

Appendix A: Self-assessment form

This self-assessment form should be completed by the complaints officer and it must be reviewed and approved by the landlord's governing body at least annually.

Once approved, landlords must publish the self-assessment as part of the annual complaints performance and service improvement report on their website. The governing body's response to the report must be published alongside this.

Landlords are required to complete the self-assessment in full and support all statements with evidence, with additional commentary as necessary.

We recognise that there may be a small number of circumstances where landlords are unable to meet the requirements, for example, if they do not have a website. In these circumstances, we expect landlords to deliver the intentions of the Code in an alternative way, for example by publishing information in a public area so that it is easily accessible.

Section 1: Definition of a complaint

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
1.2	A complaint must be defined as: <i>'an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the landlord, its own staff, or those acting on its behalf, affecting a resident or group of residents.'</i>	Yes	Definition set out in CHS Complaints Policy.	'customer' used rather than 'resident' in CHS Policy because our complaints policy covers non-residents e.g. community investment services.
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	Updated CHS Complaints Policy.	CHS Policy updated 2024 to say 'we'll still offer you the choice to have your complaint investigated further at stage 1 (below)' at the point that a customer first contacts us. All customer facing staff have been briefed on the importance of this approach.
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	CHS Complaints Policy.	This is clearly set out in the CHS Complaints Policy and internal complaint handling Guide for staff (updated April 2024).

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	Updated CHS Complaints Policy.	CHS policy updated 2024 to say 'This will not prevent us from working to address the ongoing issue while we handle your 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	CHS sends surveys on overall tenant satisfaction and makes follow up calls where a customer has expressed dissatisfaction e.g. after completion of a repair. These surveys and the phone calls will include a reminder that a complaint may be made.	We have added a sentence to the introduction of our regular surveys to remind customers that they can complain.

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	Yes	Complaints Policy	The CHS Complaints Policy sets out specific situations CHS would not accept a complaint.

	considered on its own merits.			
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	<p>The Complaints Policy sets out specific situations CHS would not accept a complaint. The last policy included disagreement with CHS policies / strategies and with CHS' legal / regulatory obligations as being exclusions.</p>	<p>CHS Policy updated 2024 (issues not considered to be complaints) to say: 'Complaints about issues which occurred (or the customer became aware of them) more than twelve months previously. We may consider complaints outside this timeframe where there is good reason to do so.' (previously six months)</p> <p>CHS Policy updated 2024 to remove disagreement with policy / CHS legal obligations as exclusions – no such complaints have been recorded.</p>
2.3	<p>Landlords must accept complaints referred to them within 12 months of the issue occurring or the resident becoming aware of the issue, unless they are excluded on other grounds. Landlords must consider whether to apply discretion to accept complaints made outside this time limit where there are good reasons to do so.</p>	Yes	<p>CHS Complaints Policy and internal procedures</p>	<p>CHS Complaints Policy timescale updated 2024 from six to 12 months, with discretion to consider the individual circumstances.</p>
2.4	<p>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</p>	Yes	<p>CHS Complaints Policy clearly states such explanation will be given.</p>	

	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.			
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Yes	CHS Complaints Policy.	CHS Policy updated 2024 to include: 'We will not take a blanket approach to excluding complaints; we will consider the individual circumstances of each complaint'.

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	CHS Complaints Policy sets out the range of ways to complain and that any adjustments will be agreed with customers individually.	CHS Policy amended to say 'any employee of CHS' (See section 4 'How to complain')
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	Yes	All CHS staff have been briefed in writing and in team meetings on the requirements of the 2024 Code and an updated CHS	There is no restriction on how a customer may wish to make a complaint.

