# **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: '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.'	Yes	As per Policy and Process and website Infographic	Policy (4.1) and procedure written and adopted to reflect Housing Ombudsmans Complaint Handling Code in February 2023 and documentation on Website. All documentation prescribes definition of complaint.
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	As per Policy	Policy (2.2, 2.3, 4.1 and 4.7) CRHA define a complaint as an expression of dissatisfaction, about the standard of service, however, made, about the standard of service, actions or lack of action by CRHA, its own staff or those acting on our behalf, affecting an individual, customer or group of customers. CRHA accept complaints in person, by telephone, letter, email, social media portal or via the website and also accept complaints submitted by advocates on behalf of complainants who have consent in place.
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	No	Not clear in policy or on website but outlined in procedure.	1.4 of the self-assessment will be added to the policy and website narrative will be updated.

	requiring action to be taken to put something right. Service requests are not complaints, but must be recorded, monitored and reviewed regularly.			
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	As per Procedure	CRHA aim to get it right first time – service request and assess what outcome the customer wants to try and resolve the dissatisfaction. If this is not resolved to the customers' requirements/satisfaction it escalates to a formal Stage 1 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	Customer Satisfaction Survey methodology	All expressions of fairly dissatisfied and dissatisfied are followed up with the customer.

#### **Section 2: Exclusions**

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
2.1	Landlords must accept a complaint unless there is a valid reason not to do so. If landlords decide not to accept a complaint they must be able to evidence their reasoning. Each complaint must be considered on its own merits	Yes	As per Policy	Reasons in 4.8 of the Policy outlining circumstances where CRHA will not accept a complaint.
2.2	<ul> <li>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:</li> <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>	Yes	As per Policy	All three reasons for not accepting a complaint have been included in 4.8 of the Policy together with: Where a customer displays behaviour which CRHA consider to be unreasonable or vexatious.

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	As per Policy	Policy 2.1 CRHA aim to treat all complainants fairly and equitably, in a non- discriminatory manner and without prejudice. CRHA will apply discretion to accept complaints made outside the 12 month time limit if there is a good reason to do so.
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	As per Policy	Policy 4.8 states that if CRHA decide not to accept a complaint, for any reasons, an explanation will be given to the customer explaining why and that the customer will have the right to challenge the decision by bringing 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	As per Policy	Policy 4.8 states reasons why we would not accept 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	As per Policy	Policy 2.2. CRHA recognise that some customers may wish to be represented by a "designated person" such as Citizens Advice or any other appropriate agencies who may be able to provide support with making a complaint. CRHA will refer and assist customers to appropriate agencies in order to provide support with making a complaint. Policy 2.3 If a customer does not have the mental capacity to make a complaint, we will accept complaints from an advocate, an Independent Mental Capacity Advocate (IMCA) or Legal Representative. Policy 4.5 CRHA publicise our complaints service as widely as possible and also provide copies of the policy

				on request to customers or advocates. Policy 4.7 CRHA accept complaints in person, by telephone, letter, email, social media portal or via the website. We will also accept complaints submitted by advocates on behalf of complainants who have consent.
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	As per Policy/Procedure Staff training undertaken by Acuity 1/11/2022 Spotlight training for new employees is carried out periodically	Policy 4.7 CRHA accept complaints in person, by telephone, letter, email, social media portal or via the website. We will also accept complaints submitted by advocates on behalf of complainants who have consent.
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	Agreed as per our Complaints Policy and Procedure	As reported on in our Quarterly Performance Dashboards.
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	Yes	Policy/Procedure (should the procedure go on website)? and Website Infographic	Our Complaint, Comment and Compliment infographic identifies the complaint process and details the stages and timescales.

	timeframes for responding. The policy must also be published on the landlord's website.			
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	Customer Report	Description of the Code with links to Housing Ombudsman and performance publicised in our Customer Report
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	As per Policy, however, being represented at any meeting is not written in our procedure, infographic or our complaint Stage 1 and 2 letters – need to include.	Policy 2.2. CRHA recognise that some customers may wish to be represented by a "designated person" such as Citizens Advice or any other appropriate agencies who may be able to provide support with making a complaint. CRHA will refer and assist customers to appropriate agencies in order to provide support with making a complaint.
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	As per Infographic and Stage 2 correspondence	Housing Ombudsman details including address, website address, email and contact number is included on infographic and Stage 2 letter.

