

Riverside Self -Assessment 1/11/2023

Appendix 1

Self-Assessment Form This self-assessment form should be completed by the complaints officer and discussed at the landlord's governing body annually. Evidence should be included to support all statements with additional commentary as necessary. Explanations must also be provided where a mandatory 'must' requirement is not met to set out the rationale for the alternative approach adopted and why this delivers a better outcome.

Section 1 - Definition of a complaint Mandatory 'must' requirements

Code Section	Code Requirement	Comply Yes/ No	Evidence, commentary, and any explanations
1.2	A complaint must be defined as: 'an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the organisation, its own staff, or those acting on its behalf, affecting an individual resident or group of residents.	Yes	Section 4 - Principles
1.3	The resident does not have to use the word 'complaint' for it to be treated as such. A complaint that is submitted via a third party or representative must still be handled in line with the landlord's complaints policy.	Yes	3.9 Complaints Policy
1.6	if further enquiries are needed to resolve the matter, or if the resident requests it, the issue must be logged as a complaint.	Yes	3.9 Complaints Policy

1.7	A landlord must accept a complaint unless there is a valid reason not to do so.	Yes	Section 3 Complaints Policy Exclusions
1.8	A complaints policy must clearly set out the circumstances in which a matter will not be considered, and these circumstances should be fair and reasonable to residents.	Yes	Section 3 Complaints Policy Exclusions
1.9	If a landlord decides not to accept a complaint, a detailed explanation must be provided to the resident setting out the reasons why the matter is not suitable for the complaints process and the right to take that decision to the Ombudsman.	Yes	Section 3.8 in Complaints Policy

Best practice 'should' requirements

Code Section	Code Requirement	Comply Yes/ No	Evidence, commentary, and any explanations
1.4	Landlords should recognise the difference between a service request, where a resident may be unhappy with a situation that they	Yes	Refer to 3.9 Included in Complaints Training Guide

	wish to have rectified, and a complaint about the service they have/have not received.		
1.5	Survey feedback may not necessarily need to be treated as a complaint, though, where possible, the person completing the survey should be made aware of how they can pursue their dissatisfaction as a complaint if they wish to.	Yes	Information added to survey responses advising customers how to pursue dissatisfaction if they wish to.

Section 2 - Accessibility and awareness Mandatory 'must' requirements

Code Section	Code Requirement	Comply Yes/ No	Evidence, commentary and any explanations
2.1	Landlords must make it easy for residents to complain by providing different channels through which residents can make a complaint such as in person, over the telephone, in writing, by email and digitally. While the Ombudsman recognises that it may not be feasible for a landlord to use all of the potential channels, there must be more than one route of access into the complaints system.	Yes	Complaints can be made in person by Phone, web-form, email, post, and webchat Dissatisfaction is captured through social platforms Twitter, Facebook and Trustpilot
2.3	Landlords must make their complaint policy available in a clear and accessible format for all residents. This will detail the number of stages involved, what will happen at each stage and the timeframes for responding.	Yes	Policy available on Website

2.4	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	Complaint Policy published on website and available in leaflet form
2.5	Landlords must comply with the Equality Act 2010 and may need to adapt normal policies, procedures, or processes to accommodate an individual's needs. Landlords must satisfy themselves that their policy sets out how they will respond to reasonable adjustments requests in line with the Equality Act and that complaints handlers have had appropriate training to deal with such requests	Yes	Section 10 Complaints Policy Links to Equality, Diversity & Inclusion Policy Customer Care Policy Mandatory EDI training for all staff
2.6	Landlords must publicise the complaints policy and process, the Complaint Handling Code and the Housing Ombudsman Scheme in leaflets, posters, newsletters, online and as part of regular correspondence with residents	Yes	Complaints Policy, Complaints Leaflets Housing Ombudsman Complaint Handling Code and Self Assessments are all published on Riverside Website
2.7	Landlords must provide residents with contact information for the Ombudsman as part of its regular correspondence with residents.	Yes	All complaint correspondence Acknowledgement Stage 1 / Stage 2 Complaint leaflets
2.8	Landlords must provide early advice to residents regarding their right to access the Housing Ombudsman Service throughout their complaint, not only when the landlord's complaints process is exhausted.	Yes	All complaint correspondence Acknowledgement Stage 1 / Stage 2 Complaint leaflets

