



Trafford Council Self-Assessment (May 25)

Appendix A:

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 complaint's 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	This is referenced in the complaints policy (3.1)	As member of the Housing Ombudsman Scheme, we use the same definition for a complaint within our policy.
1.3	A resident does not have to use the word 'complaint' for it to be treated as such. Whenever a resident expresses dissatisfaction landlords must give them the choice to make complaint. A complaint that is submitted via a third party or representative must be handled in line with the landlord's complaints policy.	Yes	This is referenced in the complaints policy (3.4)	Complainants do not need to use the word complaint for it to be treated as such by us
1.4	Landlords must recognise the difference between a service request and a complaint . This must be set out in their complaints policy. A service request is a request from a resident to the landlord requiring action to be taken to put something right. Service requests are	Yes	This is referenced in the complaints policy (3.3)	The policy sets out the difference between a service request and a complaint.

	not complaints, but must be recorded, monitored and reviewed regularly.			
1.5	A complaint must be raised when the resident expresses dissatisfaction with the response to their service request, even if the handling of the service request remains ongoing. Landlords must not stop their efforts to address the service request if the resident complains.	Yes	This is referenced in the complaints policy (3.4)	Our policy sets out that we continue to address service requests regardless of whether a customer has made a complaint
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	This is referenced in the complaints policy (3.2)	

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		This is referenced in the complaints policy (4.4)	Exclusions are set out in the policy and ensure we

	accept a complaint they must be able to evidence their reasoning. Each complaint must be considered on its own merits.	Yes		are compliant with the code
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 12 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	This is referenced in the policy (4.0)	The exclusions are detailed in the 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	Yes	This is referenced in the complaints policy (4.2)	

	apply discretion to accept complaints made outside this time limit where there are good reasons to do so.			
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	This is referenced in the complaints policy (4.5)	
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Yes	This is referenced in the complaints policy (4.1)	When considering whether to exclude a complaint from our process we would consider whether the exclusions shown in our policy are relevant to that specific complaint, we would also consider the circumstances of the complaint, any vulnerabilities which may have impacted and whether any reasonable adjustments should be considered.

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	This is referenced in the complaints policy (7.1)	We accept complaints through all channels. These include by telephone, email, in writing, and in person. All channels are active and monitored. Our policy also includes references to 'reasonable adjustments' for customers making complaints
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		Regular communication of complaints policy with staff that directly deal with residents
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	Yes		Residents are given the complaints policy when signing a tenancy. This is highlighted in the annual service report.

	sign that residents are unable to complain.			
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	The policy can be found here Residential housing complaints for Trafford owned residential properties	Our complaints policy sets out the two stage process and explains how a customer can go to the HOS at any stage in the process. The policy is available on our website along with information about the HOS and our annual self-assessment
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	The policy can be found here Residential housing complaints for Trafford owned residential properties	See above
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 is referenced in the policy (5.3)	A person may choose to use an advocate to act on their behalf. Where this happens, we will get the expressed permission from the customer for us to discuss the matter with their chosen advocate. This will be done using a 'permission to discuss' form that once received will be stored on our system

3.7	Landlords must provide residents with information on their right to access the Ombudsman Service and how the individual can engage with the Ombudsman about their complaint.	Yes	This is referenced in the policy (8.0)	Residents are provided with housing ombudsman information at every stage of the complaints process.
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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	This is referenced in the policy (8.0)	We have a property management officer that oversees our process. They produce all reports for Committees and Board. They also complete the annual self assessment.
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 Complaints Officer has access to staff at all levels to facilitate the prompt resolution of complaints and the authority and autonomy to act to resolve disputes promptly and fairly. The complaints officer will

				undertake regular housing ombudsman training.
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		All staff to complete housing ombudsman training modules.

