



Appendix A: Self-assessment form 2023/24

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	<ul style="list-style-type: none"> • Complaints Policy 2024 • Residents’ Complaints Procedure 2024 • Staff Complaints Procedure 2024 • How to make a complaint leaflet 	We have adopted this definition in our complaints policy which has been approved and published on our website. It is contained within 4.1 of the policy and is also included in both staff and resident procedures and our complaints leaflet.
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	<ul style="list-style-type: none"> • Complaints Policy 2024 • Residents’ Complaints Procedure 2024 • Staff Complaints Procedure 2024 	This definition is contained within our complaints policy, section 4.1 and included in both staff and resident procedures.
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 not complaints, but must be recorded, monitored and reviewed regularly.	Yes	<ul style="list-style-type: none"> • Complaints Policy 2024 • Residents’ Complaints Procedure 2024 • Staff Complaints Procedure 2024 	This definition is contained within our complaints policy, section 4.2 and included in both staff and resident procedures.

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	<ul style="list-style-type: none"> • Complaints policy 2024 • Staff Complaints Procedure 2024 	The complaints policy section 4.2 provides details on service requests and when dissatisfaction is expressed with the service request this should be escalated to a formal 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	<ul style="list-style-type: none"> • Complaints Policy 2024 • Staff Complaints Procedure 2 • Residents' Complaints Procedure 2024 	This is contained within our complaints policy, section 4.3 and included in both staff and resident procedures. Acuity carry out our Tenant Satisfaction Measure (TSM) surveys and they inform residents how to make a complaint where necessary.

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	<ul style="list-style-type: none"> Complaints Policy 2024 	This is explained in our policy (section 6) and procedures under Scope.
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	<ul style="list-style-type: none"> Complaints Policy 2024 Residents' Complaints procedure 2024 Staff Complaints Procedure 2024 	Our policy and procedures give details of circumstances that may fall outside the scope of a complaint and are detailed under the exclusion, section 7 of the complaints policy.
2.3	Landlords must accept complaints referred to them within 12 months of the	Yes	<ul style="list-style-type: none"> Complaints Policy 2024 	This is detailed in section 6.3 of our policy which details we will accept

	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.		<ul style="list-style-type: none"> Residents' Complaints Procedure 2024 Staff Complaints Procedure 2024 	complaints made within 12 months. It is also mentioned in both staff and residents' procedures.
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	<ul style="list-style-type: none"> Complaints Policy 2024 Residents' Complaints Procedure 2024 Staff Complaints Procedure 2024 	Our policy gives details in section 7.2 about the process we will undertake if we decide not to accept a complaint. A written explanation will be provided to the complainant setting out the reasons why the matter is not suitable for the complaints process and their right to refer this decision to the Ombudsman.
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Yes	<ul style="list-style-type: none"> Complaints Policy 2024 Residents' Complaints Procedure Staff Complaints Procedure 	Our policy gives details in section 7 on exclusions and section 7.3 details that any exclusions will be considered at each stage of the process.

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	<ul style="list-style-type: none"> • Complaints Policy 2024 • How to make a complaint leaflet • Complaint webpage • Reasonable Adjustments Policy 	Complaints can be made by telephone, in writing by email or letter, in person or via our website. This is confirmed in our policy (section 10), on our website and in our 'How to make a complaint' leaflet'. We also have a reasonable adjustments policy which is referred to in section 9 of our policy.
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	<ul style="list-style-type: none"> • Complaints Policy 2024 • How to make a complaint leaflet • ccha website • Internal staff briefing presentation • Staff quarterly complaints bulletins. 	Section 10.1 of the policy details the various methods a complaint can be raised. e.g. verbally in person, over the telephone or in a meeting, or in writing by letter or email. All staff are aware of the complaints process and who to pass complaints to as a result of internal briefings, training and quarterly complaint bulletins.
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	<ul style="list-style-type: none"> • Internal staff briefing presentation • Complaints training attendance with HQN for key staff and managers • Complaints Monthly KPIs 	Staff are trained and regularly reminded of the importance of capturing complaints. KPIs are completed every month on the volume and type of complaints that we receive. Our complaint numbers have increased as a result of better awareness by residents and staff.

