

Appendix B – 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: <i>'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.'</i>	Yes	C&C follows the Housing Ombudsman's definition of a complaint. This is detailed at - <ul style="list-style-type: none"> • Paragraph 2.3 in the complaints policy • Paragraph 1.3 in the complaints procedure. • The summary of the procedure on the complaint page on C&C's web site also refers to this definition.
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	Use of word 'complaint' - this is detailed in <ul style="list-style-type: none"> • Paragraph 1.3 in the complaints procedure • The summary of the procedure on the complaint page on C&C's website • Recording a complaint via a representative is covered in paragraph 2.10 of complaints policy • C&C manages enquiries from elected representatives via CRM and MP Enquiries inbox
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	Service request considerations are covered in paragraph 1.3.1 of the complaints procedure CRM has a dedicated section to record complaints
1.7	A landlord must accept a complaint unless there is a valid reason not to do so.	Yes	Paragraph 2.4 of complaints 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	The complaints process applies to customers where a service is being provided by C&C or where an application is being made for a tenancy with C&C. Circumstances where a complaint will not be considered are covered in the - <ul style="list-style-type: none"> • Complaints policy at paragraphs 1.2, 1.3, 2.3, 2.4, 2.16 and 2.17 • Complaints procedure at paragraph 1.3.1 • The summary of the procedure on the complaint page on C&C's web site
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	This is the role of the Feedback Manager.

Best practice 'should' requirements

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	This is referenced in the complaints policy paragraph 2.3. Training of Service Hub team to ensure a consistent approach. Service request considerations are covered in paragraph 1.3.1 of the complaints procedure
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	Following customer satisfaction surveys 'red flags' are received from Business Intelligence Team to the Feedback Manager on a monthly basis to assess any need for action or following up with the resident or service lead

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	Multiple routes are available to make a complaint - detailed in paragraph 1.3 of the complaints procedure. In addition to this, customers can complete a complaint & feedback form via 'contact us' on C&C website which is assessed by the Service Hub within the requirements of the complaints policy and procedure. Social media enquiries are managed via the Communication /Engagement team and assessed by them.
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	The complaints policy is available to view on C&C's Website; Search: Policies - Publications and Reports and can be downloaded. Written copies are supplied as requested. Information is provided at Schemes, within Care Homes and within tenant welcome packs.
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	C&C's Website page contains guidance for any query that relates to a complaint. It enables how to raise a complaint together with a template to be able to record a complaint. On submission the customer receives a summary of their complaint / feedback which is sent direct to the Service Hub team for assessment.
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	C&C complies with the equality Act 2010. The complaints policy at paragraph 2.11 advises - we will ensure we are approachable and helpful throughout the complaints procedure. We will always ensure that we carry out any reasonable adjustments to the complaints process for residents that require us to do so.

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.	Yes	C&Cs website search links the Policies - Publications and Reports. This publicises the complaint policy, process, Complaint Handling Code and role of the Housing Ombudsman. C&C's complaint leaflet Your Guide To Complaints gives full details about the complaint procedure. C&C's complaint performance is published both internally to staff and externally to customers.
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2.7	Landlords must provide residents with contact information for the Ombudsman as part of its regular correspondence with residents.	Yes	The role of the Ombudsman and details of the Ombudsman including website are provided in C&C's complaints letters and leaflet.
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.	Yes	The right to refer a complaint and the contact details of the Housing Ombudsman Service are included in both stage 1 and 2 of C&C's complaints process and also in the Designated Complaints Panel (DCP) outcome letter.

Best practice 'should' requirements

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.	Yes	Social media enquiries are managed via the Communication /Engagement team and are sent to the Service Hub Team for assessment and progression.