Best practice 'should' requirements

Code Section	Code Requirement	Comply Yes/ No	Evidence, commentary and any explanations
2.2	Where a landlord has set up channels to communicate with its residents via social media, then it should expect to receive complaints via those channels. Policies should contain details of the steps that will be taken when a complaint is received via social media and how confidentiality and privacy will be maintained	Yes	Section 10.3 Complaints Policy Social Media Guidelines for

Section 3 - Complaint handling personnel

Mandatory 'must' requirements

Code Section	Code Requirement	Comply Yes/ No	Evidence, commentary and any explanations
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3.1	Landlords must have a person or team assigned to take responsibility for complaint handling to ensure complaints receive the necessary attention, and that these are reported to the governing body. This Code will refer to that person or team as the "complaints officer"	Yes	Kelly Nasr - Head of Customer Experience
	...the complaint handler appointed must have appropriate complaint handling skills and no conflicts of interest	Yes	

Best practice 'should' requirements

Code Section	Code Requirement	Comply Yes/ No	Evidence, commentary, and any explanations
3.3	Complaint handlers should: <ul style="list-style-type: none"> • be able to act sensitively and fairly • be trained to handle complaints and deal with distressed and upset residents • have access to staff at all levels to facilitate quick 	Yes	Current training includes Housing Ombudsman Modules Best Practice Training for Complaint Handlers available through the Complaints Hub Guidance in procedure Our Riverside Way for all Colleagues

Section 4 - Complaint handling principles

Mandatory 'must' requirement

Code Section	Code Requirement	Comply Yes/ No	Evidence, commentary and any explanations
4.1	Any decision to try and resolve a concern must be taken in agreement with the resident and a landlord's audit trail/records should be able to demonstrate this. Landlords must ensure that efforts to resolve a resident's concerns do not obstruct access to the complaints procedure or result in any unreasonable delay. It is not appropriate to have extra named stages (such as 'stage 0' or 'pre-complaint stage') as this causes unnecessary confusion for residents. When a complaint is made, it must be acknowledged and logged at stage one of the complaints procedures within five days of receipt.	Yes	Riverside do not have a Pre-complaint stage Section 3 – Complaints Procedure Acknowledgement response required within 2 days of receipt of complaint.
4.2	Within the complaint acknowledgement, landlords must set out their understanding of the complaint and the outcomes the resident is seeking. If any aspect of the complaint is unclear, the resident must be asked for clarification and the full definition agreed between both parties	Yes	Procedure - Acknowledgement letter
4.6 -4.7	A complaint investigation must be conducted in an impartial manner. The complaint handler	Yes	Procedure - Section 4

	<p>must:</p> <ul style="list-style-type: none"> • 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 		
4.11	Landlords must adhere to any reasonable arrangements agreed with residents in terms of frequency and method of communication	Yes	<p>Procedure -Section 3 and 4</p> <p>Best practice guidance on Complaints Hub</p> <p>Salesforce - Guidance for success</p>
4.12	The resident, and if applicable any staff member who is the subject of the complaint, must also be given a fair chance to:	Yes	Procedure - Section 3
4.13	A landlord must include in its complaints policy its timescales for a resident to request escalation of a complaint	Yes	Complaints Policy Section 5
4.14	A landlord must not unreasonably refuse to escalate a complaint through all stages of the complaints procedure and must have clear and valid reasons for taking that course of action. Reasons for declining to escalate a complaint must be clearly set out in a landlord's complaints policy and must be the same as the reasons for not accepting a complaint.	Yes	Complaints Policy Section 5
4.15	A full record must be kept of the complaint, any review and the outcomes at each stage. This must include the original complaint and the date received, all correspondence with the resident, correspondence with other parties and any reports or surveys prepared.	Yes	All complaints and associated documents are recorded on Salesforce
4.18	Landlords must have policies and procedures in place for managing unacceptable	Yes	Unacceptable Behaviour Procedure

	behaviour from residents and/or their representatives when pursuing a complaint.		
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Best practice 'should' requirements

