Housing Ombudsman Complaints Handling Code Self Assessment Form

This self-assessment form should be completed by the complaints officer and discussed at the landlord's governing body annually.

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

Explanations must also be provided where a mandatory 'must' requirement is not met to set out the rationale for the alternative approach adopted and why this delivers a better outcome.

Section 1 - Definition of a complaint

Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
1.2	A complaint must be defined as: 'an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the organisation, its own staff, or those acting on its behalf, affecting an individual resident or group of residents.	Yes	Stated in CBH Compliments, Comments and Complaints (CCC) policy at Section 2.0
1.3	The resident does not have to use the word 'complaint' for it to be treated as such. A complaint that is submitted via a third party or representative must still be handled in line with the landlord's complaints policy.	Yes	Stated in CBH 'CCC' Policy - Section 2.0
1.6	if further enquiries are needed to resolve the matter, or if the resident requests it, the issue must be logged as a complaint.	Yes	Stated in CBH 'CCC' policy - Section 2.0
1.7	A landlord must accept a complaint unless there is a valid reason not to do so.	Yes	Section 3.0 of CBH 'CCC' policy clearly states what is within / not within the scope of the policy.

1.8	A complaints policy must clearly set out the circumstances in which a matter will not be considered, and these circumstances should be fair and reasonable to residents.	Yes	Exclusions are in included within Section 3.0 of the policy
1.9	If a landlord decides not to accept a complaint, a detailed 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.	Yes	CBH 'CCC' Policy states at Section 3.0 that if a decision is made not accept a complaint, a detailed explanation will be provided to the resident setting out the reasons why the matter is not suitable for our complaints process, with an explanation that the resident has the right to take that decision to the Housing Ombudsman.

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
1.4	Landlords should recognise the difference between a service request, where a resident may be unhappy with a situation that they wish to have rectified, and a complaint about the service they have/have not received.	Yes	Stated in Section 3.0 of CBH 'CCC' Policy.
1.5	Survey feedback may not necessarily need to be treated as a complaint, though, where possible, the person completing the survey should be made aware of how they can pursue their dissatisfaction as a complaint if they wish to.	Yes	Acuity conducts a quarterly satisfaction survey on behalf of CBH. CBH are proactive in contacting residents that the survey results show to be dissatisfied with an aspect of our services. Colleagues making these telephone calls make the resident aware of how they can pursue their dissatisfaction as a complaint if they wish to.

Section 2 - Accessibility and awareness Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
2.1	Landlords must make it easy for residents to complain by providing different channels through which residents can make a complaint such as in person, over the telephone, in writing, by email and digitally. While the Ombudsman recognises that it may not be feasible for a landlord to use all of the potential channels, there must be more than one route of access into the complaints system.	Yes	CBH 'CCC' Policy Section 7.0 clearly states how complaints can be raised
2.3	Landlords must make their complaint policy available in a clear and accessible format for all residents. This will detail the number of stages involved, what will happen at each stage and the timeframes for responding.	Yes	CBH 'CCC' Policy is available via the 'Our Publications' section of the CBH Website. CBH will make this document available in other formats on request as per the reasonable adjustments noted at Section 7.0 of the policy. 'CCC' Policy Section 8.0 clearly details our two complaint stages.
2.4	Landlord websites, if they exist, must include information on how to raise a complaint. The complaints policy and process must be easy to find on the website.	Yes	CBH website provides clear information about how a complaint can be raised. Complaints policy and process are hosted in relevant areas of the CBH website.
2.5	Landlords must comply with the Equality Act 2010 and may need to adapt normal policies, procedures, or processes to accommodate an individual's needs. Landlords must satisfy themselves that their policy sets out how they will respond to reasonable adjustments requests in line with the Equality Act and that complaints handlers have had appropriate training to deal with such requests.	Yes	Reasonable adjustments are available on request and a statement is included within the complaints policy at S 7.0.

2.6	Landlords must publicise the complaints policy and process, the Complaint Handling Code and the Housing Ombudsman Scheme in leaflets, posters, newsletters, online and as part of regular correspondence with residents.	CBH 'CCC' Policy is available on website. Details of the Housing Ombudsman service are stated in the 'CCC' section of the CBH website. Last reference to 'CCC' in CBH news was in Autumn 2021
		Going forwards CBH will publicise the HO Scheme in CBH News publication to residents.
2.7	Landlords must provide residents with contact information for the Ombudsman as part of its regular correspondence with residents.	Details for contacting the Housing Ombudsman service are stated in the 'CCC' section of the CBH website.
2.8	Landlords must provide early advice to residents regarding their right to access the Housing Ombudsman Service throughout their complaint, not only when the landlord's complaints process is exhausted.	CBH 'CCC' Policy section 13.0 states that CBH will publicise access to the Housing Ombudsman service throughout the complaints procedure.
		CBH complaints correspondence also details this to the resident.