## 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	Role sits with Head of Housing and Customers	
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	Head of Homes and Customers is responsible overseeing complaints and has full access to all colleagues responsible to facilitate the prompt resolution of complaints	
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	As per Policy Training provided by Acuity and spotlight training issued to all new colleagues.	Policy 4.6 CRHA promote a positive culture about complaints to ensure that staff understand the policy and procedure, and are appropriately trained and supported.

## 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	As per Policy	Policy 1.2 For the purpose of this Policy, we aim to operate an open and accountable complaints procedure, based on clear service standards. We will implement this policy following a stage- by-stage process to investigate all expressions of dissatisfaction. Policy 2.1 CRHA aim to treat all complainants fairly and equitably, in a non-discriminatory manner and without prejudice. We seek to embed equality, fairness, inclusivity, diversity and respect in our complaints handling policy and processes.
5.2	The early and local resolution of issues between landlords and residents is key to effective complaint handling. It is not appropriate to have extra named stages (such as 'stage 0' or 'informal complaint') as this causes unnecessary confusion.	Yes	As per Procedure and Infographic	Timeframe and stages outlined in both procedure and infographic. CRHA have adopted 48 hour service request timeline to resolve complaint followed by 2 stage formal complaint process. Need to change terminology from get it right first time to service request in procedure.
5.3	A process with more than two stages is not acceptable under any circumstances	Yes	As per our procedure and Infographic	Our formal complaint handling process involves 2 stages.

	as this will make the complaint process unduly long and delay access to the Ombudsman.			
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.	No	We do not state this in our policy.	Needs to be included in Complaints Policy.
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Yes	As per Policy	2.2. CRHA recognise that some customers may wish to be represented by a "designated person" such as Citizens Advice or any other appropriate agencies who may be able to provide support with making a complaint. CRHA will refer and assist customers to appropriate agencies in order to provide support with making a complaint.
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	As per Stage 1 Acknowledgement and Outcome Letter, Stage 1 Investigation Template, Stage 2 Acknowledgement and Outcome Letter Review and Stage 2 Investigation Template	Stage 1 acknowledgement letter ascertains how the complaint was received, date and nature of complaint. The letter also identifies the complaint in full and who will be handling and investigating the complaint. Stage 1 outcome letter confirms investigation has taken place and

				lists findings (service failure established and resolution) (no service failure established and reasons why). Customer advised that they can escalate to Stage 2. The complaint is identified in full in
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	As per Stage 1 Acknowledgement	the Stage 1 letter. Any complaint made by a customer, which CRHA, is not responsible for will be highlighted in this letter and the reasons for this made clear.
5.8	<ul> <li>At each stage of the complaints process, complaint handlers must: <ul> <li>a. deal with complaints on their merits, act independently, and have an open mind;</li> <li>b. give the resident a fair chance to set out their position;</li> <li>c. take measures to address any actual or perceived conflict of interest; and</li> <li>d. consider all relevant information and evidence carefully.</li> </ul> </li> </ul>	Yes	Agreed as per our Complaints Policy	<ul> <li>Policy 1.1 CRHA customers have the right to complain about a service failure and there will be occasions when customers will express dissatisfaction about something we have done or have failed to do or about a decision we have taken.</li> <li>Policy 2.1 CRHA aim to treat all complainants fairly and equitably, in a non-discriminatory manner and without prejudice. We seek to embed equality, fairness, inclusivity, diversity and respect in our complaints handling policy and processes.</li> <li>Policy 5.1 CRHA will compensate anyone who has suffered a financial loss because of our service failure with a fair and reasonable sum. We will explain how we have determined our compensation and provide customers with a reasonable period</li> </ul>

				of time in order to accept that offer. If the complainant is a CRHA tenant in rent arrears, we will offset any financial compensation against any debt owed to CRHA.
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	As per our Stage 1 and Stage 2 Acknowledgment Letters	Both acknowledgement letters set out the time frame that the complaint will be investigated and a caveat that if this is not achievable CRHA will contact the customer giving the reasons why more time is needed and how long it will take.
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	Agreed as per our Complaints Policy	3.1 The policy will comply with the Localism Act (2011), Housing Act (1996), General Data Protection Act (GDPR) (2018), Equality Act (2010), Housing Ombudsman's Complaint Handling Code, the Regulator of Social Housing Tenant Involvement and Empowerment Standard and the Health and Social Care Act (2008). CRHA due to its size have a good understanding of their customer profile and keep equality diversity and inclusion data recorded on customers tenancy records.
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	Yes	Agreed as per our Complaints Policy	Policy 4.8 CRHA will not accept complaints or offer escalation to the next stage of our internal complaints procedure in the following circumstances:-