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	C&C has a centralised complaints team. The Feedback Manager takes ownership of complaints management. The complaint investigation itself is service led with nominated investigating officers. Heads of Service and Service Managers take ownership of responding to complaints and customers through the complaints process. The complaints process is overseen by the Director of Housing and Customer Services.
3.2	...the complaint handler appointed must have appropriate complaint handling skills and no conflicts of interest.	Yes	The service areas take the lead in complaint investigation and part of the Feedback Manager's role is to ensure there are no conflicts of interest. The Feedback Manager provides support and oversight of the complaint and review all stage 1 and stage 2 responses, with the investigating case officer before they are sent to the customer. The investigating officers are trained in complaint management and restorative justice practice

Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
3.3	<p>Complaint handlers should:</p> <ul style="list-style-type: none"> • 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	<p>Investigating Officers have authority and autonomy to act to resolve complaints as Service Managers, Heads of Service or Directors and have access to any support needed.</p> <p>C&C's approach to complaint investigation emphasises a no blame culture when trying to resolve complaints and everyone is treated fairly and honestly throughout. This is detailed in the complaints policy; paragraph 2.9 of the policy refers to training.</p>

Section 4 - Complaint handling principles

Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
4.1	<p>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.</p>	Yes	<p>Full audit trails are kept of contact and decisions made by the Complaints/Feedback team.</p> <p>All complaints are acknowledged - the target to acknowledge is 5 working days (Paragraph 2.20 Complaints policy).</p> <p>Complaints are dealt with either via the Fast-Track/Informal Process (Paragraph 2.13) or the Formal process (Paragraph 2.21- 2.23 of the complaints policy).</p> <p>The Complaints/Feedback team maintains oversight of all complaints received to ensure consistent application of the policy and procedure.</p>

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	This is included in the acknowledgement of Fast track complaints and complaints at both stage 1 and 2. If any aspects of the complaint are unclear the Feedback Manager will make contact with the customer.
4.6	A complaint investigation must be conducted in an impartial manner.	Yes	All complaint investigations are conducted in an open, no blame and transparent way. This approach is detailed in paragraphs 2.1, 2.5 and 2.8 of the complaints policy and is supported by the Complaints/Feedback team.
4.7	<p>The complaint handler must:</p> <ul style="list-style-type: none"> • 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	<p>Investigating Officers conduct the investigation within C&C's overall approach to complaint management with the emphasises on a no blame culture, trying to resolve complaints and ensuring everyone is treated fairly and honestly throughout. This is detailed in the complaints policy at paragraph 2.9. The template responses and oversight/support of the Feedback Manager support this approach.</p> <p>The Feedback Manager provides overall oversight of the quality of investigations, compliance with policy and procedure with appropriate challenge or intervention or support for each complaint investigation when required.</p>
4.11	Landlords must adhere to any reasonable arrangements agreed with residents in terms of frequency and method of communication	Yes	Investigating Officers and the Feedback Manager agree with the customer their preferred way to communicate, and if outside of complaint handling code timescales the frequency of contact.
4.12	<p>The resident, and if applicable any staff member who is the subject of the complaint, must also be given a fair chance to:</p> <ul style="list-style-type: none"> • set out their position • comment on any adverse findings before a final decision is made. 	Yes	Customers (and if applicable staff) are contacted by the Investigating Officer (and where required by the Feedback Manager) at both stage 1 and 2 as part of the investigation process as detailed in the complaints procedure at paragraphs 1.4.2 and 1.4.6. The Feedback Manager coordinates

			escalation to stage 2 and ascertain why a customer remains dissatisfied and the resolution they are seeking. This ensures all parties have an opportunity to explain, be heard and set out their position.
4.13	A landlord must include in its complaints policy its timescales for a resident to request escalation of a complaint	Yes	The timescale to respond within 10 days is included in complaints procedure at paragraphs 1.4.2 and 1.4.3 and is included in the stage 1 response. The procedure is available to view online on the C&C web page.
4.14	A landlord must not unreasonably refuse to escalate a complaint through all stages of the complaints 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.	Yes	The escalation process is detailed in the complaints policy in paragraphs 2.19 and 2.21 including the reasons for declining a complaint.