	appropriate person within the landlord.		Guide issued to all staff.	
3.3	High volumes of complaints must not be seen as a negative, as they can be indicative of a well-publicised and accessible complaints process. Low complaint volumes are potentially a sign that residents are unable to complain.	Yes	We have improved the website guidance on making complaints; staff have been briefed to invite complaints if issue not resolved to the customer's satisfaction at the first point of contact or at their request.	We intend to publish more about complaints performance on our website and annual complaints performance report.
3.4	Landlords must make their complaint policy available in a clear and accessible format for all residents. This will detail the two stage process, what will happen at each stage, and the timeframes for responding. The policy must also be published on the landlord's website.	Yes	The CHS Complaints Policy is published on our website along with a web page giving a summary. The website is accessible to use e.g. ReadSpeaker, webReader.	The policy clearly sets out the two stages, what will happen at each stage, and the timeframes for responding; it is available on our website. We send a copy to anyone making a formal complaint and on request.
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	CHS Complaints Policy.	CHS Policy amended 2024 to: 'You can find the Complaints Policy, information about the Housing Ombudsman and also our last self-assessment against the Ombudsman's Complaint Handling Code on our website.'
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	CHS Complaints Policy.	CHS policy amended 2024: 'You can ask a representative to deal with your complaint on your behalf, and you can be represented or accompanied at any meeting with CHS.'

3.7	Landlords must provide residents with information on their right to access the Ombudsman service and how the individual can engage with the Ombudsman about their complaint.	Yes	CHS Complaints Policy – also mentioned in any response to a complaint at stage 1 or 2, including contact details.	
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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	The Director of Customers is responsible for liaison with the Ombudsman and ensuring complaints are reported to the governing body. This Director also chairs the internal Complaints team and attends the Customer Complaints Panel with other complaint handlers.	
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	Complaint handlers are managers and Directors who have access to staff at all levels to facilitate the prompt resolution of complaints and they have the authority and autonomy to act to resolve disputes promptly and fairly.	

4.3	Landlords are expected to prioritise complaint handling and a culture of learning from complaints. All relevant staff must be suitably trained in the importance of complaint handling. It is important that complaints are seen as a core service and must be resourced to handle complaints effectively	Yes	Customer facing teams have training on effective customer service which is refreshed every 3 years. All staff have been briefed on the up to date Ombudsman Code and the approach to complaints and customer facing teams have had further discussions in March/ April 2024 about effective complaint handling.	Annual reports to Customer and Home Committee and to all tenants include lessons learned from complaints and changes made as a result.
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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	CHS Complaints Policy covers all customers including those in receipt of care services and looked after children who can use the Local Government and Social Care Ombudsman.	
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	Yes	The Complaints Policy has two stages although it refers to the opportunity ('Initial Contact') to resolve an issue when the customer raises it, which will be recorded.	CHS policy updated 2024 to re-name Formal Complaint to stage 1 and Formal Review to stage 2 as these are now standard terminology in the sector and with the Housing Ombudsman.

	confusion.			
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	CHS Complaints Policy has two 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 expected to go through two complaints processes.	Yes	Our contractors handle Initial Contact (defined by the HOS as Service Request) and if the issue escalates to stage 1 or 2 it is handled by CHS.	Customers are informed by CHS and by contractors that they can escalate their complaint with CHS if not resolved with a contractor.
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Yes	We have asked our contractors to handle complaints in line with the CHS Policy.	Further assurance will be pursued during the responsive repairs procurement process in 2024/5
5.6	When a complaint is logged at Stage 1 or escalated to Stage 2, landlords must set out their understanding of the complaint and the outcomes the resident is seeking. The Code will refer to this as "the complaint definition". If any aspect of the complaint is unclear, the resident must be asked for clarification.	Yes	This happens in practice and is prompted by letter templates although the Complaints Policy did not explicitly state this requirement until the latest update.	CHS Policy amended 2024 to: 'CHS will acknowledge and set out our understanding of your complaint including any outcomes you are seeking, within 5 working days. This will include the name of the manager who is dealing with the complaint and how long it will take to investigate.'
5.7	When a complaint is acknowledged at	Yes	This happens in practice	Addition to CHS Policy in 2024: 'We

