaints with reasoning. No housing Landlord complaints received. Section 4 of procedure and draft policy.	We do this and keep a log of any complaints that we decide not to proceed with. we communicate with the complainant advising the reason why/signpost as appropriate.
2.2	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: • 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.	Yes	See points 4 and 9 in procedure and draft policy.	

	• Matters that have previously been considered under the complaints policy.			
2.3	Landlords must accept complaints referred to them within 12 months of the 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.	Yes	In both current procedure and new draft policy	
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	In both current procedure and new draft policy (section 4).	We do this and keep a log of any complaints that we decide not to proceed with. An email is sent to the complainant advising the reason why/signpost as appropriate
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Yes	Each complaint is considered each time we receive a complaint. We do this currently with corporate complaints and will do so when a Housing landlord complaint is received.	

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	Included in procedure and in new draft policy. Online By phone: By email In person at any council office By post:	
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	As part of the induction covered by Legal Services Manager	
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	Complaint volumes are relative to our housing stock, and number of residents. The online form is accessible via our website however we accept complaints via other channels such as letter/phone/email.	

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 timeframes for responding. The policy must also be published on the landlord's website.	Yes	See link How will the council deal with my complaint? - Breckland Council Our digital team design our website and online forms to remain compliant with accessibility standards. When the new policy is agreed it will be available on our website. The new policy will be available in different formats/languages upon request. Section 15 of procedure.	
3.5	The policy must explain how the landlord will publicise details of the complaints policy, including information about the Ombudsman and this Code.	Yes	This is in progress and will be included in the new policy. Via our website.	Will be in new draft policy
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	This will be explicit in the new policy. As our current 17 tenants are Afghans or Ukrainians we work closely with those who are supporting them. None of these meetings have been in relation to complaints so far.	
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	See point 13 in procedure and new draft policy. This is included in any complaint responses that we send.	

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	Point 6 of procedure and draft policy.	Governance Information Officer is the assigned person.
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	Governance Information Officer facilitates liaising with the appropriate managers/officers/ to get resolution response in place	Governance Information Officer facilitates liaising with the appropriate managers/officers/ to get resolution response in place
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 core service and must be resourced to handle complaints effectively	Yes	Governance Information Officer dedicated role is Complaints and Freedom of information/data protection managed by the Legal Services Manager – who plays an active role in complaint handling and reports/complaints analysis to the Senior	

			Leadership Team. Team managers and team leaders are supported by the complaints team throughout the process.	
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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	Due to the small number of tenants (17) we have decided not to have a separate policy at this moment. New draft policy is aligned with the HOS code timescales.	Our current procedure concentrates on referrals to LGSCO but we would adopt the same approach/process for any complaints relating to our housing stock where relevant referrals are to HOS.
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	See procedure and new draft policy for 2 stages. We do not have any additional stages.	Also see policy for clarification on identify Service Request and a complaint.
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	See procedure and new draft policy for 2 stages. We do not have any additional stages	

5.4	Where a landlord's complaint response is handled by a third party (e.g. a contractor or independent adjudicator) 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.	Yes	Complaints are handled internally, however we do have some temporary accommodation properties that are managed by third parties and as part of that process if a complaint is about a way that they manage the property then the third party would deal with it and their process is aligned with ours in the way that it forms 2 stages.	
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Yes	Code and our procedure shared with third party. With expectation and procedure that they follow the same timescale.	
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	We keep a log on our complaints spreadsheet of the definition. We also currently summarise key points of the complaints. If clarification is required we will email out to ask for this.	
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	Point 4 of procedure and draft policy	

5.8	At each stage of the complaints process, complaint handlers must: a. deal with complaints on their merits, act independently, and have an open mind; 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.	Yes	In procedure and new draft policy.	
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	Complainants are communicated with any changes with response delays.	
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	Procedure and draft Policy state that we will make reasonable adjustments.	There can be markers within tenants records for any reasonable adjustments that need to be made. We act/respond accordingly to this
5.11	Landlords must not refuse to escalate a complaint through all stages of the complaints procedure unless it has	Yes	See section 10 procedure and new draft policy.	