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	<ul style="list-style-type: none"> • Complaints Policy 2024 • How to make a complaint leaflet • ccha website 	The complaints policy is available on our website and in different languages on request. We also have a 'How to make a complaint' leaflet which clearly details the two-stage process, what will happen at each stage and the timeframes for responding. This is also available on our website and given to new residents when they join us.
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	<ul style="list-style-type: none"> • Complaints Policy 2024 • ccha website • Newsletter Winter 2024 • Annual Report 2022/23 	We publicise details of the complaints policy through the website and a copy of our 'How to make a complaint' leaflet is given to all new residents. This includes information about the Ombudsman and Code. Information about complaints is also published in our newsletter and annual report. This is detailed in section 11.19, 12.3, 12.8 and 15.1 of the 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	<ul style="list-style-type: none"> • Complaints Policy 2024 • Residents' Complaints Procedure 2024 • Staff Complaints Procedure 2024 	Section 4.5 of the complaints policy details that a complainant can choose a representative but must give full permission for information to be disclosed to them in line with GDPR.
3.7	Landlords must provide residents with information on their right to access the Ombudsman service and how the	Yes	<ul style="list-style-type: none"> • Complaints Policy 2024 • How to make a complaint leaflet 	Our complaints policy, 'how to make a complaint' leaflet and our website give details of the Housing Ombudsman. The leaflet is also sent alongside every acknowledgement produced

	individual can engage with the Ombudsman about their complaint.		<ul style="list-style-type: none">• Complaint acknowledgement, holding letter and stage 2 formal response template letters	and the Housing Ombudsman information is within the body of stage 2 formal responses letter.
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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	<ul style="list-style-type: none"> • Complaints Policy 2024 • Residents' Complaints Procedure 2024 • Staff Complaints Procedure 2024 • The Senior Customer Investment Role Profile 	All policies detail that the Senior Customer Investment Officer who manages the complaints team is the complaints officer, has responsibility for this and liaising with the Housing Ombudsman. They work closely with the Director of Customers who reports directly into the Leadership Team and the Board.
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	<ul style="list-style-type: none"> • Complaints Policy 2024 • Residents' Complaints Procedure 2024 • Staff Complaints Procedure 2024 	The complaints officer (Senior Customer Investment Officer) has access to all staff and is closely supported by the Senior Management Team and Director of Customers. This is explained in our policy in section 12.7 and in our procedure.
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	<ul style="list-style-type: none"> • Complaints Policy 2024 • HQN Complaints handling Training and attendance • Internal staff briefing presentation • Records from Quarterly Complaints Learning Forums 	Section 13.0 of the complaints policy details complaints management and training. Section 13.2 details that all staff will be regularly trained on complaints. The last training was provided by HQN and key staff and managers attended. All staff also attended a company presentation on complaints. We have a complaints team in place to oversee complaints and work closely with the service

				departments who are responsible for the investigations, responses and actions. Learning from complaints is reviewed as part of our quarterly complaints learning forums.
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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	<ul style="list-style-type: none"> Complaints Policy 2024 	Section 8.1 of the policy details that complaints will be decided on the merits of each case rather than the attitude of the of the complainant.
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	<ul style="list-style-type: none"> Complaints Policy 2024 Residents' Complaints Procedure 2024 Staff Complaints Procedure 2024 	The policy and procedures make it clear that there are only 2 stages. Complaints can then be referred to the Housing Ombudsman. The previous optional residents panel stage provided by London Borough of Croydon was removed in 2023.
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	<ul style="list-style-type: none"> Complaints Policy 2024 Staff Complaints Procedure 2024 Residents' Complaints Procedure 2024 	Section 11 of the complaints policy details that the complaints process has only 2 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		<ul style="list-style-type: none"> The Complaints Policy 2024 Contractor Meetings Minutes 	Section 6.1 identifies that the policy applies to all complaints made against us or our contractors. Our contractors are aware that all complaints will be handled by us.

	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.		<ul style="list-style-type: none"> Complaints Policy 2024 	All complaints are handled by ccha and are managed in line with the Code. Responsibilities are detailed in sections 10 and 11.
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	<ul style="list-style-type: none"> Complaints Policy 2024 Complaint acknowledgement templates 	Section 11.3 and 11.10 details this process and the investigating officer should always contact the complainant to better understand the issues raised and desired resolution. This is also sent out in our complaint acknowledgements.
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	<ul style="list-style-type: none"> Complaints Policy 2024 	Section 11.2 and 11.10 of the complaints policy states that ‘We will confirm what aspects of the complaint we are and are not responsible for and clarify any areas where this is not clear’.
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 	Yes	<ul style="list-style-type: none"> Staff Complaints procedure HQN Complaints Handling Training and attendance 	This is stated in section 13 ccha roles, under the role of the Investigating Officer (IO). Staff/managers responsible for complaints have all received training in line with this.