Code Section	Code Requirement	Comply Yes/ No	Evidence, commentary, and any explanations
4.3	Landlords should manage residents' expectations from the outset, being clear where a desired outcome is unreasonable or unrealistic	Yes	Guidance included in Procedure, Guidance success on Salesforce and in the template, outcome letters
4.4	A complaint should be resolved at the earliest possible opportunity, having assessed what evidence is needed to fully consider the issues, what outcome would resolve the matter for the resident and whether there are any urgent actions required.	Yes	Our Procedure is compliant to support this best practice. However, time taken to resolve complaints differs across the business. Performance is now monitored at Monthly Complaints Performance meetings. Tableau reports are used to monitor performance against our complaints SLA's
4.5	Landlords should give residents the opportunity to have a representative deal with their complaint on their behalf, and to be represented or accompanied at any meeting with the landlord where this is reasonable	Yes	Policy - Section 4
4.8	Where a key issue of a complaint relates to the parties' legal obligations landlords should clearly set out their understanding of the obligations of both parties	Yes	Section 4 & 10 Procedure
4.9	Communication with the resident should not generally identify individual members of staff or contractor	Yes	Included in supporting best practice guidance

4.10	Landlords should keep residents regularly updated about the progress of the investigation	Yes	Guidance in Section 3 in Procedure and Guidance for Success on Salesforce Customer Interactions are evidenced on Salesforce
4.16	Landlords should seek feedback from residents in relation to the landlord's complaint handling as part of the drive to encourage a positive complaint and 28 learning culture	Yes	Complaint Handling Satisfaction surveys
4.17	Landlords should recognise the impact that being complained about can have on future service delivery. Landlords should ensure that staff are supported and engaged in the complaints process, including the learning that can be gained	Yes	
4.19	Any restrictions placed on a resident's contact due to unacceptable behaviour should be appropriate to their needs and should demonstrate regard for the provisions of the Equality Act 2010.	Yes	Unacceptable Behaviour Procedure – Equality Impact Assessment completed on Procedure

Section 5 - Complaint stages

Mandatory 'must' requirements Stage 1, 2 & 3

Code Section	Code Requirement	Comply Yes/ No	Evidence, commentary, and any explanations
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5.1	Landlords must respond to the complaint within 10 working days of the complaint being logged. Exceptionally, landlords may provide an explanation to the resident containing a clear timeframe for when the response will be received. This should not exceed a further 10 days without good reason.	Yes	Section 5 Policy Procedure
5.5	A complaint response must be sent to the resident when the answer to the complaint is known, not when the outstanding actions required to address the issue, are completed. Outstanding actions must still be tracked and actioned expeditiously with regular updates provided to the resident	Yes	Section 5 Policy Procedure
5.6	Landlords must address all points raised in the complaint and provide clear reasons for any decisions, referencing the relevant policy, law and good practice where appropriate	Yes	Procedure - Best Practice & Template response letters.
5.8	Landlords must confirm the following in writing to the resident at the completion of stage one in clear, plain language: • the complaint stage • the decision on the complaint • the reasons for any decisions made • the details of any remedy offered to put things right • details of any outstanding actions • details of how to escalate the matter to stage two if the resident is not satisfied with the answer	Yes	Procedure – Template letters
5.9	If all or part of the complaint is not resolved to the resident's satisfaction at stage one it must be progressed to stage two of the landlord's procedure, unless an exclusion ground now applies. In instances where a landlord declines to escalate a complaint it must clearly communicate in writing its reasons for not escalating as well as the resident's right to approach the Ombudsman about its decision.	Yes	Section 5 Policy Procedure
5.10	On receipt of the escalation request, landlords must set out their understanding of issues	Yes	Procedure Guidance for Introduction contact

