

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	Noted within the WFHA Complaints and Compliments policy Noted within the WFHA Complaints and Compliments policy easy to read leaflet Both of the above are available on our website.	
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	Tenants are advised they can speak to a member of staff about any concern, and we aim to resolve as an informal discussion. However, if the matter is not resolved, it will be passed to a Head of Service to investigate the matter via the complaints procedure in line with our policy and timescales. Our policy is clear that a complaint will be handled 'however it is made'	The policy has been amended to explicitly refer to 3 rd parties and to stress that tenants expressing dissatisfaction will be given a choice to make a complaint
1.4	Landlords must recognise the difference between a service request and a complaint. This must be set out in	Yes	Staff understand the difference between a service request, where a resident wish to have	Service requests are now added to the complaints and

	<p>their complaints policy. A service request is a request from a resident to the landlord requiring action to be taken to put something right. Service requests are not complaints, but must be recorded, monitored and reviewed regularly.</p>		<p>something rectified, and a complaint about the service they have/have not received. If it is a complaint about service they have/have not received, the matter will be treated as a complaint.</p>	<p>compliments spreadsheet so they can be monitored</p>
1.5	<p>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.</p>	Yes	<p>As above, tenants are advised they can speak to a member of staff about rectifying any situation, and we aim to resolve it. However, if the matter is not resolved, it will be passed to a Head of Service to investigate the matter via the complaints procedure and in line with our timescales.</p>	
1.6	<p>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.</p>		<p>All tenants receiving a repair are invited to feedback and as above, where it has not been possible to rectify a situation to the tenant's satisfaction, they are advised how they can make a complaint. All tenants expressing dissatisfaction in the TSMs were contacted to better understand how the matter could be resolved and informed of their right to make a complaint. Not all tenants however gave their contact details</p>	<p>A note on the 2025 TSM form will be added to inform tenants that they can make a complaint and directing them to the contact details for doing so</p>

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	As noted within the Complaints policy and in our easy read guide.	
2.2	<p>A complaints policy must set out the circumstances in which a matter will not be considered as a complaint or escalated, and these circumstances must be fair and reasonable to residents. Acceptable exclusions include:</p> <ul style="list-style-type: none"> • The issue giving rise to the complaint occurred over twelve months ago. • Legal proceedings have started. This is defined as details of the claim, such as the Claim Form and Particulars of Claim, having been filed at court. • Matters that have previously been considered under the complaints policy. 	Yes	As noted within the Complaints policy and in our easy read guide.	

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	The Complaints policy states all complaints will be investigated	
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	The Complaints policy states all complaints will be investigated	
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Yes	As noted within the Complaints policy and in our easy read guide.	

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	As noted within the Complaints policy and in our easy read guide. Translation facilities are available and people making complaints can do so with the help of another	
3.2	Residents must be able to raise their complaints in any way and with any member of staff. All staff must be aware of the complaints process and be able to pass details of the complaint to the appropriate person within the landlord.	yes	All staff are trained in the complaints procedure and understand the timescales for responding. One central place for recording all complaints, service requests and compliments is known to all staff.	
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	Our policy reflects our view that complaints and trends in complaints are an opportunity to learn and improve our service. We are clear that we welcome complaints and whilst our complaint numbers are small, the organisation is very small too.	

			Now that service requests are recorded, this number will rise.	
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	Our procedure sets this out and is summarised in an easy-read complaints leaflet.	This leaflet is under review to reflect service requests
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	As noted within the Complaints 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	As noted within the Complaints procedure	
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	As noted within the Complaints policy	

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	We are a very small organisation. The Director of Housing is overall responsible for complaints and liaison with the Ombudsman and Regulator of Social Housing	
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	The advantage of a small team is easy access to staff, statements, and documents. The Director of Housing has autonomy to resolve complaints quickly and fairly	
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	Staff are trained and are service oriented. We note from complaints that some tenants prefer to be referred to by a particular title, not to be visited by male contractors, or like to receive email rather than phone	

			calls. This attention to detail and learning is very important to us	
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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	There is only one policy and procedure for all complaints handling in the organisation	
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	We no longer advertise informal complaint resolution	
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	We operate only 2 complaint handling 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	yes	Complaints about the performance of WFHA or its contractors are addressed by WFHA	

	expected to go through two complaints processes.			
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	yes	We do not outsource any complaints. At most we will seek 3 rd party statements about an incident	
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	Noted in our complaints log and in replies to individuals making complaints	
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	Noted in our complaints log and in replies to individuals making complaints	
5.8	At each stage of the complaints process, complaint handlers must: <ul style="list-style-type: none"> a. deal with complaints on their merits, act independently, and have an open mind; b. give the resident a fair chance to set out their position; 	yes	Noted in our complaints log and in replies to individuals making complaints	