	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	<ul style="list-style-type: none"> Complaints policy 2024 Staff Complaints Procedure 	Section 11.6 and 11.13 of the policy states that an explanation will be given to the complainant alongside the housing ombudsman details.
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	<ul style="list-style-type: none"> Complaints Policy Reasonable Adjustments Policy Fields in CX Housing Management system 	Section 9.0 of the policy and our Reasonable Adjustments Policy which supports this and our housing management system enables us to record information regarding this.
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	<ul style="list-style-type: none"> Complaints Policy 2024 	This is explained in our policy under exclusions, section 7.0.
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	Yes	<ul style="list-style-type: none"> Complaints Policy 2024 Staff Complaints procedure CX Housing Management system 	Section 10 and 12.2 of our policy details the process and requirements to record complaints in line with this.

	any relevant supporting documentation such as reports or surveys.		<ul style="list-style-type: none"> • Internal staff briefing presentation • Results of monthly document checks and any required follow up • Result of RSM follow-up audit 	<p>A detailed guide on how to process a complaint also forms part of the staff complaints procedure.</p> <p>Our housing management system enables us to do this. Staff are regularly reminded of the importance of this and monthly checks are completed by the complaints team to ensure this happens. Our internal auditors have checked and signed off that these processes are in place.</p>
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	<ul style="list-style-type: none"> • Complaints Policy 2024 • Staff Complaints procedure 	Sections 11.7 of our policy details this for stage 1 complaints and section 11.14 for stage 2 complaints.
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	<ul style="list-style-type: none"> • Complaints Policy 2024 • Unacceptable User Policy 	<p>Section 8.0 of the complaints policy details persistent and unreasonable behaviour.</p> <p>The unacceptable user policy gives full details of when a restriction will be placed, reasons for the restriction and how it will be managed.</p>
5.15	Any restrictions placed on contact due to unacceptable behaviour must be proportionate and demonstrate regard	Yes	<ul style="list-style-type: none"> • Complaints Policy 2024 	Section 8.3 of the complaints policy details that any restrictions will be appropriate to their needs and

	for the provisions of the Equality Act 2010.			demonstrate regard for the provisions of the Equality Act 2010.
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Section 6: Complaints Stages

Stage 1

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
6.1	Landlords must have processes in place to consider which complaints can be responded to as early as possible, and which require further investigation. Landlords must consider factors such as the complexity of the complaint and whether the resident is vulnerable or at risk. Most stage 1 complaints can be resolved promptly, and an explanation, apology or resolution provided to the resident.	Yes	<ul style="list-style-type: none"> • Complaints Policy 2024 	The complaints stages, section 11.7 of the policy details that the complaint response must be provided to the complainant when the answer to the complaint is known.
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	<ul style="list-style-type: none"> • Complaints Policy 2024 • The Residents' Complaints Procedure • Staff Complaints Procedure • How to make a complaint leaflet • KPI monitoring spreadsheet • KPI performance on website • Annual Complaints and Performance Report 2023-24 	The complaints policy, section 11, and procedures provide the detailed timeline of the process and reflects the five working days. The process on our Housing Management system reflects this and this is monitored through our monthly KPIs. Performance is updated on a quarterly basis on our website and is also included in our Annual Complaints and Performance Report 2023-24.
6.3	Landlords must issue a full response to stage 1 complaints <u>within 10 working</u>	Yes	<ul style="list-style-type: none"> • Complaints Policy 2024 	The complaints policy, section 11, and procedures provide the detailed

	<u>days</u> of the complaint being acknowledged.		<ul style="list-style-type: none"> Residents' Complaints Procedure Staff Complaints Procedure How to make a complaint leaflet KPI monitoring spreadsheet KPI performance on website Annual Complaints and Performance Report 2023-24 	<p>timeline of the process and reflects the ten working days. The process on our Housing Management system reflects this and this is monitored through our monthly KPIs. Performance is updated on a quarterly basis on our website and is also included in our Annual Complaints and Performance Report 2023-24.</p>
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	<ul style="list-style-type: none"> Complaints Policy 2024 Residents' Complaints Procedure Staff Complaints Procedure 	<p>This is detailed in section 11 of our Complaints Policy and in our procedures.</p>
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	<ul style="list-style-type: none"> Complaints Policy 2024 Residents' Complaints Procedure Staff Complaints Procedure Hold letter template 	<p>This is explained in section 11.6 of the complaints policy. The Housing Ombudsman information forms the final paragraphs of the hold letter.</p>
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	Yes	<ul style="list-style-type: none"> Complaints Policy 2024 Residents' Complaints Procedure 	<p>The complaints stages, section 11.7 of the policy details that the complaint response must be provided to the complainant when the answer to the</p>