	comply with the provisions set out in section 2 of this Code.			<ul> <li>Where the problem is a recurring issue, and we consider we have previously resolved the matter.</li> <li>Where a complainant is not engaging with CRHA and failing to provide relevant information relating to their complaint.</li> <li>Where legal proceedings have started.</li> <li>Where a customer displays behaviour which CRHA consider to be unreasonable or vexatious.</li> </ul>
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	SDM Software, Complaints, Comments and Compliments Spreadsheet and Tenancy Records File	All complaints are recorded on our Complaints module in SDM including nature of complaint, how it was made and date received. They are then logged on a spreadsheet and allocated to Officer to deal with as service request (48 hours) unless customer specifically wishes to go straight to Stage 1. At each stage the complaint is passed to a designated officer. All relevant correspondence and communication related to the complaint is saved on the customers tenancy record file in SDM and on SharePoint.
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	Yes	As per Policy and Procedure	Our procedure starts at trying to remedy the complaint at the first point of contact (service request) with a viewing to resolving the complaint and closing it within 48 hours. At Stage 1 and Stage 2

	of the complaints process without the need for escalation.			CRHA will try and resolve the complaint and consider any loss the complainant has had and compensate accordingly.
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	As per Unacceptable behaviour policy and procedure	1.1 The Management of Unacceptable policy and procedure in place together with Unacceptable Behaviour Incident Record Log which records date, name of customer/advocate, address and brief description of incident. The incident is also recorded on the tenancy records file in SDM (a warning flag will be included if the incident warrants it) and on SharePoint.
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	As per Unacceptable behaviour policy and procedure	Policy 3.1 To deal fairly, honestly, consistently and appropriately with all our customers including those whose actions we consider to be unacceptable. CRHA believes that all of our customers have the right to be heard, understood and respected. Policy 6.1 This policy has been written with consideration of the Equality Act 2010 and seeks not to consciously or subconsciously discriminate or to have an adverse effect upon anyone on the grounds of age, disability, gender identity or

	sexual orientation, race, religion or belief or sex. Policy 6.2 CRHA is committed to a customer first approach promoting an environment of respect, understanding and encouraging diversity and reasonable adjustments as outlined in the Equality Act 2010 will be made where appropriate to take account of situations where a customer may have a physical or mental health impairment, which has a long term or substantial affect on
	their everyday abilities.

## Section 6: Complaints Stages

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	As per Policy and Procedure	Policy 4.3 CRHA will ensure complaints are handled quickly and efficiently, making sure any changes to the service required are put in place. CRHA will try and resolve any complaint about the services we provide within 48 hours.
6.2	Complaints must be acknowledged, defined and logged at stage 1 of the complaints procedure <u>within five</u> <u>working days of the complaint being</u> <u>received</u> .	Yes	As per Procedure, website Infographic and Stage 1 Correspondence	Our procedure and Stage 1 acknowledgement letter is responded to within 5 days of the complaint being received.
6.3	Landlords must issue a full response to stage 1 complaints <u>within 10 working</u> <u>days</u> of the complaint being acknowledged.	Yes	As per Procedure, website Infographic and Stage 1 Correspondence	Our Procedure and Stage 1 acknowledgement letter states that we will respond within 10 work days of the complaint being acknowledge.
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.	Yes	As per Procedure	If CRHA is unable to resolve the complaint in the above timeframes, we will outline, in writing, what we are