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
2.2	Where a landlord has set up channels to communicate with its residents via social media, then it should expect to receive complaints via those channels. Policies should contain details of the steps that will be taken when a complaint is received via social media and how confidentiality and privacy will be maintained.		Corporate Facebook & Twitter accounts are monitored by the Comms Team. CBH 'CCC' Section .7.0 details the steps that will be taken in relation to complaints received through these channels.

Section 3 - Complaint handling personnel

Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
3.1	Landlords must have a person or team assigned to take responsibility for complaint handling to ensure complaints receive the necessary attention, and that these are reported to the governing body. This Code will refer to that person or team as the "complaints officer".	Yes	The Customer Services Team Leader administers and acknowledge the complaint, identifying all aspects of the complaint and who then advise the resident of their investigating officer and next steps. Quarterly complaints reports are sent to CBC
3.2	the complaint handler appointed must have appropriate complaint handling skills and no conflicts of interest.	Yes	Complaints training is provided to all investigating officers which covers conflicts of interest. At the point of allocation to a complaint handler, a complaint will be reviewed for any conflict of interest.

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
3.3	 Complaint handlers should: be able to act sensitively and fairly be trained to handle complaints and deal with distressed and upset residents have access to staff at all levels to facilitate quick resolution of complaints have the authority and autonomy to act to resolve disputes quickly and fairly. 	Yes	The complaint officer has autonomy to resolve complaints as needed, subject to the CBH Compensation Policy The complaint officer is ordinarily from the relevant service area and therefore the matter resolved in the appropriate area of the business allowing learning to happen. The complaint officer engages with all required departments to resolve the complaint effectively

Section 4 - Complaint handling principles Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
4.1	Any decision to try and resolve a concern must be taken in agreement with the resident and a landlord's audit trail/records should be able to demonstrate this. Landlords must ensure that efforts to resolve a resident's concerns do not obstruct access to the complaints procedure or result in any unreasonable delay. It is not appropriate to have extra named stages (such as 'stage 0' or 'pre-complaint stage') as this causes unnecessary confusion for residents. When a complaint is made, it must be acknowledged and logged at stage one of the complaints procedure within five days of receipt.	Yes	CBH have reviewed complaints handling processes and do not have any extra named stages. As dissatisfaction is received it is logged as 'complaint received' within our QL management system and allocated to the Customer Services Team Leader for acknowledgement.

4.2	Within the complaint acknowledgement, landlords must set out their understanding of the complaint and the outcomes the resident is seeking. If any aspect of the complaint is unclear, the resident must be asked for clarification and the full definition agreed between both parties.	Yes	At the time that the complaint is logged CBH staff detail the complaint. If any aspect of this is unclear the Customer Services Team Leader seeks clarification from the resident before issuing formal acknowledgement.
4.6	A complaint investigation must be conducted in an impartial manner.	Yes	This is clearly stated in CBH 'CCC' policy section 2.0 and discussed in training of complaint handlers.
4.7	 The complaint handler must: deal with complaints on their merits act independently and have an open mind take measures to address any actual or perceived conflict of interest consider all information and evidence carefully keep the complaint confidential as far as possible, with information only disclosed if necessary to properly investigate the matter. 	Yes	CBH's complaint handling approach is set out in section 9.0 of the 'CCC' Policy and is clearly stated during training of complaint handlers.
4.11	Landlords must adhere to any reasonable arrangements agreed with residents in terms of frequency and method of communication	Yes	On first contact with a resident, the complaint handling officer will agree frequency and method of communication. This is Stated in section 10.0 of CBH 'CCC' Policy
4.12	 The resident, and if applicable any staff member who is the subject of the complaint, must also be given a fair chance to: set out their position comment on any adverse findings before a final decision is made. 	Yes	Residents are contacted prior to a final response being sent, to discuss the findings of the investigation and the proposed outcome. Any staff member subject of a complaint is given a fair chance to set out their position, with any reasonable adjustments made to ensure best evidence. The findings and proposed outcome are also shared for their comment.