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	The Complaints/Feedback team keep a record of all correspondence and associated documents during a formal complaint investigation in the Feedback Sharepoint Site - paragraph 1.4 of Complaints procedure. The complaints process is managed by the Complaints /Feedback team.
4.18	Landlords must have policies and procedures in place for managing unacceptable behaviour from residents and/or their representatives when pursuing a complaint.	Yes	The Unreasonable Complainers Guidance is an appendix (A) of the complaints Procedure. This is also referred to in the complaints policy - paragraph 2.14

Best practice 'should' requirements

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	The Complaints/Feedback team provide a central resource for C&C assessing, classifying and where needed clarifying the nature of a complaints and the desired outcome, supporting the management of customers' expectations where required.
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	Part of the assessment and classification process is consideration of achieving a resolution as early as possible and any immediate actions required (Paragraph 1.3.2 of complaints procedure).
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	Paragraph 2.10 of complaints policy refers to representatives supporting customers
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	This is included in the complaint response

4.9	Communication with the resident should not generally identify individual members of staff or contractors.	Yes	Unless known to customer generally these details are not divulged
4.10	Landlords should keep residents regularly updated about the progress of the investigation.	Yes	This is the role of both the Investigating Officer and the Feedback Manager overseeing complaint
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.	No	A Complaint Satisfaction Survey exists, however, is not consistently completed currently in a timely manner
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	C&C's approach to complaint investigation emphasises a no blame culture when trying to resolve complaints and everyone is treated fairly and honestly throughout. The value of being able to learn from complaints via lessons learnt will be shared throughout the organisation and with customers.
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.	Yes	The Unreasonable Behaviour Guidance provides the steps and considerations to be taken

Section 5 - Complaint stages

Mandatory 'must' requirements

Stage

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
5.1	Landlords must respond to the complaint <u>within 10 working days</u> 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	The complaints policy and procedure clearly set out the timescales for responses – complaints policy Paragraph 2.21 and complaints procedure paragraphs 1.4.2 – 1.4.6. Customers are notified if an extension is needed and the proposed response time. (10 working days) by the Feedback Manager. Compliance with this requirement is monitored and is an operational performance indicator
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	Responses are sent with the proposed actions and undertakings within the Complaint Handling Code response timescales. Completion of these actions are monitored within the Complaints/Feedback team to ensure completion.

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	Response template covers the requirements for the response to support Investigating Case Managers. All responses are overseen by the Complaint/ Feedback Manager
5.8	Landlords must confirm the following in writing to the resident at the completion of stage one in clear, plain language: <ul style="list-style-type: none"> • 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	The response template covers the requirements for the response to customers. All responses are overseen by the Complaints/Feedback Manager

Stage 2

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	This is covered in paragraph 2.19 of the complaints 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	The Feedback Manager is responsible for the escalation process to stage 2, liaising with the customer and the investigating case manager. The stage 2 acknowledgment letter to the customer sets out both the reason for dissatisfaction and the outcomes being sought.
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	This is detailed in Paragraph 2.21 of Complaints Policy and Paragraph 1.4.4 of the Complaints procedure.

5.12	The person considering the complaint at stage two, must not be the same person that considered the complaint at stage one.	Yes	Paragraph 1.4.4 of the Complaints Procedure
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	The complaints policy and procedure clearly set out responses timescales for policy Paragraph 2.21 and procedure paragraphs 1.4.2 & 1.4.6. Customers are notified if an extension is needed and the proposed response time (10 working days) by the Feedback Manager.
5.16	Landlords must confirm the following in writing to the resident at the completion of stage two in clear, plain language: <ul style="list-style-type: none"> • the complaint stage • the complaint definition • the decision on the complaint • the reasons for any decisions made • the details of any remedy offered to put things right • details of any outstanding actions and <ul style="list-style-type: none"> • 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. 	Yes	All elements are contained within stage 2 template letter and monitored/oversight by the Feedback Manager C&C does not have a third stage

Stage 3

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.	Not applicable	C&C has a 2 stage complaints process

5.20	<p>Landlords must confirm the following in writing to the resident at the completion of stage three in clear, plain language:</p> <ul style="list-style-type: none"> • the complaint stage • the complaint definition • the decision on the complaint • the reasons for any decisions made • the details of any remedy offered to put things right • details of any outstanding actions • details of how to escalate the matter to the Housing Ombudsman Service if the resident remains dissatisfied 	Not applicable	C&C has a 2 stage complaints process
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Best practice 'should' requirements

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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	Paragraph 1.4.5 of the complaints procedure refers to this point
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	Should there be a disagreement or concerns regarding delays in response times the customer will be reminded of the option to approach the Housing Ombudsman and will be provided with their contact details - paragraph 1.4.5 of the complaints procedure
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	This forms part of investigative process.
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	The Feedback Manager and Investigating Officers will consider any new information during an investigation. It can be incorporated into the response at the current stage of the investigation, or a new complaint can be logged consulting with and updating the customer.