Stage 1

	Any extension must be no more than 10 working days without good reason, and the reason(s) must be clearly explained to the resident.			intending to do to resolve the complaint, and by when.
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	As per Stage 2 Outcome Letter Website Infographic Complaints leaflet	CRHA provides the details of the Housing Ombudsman on the State 2 complaint outcome letter, the website infographic and the complaints leaflet. This information is included in all correspondence to our customers.
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	As per our Procedure and Stage 1 and Stage 2 outcome letters	<ul> <li>Stage 1 and Stage 2 outcome letter confirms investigation has taken place and lists findings <ul> <li>(service failure established and resolution)</li> <li>(no service failure established and reasons why).</li> </ul> </li> <li>Any actions required to address the issue are tracked and actioned promptly with appropriate updates provided to the customer.</li> </ul>
6.7	Landlords must address all points raised in the complaint definition and provide clear reasons for any decisions,	Yes	As per our Stage 1 and Stage 2 outcome letters	CRHA will carry out investigation and establish findings. In both outcome letters CRHA set out the

	referencing the relevant policy, law and good practice where appropriate.			reasons for the decision and refer to policy and law if relevant.
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	As per Procedure	CRHA procedure states - If a complainant raises any additional complaints during the investigation, these will be incorporated into Stage 1 response if they are relevant, and the Stage one response has not been issued. Where the additional complaints are not relevant, or the Stage 1 response has been issued, or it would unreasonably delay the response, the complaint will be logged as a new complaint.
6.9	Landlords must confirm the following in writing to the resident at the completion of stage 1 in clear, plain language: 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	Yes	As per Stage 1 outcome letter	CRHA Stage 1 letter identifies the complaint stage in the heading, identifies the complaint, the decision following investigation on the complaint, the reasons why the decision has been made, any actions that are proposed and if still dissatisfied how to escalate to a Stage 2 complaint.

g. details of how to escalate the	
matter to stage 2 if the individual is not satisfied with the response.	

#### 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	As per our Policy and Procedure	CRHA have a 2 stage complaint handling process.
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.	No	Our Procedure and Infographic do not state timeframe for acknowledging escalation request in 5 days.	
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	As per Stage 1 outcome letter	CRHA advise customers of their findings following investigation and the reason/s for not finding a service failure. CRHA state that they understand that the customer may be disappointed with the outcome of the investigation and advises them that if they are not satisfied that all or part of their complaint has been resolved, they can escalate their complaint to Stage 2 of the complaints process.

6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Yes	As per our Procedure and website Infographic	Our Heads of Service (Property Services. Housing Management, Finance, Development) will detail with any Stage 1 complaints.
6.14	Landlords must issue a final response to the stage 2 <u>within 20 working days</u> of the complaint being acknowledged.	Yes	As per our Stage 2 acknowledgement letter	CRHA Stage 2 acknowledgement letter states - It is anticipated that this part of the procedure will take no longer than 20 working days, however, if more time is needed to review your complaint, I will contact you giving the reasons why more time is needed and how long it will take.
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	As per our Stage 1 and Stage 2 letters	CRHA Stage 1 and Stage 2 letters both state the timescales for dealing with the complaint and advise the customer/s that if more time is needed to review the complaint they will contact the complainant/s giving the reasons and how long it will take to conclude. CRHA would only do this if more time was needed to investigate the complaint.
6.16	When an organisation informs a resident about an extension to these timescales,	Yes	As per our Stage 1 and 2 letters, procedure and complaint leaflet	CRHA Stage 1 and Stage 2 acknowledgement letters

	they must be provided with the contact details of the Ombudsman.			both mention that if mention that if more time is needed to investigate the complaint that the complainant will be informed giving the reasons why with a new timescale. This is also in the procedure and on the complaint leaflet.
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	As per our procedure and Stage 1 and Stage 2 outcome letters.	Stage 1 and Stage 2 outcome letter confirms investigation has taken place and lists findings • (service failure established and resolution) • (no service failure established and reasons why). Any actions required to address the issue are tracked and actioned promptly with appropriate updates provided by the customer.
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	As per our procedure and Stage 1 and Stage 2 outcome letters.	CRHA will carry out investigation and establish findings. In both outcome letters CRHA set out the reasons for the decision and refer to policy and law if relevant.

