

Appendix A: Self-assessment form

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

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

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

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

Section 1: Definition of a complaint

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
1.2	A complaint must be defined as: <i>‘an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the landlord, its own staff, or those acting on its behalf, affecting a resident or group of residents.’</i>	Yes	Webpage Complaints Crawley GOV Definition in Crawley Borough Councils Complaints Policy April 2024	For the purposes of this policy, and in line with the definition provided by the Local Government & Social Care & the Housing Ombudsman Services, a complaint is defined as: “an expression of dissatisfaction, however made, about the standard of a service, actions or lack of actions by the council, its own staff, or those acting on its behalf, affecting an individual or group of individuals”
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	Complaint report - What this form is for - Section 1 - myCrawley	Our online complaint form clearly states third parties can complete the form, including family members and health professionals. CBC policy “The complaints policy also covers complaints made via your local Councillor or Member of Parliament.” We can accept complaints by a representative. Although not explicitly mentioned in the policy
1.4	Landlords must recognise the difference between a service request and a complaint. This must be set out in their complaints policy. A service request is a request from a resident to the landlord requiring action to be taken to put something right. Service requests are not complaints, but must be recorded,	Yes	Defined in CBC Policy - What wouldn’t be considered as a complaint? There are some instances where an expression of dissatisfaction will not be treated as a complaint under the council’s complaints policy. Examples of these are:	Service requests are recorded as such, acknowledged, and passed to the service area. They are then dealt with as per any other service requests, e.g. repairs requested. We are exploring tasking within our new

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	monitored and reviewed regularly.		<ul style="list-style-type: none"> • A request for a service (e.g., a missed waste collection, requesting a repair for the first time, or reporting problems like fly tipping or litter.) These may subsequently be treated as a complaint if we don't deal with the original request.	housing management system to further track service requests.
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	Complaints Policy states A request for a service (e.g., a missed waste collection, requesting a repair for the first time, or reporting problems like fly tipping or litter.) These may subsequently be treated as a complaint if we don't deal with the original request.	Any dissatisfaction with the response to a service request will be treated as a formal complaint and processed accordingly. It would not stop our efforts to address the service request.
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	A standard statement will be included at the end of each online or paper survey from June 2024. “Please note that any expression of dissatisfaction with our service made in a survey is not defined as a complaint. For more information about how to make a complaint please visit the complaints page on the councils' website. ”	We have overlooked this for our recent surveys but have promoted to residents how they can make a complaint over the year. We will review surveys in the future to ensure we promote complaints process.

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	It is extremely rare for us not to accept a request. If the complaint is the responsibility of another organisation an automatic response is sent setting out who the complaint should be directed to. In all other cases, each complaint is considered on its own merits and a reason given in full if not accepted.	See also 2.4
2.2	<p>A complaints policy must set out the circumstances in which a matter will not be considered as a complaint or escalated, and these circumstances must be fair and reasonable to residents. Acceptable exclusions include:</p> <p>1.1 The issue giving rise to the complaint occurred over twelve months ago.</p> <p>1.2 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.</p> <p>1.3 Matters that have previously been considered under the complaints policy.</p>	Yes	<p>CBC Policy states</p> <p>What wouldn't be considered as a complaint?</p> <p>There are some instances where an expression of dissatisfaction will not be treated as a complaint under the council's complaints policy. Examples of these are:</p> <ul style="list-style-type: none"> • A request for a service (e.g., a missed waste collection or reporting problems like fly tipping or litter.) These may subsequently be treated as a complaint if we don't deal with the original request. • Requests for information under the Freedom of Information Act or the Data Protection Act • Disagreement with a decision where a right of appeal exists, either within the council or 	

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
			<p>externally (e.g. Benefits tribunal, Planning inquiry and Penalty Charge Notices)</p> <ul style="list-style-type: none"> • An attempt to reopen a previously concluded complaint or to have a complaint reconsidered where we have already given our final decision. • Services which are the responsibility of another organisation, e.g. highways, education and adult social care (West Sussex County Council), health matters (NHS), or local bus services (Metrobus). • Where we have taken legal action that we have a duty to perform, such as recovery of Council Tax or enforcement action. • A request for compensation only. • When there is a formal legal claim against the council or legal dispute. When the matter is being dealt with through our insurers. • Disagreement with a council policy or legislation decision that we are applying when delivering a service. 	