	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.		although the Complaints Policy did not explicitly state this requirement until the latest update.	will explain if any parts of your complaint are not CHS's responsibility'.
5.8	At each stage of the complaints process, complaint handlers must: <ul style="list-style-type: none"> a. deal with complaints on their merits, act independently, and have an open mind; b. give the resident a fair chance to set out their position; c. take measures to address any actual or perceived conflict of interest; and d. consider all relevant information and evidence carefully. 	Yes	Complaints records detail the communication with customers to clarify the complaint and include all relevant information. Staff involved in an issue from which a complaint arises do not investigate those complaints.	
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	CHS Complaints Policy paragraphs 8 and 9.	
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	We record any disabilities disclosed by the customer in our housing database, QL and any adjustments required generally. These will be discussed afresh in the course of handling a complaint.	CHS policy amended 2024: 'We will agree with you any reasonable adjustments you need and keep a record of 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	CHS Complaints Policy.	CHS Policy amended 2024: 'If we decide not to escalate your complaint we will explain the reason in writing, and we will only do so for a good reason e.g. legal action is under way or the same issue has already been considered at this stage under our policy.'
5.12	A full record must be kept of the complaint, and the outcomes at each stage. This must include the original complaint and the date received, all correspondence with the resident, correspondence with other parties, and any relevant supporting documentation such as reports or surveys.	Yes	The Housing database records every complaint as a case with key stages and target timescales, notes about the investigation and all correspondence.	
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	The CHS Compensation Policy sets a framework for appropriate compensation; guidance for staff encourages early and effective resolution to prevent complaint escalation.	
5.14	Landlords must have policies and procedures in place for managing unacceptable behaviour from residents and/or their representatives. Landlords must be able to evidence reasons for putting any restrictions in place and must keep restrictions under regular	Yes	The CHS Managing Unreasonable Customer Behaviour policy sets out clear guidelines for what is judged to be unreasonable behaviour and the ways in which it may be addressed	The Complaints Policy contains section 11 on Unreasonable use of the complaints process and refers to the Managing Unreasonable Behaviour policy.

	review.		and reviewed.	
5.15	Any restrictions placed on contact due to unacceptable behaviour must be proportionate and demonstrate regard for the provisions of the Equality Act 2010.	Yes	The Managing Unreasonable Customer Behaviour policy includes the review of any limitations on contact with the customer and an appeal process.	CHS Complaints Policy amended: 'Any restrictions placed on contact due to unacceptable behaviour will be proportionate and demonstrate regard for the provisions of the Equality Act 2010.'

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	The complaint handling guidance for staff encourages quick resolution of complaints where possible including answering a complaint along with the acknowledgment where appropriate. Very few stage one complaints are escalated to stage two.	We will add more to the CHS complaint handling guidance about considering whether the resident is vulnerable or at risk including potential implications and reasonable adjustments.
6.2	Complaints must be acknowledged, defined and logged at stage 1 of the	Yes	Our policy section 6 says 'CHS will acknowledge and set out our	The actual response times are recorded and monitored

	complaints procedure <u>within five working days of the complaint being received.</u>		understanding of your complaint including any outcomes you are seeking, within 5 working days.'	against the target timescale and will included in the annual report for 2023/4.
6.3	Landlords must issue a full response to stage 1 complaints <u>within 10 working days</u> of the complaint being acknowledged.	Yes	CHS Complaints Policy section 8.0.	The actual response times are recorded and monitored against the target timescale and will included in the annual report for 2023/4.
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	CHS Complaints Policy section 8.0.	Complaints Policy updated 2024 to include explain the reason for any extension.
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	CHS Complaints policy section 8.0.	
6.6	A complaint response must be provided to the resident when the answer to the complaint is known, not when the outstanding actions required to address the issue are completed. Outstanding actions must still be tracked and actioned promptly with appropriate	Yes	Recent complaints have improved on this; included in updated guidance for staff issued April 2024.	