Section 5: 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	Complaints policy accessed here Residential housing complaints for Trafford owned residential properties	We have a single policy to deal with housing related complaints
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	Yes	The policy can be found here Residential housing complaints for Trafford owned residential properties	We do not have an informal complaint or Stage 0 complaints stage or informal complaints as part of our procedures. We strictly follow the

	complaint') as this causes unnecessary confusion.			requirement of criteria 1.2 and 1.4 of the Handling Code
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 above	See above
5.4	Where a landlord's complaint response is handled by a third party (for example a contractor or independent adjudicator) at any stage, it must form part of the 2 stage complaints process set out in this Code. Residents must not be expected to go through two complaints processes.	Yes		All complaints will be dealt with through Trafford's two stage policy. Any third-party complaints will be taken through the formal process by Trafford and resolved.
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Yes	See above	See above
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	This is referenced in the policy (8.3)	

5.7	When a complaint is acknowledged at either stage, landlords must be clear which aspects of the complaint they are, and are not, responsible for and clarify any areas where this is not clear.	Yes	This is referenced in the policy (8.3)	
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 c. take measures to address any actual or perceived conflict of interest; and d. consider all relevant information and evidence carefully 	Yes		All staff to complete housing ombudsman training modules.
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	This is referenced in the policy (8.5)	
5.10	Landlords must make reasonable adjustments for residents where appropriate under the Equality Act	Yes	This is referenced in the policy (6.1)	

	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		
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	Complaints will not be refused unless they fall within the exclusions as per the policy (4.0)	
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		Detailed records are kept of complaints, including all correspondence, and outcome.
5.13	Landlords must have processes in place to ensure that a complaint can be remedied at any stage of its complaints process. Landlords must ensure that appropriate remedies can be provided at any	Yes		Staff receive ongoing training to ensure that a complaint is remedied at the earliest time with no delays to the customer where possible.

	stage of the complaints process without the need for escalation.			
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		The council have an unacceptable behaviour policy
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		The council have an unacceptable behaviour policy

Section 6: Complaint 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	Yes		Staff receive ongoing training to ensure that a complaint is remedied at the earliest time with no

	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.			delays to the customer where possible.
6.2	Complaints must be acknowledged, defined and logged at stage 1 of the complaints procedure within 5 working days of the complaint being received.	Yes	This is referenced in the complaints policy (8.3)	
6.3	Landlords must issue a full response to stage 1 complaints within 10 working days of the complaint being acknowledged.	Yes	This is referenced in the complaints policy (8.5)	
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 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.	Yes	This is referenced in the complaints policy (8.5)	
6.5	When an organisation informs a resident about an extension to these timescales, they must be provided	Yes		Housing Ombudsman details are given at all

	with the contact details of the Ombudsman.			complaint stages and communication.
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	This is referenced in the policy (8.0)	
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		We ensure every aspect of the complaint is responded to accordingly. Contact is made at the outset of the complaint to understand the scope of the complaint.
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 investigated or it would unreasonably delay the	Yes	This is referenced in the policy (8.6)	

	response, the new issues must be logged as a new complaint.			
6.9	<p>Landlords must confirm the following in writing to the resident at the completion of stage 1 in clear, plain language:</p> <ol 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 g. details of how to escalate the matter to stage 2 if the individual is not satisfied with the response 	Yes		This is required as part of our Stage 1 and letter templates. Staff have received training to ensure that every point is answered too. Letters have been structured using the Housing Ombudsman's template which ensures all the requirements are included.

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	Yes	This is referenced in the policy (8.8)	Our policy includes a Stage Two review process which is communicated

	landlord's procedure. Stage 2 is the landlord's final response.			in correspondence to complainants.
6.11	Requests for stage 2 must be acknowledged, defined, and logged at stage 2 of the complaint procedure within 5 working days of the escalation request being received.	Yes	This is referenced in the policy (8.8)	These timescales are set out in our policy and procedure and meet the requirement of the code.
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 referenced in the policy. (8.7)	
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 referenced in the policy (8.9)	
6.14	Landlords must issue a final response to the stage 2 within 20 working days of the complaint being acknowledged.	Yes	This is referenced in the policy (8.12)	
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	Yes	This is referenced in the policy (8.12)	

	20 working days without good reason, and the reason(s) must be clearly explained to the resident.			
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		Housing Ombudsman details are given at all complaint stages and communication.
6.17	A complaint response must be provided to the resident when the answer to the complaint is known, not when the outstanding actions required to address the issue are completed. Outstanding actions must still be tracked and actioned promptly with appropriate updates provided to the resident.	Yes	This is referenced in the policy	We ensure every aspect of the complaint is responded to accordingly. Contact is made at the outset of the complaint to understand the scope of the complaint.
6.18	Landlords must address all points raised in the complaint definition and provide clear reasons for any decisions, referencing the relevant policy, law and good practice where appropriate.	Yes		This is required as part of our Stage 2 and letter templates. Staff have received training to ensure that every point is answered too. Letters have been structured using the Housing Ombudsman's template which ensures all the requirements are included.