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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	CBC Complaints Policy states Time limit for making complaints Complaints should be made as soon as possible after the incident and no more than 12 months from the event or issue being complained about. Discretion may be applied to accepting complaints made outside this time limit where there are good reasons 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	If a complaint is not accepted, the Service Manager would contact the complainant in the format it was received in to explain why e.g. email or post. If the complaint is a service request, this will be acknowledged back by the Corporate Performance Team to the customer, explaining why it is not being logged as a complaint.	Information about the Ombudsman is now included in the response explaining the decision not to accept a complaint
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Yes	Our policy has no blanket exclusions – see 2.1 .	

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	Complaints can be submitted using our online complaints form. You can also make a complaint by email, telephone on 01293 438000, visiting the Town Hall, or by writing to us: Corporate Performance Team, Governance People & Performance Division, Town Hall, The Boulevard, Crawley, West Sussex, RH10 1UZ. Our preference is for customers to use the online form. If a complaint is received direct to the service by email, or by the other methods, this will be logged using the online form in the new process.	Complaints web page states “We are committed to ensuring the way we work does not place people who require assistance at a disadvantage when accessing our services. We will consider each request individually, aiming to agree and provide appropriate reasonable adjustments when they are needed and in compliance with the Equality Act 2010
3.2	Residents must be able to raise their complaints in any way and with any member of staff. All staff must be aware of the complaints process and be able to pass details of the complaint to the appropriate person within the landlord.	Yes	All staff trained to be aware of the complaints process All Crawley Homes staff have either completed the Ombudsman’s Dispute resolution training or attended an awareness session	Complaints Handling CBC Intranet has staff guidance Crawley Homes complaint handling training (2021) Crawley Homes’ complaints awareness training
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	Annual Complaints performance and service improvement report.	Crawley Homes receives the highest level of complaints within Crawley Borough Council, and this is indicative of our positive approach to complaints and the accessibility of the process to our customers. We see complaints as constructive feedback and encourage complaints to be made if our service

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
				has failed to deliver what they require.
3.4	Landlords must make their complaint policy available in a clear and accessible format for all residents. This will detail the two stage process, what will happen at each stage, and the timeframes for responding. The policy must also be published on the landlord's website.	No	Information is published on our website, but we appreciate that not all customers can access this information this way and are therefore working on more accessible methods such as a customer leaflet.	We will develop a simple resident leaflet to explain the complaints process to be introduced at our tenant conference in September 2024
3.5	The policy must explain how the landlord will publicise details of the complaints policy, including information about the Ombudsman and this Code.	No	Crawley Borough Council's complaints policy does not explain how we will publicise the complaints policy to residents as it is an overarching corporate policy; however, Crawley Homes promotes and publicises how to make a complaint, for example through hosting a Meet the Ombudsman event, information, Annual reports etc – see communications plan attached.	Crawley Homes has a communications plan for promoting how to make a complaint
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	Our online complaint form clearly states third parties can complete the form, including family members and health professionals	CBC policy "The complaints policy also covers complaints made via your local Councillor or Member of Parliament." We can accept complaints by a representative. Although not explicitly mentioned in the policy.
3.7	Landlords must provide residents with information on their right to access the Ombudsman service and how the individual can engage with the	Yes	Information is included on all letters about a complaint and on the website	Crawley Homes' communication plan details other opportunities

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	Ombudsman about their complaint.			

Section 4: Complaint Handling Staff

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
4.1	Landlords must have a person or team assigned to take responsibility for complaint handling, including liaison with the Ombudsman and ensuring complaints are reported to the governing body (or equivalent). This Code will refer to that person or team as the 'complaints officer'. This role may be in addition to other duties.	Yes	The council's feedback team and Corporate Performance Manager manage the Councils Complaints Processing system, liaise with the ombudsman and report data to the Corporate Management Team. They have been identified as complaints officer.	
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	The entire corporate team is identified as the complaints officer as above. They have access to staff at all levels. The identified Landlord's Lead and complaint handlers respond to and resolve complaints and facilitate the fair, prompt resolution. The complaints officer monitors response times and sends timely reminders for actions.	Our complaints handling approach has a different structure to what a PRP may have. Our corporate team manages the system and reports high level performance, so has been identified as Complaints officer, but the housing landlord division is responsible for complaint resolution.
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	Evidence of a culture of learning: <ul style="list-style-type: none"> Regular weekly repairs complaints workshop Complaints regularly discussed at Team meetings. All staff undertake HOS dispute resolution training or bespoke training appropriate to role <p>Notes from TLAP sub group with SMT</p>	Covered in staff induction - led by SMT to make clear culture and expectations and within this the approach to complaints is emphasised. The tenant and Leaseholder Panel (our tenant scrutiny group) have a complaints sub group that meet monthly to review complaints and make service improvement suggestions

