

## Cambridge Housing Society Limited (CHS) including registered subsidiary Waters Almshouses.

### Housing Ombudsman Complaint Handling Code Self-assessment July 2026

**This self-assessment form is completed and approved by the CHS Board annually.**

Once approved, CHS Group publishes the self-assessment as part of the annual complaints performance and service improvement report on its website. The response of the CHS Board is published alongside this.

#### Section 1: Definition of a complaint

| Code provision | Code requirement                                                                                                                                                                                                                                                                                                                                     | Comply: Yes / No | Evidence                                    | Commentary / explanation                                                                                                                                                                                                                                                                                             |
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| 1.2            | A complaint must be defined as:<br><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              | CHS Complaints Policy                       | CHS Policy states 'If we can resolve the issue quickly and to your satisfaction.....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 trained 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 and staff guidance    | This is clearly set out in the CHS Complaints Policy (updated December 2025) and internal complaint handling Guide for staff                                                                                                                                                                                         |

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| 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 | CHS Complaints Policy                                                                                                                                                                                                              | CHS policy states '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 Tenant Satisfaction and transactional surveys e.g. after completion of a repair and makes follow up calls where a customer has expressed dissatisfaction. These surveys include a reminder that a complaint may be made. | We include advice on our annual Tenants Satisfaction survey questionnaire about how to make a complaint.               |

## Section 2: Exclusions

| Code provision | Code requirement                                                                                                                                                                                                                 | Comply: Yes / No | Evidence                                                                  | Commentary / explanation                                                                                                                                                                                        |
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| 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              | Complaints Policy                                                         | The CHS Complaints Policy sets out specific situations CHS would not accept a complaint. Where we decline to accept a complaint we have explained the reasons in full and consider each situation individually. |
| 2.2            | A complaints policy must set out the circumstances in which a matter will not be considered as a complaint or escalated, and                                                                                                     | Yes              | The Complaints Policy sets out specific situations CHS would not accept a | CHS Policy states (issues not considered to be complaints) including the examples given in the Code, plus:                                                                                                      |

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|     | <p>these circumstances must be fair and reasonable to residents. Acceptable exclusions include:</p> <ul style="list-style-type: none"> <li>• The issue giving rise to the complaint occurred over twelve months ago.</li> <li>• 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.</li> <li>• Matters that have previously been considered under the complaints policy.</li> </ul> |     | complaint.                                                           | <ul style="list-style-type: none"> <li>• Complaints about level of rent</li> <li>• Complaints about services we don't provide</li> <li>• Complaints made in an unreasonable manner</li> </ul> |
| 2.3 | Landlords must accept complaints referred to them within 12 months of the issue occurring or the resident becoming aware of the issue, unless they are excluded on other grounds. Landlords must consider whether to apply discretion to accept complaints made outside this time limit where there are good reasons to do so.                                                                                                                                                        | Yes | CHS Complaints Policy and internal procedures                        | CHS Complaints Policy timescale is 12 months, with discretion to consider the individual circumstances.                                                                                       |
| 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 | CHS Complaints Policy clearly states such explanation will be given. | Where we decline to accept a complaint we have explained the reasons in full and consider each situation individually and the right to refer the matter to the Housing Ombudsman.             |
| 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 states: '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                                                                                                                                                                                                                                                             |
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| 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 in any way that suits them and that any adjustments will be agreed with customers individually.                                                      | CHS has also agreed a corporate Reasonable Adjustments Policy (July 2026).                                                                                                                                                                                                           |
| 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              | All CHS staff have been briefed in writing and in team meetings on the requirements of the 2024 Code and an updated CHS Guide issued to all staff.                                                                | There is no restriction on how a customer may wish to make a complaint.                                                                                                                                                                                                              |
| 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 comprehensive website guidance on making complaints; staff have been trained to invite complaints if issue not resolved to the customer's satisfaction at the first point of contact or at their request. | Since the 2024 Code came into effect the number of formal complaints increased from 35 in 2023/4 to 80 in 2024/5 and 161 in 2025/6. We believe this is in part due to staff being more open to accepting complaints and increased awareness / communication about making complaints. |
| 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.                                                                    |

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| 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 states:<br>'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 states: '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 | This is also mentioned in any acknowledgement or response to a complaint at stage 1 or 2, including contact details.                                                                                  |