	to address the issue are completed. Outstanding actions must still be tracked and actioned promptly with appropriate updates provided to the resident.		<ul style="list-style-type: none"> • Staff Complaints Procedure 	complaint is known, not when the outstanding actions required to address the issue are completed. The outstanding actions will be tracked and actioned expeditiously with regular updates provided to the resident.
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	<ul style="list-style-type: none"> • Staff Complaints Procedure 	Section 9 of the staff procedure provides guidance and details on how to address and communicate with the complainant and third-party representatives.
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 response, the new issues must be logged as a new complaint.	Yes	<ul style="list-style-type: none"> • Complaints Policy 2024 	The scope of the policy explains this process and section 6.4 details the expectation of adding the related issue to the complaint if the response has not been issued and if a response has been issued a new complaint should be raised.
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; 	Yes	<ul style="list-style-type: none"> • Staff Complaints Procedure 	Section 9 of the staff procedure provides details on what should be provided to the resident in writing, using clear plain language at the completion of stage 1.

	<p>d. the reasons for any decisions made;</p> <p>e. the details of any remedy offered to put things right;</p> <p>f. details of any outstanding actions; and</p> <p>g. details of how to escalate the matter to stage 2 if the individual is not satisfied with the response.</p>			
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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	<ul style="list-style-type: none"> • Complaints Policy 2024 	This is in our 11.8 of our policy. The resident has 20 working days to consider our response and if all or part of the complaint has not been resolved to their satisfaction they can request an escalation to Stage 2. The complainant is not required to justify their reasons for this.
6.11	Requests for stage 2 must be acknowledged, defined and logged at stage 2 of the complaints procedure within five working days of the escalation request being received.	Yes	<ul style="list-style-type: none"> • Complaints Policy 2024 • The Residents' Complaints Procedure • Staff Complaints Procedure • 'How to make a complaints' leaflet • KPI monitoring spreadsheet • KPI performance on website 	The complaints policy, section 11, and procedures provide the detailed timeline of the process and reflects the five working days. The process on our Housing Management system reflects this and this is monitored through our monthly KPIs. Performance is updated on a quarterly basis on our website and is also included in our Annual

			<ul style="list-style-type: none"> • Annual Complaints and Performance Report 2023-24 	Complaints and Performance Report 2023-24.
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	<ul style="list-style-type: none"> • Complaints Policy 2024 • Staff Complaints Procedure 	Section 11.8 of the complaints policy provides details on escalation and that the complainant is not required to justify their reasons for this.
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Yes	<ul style="list-style-type: none"> • Complaints Policy 2024 • Residents' Complaints Procedure • Staff Complaints Procedure 	A director will be appointed to respond to all stage 2 complaints and all policies make reference to who will investigate the complaint at stage 2.
6.14	Landlords must issue a final response to the stage 2 <u>within 20 working days</u> of the complaint being acknowledged.	Yes	<ul style="list-style-type: none"> • Complaints Policy 2024 • Residents' Complaints Procedure • Staff Complaints Procedure • How to make a complaint leaflet • KPI monitoring spreadsheet • KPI performance on website • Annual Complaints and Performance Report 2023-24 	The complaints policy, section 11, and procedures provide the detailed timeline of the process and reflects the ten working days. The process on our Housing Management system reflects this and this is monitored through our monthly KPIs. Performance is updated on a quarterly basis on our website and is also included in our Annual Complaints and Performance Report 2023-24.
6.15	Landlords must decide whether an extension to this timescale is needed when considering the complexity of the	Yes	<ul style="list-style-type: none"> • Complaints Policy 2024 	This is detailed in section 11 of our complaints policy and in our procedures.