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Section 5: The Complaint Handling Process

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
5.1	Landlords must have a single policy in place for dealing with complaints covered by this Code. Residents must not be treated differently if they complain.	Yes	Webpage Complaints Crawley GOV Crawley Borough Councils Complaints Policy April 2024	CBC Complaints Policy covers all complaints to the council
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	CBC Complaints Policy The council has a two-stage process	In addition, Crawley Homes aims to speak to all complainants within 5 working days to discuss the complaint and their desired outcomes.
5.3	A process with more than two stages is not acceptable under any circumstances as this will make the complaint process unduly long and delay access to the Ombudsman.	Yes	The council has a two-stage process	
5.4	Where a landlord's complaint response is handled by a third party (e.g. a contractor or independent adjudicator) at any stage, it must form part of the two stage complaints process set out in this Code. Residents must not be expected to go through two complaints processes.	Yes	The contractor response is the stage 1 response and contractor complaint handling staff have access to the complaint handling case processing software.	
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Yes	Contractor staff involved in complaint handling have completed the dispute resolution training and attend regular meetings about complaint resolution.	Additional training will be done in 2024 -25 to broaden awareness with operatives.
5.6	When a complaint is logged at Stage 1 or	Yes	Contact with the complainant is	This is an additional step for Crawley

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	<p>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.</p>		<p>attempted within 5 days of receiving the complaint. This is usually a telephone call, but can be by email. This call clarifies the details of the complaint and the outcomes the complainant is looking for. This conversation form part of the stage 1 response. This contact is included as a step within the case processing software.</p>	<p>Homes to take so is not included in the CBC complaints policy</p>
5.7	<p>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.</p>	Yes	<p>Contact with the complainant is attempted within 5 days of receiving the complaint. This is usually a telephone call but can be by email. This call clarifies the details of the complaint and the outcomes the complainant is looking for. This conversation form part of the stage 1 response. This contact is included as a step within the case processing software. Stage 1 response template</p>	<p>This is an additional step for Crawley Homes to take so is not included in the CBC complaints policy</p>
5.8	<p>At each stage of the complaints process, complaint handlers must:</p> <ol style="list-style-type: none"> a. deal with complaints on their merits, act independently, and have an open mind; b. give the resident a fair chance to set out their position; c. take measures to address any actual or perceived conflict of interest; and 	Yes	<p>Complaint handlers Crawley Homes complaint handling training (2021)</p>	<p>Our training will be updated to reflect the new code and additional training for complaint handlers will be done in 2024 -25 .</p>

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	d. consider all relevant information and evidence carefully.			
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	The case management systems provides timely reminders for approaching deadlines to ensure that contact is made to agree contact intervals and extended timescales.	
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	CBC Complaints policy states: We will make reasonable adjustments for individuals where appropriate under the Equality Act 2010 and keep a record of any reasonable adjustments agreed. We keep records on individual tenants and family members in our housing management system as well as within the complaints case data.	Further training on the Equality Act 2010 is proposed for all Crawley Homes staff in 2024 - 25
5.11	Landlords must not refuse to escalate a complaint through all stages of the complaints procedure unless it has valid reasons to do so. Landlords must clearly set out these reasons, and they must comply with the provisions set out in section 2 of this Code.	Yes	CBC complaints Policy states “..... , the Council reserves the right to refuse escalation of a complaint through all stages only where there is good reason to do so on a case-by-case basis. We will provide a full explanation for the reason in these cases and refer you to either the Local Government & Social Care Ombudsman or Housing Ombudsman.” There may be occasions when we	