	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.			
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	Spreadsheet keeps a log of all of this information	
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	Section 10 of procedure and new draft policy	
5.14	Landlords must have policies and procedures in place for managing unacceptable behaviour from residents and/or their representatives. Landlords must be able to evidence reasons for putting any restrictions in place and must keep restrictions under regular review.	Yes	Unreasonable conduct policy and cautionary contact database (CCD). Not conduct of the complainant and how they have complained.	
5.15	Any restrictions placed on contact due to unacceptable behaviour must be	Yes	With the unreasonable contact policy the resident is written to	

	proportionate and demonstrate regard for the provisions of the Equality Act 2010.		with warning and explanation and with the CCD anyone placed on the CCD has to go through a process of justification and approval from Assistant Directors.	
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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	Whilst this approach does not sit within a written process the Housing Manager makes this assessment upon reading/picking up each complaint received.	
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 10 of procedure and new draft policy.	
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 10 of procedure and new draft policy.	
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	Section 10 of procedure and new draft policy.	

	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	Within process to time extension.	
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 complaints management system enables the complainant to keep track of their complaint. Any follow-up steps or actions would be communicated to the complainant as necessary whether by email from the complaint handler or GIO.	
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	Examples of non HOS complaints if required. Each complaint is ordinarily dealt with by an officer within the relevant Service and therefore is able to respond appropriately.	
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	Yes	Each complaint would be dealt with on a case by case basis depending on follow-up comments/complaints and how far along the existing investigation is progressed. Non-HOS example can be provided.	

	unrelated to the issues already being 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: 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	Template provided to responding officer to ensure all points are covered.	

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 10 of Procedure and new draft Policy – withing a written response we always inform the complainant of this.	
6.11	Requests for stage 2 must be acknowledged, defined and logged at	Yes	Section 10 of Procedure and new draft Policy.	

	stage 2 of the complaints procedure within five working days of the escalation request being received.			
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	Section 10 of Procedure and new draft Policy.	
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Yes	Section 10 of Procedure and new draft Policy.	
6.14	Landlords must issue a final response to the stage 2 <u>within 20 working days</u> of the complaint being acknowledged.	Yes	Section 10 of Procedure and new draft 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	Section 10 of Procedure and new draft Policy.	
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.		This is part of our process/practice for time extensions.	
6.17	A complaint response must be provided to the resident when the answer to the	Yes	Examples of non-HOS complaints if required.	

	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.		Each Stage 2 complaints are dealt with by a Senior Officer/Assistant Director and relevant Service manager and therefore is able to respond appropriately	
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	Template provided to responding officer to ensure all points are covered. Relevant Service Manager/Assistant Direct and therefore is able to respond appropriately	
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	Template provided to responding officer to ensure all points are covered.	
6.20	Stage 2 is the landlord's final response and must involve all suitable staff	Yes	Service manager and Assistant Director/SLT	

	members needed to issue such a response.			
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Section 7: Putting things right

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
7.1	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: • 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	In Procedure and Policy see point 11. These are considerations that we have already adopted within our current approach to complaints.	
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Yes	Appropriate remedies are considered on a case-by-case basis i.e. financial, correction of records.	

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	Where appropriate details of the remedy will be set out within the complaint response	
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes	We adopt this approach corporately already and will do so with the Housing Ombudsman where relevant.	

Section 8: Self-assessment, reporting and compliance

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
8.1	Landlords must produce an annual complaints performance and service improvement report for scrutiny and challenge, which must include: 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.	No	We have previously reported on this on a quarterly basis and will now adopt this on an annual basis. This will go to Cabinet (the governing body) in January 2026.	

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.	No	This has not yet been done as we have not received any complaints, however, we will now publish a report by March 2026.	
8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	Yes	We would do this if relevant.	
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	Yes	Noted.	
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	Noted.	

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	All complaints are analysed on a quarterly basis any patterns or learnings are fed back to Senior Managers on a quarterly basis.	
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	Reports produced quarterly to Housing manager of any findings/patterns	
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	As a landlord of 17 tenants we will send a copy of the annual report to each tenant.	
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	Legal Services Manager has the overall responsibility for overseeing complaints handling. Any themes or trends are fed back to the relevant Corporate Management Team (CMT).	

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	This falls within the remit of the Portfolio Holder. The governing body is Cabinet for the whole Council not for housing landlord services.	
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	Members are briefed on complaints trends every 6 weeks.	
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	Yes	We will refer specifically to any Housing Landlord complaints within our update.	

	d. annual complaints performance and service improvement report.			
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	Section 1 of Procedure and new draft Policy.	