#### Section 4: Complaint Handling Staff

| Code provision | Code requirement                                                                                                                                                                                                                                                                                                                     | Comply: Yes / No | Evidence                                                                                                                                                                                                                                     | Commentary / explanation                                                                                                                                                 |
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| 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 Executive Director of Customer Service is responsible for liaison with the Ombudsman and ensuring complaints are reported to the governing body. This Director also attends the Customer Complaints Panel with other complaint handlers. | CHS introduced a new post of Corporate Complaints Manager in 2026/7 to lead on supporting all complaint handling, monitoring compliance and liaising with the Ombudsman. |

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| 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 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.                                                                                                                            | The new Corporate Complaints Manager will operate independently from complaint handlers within CHS teams.                                         |
| 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 current Ombudsman Code and the approach to complaints and customer facing teams have regular training in 2024/5 on effective complaint handling including external training in 2025. | Annual reports to Customer and Home Committee, CHS Board and to all tenants include lessons learned from complaints and changes made as a result. |

### Section 5: The Complaint Handling Process

| Code provision | Code requirement                                                                                                                                           | Comply: Yes / No | Evidence                                                                                                                                                                     | Commentary / explanation |
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| 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                                 | Yes              | The Complaints Policy has two stages although it refers to the opportunity ('Initial Contact') to                                                                            |                          |

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|     | appropriate to have extra named stages (such as 'stage 0' or 'informal complaint') as this causes unnecessary confusion.                                                                                                                                                                                                 |     | resolve an issue when the customer raises it, which will be recorded.                                                                           |                                                                                                                                                                                                                                                                                |
| 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 require our contractors to handle initial contact complaints in line with the CHS Policy.                                                    | The responsive repairs procurement process in 2024/5 reiterated the requirement for the new contractor to handle initial contacts in line with the CHS policy.                                                                                                                 |
| 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 | CHS Complaints Policy                                                                                                                           | CHS Policy states: '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 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 | CHS Complaints Policy                                                                                                                           | CHS Policy states: 'We will explain if any parts of your complaint are not CHS's responsibility'.                                                                                                                                                                              |

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| 5.8  | At each stage of the complaints process, complaint handlers must:<br>a. deal with complaints on their merits, act independently, and have an open mind;<br>b. give the resident a fair chance to set out their position;<br>c. take measures to address any actual or perceived conflict of interest; and<br>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. | The Customer Complaints Panel reviews completed complaints each time it meets and has a checklist of items to check to ensure the comply with the Ombudsman Code including the tone of the response.                                                                                                                    |
| 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 states: 'We will agree with you any reasonable adjustments you need and keep a record of this. See also the new Reasonable Adjustments Policy July 2026                                                                                                                                                      |
| 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 - 'We will not unreasonably decline to escalate your complaint to stage 2. We may tell you that it is not appropriate to take your complaint further'                                             | The reasons include:<br>The same issue has already been considered at this stage under our policy; unreasonable use of the process; legal proceedings have begun on the same matter; new issues being raised that it would be unreasonable to add to the original complaint (which may then be considered as a separate |

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|      |                                                                                                                                                                                                                                                                                             |     |                                                                                                                                                                                           | complaint).                                                                                                                                                                                 |
| 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.                                       | The quality of record keeping allows us to ensure we can provide case histories to the Complaints Panel, to respond to Housing Ombudsman enquiries and to report all complaints accurately. |
| 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.                  | The Compensation Policy was updated in May 2026 to incorporate Ombudsman guidance on appropriate levels of compensation.                                                                    |
| 5.14 | Landlords must have policies and procedures in place for managing unacceptable behaviour from residents and/or their representatives. Landlords must be able to evidence reasons for putting any restrictions in place and must keep restrictions under regular review.                     | Yes | The 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 and reviewed. | The Complaints Policy contains section 11 on Unreasonable use of the complaints process and refers to the Managing Unreasonable Behaviour policy.                                           |
| 5.15 | Any restrictions placed on contact due to unacceptable behaviour must be proportionate and demonstrate regard for the provisions of the Equality Act 2010.                                                                                                                                  | Yes | The Managing Unreasonable Customer Behaviour policy includes the review of any limitations on contact with the customer and an appeal process.                                            | CHS Complaints Policy states: '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                                                                                                                                                                               |
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| 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. | Complaint handling guidance includes 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 complaints procedure <b><u>within five working days of the complaint being received.</u></b>                                                                                                                                                                                                                                      | Yes              | Our policy section 6 says 'CHS will acknowledge and set out our understanding of your complaint including any outcomes you are seeking, within 5 working days.'                     | In 2025/6 100.00% of stage 1 complaints were acknowledged within this timescale.                                                                                                                       |
| 6.3            | Landlords must issue a full response to stage 1 complaints <b><u>within 10 working days</u></b> of the complaint being acknowledged.                                                                                                                                                                                                                                                                    | Yes              | CHS Complaints Policy section 8.0                                                                                                                                                   | Response times are recorded and monitored against the target timescale. In 2025/6 97.7% of stage one complaints were responded to within the 10 day timescale, or extended once in line with the Code. |
| 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                                                                                                                                                                                                        | Yes              | CHS Complaints Policy                                                                                                                                                               | Complaints Policy includes explaining the reason for any extension.                                                                                                                                    |