	<ul style="list-style-type: none"> c. take measures to address any actual or perceived conflict of interest; and d. consider all relevant information and evidence carefully. 			
5.9	Where a response to a complaint will fall outside the timescales set out in this Code, the landlord must agree with the resident suitable intervals for keeping them informed about their complaint.	yes	Noted in our procedure and in interim/holding correspondence	
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	Any impairment that is made known to us to an individual making a complaint, including those protected characteristics, is factored into our responses.	This understanding is improving with our 'Stay Connected' form that gives more information about the needs to tenants and how we can better serve them
5.11	Landlords must not refuse to escalate a complaint through all stages of the complaints procedure unless it has valid reasons to do so. Landlords must clearly set out these reasons, and they must comply with the provisions set out in section 2 of this Code.	yes	We do not refuse to escalate any complaints to stage 2	

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	An up to date log of all complaints and service requests is maintained	
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	Heads of service and the Director of Operations or Chief Executive in his absence, have authority to remedy complaints at any stage	
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	Unacceptable behaviour towards staff and other tenants is covered in a few policies and the tenants' handbook. We do not refuse to investigate complaints even if we believe them to be vexatious	
5.15	Any restrictions placed on contact due to unacceptable behaviour must be proportionate and demonstrate regard for the provisions of the Equality Act 2010.	yes	Restrictions placed on contact are imposed on a case by case basis and kept under regular review.	

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	Our policy aim is to respond and resolve as quickly as possible. Our experience is that complaints do not need additional time to consider unless they involve evidence from 3 rd parties or legal advice	
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	Noted in our procedure	
6.3	Landlords must issue a full response to stage 1 complaints <u>within 10 working days</u> of the complaint being acknowledged.	yes	Noted in our procedure	
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	Noted in our procedure	

	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	Residents are informed of the Ombudsman contact details on correspondence	
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	Full resolution responses are given and all actions tracked on our complaints log	
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	Full resolution responses are given and all actions tracked on our complaints log	
6.8	Where residents raise additional complaints during the investigation, these must be incorporated into the stage 1 response if they are related and the stage 1 response has not been issued. Where the stage 1 response has been issued, the new issues are unrelated to the issues already being	yes	New complaints are added to the stage 1 complaint response if in time. If not, a new complaint is logged and responded to	

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

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	This is in our procedure	
6.11	Requests for stage 2 must be acknowledged, defined and logged at stage 2 of the complaints procedure	yes	This is in our 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	This is in our procedure	
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	yes	This is in our procedure. A more senior manager will respond to stage 2 complaints	
6.14	Landlords must issue a final response to the stage 2 <u>within 20 working days</u> of the complaint being acknowledged.	yes	This is in our procedure	
6.15	Landlords must decide whether an extension to this timescale is needed when considering the complexity of the complaint and then inform the resident of the expected timescale for response. Any extension must be no more than 20 working days without good reason, and the reason(s) must be clearly explained to the resident.	yes	This is in our procedure	
6.16	When an organisation informs a resident about an extension to these timescales, they must be provided with the contact details of the Ombudsman.	yes	This is on the correspondence	
6.17	A complaint response must be provided to the resident when the answer to the complaint is known, not when the	yes	Responses are provided promptly and in any event within the promised timescale. We do	

	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.		not wait for actions to be completed. All complaints are logged and tracked together with actions promised	
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	We provide a comprehensive response	
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	We provide a comprehensive response including these details	
6.20	Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.	yes	There are only 2 possible members of staff responding at stage 2. The response is copied to the stage 1 head of service for logging and follow up.	

Section 7: Putting things right

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
7.1	<p>Where something has gone wrong a landlord must acknowledge this and set out the actions it has already taken, or intends to take, to put things right. These can include:</p> <ul style="list-style-type: none"> • Apologising; • Acknowledging where things have gone wrong; • Providing an explanation, assistance or reasons; • Taking action if there has been delay; • Reconsidering or changing a decision; • Amending a record or adding a correction or addendum; • Providing a financial remedy; • Changing policies, procedures or practices. 	yes	All of these actions have been taken for various complaints over time	
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	yes	We will ask the tenant the remedy sought by them and make sure that is commensurate with the impact suffered	
7.3	The remedy offer must clearly set out what will happen and by when, in agreement with the resident where	yes	This is included in the response. Remedies are tracked and followed through	

	appropriate. Any remedy proposed must be followed through to completion.			
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes	Reference is made to the code as well as the wishes of the person making a complaint when considering remedies	

Section 8: Self-assessment, reporting and compliance

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

	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.		report published to all tenants and stakeholders	
8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	yes	We will do this although have not yet had occasion to	
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	yes	We will comply with this as required	
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	We will comply with this as required	

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	This is part of every complaint and is also reviewed annually when looking for trends across all complaints data	
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	This is part of every complaint and is also reviewed annually when looking for trends across all complaints data	
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	This has been produced for Board members and will go out in the annual report	
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	The Director of Housing has this responsibility	

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	A Board lead for complaints has been appointed	
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 Board lead for complaints has been appointed	
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	A Board lead for complaints has been appointed	

	d. annual complaints performance and service improvement report.			
9.8	<p>Landlords must have a standard objective in relation to complaint handling for all relevant employees or third parties that reflects the need to:</p> <p>a. have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments;</p> <p>b. take collective responsibility for any shortfalls identified through complaints, rather than blaming others; and</p> <p>c. act within the professional standards for engaging with complaints as set by any relevant professional body.</p>	Yes	This has been incorporated into training and 121s	