	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	This is included in our procedures and prompted by the response letter template.	This will be monitored by the Complaints Panel and senior officers when reviewing complaints.
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	CHS Complaints policy section 8.0.	
6.9	Landlords must confirm the following in writing to the resident at the completion of stage 1 in clear, plain language: <ul style="list-style-type: none"> a. the complaint stage; b. the complaint definition; c. the decision on the complaint; d. the reasons for any decisions made; e. the details of any remedy offered to put things right; f. details of any outstanding actions; and g. details of how to escalate the 	Yes	This is included in staff guidance and letter templates, revised April 2024. An internal audit February 2022 found responses were appropriate in covering these details.	

	matter to stage 2 if the individual is not satisfied with the response.			
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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	CHS Complaints Policy and guidance for staff.	
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	CHS Complaints Policy section 9.0	Complaints policy amended 2024 to make this timescale more explicit.
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	CHS Complaints Policy section 9.0	Complaints Policy amended 2024 to remove the requirement for the complainant to confirm the reason for escalating the complaint.
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Yes	CHS Complaints Policy section 9.0	
6.14	Landlords must issue a final response to	Yes	CHS Complaints Policy section	

	the stage 2 <u>within 20 working days</u> of the complaint being acknowledged.		9.0. This is recorded and monitored and reported with our Tenant Satisfaction Measures.	
6.15	Landlords must decide whether an extension to this timescale is needed when considering the complexity of the complaint and then inform the resident of the expected timescale for response. Any extension must be no more than 20 working days without good reason, and the reason(s) must be clearly explained to the resident.	Yes	CHS Complaints Policy section 9.0.	Complaints Policy amended 2024 to confirm we will not extend the timescale without a good reason which we will explain.
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	CHS Complaints Policy section 9.0.	Policy amended 2024 to say we will provide the Ombudsman's contact details.
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	The Complaints Policy is clear that while there may be outstanding actions this should not prevent us from answering a complaint.	Outstanding actions are tracked on our Housing Management system.
6.18	Landlords must address all points raised in the complaint definition and provide clear reasons for any decisions, referencing the relevant policy, law and good practice where appropriate.	Yes	This is included in our guidance for staff.	
6.19	Landlords must confirm the following in writing to the resident at the completion	Yes	This is included in our guidance for staff.	Adherence to this practice was confirmed in an internal

	<p>of stage 2 in clear, plain language:</p> <ol style="list-style-type: none"> 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 details of how to escalate the matter to the Ombudsman Service if the individual remains dissatisfied. 			audit February 2022.
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	<p>A single senior staff member will lead on a stage 2 response and will involve any relevant staff required to provide the information for the response.</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 	Yes	<p>Our Complaints Policy 'How will we handle complaints' commits CHS to these remedies. Our case histories show examples where we have apologised, explained, made compensation payment, changed procedure and practice.</p>	

	<ul style="list-style-type: none"> • 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. 			
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Yes	Clear guidelines are set out in the Compensation Policy	
7.3	The remedy offer must clearly set out what will happen and by when, in agreement with the resident where appropriate. Any remedy proposed must be followed through to completion.	Yes	Offers of compensation are clearly set out in complaint responses and the actions taken to complete the remedy are recorded on the housing management system.	
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes	The CHS Compensation Policy takes into account the guidance e.g. considering the stress, inconvenient, loss, remedies that are proportionate to the circumstances of the case.	

Section 8: Putting things right

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
8.1	<p>Landlords must produce an annual complaints performance and service improvement report for scrutiny and challenge, which must include:</p> <ul style="list-style-type: none"> a. the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements. b. a qualitative and quantitative analysis of the landlord's complaint handling performance. This must also include a summary of the types of complaints the landlord has refused to accept; c. any findings of non-compliance with this Code by the Ombudsman; d. the service improvements made as a result of the learning from complaints; e. any annual report about the landlord's performance from the Ombudsman; and f. any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord. 	Yes	<p>The annual self-assessment against the Ombudsman Code is published annually on the CHS website, with any Ombudsman findings including the full investigation reports. Our Customer Annual Reports include data and analysis of complaints handled each year, with any learning and resulting changes.</p>	
8.2	The annual complaints performance and	Yes	Further developments in annual	

	service improvement report must be reported to the landlord's governing body (or equivalent) and published on the section of its website relating to complaints. The governing body's response to the report must be published alongside this.		reporting are included in the submission of an annual report on complaint handling to the Customer & Home Committee (May 2024) which will draft a response to the report for the Board to confirm and which will be published on the website.	
8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	Yes	This has not so far been necessary.	
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	Yes	This has not so far been necessary.	
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	This has not so far been necessary.	