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|     | extension must be no more than 10 working days without good reason, and the reason(s) must be clearly explained to the resident.                                                                                                                                                                                                                                                                              |     |                                                                                                                          |                                                                                                                                                                                                                      |
| 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                                                                                                    | This is included in our standard letter templates.                                                                                                                                                                   |
| 6.6 | A complaint response must be provided to the resident when the answer to the complaint is known, not when the outstanding actions required to address the issue are completed. Outstanding actions must still be tracked and actioned promptly with appropriate updates provided to the resident.                                                                                                             | Yes | Weekly monitoring of property-related complaints includes whether outstanding actions may legitimately delay a response. |                                                                                                                                                                                                                      |
| 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.                                         |                                                                                                                                                                                                                      |
| 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                                                                                                    | In most cases it is possible to respond to a new issue within the existing response however if this would delay the response to the issues already raised, a separate complaint will be logged for the newer issues. |
| 6.9 | Landlords must confirm the following in writing to the resident at the completion of                                                                                                                                                                                                                                                                                                                          | Yes | This is included in staff guidance and letter templates, revised January                                                 |                                                                                                                                                                                                                      |

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|  | stage 1 in clear, plain language: <ol style="list-style-type: none"> <li>the complaint stage;</li> <li>the complaint definition;</li> <li>the decision on the complaint;</li> <li>the reasons for any decisions made;</li> <li>the details of any remedy offered to put things right;</li> <li>details of any outstanding actions; and</li> <li>details of how to escalate the matter to stage 2 if the individual is not satisfied with the response.</li> </ol> |  | 2026. |  |
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## Stage 2

| Code provision | Code requirement                                                                                                                                                                                                                | Comply: Yes / No | Evidence                                      | Commentary / explanation                                                                                                    |
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| 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                         | In 2025/6 100.0% of stage 2 complaints were acknowledged within this timescale.                                             |
| 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                         | Where necessary we will attempt to clarify the reasons for wishing to escalate a complaint to stage 2 with the complainant. |

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| 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                                                                                                             | On rare occasions a Director may have been involved in a stage 1 response in which case a different Director will carry out the stage 2 investigation. |
| 6.14 | Landlords must issue a final response to the stage 2 <b>within 20 working days</b> of the complaint being acknowledged.                                                                                                                                                                                                           | Yes | CHS Complaints Policy<br>This is recorded and monitored and reported with our Tenant Satisfaction Measures.                       | In 2025/6 97.7% of complaints were responded to within the 20 day timescale at stage 2, or extended no more than once.                                 |
| 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                                                                                                             | The reviews carried out by the CHS Complaints Panel include whether an extension was properly communicated to the complainant.                         |
| 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                                                                                                             | This is included in our letter templates.                                                                                                              |
| 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 and with contractors.                                                                 |
| 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.                                                                                       |                                                                                                                                                        |

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| 6.19 | Landlords must confirm the following in writing to the resident at the completion of stage 2 in clear, plain language:<br>a. the complaint stage;<br>b. the complaint definition;<br>c. the decision on the complaint;<br>d. the reasons for any decisions made;<br>e. the details of any remedy offered to put things right;<br>f. details of any outstanding actions; and<br>g. details of how to escalate the matter to the Ombudsman Service if the individual remains dissatisfied. | Yes | This is included in our Complaints Policy and guidance for staff.                                                                                      |  |
| 6.20 | Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.                                                                                                                                                                                                                                                                                                                                                                    | Yes | 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. |  |

## Section 7: Putting things right

| Code provision | Code requirement                                                                                                                                                                                                                                                                          | Comply: Yes / No | Evidence                                                                                                                                                                                                                                               | Commentary / explanation |
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| 7.1            | 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:<br>• Apologising;<br>• Acknowledging where things have gone wrong;<br>• Providing an explanation, assistance or | Yes              | Our Complaints Policy 'How will we handle complaints' commits CHS to these remedies. Our case histories shared with the Complaints Panel show examples where we have apologised, explained, made compensation payment, changed procedure and practice. |                          |