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
			consider the matter has been exhausted at Stage 1 and any further investigation would not change the outcome or decision. If this is the case, the decision to conclude the Council's complaints process at Stage 1 will be taken by the relevant Head of Service. We will clearly state the reasons for not escalating the complaint and you will have the right to refer the matter to the Local Government and Social Care Ombudsman or Housing Ombudsman for their consideration	
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	We use Case processing software within Firmstep Dash to manage our complaints and store relevant documents.	Further training on the system is required to ensure all relevant documents are added to the system
5.13	Landlords must have processes in place to ensure a complaint can be remedied at any stage of its complaints process. Landlords must ensure appropriate remedies can be provided at any stage of the complaints process without the need for escalation.	Yes		Complaint handlers are empowered to resolve complaints and offer appropriate remedies and compensation in a timely fashion.
5.14	Landlords must have policies and procedures in place for managing unacceptable behaviour from residents	Yes	The CBC complaints policy includes a section on Unreasonably Persistent or Vexatious	

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	and/or their representatives. Landlords must be able to evidence reasons for putting any restrictions in place and must keep restrictions under regular review.		Complainants to help manage unacceptable behaviour.	
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	All decisions made by the council about any individual will consider the individuals personal circumstances and needs.	Although the complaints policy does refer to the Equality Act 2010, and we will consider each request individually. This is not specifically mentioned in the section on from the policy on Unreasonably Persistent or Vexatious Complainants. this will be addressed by September 2024.

Section 6: Complaints Stages

Stage 1

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
6.1	Landlords must have processes in place to consider which complaints can be responded to as early as possible, and which require further investigation. Landlords must consider factors such as the complexity of the complaint and whether the resident is vulnerable or at risk. Most stage 1 complaints can be resolved promptly, and an explanation, apology or resolution provided to the resident.	Yes	<p>The investigator makes personal contact, usually by telephone, with the complainant. This makes it possible to establish the complexity and any issues that specifically unpick the needs and wishes of the complainant.</p> <p>This initial discussion enables both parties to identify exactly what needs to be identified, or if there is a swift remedy, to discuss and enact the outcome straightaway.</p>	
6.2	Complaints must be acknowledged, defined and logged at stage 1 of the complaint's procedure <u>within five working days of the complaint being received.</u>	Yes	<p>From Complaints Policy:</p> <ul style="list-style-type: none"> we will acknowledge and log the complaint within five working days of the complaint being received our acknowledgement will be made in writing (email or post) and will confirm our understanding of the complaint, the outcome you are seeking and the date you can expect to receive a response 	<p>Complaints are acknowledged and tracked immediately and then are sent to the complaint handler to define and make further contact.</p> <p>Timescales are built into our complaints handling system, with automated reminders sent and tracking throughout</p>
6.3	Landlords must issue a full response to stage 1 complaints <u>within 10 working</u>	Yes	<p>From complaints policy:</p> <ul style="list-style-type: none"> we will issue a full response to 	

	days of the complaint being acknowledged.		<p>Stage 1 complaints within 10 working days of the complaint being acknowledged</p> <ul style="list-style-type: none"> the complaint response will be provided when the answer to the complaint is known, not when the outstanding actions required to address the issues are completed. Outstanding actions will be tracked and actioned promptly, with appropriate updates provided 	
6.4	Landlords must decide whether an extension to this timescale is needed when considering the complexity of the complaint and then inform the resident of the expected timescale for response. Any extension must be no more than 10 working days without good reason, and the reason(s) must be clearly explained to the resident.	Yes	<p>Stated in the policy :</p> <p>In the event an extension is required due to the complexity of the complaint, we will inform you of the expected timescale for the response. This should not exceed a further 10 working days and you will be provided with the details of the relevant Ombudsman</p>	During the course of the year we have been working hard to ensure that officers reach out to complainants to request an extension. This request is integrated into our complaints handling system where it is needed.
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 6.4 above	
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	Yes	The complaint handler will track outstanding actions or identify an officer to be responsible for keeping the complainant informed.	We have now built capacity into our Housing Management systems to track outstanding items and keep residents updated.