6.19	<p>Landlords must confirm the following in writing to the resident at the completion of stage 2 in clear, plain language:</p> <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 g. details of how to escalate the matter to the Ombudsman Service if the individual remains dissatisfied 	Yes		As above
6.20	<p>Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.</p>	Yes	This is referenced in the policy (8.13)	<p>Our Policy sets out that Stage 2 reviews are undertaken and responded to a senior manager/head of service. The letter to the complainant advises that this is the final response and advises on the contact details of the Housing Ombudsman's</p>

				Office should the complainant remain dissatisfied
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Section 7: Putting things right

Code Provision	Code Requirement	Comply: Yes/No	Evidence	Commentary/Explanation
7.1	<p>Where something has gone wrong a landlord must acknowledge this and set out the actions it has already taken, or intends to take, to put things right. These can include:</p> <ul style="list-style-type: none"> • apologising • acknowledging where things have gone wrong • providing an explanation, assistance, or reasons • taking action if there has been delay • reconsidering or changing a decision • amending a record or adding a correction or addendum • providing a financial remedy • changing policies, procedures, or practices 	Yes	This is referenced in the policy (10.4)	<p>In each case we address the matters that caused the customer to complain and put them right. There are a number of ways in which we may apologise:</p> <ul style="list-style-type: none"> • Acknowledging when we have made errors • Providing the reasons as to why they happened • Saying sorry • Taking action where needed • Changing a decision • Updating records

				<ul style="list-style-type: none"> • Compensation • Changing policies or procedures
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Yes		Each case is assessed on its own merits and Trafford Council will take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.
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		Remedy offers are included in the written response and arrangements are in place to monitor deliver of the remedy whilst keeping the tenant regularly informed.
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes		The policy takes account of the guidance issued by the Ombudsman and is used 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 	Yes		Annual complaint and service report completed.

	f. any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord			
8.2	The annual complaints performance and service improvement report must be reported to the landlord's governing body (or equivalent) and published on the on the section of its website relating to complaints. The governing body's response to the report must be published alongside this.	Yes		Annual complaint and service report published on website
8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	Yes		As a newly established social landlord, we don't anticipate any restructures but will comply if this scenario arises.
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	Yes		We will comply if requested.
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	Yes		We will comply with the code.

	publish this on their website. Landlords must provide a timescale for returning to compliance with the Code.			
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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		We review all complaints to understand the themes which have caused dissatisfaction. And thereafter update operational plans to reflect service improvements.
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		We will proactively use learning from complaints to revise policies and procedures, to train colleagues and contractors and to improve communication and record-keeping

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		Updates are provided to the board and senior management for review.
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 principal estates surveyor is the lead person responsible for complaint handling
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		The director for development and estates is the Member Responsible for Complaints(the MRC)
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		We will comply with the code, relevant information will be shared with the MRC quarterly

9.7	<p>As a minimum, the MRC, and the governing body (or equivalent) must receive:</p> <ul style="list-style-type: none"> 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 d. the annual complaints performance and service improvement report 	Yes		<p>All complaints performance including Ombudsman determinations are reported to the MRC quarterly.</p> <p>As per ombudsman requirement, an annual complaint and service report will be completed.</p>
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> <ul style="list-style-type: none"> a. have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments 	Yes		<p>We encourage a culture that welcomes complaints and the opportunity they give to help improve our services.</p>

	<ul style="list-style-type: none">b. take collective responsibility for any shortfalls identified through complaints, rather than blaming othersc. act within the professional standards for engaging with complaints as set by any relevant professional body			
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