4.13	A landlord must include in its complaints policy its timescales for a resident to request escalation of a complaint	Yes	This is Stated in section 8.0 of CBH 'CCC' Policy.
4.14	A landlord must not unreasonably refuse to escalate a complaint through all stages of the complaints	Yes	Reasons for refusing to escalate a complaint are stated in section.8.0 of CBH 'CCC' Policy.
	procedure and must have clear and valid reasons for taking that course of action. Reasons for declining to escalate a complaint must be clearly set out in a landlord's complaints policy and must be the same as the reasons for not accepting a complaint.	6	
4.15	A full record must be kept of the complaint, any review, and the outcomes at each stage. This must include the original complaint and the date received, all correspondence with the resident, correspondence with other parties and any reports or surveys prepared.	Yes	Complaint information is stored as a case on CBH's secure QL housing management systems and cloud data storage platform.
4.18	Landlords must have policies and procedures in place for managing unacceptable behaviour from residents and/or their representatives when pursuing a complaint.	Partial	CBH Unreasonable Behaviour Policy is currently in draft form for agreement.

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
4.3	Landlords should manage residents' expectations from the outset, being clear where a desired outcome is unreasonable or unrealistic	Yes	This forms part of complaints training for investigating officers
4.4	A complaint should be resolved at the earliest possible opportunity, having assessed what evidence is needed to fully consider the issues, what outcome would resolve the matter for the resident and whether there are any urgent actions required.	Yes	This forms part of the complaints training for investigating officers
4.5	Landlords should give residents the opportunity to have a representative deal with their complaint on their behalf, and to be represented or accompanied at any meeting with the landlord where this is reasonable.	Yes	This is stated in CBH 'CCC' Policy at section 7.0.
4.8	Where a key issue of a complaint relates to the parties' legal obligations landlords should clearly set out their understanding of the obligations of both parties.	Yes	Stated in CBH 'CCC' Policy section 9.0. This is also covered in training of investigating officers.

4.9	Communication with the resident should not generally identify individual members of staff or contractors.	Yes	Wherever possible individuals are not identified. However, staff carry ID and, in many cases, have longstanding working relationships with the resident so are well known to them
4.10	Landlords should keep residents regularly updated about the progress of the investigation.	Yes	Complaint handling officer has clear investigation timescales and procedure is in place to update resident by telephone or in person at the point that the investigation is complete to discuss the proposed outcome. Contact will also be made with the resident by telephone or in person to mutually agree any extension of the complaint timescale.
4.16	Landlords should seek feedback from residents in relation to the landlord's complaint handling as part of the drive to encourage a positive complaint and learning culture.	Yes	Complaint satisfaction survey completed at point of closure by Customer Service Team.
4.17	Landlords should recognise the impact that being complained about can have on future service delivery. Landlords should ensure that staff are supported and engaged in the complaints process, including the learning that can be gained	Yes	Any staff member subject of a complaint is given a fair chance to set out their position, with any reasonable adjustments made to ensure best evidence. The findings and proposed outcome of the complaint are also shared for their comment, as well as their involvement in identifying lessons learnt and shaping any required process changes.
4.19	Any restrictions placed on a resident's contact due to unacceptable behaviour should be appropriate to their needs and should demonstrate regard for the provisions of the Equality Act 2010.	Partial	This is detailed in CBH Unreasonable Behaviour Policy which is currently in draft form for agreement.

Section 5 - Complaint stages Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
5.1	Landlords must respond to the complaint within 10 working days of the complaint being logged. Exceptionally, landlords may provide an explanation to the resident containing a clear timeframe for when the response will be received. This should not exceed a further 10 days without good reason.	Yes	Our Policy and complaint acknowledgement letter clearly states the ten working day deadline for the Handling Officer to provide the resident with a response.
5.5	A complaint response must be sent to the resident when the answer to the complaint is known, not when the outstanding actions required to address the issue, are completed. Outstanding actions must still be tracked and actioned expeditiously with regular updates provided to the resident.	Yes	Stated in CBH 'CCC' Policy section 10.0 and forms part of complaints handling training.
5.6	Landlords must address all points raised in the complaint and provide clear reasons for any decisions, referencing the relevant policy, law and good practice where appropriate.	Yes	The resolution telephone call / meeting with the resident prior to a formal written response being sent, provides the resident with the opportunity to highlight any points they do not feel have been addressed or clear reasons given for any decision.
5.8	Landlords must confirm the following in writing to the resident at the completion of stage one in clear, plain language: the complaint stage the decision on the complaint the reasons for any decisions made the details of any remedy offered to put things right details of any outstanding actions details of how to escalate the matter to stage two if the resident is not satisfied with the answer	Yes	Required content to be provided in a complaint response is detailed in section 8.0 of CBH 'CCC' Policy. Complaint handlers are aware of this required content