	promptly with appropriate updates provided to the resident.			
6.7	Landlords must address all points raised in the complaint definition and provide clear reasons for any decisions, referencing the relevant policy, law and good practice where appropriate.	Yes	The stage 1 response letter template is sectioned so that each point raised is addressed.	We will ensure complaint handlers are skilled in completing responses. Responses are monitored by senior managers.
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	From policy: 'If more information or additional complaints are raised during the complaint investigation and is relevant to the original issue and a response has not been provided, we will include these in our response. If, however the Stage 1 response has been issued, or the new issues are unrelated we will log it 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 g. details of how to escalate the matter to stage 2 if the individual is not satisfied with the response.	Yes	Included in CBC Complaints Policy	Our policy incorporates detail on these requirements. Following resident feedback, however, we introduced a template letter, which can be personalised and adapted, but follows these requirements as mandatory. We have introduced an induction which includes communication standards and understanding of accessibility and plain English.

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	Response letter includes the following text: This reply concludes stage one of the Council's complaints procedure. If you remain dissatisfied you can escalate your complaint to the second stage of our complaints procedure, at this final stage your complaint will be reviewed by the Head of Crawley Homes. Further details about our complaints procedure can be found at www.crawley.gov.uk . Information and advice about making and escalating a complaint can also be obtained from the Housing Ombudsman, telephone 0300 111 3000 or visit the website www.housing-ombudsman.org.uk .	This is built into the response and sent and tracked via our complaint management system
6.11	Requests for stage 2 must be acknowledged, defined and logged at stage 2 of the complaints procedure within five working days of the escalation request being received.	Yes	This is built into our complaints management system with reminders and trackers as above	
6.12	Residents must not be required to explain their reasons for requesting a stage 2 consideration. Landlords are expected to	Yes	CBC Complaints Policy updated in April 2024	The automatic right to progress to stage two is clearly written into our complaint outcome letter. As with stage one,

	make reasonable efforts to understand why a resident remains unhappy as part of its stage 2 response.			complainants are offered a personal phone contact to discuss further and unpick reasons for dissatisfaction.
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Yes	From Policy: Stage 2 complaints are conducted by the relevant head of service and is the final stage of our complaints process. This review will ensure that all matters raised in the original complaint have been fully and accurately addressed, and if not, to ensure that this is rectified.	The Head of Crawley Homes investigates complaints at stage two. They do not investigate complaints at stage one, so that there is a clear involvement at stage 2 only
6.14	Landlords must issue a final response to the stage 2 within 20 working days of the complaint being acknowledged.	Yes	CBC Policy states ‘We aim to respond to Stage 2 complaints within 20 working days of the complaint being escalated.	Timescales and reminders are built into our systems as above.
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	CBC policy sets this out: In exceptional cases, we will provide an explanation to you containing a clear timeframe for when the response will be received. This should not exceed a further 10 working days without good reason.	As above – telephone contact with complainant helps unpick complexity and agree any deviations to timescale. Our complaint management system tracks response times and gives clear warnings when these are approaching to enable extension periods to be agreed if necessary
6.16	When an organisation informs a resident about an extension to these timescales, they must be provided with the contact details of the Ombudsman.	Yes	Policy states: ‘In the event an extension is required due to the complexity of the complaint, we will inform you of the expected timescale for the response. This should not exceed a further 20	

			working days and you will be provided with the details of the relevant Ombudsman.	
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 stage one above	Actions are placed on a tracker. We are looking to improve this by using our organisational 'tasking' system, with reminders, so that multiple parties who may be involved in follow up actions are checking off all that they are responsible for and updating 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	Stage 1 letter template	Each point is addressed in turn, our standard letter format for this ensures that this is the case.
6.19	Landlords must confirm the following in writing to the resident at the completion of stage 2 in clear, plain language: <ul style="list-style-type: none"> a) the complaint stage; b) the complaint definition; c) the decision on the complaint; d) the reasons for any decisions made; e) the details of any remedy offered to put things right; f) details of any outstanding actions; and g) details of how to escalate the matter to the Ombudsman Service if the individual remains dissatisfied. 	Yes	See policy	As above 6.18

6.20	Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.	Yes	Letter response makes it clear that stage 2 is the final response. It sets out all lines of enquiry and appropriate staff members who have provided information. The response letter is always from the Head of Crawley Homes.	
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Section 7: Putting things right

