Housing Ombudsman Complaint Handling Code Self-Assessment Form

This self-assessment form was completed by the SLH Complaints Team and reported to the Board in August 2022.

Evidence is included to support all statements with additional commentary as necessary.

Explanations are also 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	The definition is in the Complaints Policy November 2020. To be updated to reflect changes in CHC and published, along with updated self-assessment.
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	Informal complaints are now included as complaints
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	If the resident requests a complaint it will be logged
1.7	A landlord must accept a complaint unless there is a valid reason not to do so.	Yes	We will

		
	A complaints policy must clearly set out the	The exclusions in the current policy are;
1.8	circumstances in which a matter will not be considered,	#A
-	and these circumstances should be fair and reasonable	"Areas where individuals may express
	to residents.	dissatisfaction which would not be regarded
		as complaints would relate to;
		An initial request for a service e.g. first
		reporting a repair or if the matter can
		be resolved informally,
		• the general law, unless wrongly
		applied,
		 persons or bodies over which SLH has no control,
		Reports about anti-social behaviour
		(ASB) are not part of this policy as
		there is a separate ASB Policy,
		SLH's overall policies (e.g. rent levels,)
		allocations policy, maintenance and
		renewal policies),
		Matters which are,or could reasonably
		be expected to be the subject of court
		or tribunal proceedings, or which are
		in the hands of SLH's insurers."
		Section included: If SLH decides not to
		accept a complaint a detailed explanation
		should be provided to the resident setting
		out the reasons why the matter is not
		suitable for the complaints process. A
		resident has the right to challenge this
		decision by bringing their complaint to the
		Ombudsman. Where appropriate the
		Ombudsman will instruct the landlord to take
		on the complaint.
	If a landlord decides not to accept a complaint, a	Yes The repeated and/or obsessive pursuit of:
4.0	detailed explanation must be provided to the resident	
1.9	setting out the reasons why the matter is not suitable	Unreasonable complaints and/or
	for the complaints process and the right to take that	unrealistic outcomes,
	decision to the Ombudsman.	Continuing to repeat the same issues
		despite SLH responses, and

	 Reasonable complaints raised in an unacceptable manner. Examples of unacceptable behaviour includes; threats, physical violence, personal abuse, derogatory or discriminatory remarks and rudeness.
	Where complaints continue and have been identified as persistent or unreasonable in accordance with the criteria above then a Director will determine whether it is a persistent or vexatious complaint and will determine the appropriate action to be taken.
	The Director of Business Improvement will notify the complainants, in writing, of the reasons why their complaint has been treated as persistent or unreasonable and the action that will be taken.

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 wish to have rectified, and a complaint about the service they have/have not received.	Yes	CST are trained to follow up if a customer needs a situation rectifying – ie garage waiting list.
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.	Partial	STAR & Transaction Surveys – follow up Process being reviewed by Customer Insigh Partner who will link dissatisfaction to complaints process and provide a link on survey forms.

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	"A complaint can be from a tenant, leaseholder or any other customer. Complaints can be made in person, via email, telephone or via a Councillor, MP or other advocate who has been authorised to make a complaint on their behalf. Complaints can be made online on the SLH website."
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	Complaints Policy is available on the website under 'feedback'. This is published online under 'Make a complaint' to make it easier to find to make a complaint.
2.4	Landlord websites, if they exist, must include information on how to raise a complaint. The complaints policy and process must be easy to find on the website.	Yes	https://www.southlakeshousing.co.uk/feedback/ It is on the front page of SLH website.
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	SLH is committed to ensuring people are not disadvantaged in accessing its services or by making a complaint. To this end we will make reasonable adjustments for people. This policy does not seek to explain how we will approach every situation, it is intended as a general statement of our policy and: • Confirms our commitment to
			 improving accessibility for everybody that we deal with, Sets out some of the basic principles of our commitment to provide reasonable adjustments for people, and

		la	 Sets out the factors that we will take into account in dealing with requests for reasonable adjustments. example, provision of documents in reger font than our usual font. examples of this include: Allowing more time than we would usually for someone to provide information that we needed, Providing specialist equipment or additional support such as a sign language interpreter for a workshop or event, Communication through a representative or intermediary, Rest or comfort breaks in meetings.
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.	pu pa re	ne complaints policy and process is ublicised in leaflets annual reports and as art of regular correspondence with esidents. A copy is provided when equested.