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
5.9	If all or part of the complaint is not resolved to the resident's satisfaction at stage one it must be progressed to stage two of the landlord's procedure, unless an exclusion ground now applies. In instances where a landlord declines to escalate a complaint it must clearly communicate in writing its reasons for not escalating as well as the resident's right to approach the Ombudsman about its decision.	Yes	Detailed in section 8.0 of CBH 'CCC' Policy
5.10	On receipt of the escalation request, landlords must set out their understanding of issues outstanding and the outcomes the resident is seeking. If any aspect of the complaint is unclear, the resident must be asked for clarification and the full definition agreed between both parties.	Yes	Detailed in section 8.0 of CBH 'CCC' Policy
5.11	Landlords must only escalate a complaint to stage two once it has completed stage one and at the request of the resident.	Yes	

5.12	The person considering the complaint at stage two, must not be the same person that considered the complaint at stage one.	Yes	Clearly stated in section 8.0 of CBH 'CCC' Policy.
5.13	Landlords must respond to the stage two complaint within 20 working days of the complaint being escalated. Exceptionally, landlords may provide an explanation to the resident containing a clear timeframe for when the response will be received. This should not exceed a further 10 days without good reason.	Yes	Clearly stated in section 8.0 of CBH 'CCC' Policy.
5.16	Landlords must confirm the following in writing to the resident at the completion of stage two in clear, plain language: the complaint stage the complaint definition the decision on the complaint the reasons for any decisions made the details of any remedy offered to put things right details of any outstanding actions and	Yes	Required content to be provided in a complaint response is detailed in section 8.0 of CBH 'CCC' Policy. Complaint handlers are aware of this required content
	 if the landlord has a third stage, details of how to escalate the matter to stage three if this was the final stage, details of how to escalate the matter to the Housing Ombudsman Service if the resident remains dissatisfied. 		All complaint responses provide details of how to contact the Ombudsman Service if the resident remains dissatisfied.

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
5.17	Two stage landlord complaint procedures are ideal. This ensures that the complaint process is not unduly long. If landlords strongly believe a third stage is necessary, they must set out their reasons for this as part of their self-assessment. A process with more than three stages is not acceptable under any circumstances.	Yes	CBH have a two-stage complaint procedure.

5.20	the completion of stage three in clear, plain language:	Not applicable to the CBH two stage complaint procedure.
	 the details of any remedy offered to put things right details of any outstanding actions details of how to escalate the matter to the Housing Ombudsman Service if the resident remains dissatisfied 	

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
5.2	If an extension beyond 20 working days is required to enable the landlord to respond to the complaint fully, this should be agreed by both parties.	Yes	All complaint extensions are agreed with the resident, who is provided with clear reasons why the extension is required.
5.3	Where agreement over an extension period cannot be reached, landlords should provide the Housing Ombudsman's contact details so the resident can challenge the landlord's plan for responding and/or the proposed timeliness of a landlord's response.	Yes	Included at S.8.0 of CBH 'CCC' Policy
5.4	Where the problem is a recurring issue, the landlord should consider any older reports as part of the background to the complaint if this will help to resolve the issue for the resident.	Yes	Handling officers have access to any previous reports held on CBH's QL housing management system and Documotive data storage platform
5.7	Where residents raise additional complaints during the investigation, these should be incorporated into the stage one response if they are relevant and the stage one response has not been issued. Where the stage one response has been issued, or it would unreasonably delay the response, the complaint should be logged as a new complaint.	Yes	This approach to complaint handling is detailed at Section 9.0 of CBH 'CCC' policy and is included in complaints handling training.

Stage 2

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
5.14	If an extension beyond 10 working days is required to enable the landlord to respond to the complaint fully, this should be agreed by both parties.		All complaint extensions are agreed with the resident, who is provided with clear reasons why this is required.
5.15	Where agreement over an extension period cannot be reached, landlords should provide the Housing Ombudsman's contact details so the resident can challenge the landlord's plan for responding and/or the proposed timeliness of a landlord's response		Included at section.8.0 of CBH 'CCC' Policy.

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
5.18	Complaints should only go to a third stage if the resident has actively requested a third stage review of their complaint. Where a third stage is in place and has been requested, landlords must respond to the stage three complaint within 20 working days of the complaint being escalated. Additional time will only be justified if related to convening a panel. An explanation and a date for when the stage three response will be received should be provided to the resident.	N/A	Not applicable to the CBH two stage complaints process.
5.19	Where agreement over an extension period cannot be reached, landlords should provide the Housing Ombudsman's contact details so the resident can challenge the landlord's plan for responding and/or the proposed timeliness of a landlord's response.	N/A	Not applicable to the CBH two stage complaints process.