	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.		<ul style="list-style-type: none"> Residents' Complaints Procedure Staff Complaints 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	<ul style="list-style-type: none"> Complaints Policy 2024 Residents' Complaints Procedure Staff Complaints Procedure Hold letter template 	This is explained in section 11.13 of the complaints policy. The Housing Ombudsman information forms the final paragraphs of the hold letter.
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	<ul style="list-style-type: none"> Complaints Policy 2024 Residents' Complaints Procedure Staff Complaints Procedure 	The complaints stages, section 11.14 of the policy, details that the complaint response must be provided to the complainant when the answer to the complaint is known, not when the outstanding actions required to address the issue are completed. The outstanding actions will be tracked and actioned expeditiously with regular updates provided to the resident.
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	<ul style="list-style-type: none"> Complaints Policy 2024 Staff Complaints Procedure 	This is in our policy under section 11.14, and in our staff procedure in section 9.
6.19	Landlords must confirm the following in writing to the resident at the	Yes	<ul style="list-style-type: none"> Staff Complaints Procedure 	Section 9 of the staff procedure provides details on what should be

	<p>completion of stage 2 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; and g. details of how to escalate the matter to the Ombudsman Service if the individual remains dissatisfied. 			<p>provided to the resident in writing, using clear plain language at the completion of stage 2.</p>
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	<ul style="list-style-type: none"> • Complaints Policy 2024 	<p>Section 11.11 of our policy explains that a director will respond at stage 2. Section 11.15 explains that stage 2 response is the final response and the complainant will be informed of what to do if they remain dissatisfied. The director has authority to ensure that all staff required to issue a response are involved.</p>

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	<ul style="list-style-type: none"> • Complaints Policy 2024 • Staff Complaints Procedure 	Section 1.3 of the complaints policy provides an overview of this and 13.3 links to the Ombudsman guidance on dispute resolution. Guidance is also included in the staff complaints procedure under 'putting things right'.
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Yes	<ul style="list-style-type: none"> • Staff Complaints Procedure 	Our staff procedure states that any remedy offered must reflect the extent of any service failures and the level of detriment caused to the resident as a result. Details can be found under the 'putting things right' section 15.
7.3	The remedy offer must clearly set out what will happen and by when, in agreement with the resident where	Yes	<ul style="list-style-type: none"> • Staff Complaints Procedure 	This is detailed in our staff procedure under the 'putting things right' section 15.

	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	<ul style="list-style-type: none"> • Complaints Policy 2024 • Staff Complaints Procedure 	Section 13.0 details guidance on complaints management and training and section 13.3 of the policy and the staff procedure also provides a direct link to the Housing ombudsman dispute resolution and landlord learning web page.

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> <p>a. the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements.</p> <p>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;</p> <p>c. any findings of non-compliance with this Code by the Ombudsman;</p> <p>d. the service improvements made as a result of the learning from complaints;</p> <p>e. any annual report about the landlord's performance from the Ombudsman; and</p> <p>f. any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord.</p>	Yes	<ul style="list-style-type: none"> • Annual Complaints Performance and Service Improvement Report 2023-24 • Annual self-assessment against the Code • Board agenda, papers and minutes • ccha website • Performance information on ccha website • ccha annual report 	<p>The annual complaints performance and service improvement report 2023-24 including these areas has been completed and is being taken to our Board for review on 19 June 2024. There are no relevant reports from the Ombudsman to include but a link has been given to the determination page on the Ombudsman website. Our report and self-assessment will be made available on our website by 30 June 2024.</p> <p>In previous years, the board received an annual performance review as part of our Customer Strategy update and performance information was made available on our website and in our annual report.</p>

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	<ul style="list-style-type: none"> • Annual Complaints Performance and Service Improvement Report 2023-24 • Board agenda, papers and minutes • ccha website 	The annual complaints performance and service improvement report is being reported to the Board on 19 June 2024. It will be published in the complaints area of our website before 30 June 2024. It will include a foreword from the Board confirming their response to the report.
8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	Yes	<ul style="list-style-type: none"> • Annual self-assessment against the Code 	We are aware that we are required to carry out a review of our self-assessment should there be a significant change in the organisation or our procedures. Our latest self-assessment was completed in June 2024 and there are no known significant changes planned or pending.
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	Yes	<ul style="list-style-type: none"> • Annual self-assessment against the Code 	We have not been asked to update our self-assessment following an investigation but are aware that this is something we could be asked to do.
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	<ul style="list-style-type: none"> • ccha website 	We are aware of this requirement should we be unable to comply with the Code due to exceptional circumstances. This is currently not an issue for us.