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|     | reasons;<br>• Taking action if there has been delay;<br>• Reconsidering or changing a decision;<br>• Amending a record or adding a correction or addendum;<br>• Providing a financial remedy;<br>• 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 updated May 2026 takes into account the guidance e.g. considering the stress, inconvenience, loss, remedies that are proportionate to the circumstances of the case. |  |

### Section 8: Self-assessment, reporting & compliance

| Code provision | Code requirement                                                                                                                       | Comply: Yes / No | Evidence                                                                                                                              | Commentary / explanation |
|----------------|----------------------------------------------------------------------------------------------------------------------------------------|------------------|---------------------------------------------------------------------------------------------------------------------------------------|--------------------------|
| 8.1            | Landlords must produce an annual complaints performance and service improvement report for scrutiny and challenge, which must include: | Yes              | The annual self-assessment against the Ombudsman Code is published annually on the CHS website, with any Ombudsman findings including |                          |

|     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |     |                                                                                                                                                                                                                                                                               |  |
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|     | <ul style="list-style-type: none"> <li>a. the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements.</li> <li>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;</li> <li>c. any findings of non-compliance with this Code by the Ombudsman;</li> <li>d. the service improvements made as a result of the learning from complaints;</li> <li>e. any annual report about the landlord's performance from the Ombudsman; and</li> <li>f. any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord.</li> </ul> |     | the full investigation reports. The annual complaint handling report is published in the complaints area of the website. Our Customer Annual reports include data and analysis of complaints handled each year, with any learning and resulting changes.                      |  |
| 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 section of its website relating to complaints. The governing body's response to the report must be published alongside this.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | Yes | Further developments in annual reporting are included in the submission of an annual report on complaint handling to the Customer & Home Committee (July 2026) 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 been necessary.                                                                                                                                                                                                                                                  |  |
| 8.4 | Landlords may be asked to review and                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | Yes | This has not so far been necessary.                                                                                                                                                                                                                                           |  |

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|     | update the self-assessment following an Ombudsman investigation.                                                                                                                                                                                                                                                  |     |                                     |  |
| 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 circumstances of the individual complaint and consider whether service improvements can be made as a result of any learning from the complaint.                                                                       | Yes              | Each stage 1 or 2 complaint is reviewed for lessons that can be learned, with such learning reported annually.                                                                                                                                                                  | The CHS Complaints Panel, Customer & Home Committee and Board 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 has also been shared with the Tenant Scrutiny Team.                                                                               | Learning and improvements from complaints are included in our customer newsletter and annual report.                         |

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| 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 Executive Director of Customer Service 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 complaint handling culture. This person is referred to as the Member Responsible for Complaints ('the MRC').                                                                                                                                                                                | Yes | A member of the Customer and Home Committee is the Board member with lead responsibility for complaints (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 Executive Director of Home and Executive Director of Customer Service. These are discussed at committees and Board meetings. | This self-assessment is conducted annually and reported to the Customer and Home Committee and full Board.                                                                                                                                       |
| 9.7 | As a minimum, the MRC and the governing body (or equivalent) must receive:<br>a. regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance;<br>b. regular reviews of issues and trends arising from complaint handling;<br>c. regular updates on the outcomes of the Ombudsman's investigations and progress made in complying with orders related to severe maladministration findings; and | Yes | The Customer & Home Committee and Board receive annual reports on complaints performance and quarterly updates on learning. The same Committee also reviews any investigation findings from the Housing Ombudsman.    | Any complaint escalated to the Housing Ombudsman is reported to the Customer and Home Committee.<br><br>Team annual reports and quarterly Operational Directors' reports to Customer and Home Committee include lessons learned from complaints. |

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|     | d. annual complaints performance and service improvement report.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                                                                                         |
| 9.8 | <p>Landlords must have a standard objective in relation to complaint handling for all relevant employees or third parties that reflects the need to:</p> <ul style="list-style-type: none"> <li>a. have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments;</li> <li>b. take collective responsibility for any shortfalls identified through complaints, rather than blaming others; and</li> <li>c. act within the professional standards for engaging with complaints as set by any relevant professional body.</li> </ul> | Yes | <p>These requirements are included in the CHS Complaint Handling Guide which applies to all employees. All employees have required behaviours linked to their role, e.g. customer focus, teamwork, flexible and adaptable.</p> <p>The CHS Employee Code of Conduct includes expected behaviours including taking responsibility, Customer Focus, Teamwork. Contractors are reminded that they are expected to comply with the Code when handling complaints on CHS's behalf; this was also a clear requirement in the repairs contracts re-tendering in 2024/5.</p> | <p>A standard requirement to meet this objective was added to the job descriptions of all CHS staff from June 2024.</p> |