	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.		Acknowledgement – Letter
5.11	Landlords must only escalate a complaint to stage two once it has completed stage one and at the request of the resident.	Yes	5.10 Policy
5.12	The person considering the complaint at stage two, must not be the same person that considered the complaint at stage one	Yes	The central complaints team allocate all Stage 2 complaints
5.13	Landlords must respond to the stage two complaint within 20 working days of the complaint being escalated. Exceptionally, landlords may provide an explanation to the resident containing a clear timeframe for when the response will be received. This should not exceed a further 10 days without good reason.	Yes	Section 5 Policy
5.14	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	Procedure & Template letters

Code Section	Code Requirement	Comply Yes/ No	Evidence, commentary and any explanations
5.17	Two stage landlord complaint procedures are ideal. This ensures that the complaint process is not unduly long. If landlords strongly believe a third stage is necessary, they must set out their reasons for this as part of their self-assessment. A process with more than three stages is not acceptable under any circumstances.	Yes	Two Stage Procedure
5.20	Landlords must confirm the following in writing to the resident at the completion of stage three in clear, plain language: • the complaint stage 31 • the complaint definition • the decision on the complaint • the reasons for any decisions made • the details of any remedy offered to put things right • details of any outstanding actions • details of how to escalate the matter to the Housing Ombudsman Service if the resident remains dissatisfied	N/A – No Stage 3	N/A

Best practice 'should' requirements Stage 1

Code Section	Code Requirement	Comply Yes/ No	Evidence, commentary, and any explanations
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5.2	If an extension beyond 20 working days is required to enable the landlord to respond to the complaint fully, this should be agreed by both parties.	Yes	Section 5 Policy
5.3	Where agreement over an extension period cannot be reached, landlords should provide the Housing Ombudsman's contact details so the resident can challenge the landlord's plan for responding and/or the proposed timeliness of a landlord's response	Yes	Section 5 Policy
5.4	Where the problem is a recurring issue, the landlord should consider any older reports as part of the background to the complaint if this will help to resolve the issue for the resident	Yes	3.1 Policy
5.7	Where residents raise additional complaints during the investigation, these should be incorporated into the stage one response if they are relevant, and the stage one response has not been issued. Where the stage one response has been issued, or it would unreasonably delay the response, the complaint should be logged as a new complaint	Yes	Procedure

Best practice 'should' requirements Stage 2

Code Section	Code Requirement	Comply Yes/ No	Evidence, commentary, and any explanations
5.2	If an extension beyond 20 working days is required to enable the landlord to respond to the complaint fully, this should be agreed by both parties.	Yes	Section 5 Policy
5.3	Where agreement over an extension period cannot be reached, landlords should provide the Housing Ombudsman's contact details so the resident can challenge the landlord's plan for responding and/or the proposed timeliness of a landlord's response	Yes	Section 5 Policy

Best practice 'should' requirements Stage 3

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

5.19	Where agreement over an extension period cannot be reached, landlords should provide the Housing Ombudsman's contact details so the resident can challenge the landlord's plan for responding and/or the proposed timeliness of a landlord's response.	N/A	No 3 rd Stage
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Section 6 - Putting things right

Mandatory 'must' requirements

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	Policy Section 4 – Principles Policy Section 6 – Putting things right Procedure Section 4.1 Resolving Complaints
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	Procedure Section 4.2 Remedies Financial Redress Procedure Complaint Stage responses
6.5	The remedy offer must clearly set out what will happen and by when, in agreement with the resident where appropriate. Any remedy proposed must be followed through to completion.	Yes	As Above
6.6	In awarding compensation, a landlord must consider whether any statutory payments are	Yes	Section 6 Financial Redress Procedure

	due, if any quantifiable losses have been incurred, the time and trouble a resident has been put to as well as any distress and inconvenience caused		
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Best practice 'should' requirement