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
7.1	<p>Where something has gone wrong a landlord must acknowledge this and set out the actions it has already taken, or intends to take, to put things right. These can include:</p> <ul style="list-style-type: none"> • Apologising; • Acknowledging where things have gone wrong; • Providing an explanation, assistance or reasons; • Taking action if there has been delay; • Reconsidering or changing a decision; • Amending a record or adding a correction or addendum; • Providing a financial remedy; • Changing policies, procedures or practices. 	Yes	<p>CBC complaints policy states Putting things right</p> <p>Where something has gone wrong, we will acknowledge this and set out the actions already taken, or we will be taking to put things right. These can include:</p> <ul style="list-style-type: none"> • Apologising. • Acknowledging where things have gone wrong. • Providing an explanation, assistance or reasons. • Taking action if there has been a delay. • Reconsidering or changing a decision. • Amending a record or adding a correction or addendum. • Providing a financial remedy. • Changing policies, procedures or practices. 	<p>All complaint handlers have completed the Ombudsman complaint resolution online courses.</p> <p>Outstanding repairs complaints are discussed at regular meetings.</p> <p>All stage 2 complaints are dealt with by the Head of Service.</p>
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Yes	All complaint handlers have completed the Ombudsman complaint resolution online courses and follow guidance to offer appropriate remedies if the complaint is upheld to any degree.	This is explicitly included in draft compensation policy to be ratified July 2024.
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	yes		We use the tasking function to track outstanding actions

	through to completion.			
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes	All complaint handlers have completed the Ombudsman complaint resolution online courses and follow guidance.	

Section 8: Self-assessment, reporting and compliance

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

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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	Clarification of the governing body as Cabinet arrived too late for this to have been reported and responded to by the deadline. The announcement of a General Election has also distorted our Committee schedule. We will become compliant with 8.2. In September.	
8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	Yes		A further assessment will be completed following the governing bodies response to the Annual report and self-assessment
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	Yes	We would do this	
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	We would do this	

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	Our complaints management system asks for a precis of learning when a complaint is upheld.	
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	Trends in complaints	
9.3	Accountability and transparency are also integral to a positive complaint handling culture. Landlords must report back on wider learning and improvements from complaints to stakeholders, such as residents' panels, staff and relevant committees.	Yes	Learning from complaints is reported in the Annual Report, included in the internal monthly briefing and shared with the Tenant and Leaseholder Action Panel. We will share The annual complaints performance and service improvement report, findings, actions and improvements at our residents' conference in September 2024.	
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	Our lead person has been identified as the Head of Crawley Homes. The Policy and Engagement Manager assists by providing data for discussion.	
9.5	In addition to this a member of the	Yes	The Portfolio Holder for Housing has	

	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').		been identified as the MRC	
9.6	The MRC will be responsible for ensuring the governing body receives regular information on complaints that provides insight on the landlord's complaint handling performance. This person must have access to suitable information and staff to perform this role and report on their findings.	No	Although complaint performance is shared and discussed with the MRC we are developing the process for ensuring the governing body (the Cabinet) receives regular information on complaints from the landlord service.	Complaints performance is shared and discussed quarterly with the Corporate Management team.
9.7	As a minimum, the MRC and the governing body (or equivalent) must receive: <ul style="list-style-type: none"> a) regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance; b) regular reviews of issues and trends arising from complaint handling; c) regular updates on the outcomes of the Ombudsman's investigations and progress made in complying with orders related to severe maladministration findings; and d) annual complaints performance and service improvement report. 	No	Although complaint performance is shared and discussed with the MRC we are developing the process for ensuring the governing body (the Cabinet) receives regular information	Complaints performance is shared and discussed quarterly with the Corporate Management team.
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: <ul style="list-style-type: none"> a) have a collaborative and co-operative 	Yes	This is part of the induction process for new staff, who have to complete the Ombudsmans online complaint resolution training. Complaints and the learning form	Document: Crawley Homes Complaint Handling training

	<p>approach towards resolving complaints, working with colleagues across teams and departments;</p> <p>b) take collective responsibility for any shortfalls identified through complaints, rather than blaming others; and</p> <p>c) act within the professional standards for engaging with complaints as set by any relevant professional body.</p>		<p>complaints is regularly discussed at all team meetings, including operative toolbox talks and overarching repairs management meetings.</p>	
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