2.7	Landlords must provide residents with contact information for the Ombudsman as part of its regular correspondence with residents.	Yes	SLH's stage 1 process investigation letter will provide early advice to residents regarding their right to access the Housing Ombudsman Service, not only at the point they have exhausted the landlord's complaints process.
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	The Housing Ombudsman Service can assist residents throughout the life of a complaint. This affords the resident the opportunity to engage with the Ombudsman's dispute support advisors

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.		Will update policy and will have reference to receiving complaints via social media. All customer enquiries will be managed by omni channel system by March 23.

Section 3 - Complaint handling personnel

Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
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	Customer Insight Partner, with oversight of Customer First Manager
3.2	the complaint handler appointed must have appropriate complaint handling skills and no conflicts of interest.	Yes	Attendance at HOS Complaint Handling Code sessions Customer Insight Partner will receive training from former Complaints Officer

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
3.3	Complaint handlers should: 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 resolution of complaints have the authority and autonomy to act to resolve disputes quickly and fairly.	Yes	The officer has access to all colleagues and resources within the organisation and can escalate to the Director of Business Improvement. Both are independent of the service delivery teams.

Section 4 - Complaint handling principles Mandatory 'must' requirements

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 procedure within five days of receipt.	Yes	All complaints are logged within 5 working days and the acknowledgment attachment added to Cx

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	In place now with Customer Insight Partner. Templates updated.
4.6	A complaint investigation must be conducted in an impartial manner.	Yes	SLH Behaviours To deliver Customer First Training to develop culture.
4.7	 The complaint handler must: deal with complaints on their merits act independently and have an open mind take measures to address any actual or perceived conflict of interest consider all information and evidence carefully keep the complaint confidential as far as possible, with information only disclosed if necessary to properly investigate the matter. 	Yes	Further training to be provided as above.
4.11	Landlords must adhere to any reasonable arrangements agreed with residents in terms of frequency and method of communication	Yes	Some residents don't like emails so letters are sent in the post, some customers are unable to read Arial 11 so larger font letters are sent. Communication to colleagues on how complaints are received.
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: • set out their position • comment on any adverse findings before a final decision is made.	Yes	Colleagues are interviewed by People Team as part of the investigation and provided the opportunity to set our their position and comment before a final decision is made.
4.13	A landlord must include in its complaints policy its timescales for a resident to request escalation of a complaint	Yes	https://www.southlakeshousing.co.uk/wp-content/uploads/2020/11/How-do-l-complain-leaflet nov-20-version.pdf
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	Yes	Part of policy 'If SLH decides not to accept a complaint a detailed explanation should be provided to the resident setting out the reasons why the matter is not suitable for the

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.	complaints process. A resident has the right to challenge this decision by bringing their complaint to the Ombudsman. Where appropriate the Ombudsman will instruct the landlord to take on the complaint.
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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.	Full records are kept on Cx system, of date complaint received, acknowledged, any information pertaining to the complaint and date of response.
4.18	Landlords must have policies and procedures in place for managing unacceptable behaviour from residents and/or their representatives when pursuing a complaint.	In the policy 'Persistent or Unreasonable/Unacceptable Complainants'

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	EG a resident asked officers to go around policing a car park for those cars parking not belonging to the scheme and it was explained this was not reasonable or proportionate.
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	Managers should contact the tenant to discuss the complaint and ask what the complainant's desired outcome is to resolve the issues.
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	We accept complaints on behalf of residents from family members, friends, MP's/ Cllrs etc with their permission.
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	We would reference the legal obligations, including any contained in the Tenancy Agreement.

4.9	Communication with the resident should not generally identify individual members of staff or contractors.	Yes	Particular members of staff or contractors are not referred to in responses but are referred to by role/ company.
4.10	Landlords should keep residents regularly updated about the progress of the investigation.	Yes	Complaint responses are sent within 10 days working days and managers usually contact the customer firstly to establish what exactly is the complaint about and how we can resolve.
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 learning culture.	Yes	Feedback surveys are sent out once the complaint is closed.
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	Lessons learned are discussed at quarterly customer complaint meetings.
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	Part of the policy 'Reasonable complaints raised in an unacceptable manner. Examples of unacceptable behaviour includes; threats, physical violence, personal abuse, derogatory or discriminatory remarks and rudeness.' Consideration will be given to any vulnerabilities and agreeing how the resident can contact SLH.

Section 5 - Complaint stages

Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
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	All complaints must be responded to within 10 working days and the tenant informed if it will take longer and why.
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.	Yes	Outstanding actions are mentioned in the tracker.

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	Clear reasons and decisions are given.
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	Templates in place and recently reviewed to be more customer friendly as part of customer first approach.