Section 6 - Putting things right

Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary, and any explanations
6.1	Effective dispute resolution requires a process designed to resolve complaints. Where something has gone wrong a landlord must acknowledge this and set out the actions it has already taken, or intends to take, to put things right.	Yes	Documented in section 13.0 of CBH 'CCC' Policy 'Putting Matters Right'
6.2	Any remedy offered must reflect the extent of any service failures and the level of detriment caused to the resident as a result. A landlord must carefully manage the expectations of residents and not promise anything that cannot be delivered or would cause unfairness to other residents.	Yes	CBH Compensation Policy provides clear guidance on in what circumstances compensation can be offered, what this can include and to what value.
6.5	The remedy offer must clearly set out what will happen and by when, in agreement with the resident where appropriate. Any remedy proposed must be followed through to completion.	Yes	Documented at section 10.0 of CBH 'CCC' policy. and is included in complaints handling training.
6.6	In awarding compensation, a landlord must consider whether any statutory payments are due, if any quantifiable losses have been incurred, the time and trouble a resident has been put to as well as any distress and inconvenience caused.	Yes	Clear guidance is provided in CBH Compensation Policy

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
6.3	Landlords should look beyond the circumstances of the individual complaint and consider whether anything needs to be 'put right' in terms of process or systems to the benefit of all residents.		Lessons learnt are a mandatory action in CBH complaints handling.
6.7	In some cases, a resident may have a legal entitlement to redress. The landlord should still offer a resolution where possible, obtaining legal advice as to how any offer of resolution should be worded.		Investigating officer guidance is provided in section 9.0 of CBH 'CCC' policy.

Section 7 - Continuous learning and improvement Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
7.2	Accountability and transparency are integral to a positive complaint handling culture. Landlords must report back on wider learning and improvements from complaints in their annual	Yes	CBH report on complaint statistics in our annual report to tenants.
	report and more frequently to their residents, staff and scrutiny panels.		Going forwards this will incorporate wider learning.
			CBH will work with the Tenant Scrutiny and Improvement Panel (TSIP) to scrutinise complaint reports.

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
7.3	A member of the governing body should be appointed to have lead responsibility for complaints to support a positive complaint handling culture. This role will be responsible for ensuring the governing body receives regular information on complaints that provides insight to the governing body on the landlord's complaint handling performance.	Partial	CBH Board will consider the introduction of a 'champion' at their October meeting.
7.4	 As a minimum, governing bodies should receive: Regular updates on the volume, categories and outcome of complaints, alongside complaint handling performance including compliance with the Ombudsman's orders Regular reviews of issues and trends arising from complaint handling, The annual performance report produced by the Ombudsman, where applicable Individual complaint outcomes where necessary, including where the Ombudsman made findings of severe maladministration or referrals to regulatory bodies. The implementation of management responses should be tracked to ensure they are delivered to agreed timescales. The annual self-assessment against the Complaint Handling Code for scrutiny and challenge. 	Yes	Cheltenham Borough Council & CBH Board receive annual CCC report

7.5	Any themes or trends should be assessed by senior management to identify potential systemic issues, serious risks or policies and procedures that require revision. They should also be used to inform staff and contractor training.	Yes	Quarterly LT / ET discussion of complaints report has been introduced.
7.6	 Landlords should have a standard objective in relation to complaint handling for all employees that reflects the need to: have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments take collective responsibility for any shortfalls identified through complaints rather than blaming others act within the Professional Standards for engaging with complaints as set by the Chartered Institute of Housing. 	Yes	Incorporated into CCC Policy.

Section 8 - Self-assessment and compliance

Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
8.1	Landlords must carry out an annual self-assessment against the Code to ensure their complaint handling remains in line with its requirements.	Yes	Self-assessment completed in September 2022; next assessment due in September 2023.
8.2	Landlords must also carry out a self-assessment following a significant restructure and/or change in procedures.	Yes	
8.3	 Following each self-assessment, a landlord must: report the outcome of their self-assessment to their governing body. In the case of local authorities, self-assessment outcomes should be reported to elected members publish the outcome of their assessment on their website if they have one, or otherwise make accessible to residents include the self-assessment in their annual report section on complaints handling performance 	Yes	CBH's self-assessment against the complaints handling code is published on CBH website alongside CCC Policy. CBH will Incorporate self-assessment into next annual report to residents.