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	<ul style="list-style-type: none"> • Complaints Policy 2024 • Staff Complaints Procedure • Complaint Forum Records • Complaint Learning Spreadsheet 	As well as looking at the individual complaints, we have quarterly complaint forums to discuss wider learning and improvements. This is detailed in section 12 of our policy and in our staff complaints procedure.
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	<ul style="list-style-type: none"> • Complaints Policy 2024 • Staff Complaints Procedure • HQN Complaints Handling Training and attendance • Internal staff briefing complaints presentation • Records from Quarterly Complaints Learning Forum • Annual Performance and Service Improvement Report 2023-24 	We encourage a positive complaint handling culture through our policies (sections 1 and 12), procedures, training and learning and use feedback from complaints to make positive changes to our services. Examples of this can be seen in our Annual Complaints Performance and Service Improvement Report 2023-24 section 7.
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	<ul style="list-style-type: none"> • Complaints Policy 2024 • Annual Reports • Annual Performance and Service Improvement Report 2023-24 	<p>This is covered in section 12 of our policy.</p> <p>Learning from complaints has been reported to residents through our annual reports (performance section) and promoted on our website. Our Annual Complaints Performance and</p>

			<ul style="list-style-type: none"> • Board agenda, papers and minutes • RNC agenda, papers and minutes • Quarterly Complaints Bulletins to staff • Internal staff briefing complaints presentation 	<p>Service Improvement Report 2023-24 section 7 also includes this and will be published on our website by 30 June 2024.</p> <p>Our Board receive an annual update on complaints as part of our Customer Strategy update which includes learning. The Annual Complaints Performance and Service Improvement Report 2023-24 also includes this and will be presented to Board in June 2024. Our Remuneration and Nomination Committee (RNC) also received information on complaints every six months and this is reported back into the main Board.</p> <p>Staff received quarterly complaints bulletins and we have completed an annual update on complaints and learning at one of our staff collaboration days.</p>
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	<ul style="list-style-type: none"> • Complaints Policy 2024 	<p>This is confirmed in section 12 of our complaints policy. The Director of Customers works closely with our designated Complaints Officer and reports themes and trends into the leadership team and Board.</p>

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	<ul style="list-style-type: none"> • Complaints Policy 2024 • Role Profile for Chair of RNC 	This is confirmed in section 12 of our complaints policy. The Chair of our Remuneration and Nomination Committee (RNC) has been appointed as the Member Responsible for Complaints.
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	<ul style="list-style-type: none"> • Complaints Policy 2024 • Role Profile for Chair of RNC • RNC Terms of Reference • Board agenda, papers and minutes • RNC agenda, papers and minutes 	This is confirmed in section 12 of our complaints policy, and in the chair's role profile and terms of reference for our Remuneration and Nominations Committee (RNC). A six monthly report is presented to RNC and the MRC feeds back to the main Board. Further information is also presented directly to Board. All members are encouraged to meet staff and are provided with opportunities to do so and staff/managers are able to attend committee and board meetings when requested to do so.
9.7	As a minimum, the MRC and the governing body (or equivalent) must receive: <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; 	Yes	<ul style="list-style-type: none"> • Complaints Policy 2024 • Board agenda, papers and minutes • RNC agenda, papers and minutes • Annual Performance and Service Improvement Report 2023-24 	This is confirmed in section 12 of our complaints policy. An annual update is provided to Board as part of the Customer Strategy Update including these areas and this year the Board will receive the Annual Complaints Performance and Service Improvement Report 2023-24 and the Board review the self-assessment annually. The Board also receive

	<p>c. regular updates on the outcomes of the Ombudsman's investigations and progress made in complying with orders related to severe maladministration findings; and</p> <p>d. annual complaints performance and service improvement report.</p>		<ul style="list-style-type: none"> Annual Report 	<p>information as part of our quarterly Special Performance Indicators and on an ad-hoc basis via the CE Update in relation to any determinations received by the Ombudsman. The Remuneration and Nomination Committee (RNC) also received a six monthly report and the MRC reports back into the board on this after each meeting. Information is also provided in our annual report which is approved by the Board.</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> <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	<ul style="list-style-type: none"> Complaint Policy 2024 Role Profiles for staff/managers in our Operational Teams and members of the Leadership Team. 	<p>This is confirmed in section 13 of our complaints policy and is included in the role profiles for all relevant employees.</p>