6.19	<ul> <li>Landlords must confirm the following in writing to the resident at the completion of stage 2 in clear, plain language: <ul> <li>a. the complaint stage;</li> <li>b. the complaint definition;</li> <li>c. the decision on the complaint;</li> <li>d. the reasons for any decisions made;</li> </ul> </li> <li>e. the details of any remedy offered to put things right;</li> <li>f. details of any outstanding actions; and</li> <li>g. details of how to escalate the matter to the Ombudsman Service if the individual remains dissatisfied.</li> </ul>	Yes	As per Stage 2 outcome letter	CRHA Stage 2 letter identifies the complaint stage in the heading, identifies the complaint, the decision following investigation on the complaint, the reasons why the decision has been made, any actions that are proposed and if still dissatisfied how to they can refer the matter to the Ombudsman.
6.20	Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.	Yes	As per Policy and Procedure and website Infographic	CRHA have a 2 stage complaint handling process and designated colleagues are responsible for investigating and providing a response to the customer/s

# Section 7: Putting things right

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
7.1	<ul> <li>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.</li> <li>These can include:</li> <li>Apologising;</li> </ul>	Yes	As per Complaints Handling Policy and Compensation Policy	Compensation Policy 1.7 CRHA recognise that a financial payment or an offer of something tangible as an

•	Acknowledging where things have gone wrong;	apology for any inconvenience incurred.
•	Providing an explanation,	Compensation Policy 5.1
•	assistance or reasons; Taking action if there has been	Any offer of compensation
•	delay; Reconsidering or changing a	made by CRHA will be accompanied by:-
•	decision; Amending a record or adding a	An apology
•	correction or addendum; Providing a financial remedy;	An explanation as to
•	Changing policies, procedures or practices.	how the failures in service occurred
		Compensation Policy 1.1 CRHA strives to provide
		good quality housing and services to all its customers.
		However, it recognises that there will be instances where
		CRHA have not met its service standards and
		customers may be inconvenienced or suffer a
		loss as a result. In such circumstances customers
		may be offered
		compensation as a form of redress for the failure in line
		with this policy.
		Compensation Policy 1.2 details the circumstances
		under which compensation

	will be considered by CRHA and the process for determining any amount of financial or non-financial compensation offered.
	Compensation Policy 2.1 CRHA may compensate people for time and trouble or distress and inconvenience caused by a failure of our service including unreasonable time taken to resolve a situation.
	1.2 Compensation Policy 1.5 Any compensation payments made by CRHA will be fair and proportionate, with each case being considered on its individual merits. CRHA will apply discretion and common sense to the decision-making process while also promoting consistency.
	1.3 Compensation Policy 3.1 The amount of compensation awarded will fall into line with the circumstances in which

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	the compensation is
	issued. Each case will
	be considered on its
	merits and the impact
	the service failure has
	had on the individual/s,
	and these will fall into
	three separate
	categories 'minor',
	<b>.</b>
	'severe'.
	CH Policy 5.1 CRHA will
	compensate anyone who
	has suffered a financial loss
	because of our service
	failure with a fair and
	reasonable sum. We will
	explain how we have
	determined our
	compensation and provide
	customers with a reasonable
	period of time in order to
	accept that offer. If the
	complainant is a CRHA
	tenant in rent arrears, we will
	offset any financial
	compensation against any
	debt owed to CRHA.
	Compensation Policy 5.1
	CRHA will demonstrate
	learning and a commitment

7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Yes	As per Compensation Policy	to making service improvements. Compensation Policy 3.1 The amount of compensation awarded will fall into line with the circumstances in which the compensation is issued. Each case will be considered on its merits and the impact the service failure has had on the individual/s, and these will fall into three separate categories 'minor', 'moderate' or and 'severe'.
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.	No	We need to set out what will happen and by when – needs to be included in the compensation policy.	
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	No	We need to add this to our compensation policy	

## Section 8: Self-assessment, reporting and 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: 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	2023/24 Self Assessment Form Performance Dashboard (quarterly) Adhere to the Housing Ombudsman Complaint Handling Code Customer Report	CRHA have signed up to the Housing Ombudsman Complaint handling code and a new Policy and procedure have been produced to reflect the requirements of the code. Throughout 2023/24 all service requests and complaints have been recorded and responded to in accordance with the code. Complaint performance has been publicised on a quarterly basis on our social media platforms and to our board of management. To date there have not been any finds on non-compliance with the code by the Housing Ombudsman. As a result of complaints and TSM levels of dissatisfaction CRHA have implemented improvements to the service. CRHA are committed to carry out regular training to new colleagues and