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	Yes	Each stage 1 or 2 complaint is	The Customer Complaints

	circumstances of the individual complaint and consider whether service improvements can be made as a result of any learning from the complaint.		reviewed for lessons that can be learned, with such learning reported annually.	Panel monitor learning from complaints.
9.2	A positive complaint handling culture is integral to the effectiveness with which landlords resolve disputes. Landlords must use complaints as a source of intelligence to identify issues and introduce positive changes in service delivery.	Yes	This approach is clear in our policy and guidance to staff. The Property Service department produce quarterly complaints analysis reports. Causes of dissatisfaction are identified and the information is taken to contractor meetings to work on changes to service delivery.	Complaint handling feedback from the TSM survey and transactional surveys are used to introduce changes in service delivery.
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	Analysis reports are shared with the Customer Complaints Panel. TSMs are shared with the Tenant Committee. Complaints performance information is also shared with the Tenant Scrutiny Panel.	Learning and improvements from complaints are included in our customer newsletter and annual report.
9.4	Landlords must appoint a suitably senior lead person as accountable for their complaint handling. This person must assess any themes or trends to identify potential systemic issues, serious risks, or policies and procedures that require revision.	Yes	The Director of Customers is the responsible Executive Director for complaint handling.	
9.5	In addition to this a member of the governing body (or equivalent) must be appointed to have lead responsibility for complaints to support a positive	Yes	The Chair of the Customer and Home Committee is the Board member with lead responsibility for complaints (MRC).	

	complaint handling culture. This person is referred to as the Member Responsible for Complaints ('the MRC').			
9.6	The MRC will be responsible for ensuring the governing body receives regular information on complaints that provides insight on the landlord's complaint handling performance. This person must have access to suitable information and staff to perform this role and report on their findings.	Yes	The Customer & Home Committee receives annual reports on complaints performance from the Director of Homes and Director of Customers. These are discussed at Committees and Board meetings.	This self-assessment is conducted annually and reported to the Customer and Home Committee.
9.7	As a minimum, the MRC and the governing body (or equivalent) must receive: a. regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance; b. regular reviews of issues and trends arising from complaint handling; c. regular updates on the outcomes of the Ombudsman's investigations and progress made in complying with orders related to severe maladministration findings; and d. annual complaints performance and service improvement report.	Yes	The Customer & Home Committee receives annual reports on complaints performance including themes and learning. The same Committee also reviews any investigation findings from the Ombudsman	Need to agree with MRC the frequency of such reporting. Any complaint escalated to the Housing Ombudsman is reported to the Customer and Home Committee. Team annual reports to Customer and Home Committee include lessons learned from complaints in each team.
9.8	Landlords must have a standard objective in relation to complaint handling for all relevant employees	Yes	These requirements are included in the CHS Complaint Handling Guide which applies to all	

	<p>or third parties that reflects the need to:</p> <ol style="list-style-type: none"> a. have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments; b. take collective responsibility for any shortfalls identified through complaints, rather than blaming others; and c. act within the professional standards for engaging with complaints as set by any relevant professional body. 		<p>employees. All employees have required behaviours linked to their role, e.g. customer focus, teamwork, flexible and adaptable. The CHS Employee Code of Conduct includes expected behaviours including taking responsibility, Customer Focus, Teamwork.</p> <p>Contractors are being reminded that they are expected to comply with the Code when handling complaints on CHS's behalf; this is also a clear requirement in the repairs contracts re-tendering in 2024/5.</p> <p>A further step has been agreed to include a standard objective in the job descriptions of CHS staff to have a collaborative approach to complaints, take collective responsibility & act within professional standards relevant to the role.</p>	
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