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
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	We would. Response letters include option to escalate if remain dissatisfied. Although we have never declined to escalate a complaint.
5.10	On receipt of the escalation request, landlords must set out their understanding of issues outstanding and the outcomes the resident is seeking. If any aspect of the complaint is unclear, the resident must be asked for clarification and the full definition agreed between both parties.	Yes	Acknowledgement letter and if not clear will ask resident what outcome they are seeking.
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	The resident can ask for it to be escalated once a stage is completed.

5.12	The person considering the complaint at stage two, must not be the same person that considered the complaint at stage one.	Director (or Head of Service) review at Stage 2.
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.	This is in the policy - Stage two response – 20 working days from request to escalate – if this is not possible an explanation and a date when the stage two response will be received. This should not exceed a further 10 working days without good reason
5.16	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.	Templates in place and recently reviewed to be more customer friendly as part of customer first approach.

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	Stage 3 (optional) as agreed with Tenants' Committee. Tenant Complaint Panel Review – target response of 20 working days

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 • 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	The policy states 'At the completion of each stage of the complaints process SLH will write to the resident advising them of the following: • the complaint stage • the outcome of 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 if dissatisfied'.
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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	Yes	Will contact the customer to discuss and explain will be longer than 20 working days and why and to agree extension.
	landlord to respond to the complaint fully, this should be agreed by both parties.		
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	If unable to reach agreement we will provide HOS contact details.
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	Recurring complaints raised with Manager, Customer First Lead and Head of Transformation.
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	Yes	Reflected in current practice

Stage 2

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
5.14	If an extension beyond 10 working days is required to enable the landlord to respond to the complaint fully, this should be agreed by both parties.		Will contact the customer to explain will be longer than 10 working days, why and to agree extension.
5.15	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		If unable to reach agreement, we would provide the HOS contact details. The HOS contact details are also on How do I complain leaflet.

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.	Yes	Yes in the policy.
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.	Yes	If unable to reach agreement, we would provide the HOS contact details. Not happened to date.

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	Compensation is offered in certain cases and is referred to in the Complaints Policy.
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	Compensation policy in place for consistency.
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	Set out in stage response.
6.6	In awarding compensation, a landlord must consider whether any statutory payments are 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.	Yes	Compensation is offered in certain cases and is referred to in the Complaints Policy

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	As part of new process involving Customer First Lead and Head of Transformation. Insights gained via Learning Loop will be reviewed and considered for service design improvements/ projects.
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	In policy, for example leasehold

Section 7 - Continuous learning and improvement

Mandatory 'must' requirements

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	Annual Report Business Performance Report Tenants Committee

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.	No	Board receive Business Performance Report - Quarterly reports on complaints. For Board to consider at August Meeting.
7.4	 As a minimum, governing bodies should receive: Regular updates on the volume, categories and outcome of complaints, alongside complaint handling performance including compliance with the Ombudsman's orders Regular reviews of issues and trends arising from complaint handling, The annual performance report produced by the Ombudsman, where applicable Individual complaint outcomes where necessary, including where the Ombudsman made findings of severe maladministration or referrals to regulatory bodies. The implementation of management responses should be tracked to ensure they are delivered to agreed timescales. The annual self-assessment against the Complaint Handling Code for scrutiny and challenge. 	Yes	See Business Performance Report - Quarterly

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.	As part of new process involving Customer First Lead and Head of Transformation o identify any trends/ serious issues. This informs follow up actions and any service redesign priorities.
7.6	 Landlords should have a standard objective in relation to complaint handling for all employees that reflects the need to: have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments take collective responsibility for any shortfalls identified through complaints rather than blaming others act within the Professional Standards for engaging with complaints as set by the Chartered Institute of Housing. 	To be reviewed by Customer First Lead and Head of People and Culture.

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	Annual Self-Assessment completed by Customer First Team, provided to Board as part of August regulatory compliance report completed by Business Improvement.
8.2	Landlords must also carry out a self-assessment following a significant restructure and/or change in procedures.	Yes	Self-Assessment being carried out following recent OD changes. Customer Insight Partner appointed to take over co-ordination & oversight of complaints and learning.
8.3	 Following each self-assessment, a landlord must: report the outcome of their self-assessment to their governing body. In the case of local authorities, self-assessment outcomes should be reported to elected members publish the outcome of their assessment on their website if they have one, or otherwise make accessible to residents include the self-assessment in their annual report section on complaints handling performance 	Yes	Report to Board Aug 2022 To publish on website following Board and include in 2022 Annual Report.