				refresher training, if needed, for all colleagues. Our customer report has a focus on our service performance including complaint handling. To date there has not been any annual report about CRHA's performance from the Housing Ombudsman. To date there has not been any other relevant reports or publications produced by the Housing Ombudsman in relation to the work of CRHA.
8.2	The annual complaints performance and service improvement report must be reported to the landlord's governing body (or equivalent) and published on the on the section of its website relating to complaints. The governing body's response to the report must be published alongside this.	No	This is reported to our Board members on a quarterly basis but we have not yet published on our website.	CRHA have included their complaints performance and service improvement to their Board at each meeting. The annual complaints performance and service improvement will be included in CRHA's customer report, which is currently being published. Board members have undergone complaint handling training and a presentation to all Board

				members was given in January 2024. The response to the annual complaints performance and service improvement will be given at the September 2024 board meeting.
8.3	Landlords must also carry out a self- assessment following a significant restructure, merger and/or change in procedures.	Yes	Agreed	There has been no significant restructure, merger and/or change in procedures.
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	Yes	Agreed	CRHA agree to review and 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	Agreed	CRHA will inform the Ombudsman if they are unable to comply with the Code due to exceptional circumstances, such as a cyber incident and ensure that information is provided to our customers who may be affected, and publish this on their website. CRHA agree to provide a timescale for returning to compliance with the Code.

## 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	As per Policy	9.1 CRHA will record performance on complaints on a designated dashboard and report findings to the Board of Management on a quarterly basis. Where there is a clear service failure we will consider improvements to the service as a result of learning from the complaint.
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	Agreed as per Policy	Policy 1.1 CRHA recognises that our customers have the right to complain about a service failure and there will be occasions when customers will express dissatisfaction about something we have done or have failed to do or about a decision we have taken.
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	Yes	Agreed – Performance Dashboards	As a result of our quarterly performance dashboard and TSM surveys CRHA monitor trends and recognises where service improvement needs to be made and

	stakeholders, such as residents' panels, staff and relevant committees.			implements accordingly. This is report to our Board.
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	Head of Homes and Customers	CRHA's Head of Homes and Customers is the lead person accountable 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').	No	No MRC has been appointed yet and this will be done at our Board meeting in September.	
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.	No	No MRC has been appointed yet and this will be done at our Board meeting in September.	Once we have appointed a MRC we will ensure that they provide our Board members regular information on complaints.
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;	Yes	No MRC has been appointed yet and this will be done at our Board meeting in September.	Once we have a MRC in place we will ensure that they provide our Board members regular information on complaints. We currently provide the Performance Dashboard shows CRHA's Board the

	<ul> <li>b. regular reviews of issues and trends arising from complaint handling;</li> <li>c. regular updates on the outcomes of the Ombudsman's investigations and progress made in complying with orders related to severe maladministration findings; and</li> <li>d. annual complaints performance and service improvement report.</li> </ul>			<ul> <li>volume, categories and outcomes of complaints alongside complaint</li> <li>handling performance.</li> <li>Regular reviews of issues and trends from complaint</li> <li>handling are identified in the</li> <li>Performance Dashboard</li> <li>and TSM report.</li> <li>CRHA agree to give regular</li> <li>updates on the outcomes of</li> <li>the Ombudsman's</li> <li>investigation and progress</li> <li>made in complying with</li> <li>orders related to severe</li> <li>maladministration findings if</li> <li>they occur.</li> <li>CRHA agree to publish their</li> <li>annual complaints</li> <li>performance and service</li> <li>report.</li> </ul>
9.8	Landlords must have a standard objective in relation to complaint handling for all relevant employees or third parties that reflects the need to: 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	Yes	Agreed as per Policy and Procedure	Policy 1.1 Cornwall Rural Housing Association Limited (CRHA) is committed to the provision of high quality services. Our vision is to provide homes to make life better, we also take pride in being a people business. Our customers have the right to complain about a service failure and there will

c. act within the professional standards for engaging with complaints as set by any relevant professional body.	be occasions when customers will express dissatisfaction about something we have done or have failed to do or about a decision we have taken. Policy 4.6 CRHA will promote a positive culture about complaints to ensure that staff understand the policy and procedure, and are appropriately trained and supported. CRHA have signed up to the Housing Ombudsman Complaint Handling Code and will act within the professional standards for engaging with completes as set by this relevant professional body.
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