Code Section	Code Requirement	Comply Yes/ No	Evidence, commentary and any explanations
6.3	Landlords should look beyond the circumstances of the individual complaint and consider whether anything needs to be 'put right' in terms of process or systems to the benefit of all residents.	Yes	Our Lessons learnt process has been reviewed and we have identified areas for improvement to ensure this insight is captured used to drive service delivery. Lessons learnt is now being captured in Monthly performance meetings and Lessons Learnt Forums will be run from September.
6.7	In some cases, a resident may have a legal entitlement to redress. The landlord should still offer a resolution where possible, obtaining legal advice as to how any offer of resolution should be worded.	Yes	Financial Redress Procedure

Section 7 - Continuous learning and improvement

Mandatory 'must' requirement

Code Section	Code Requirement	Comply Yes/ No	Evidence, commentary, and any explanations
7.2	Accountability and transparency are integral to a positive complaint handling culture. Landlords must report back on wider learning and improvements from complaints in their annual report and more frequently to their residents, staff, and scrutiny panels.	Yes	Section 7 - Policy Annual Report to Customers ED Quarterly Reports CEC 6 monthly reports Riverside Matters Communication Strategy

Best practice 'should' requirements

Code Section	Code Requirement	Comply Yes/ No	Evidence, commentary, and any explanations
7.3	A member of the governing body should be appointed to have lead responsibility for complaints to support a positive complaint handling culture. This role will be responsible for ensuring the governing body receives regular information on complaints that provides insight to the governing body on the landlord's complaint handling performance.	Yes	Lead identified, paper shared with Board and has now been approved <ul style="list-style-type: none"> We'll be taking a report to CEC in Sept to confirm confirmation of compliance with the code and that we would share a summary paper with Board shortly afterwards

			<ul style="list-style-type: none"> We will share an annual summary of complaints performance with Board (this would be high level and will in part describe the assurance that we have given to CEC as well as high level details on complaints performance) Any specific concerns or updates would be shared with the Board via Sam's regular Board updates ie at each Board meeting he provides an update on what was discussed at CEC)
7.4	As a minimum, governing bodies should receive: <ul style="list-style-type: none"> 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	Board report 2022 Annual Complaints report to Customer Experience Committee (CEC) Quarterly ED report Quarterly CEC reports Annual Self – Assessment 1/08/2023
7.5	Any themes or trends should be assessed by senior management to identify potential systemic issues, serious risks or policies and procedures that require revision. They should also be used to inform staff and contractor training.	Yes	Monthly complaints performance meetings attended through 2022/2023 sponsored by the Executive Director for Customer Services Additional Lessons Learnt forums attended throughout 2022/2023 – linking up with all Business Areas
7.6	Landlords should have a standard objective in relation to complaint handling for all	Yes	We have a Customer Satisfaction objective as part of the 4 C's

	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.		Objectives will be reviewed and agreed in line with the Regulator has confirmed the Tenant Satisfaction Measures and the guidance on how to obtain. Awaiting confirmation We promote ORW – colleagues can access toolkits to support complaint handling in line with our core Values ORW has been embedded across the organisation to be part of our rhythm and routine and covers the criteria with the Professional Standards s set by the Chartered Institute of Housing
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Section 8 - Self-assessment and compliance

Mandatory 'must' requirements

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	28 th September 2022 (in line with new code) 1 st August 2023
8.2	Landlords must also carry out a self-assessment following a significant restructure and/or change in procedures.	Yes	Add to Governance compliance framework 1 st August 2023 following stakeholder work with Housing Ombudsman and amendments to the Complaints Policy
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	Yes	Paper submitted and published on website 2022 1/08/2023 – Submit paper to CEC & Board Compliant with update publish in September 2023

	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		
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