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.	Yes	Paragraph 1.4.5 of the complaints procedure refers to this point
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	Yes	Paragraph 1.4.5 of the Complaints procedure. Should there be a disagreement or concerns regarding delays in response times the customer will be reminded of the option to approach the Housing Ombudsman and will be provided with their contact details.

Stage 3

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 <u>within 20 working days</u> 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.	Not applicable	C&C has a 2 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.	Not applicable	C&C has a 2 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	This is embedded and forms the core part of the investigation process both in training and is covered in response the letter templates and overseen by the Feedback Manager.
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	This is embedded and forms the core part of the investigation process both in training and is covered in response the letter templates and overseen by the Feedback Manager.
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.	No	Often we will respond within the timeframes however not always set out the precise dates for resolution.
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	The compensation policy covers all these aspects in considering and awarding compensation payments. Oversight and reporting of compensation payments made is conducted by the Feedback Manager

Best practice 'should' requirements

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.	Yes	For each formal complaint a learning record is completed to capture learning. Investigating Officers are requested to consider how service delivery can be improved as whole, not just restricted to their service area.
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.	Yes	Assessment of complaints are made by the Feedback Manager to ensure they are dealt with via the correct process and provide advice and support to Investigating Officers to seek legal advice where required.

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 report and more frequently to their residents, staff and scrutiny panels.	Yes	Complaints performance, trends and learning is included as a section in the customers annual report. Quarterly and annual complaints reports are presented to the Regional Leadership Team, responsible for oversight of the implementation of the complaints policy and to Aster Group. Monthly performance meetings are in place to enable coordinated communication and updates for staff and colleagues to report performance trends and learning.

Best practice 'should' requirements

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.	Yes	There are clear lines of responsibility detailing reporting lines, accountability and responsibility to monitor C&C's performance and provide assurance. The Feedback Manager reports directly to the Director for Housing and Customer Services. Reporting and accountability feeds through to Customer Services Leadership Team.
7.4	As a minimum, governing bodies should receive: <ul style="list-style-type: none"> 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 	Yes	All of these aspects are included in the quarterly reports to the Senior Managers and Customers involved. Scrutiny of performance/assurance and actions required are monitored through this process. All actions are tracked and monitored by the Feedback Manager. Quarterly and Annual complaint reports with learning, trends and performance are presented to the RLT and as part of the Group Complaints Quarterly and Annual Reports.

	tracked to ensure they are delivered to agreed timescales. The annual self-assessment against the Complaint Handling Code for scrutiny and challenge.		
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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	The Complaints/Feedback team is responsible for reviewing and challenging complaint learning identified by complaints Investigating Officers, monitoring Housing Ombudsman determinations, orders and recommendations, and driving improvements in assessing and implementing learning across C&C. The team reports directly to the Director of Housing and Customer Services and reviewed monthly at the management team
7.6	Landlords should have a standard objective in relation to complaint handling for all employees that reflects the need to: <ul style="list-style-type: none"> • 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	C&C's standard objective in relation to complaint handling for staff is to reach an amicable resolution with the Customer. Strong emphasises are on our no blame culture in trying to resolve complaints and ensuring everyone is treated fairly. C&C has standard set out values and behaviours expected from colleagues.

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	An Annual self-assessment is conducted against the code and is used an opportunity to provide continuing assurance against the code requirements and any implement any changes required. Involved Customers via the Designated Complaints Panel form part of the assessment process.
8.2	Landlords must also carry out a self-assessment following a significant restructure and/or change in procedures.	Yes	Included in the complaints policy, paragraph 3.4
8.3	Following each self-assessment, a landlord must: <ul style="list-style-type: none"> 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	The assessment is published on C&C Website and a link to the assessment will be included in future customer annual reports.

Carried out by: Adebola Oni (Feedback Manager)

Date: 20/09/2022