

Housing Ombudsman's Complaint Handling Code Annual Self-Assessment 2025/26

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>		Included in Complaints Policy	The Housing Ombudsman's definition of a complaint has been incorporated within the associations Complaints policy.
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.		Included in Complaints Policy	The association's complaints policy ensures that expressions of dissatisfaction are handled in line with the complaints 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, monitored and reviewed regularly.		Included in Complaints Policy	The Housing Ombudsman's definition of a complaint has been incorporated within the association's Complaints policy. The policy also gives examples of what will and what won't be classed as a complaint under the complaints policy.
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.		Included in Complaints Policy	If a resident is not satisfied with how a service request has been dealt with, they have the right to complain. Staff will ensure that the service provided continues to stay at a high standard expected of them.

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.		Included in Complaints Policy	When issuing surveys, CHA outline what the feedback will be used for. Tenants are also advised that expressions of dissatisfaction relating to service failure, can be reported through the complaints process.
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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		Included in Complaints Policy	
2.2	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: - The issue giving rise to the complaint occurred over twelve months ago. - 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.		Included in Complaints Policy	The policy also gives examples of what isn't covered. These include: - Requests for repair e.g. the first report of repair - Services not provided by the Association e.g. refuse collection, street cleansing etc. - Complaints about services not provided by the Association where they are driven by law, the government or regulatory

	Matters that have previously been considered under the complaints policy.			direction No complaints were excluded in 2025/26
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.		Included in Complaints Policy	
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.		Included in Complaints Policy	
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.		Included in Complaints Policy	

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		Included in Complaints Policy	The policy explains that complaints can be made using any of the contact methods provided by the Association.

	the Equality Act 2010 and anticipate the needs and reasonable adjustments of residents who may need to access the complaints process.			
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.		Included in Complaints Policy	
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.		Complaints section on CHA's website and the association's annual report to tenants. Quarterly performance reports.	Complaint trends and learning from complaints is included in the annual report which is available on the association's website. Board have oversight of complaints through quarterly performance reports and annual complaints reports
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.		Included in Complaints Policy. Complaints section of website	
3.5	The policy must explain how the landlord will publicise details of the complaints policy, including information about the Ombudsman and this Code.		Included in Complaints Policy	

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.		Included in Complaints Policy	Consent form is included as an appendix to the complaints 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 Ombudsman about their complaint.		Included in Complaints Policy Complaints section of website	

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.		Included in the Complaints Policy	The HR & Governance Manager is responsible for complaint handling including reporting to the board and ensuring that the policy is implemented and reviewed when necessary. In their absence the Head of Resources, or designated Officer, will lead on this.
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.		Included in the Complaints Policy	

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.		Included in the Complaints Policy	Complaint leads have attended ombudsman training sessions online as well as participating in the complex complaints collaboration group through CHANW. Complaint policy implementation training to be delivered to all staff in July
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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.		Included in the Complaints Policy	
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.		Included in the Complaints Policy	
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.		Included in the Complaints Policy	CHA uses a two stage complaints 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		Included in the Complaints Policy	CHA's policy states that there may be times when a complaint is dealt with by a third party such as a

	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.			contractor however the contractor will follow the associations policy.
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.		Included in the Complaints Policy	
5.6	When a complaint is logged at Stage 1 or escalated to Stage 2, landlords must set out their understanding of the complaint and the outcomes the resident is seeking. The Code will refer to this as “the complaint definition”. If any aspect of the complaint is unclear, the resident must be asked for clarification.		Included in the Complaints Policy Included in correspondence to complainant	Correspondence with the complainant includes the associations understanding of the complaint and the outcome the resident is seeking. Where the investigating manager requires clarity on the complaint they will contact the resident direct.
5.7	When a complaint is acknowledged at either stage, landlords must be clear which aspects of the complaint they are, and are not, responsible for and clarify any areas where this is not clear.		Included in the Complaints Policy Included in correspondence to complainant	Correspondence with the complainant includes the associations understanding of the complaint and the outcome the resident is seeking.
5.8	At each stage of the complaints process, complaint handlers must: 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 d. consider all relevant information		Included in the Complaints Policy Included in the association’s procedure	As part of the association’s complaints handling process, the investigating manager is selected by the complaints lead to avoid conflict of interest and all complainants should expect a fair and independent review.

	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.		Included in the Complaints Policy	The policy states that where more time may be needed to further investigate the complaint, the complainant will be contacted directly to discuss this.
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.		Included in the Complaints Policy	Where customers have specific needs or require additional support, we will make every effort to accommodate them and to provide a service that is open and inclusive. An Equality Impact Assessment has been carried out on the policy.
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.		Included in the Complaints Policy	
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.		Complaint information is stored on the associations systems.	All documentation relating to complaints is filed by the HR & Governance Manager. In 2025/26 we will introduce the use of the complaints module in the new housing management system to allow streamlining and more in depth reporting.
	Landlords must have processes in place to ensure a complaint can be remedied at any stage of its complaints process. Landlords		Included in the Complaints Policy	

5.13	must ensure appropriate remedies can be provided at any stage of the complaints process without the need for escalation.			
5.14	Landlords must have policies and procedures in place for managing unacceptable behaviour from residents and/or their representatives. Landlords must be able to evidence reasons for putting any restrictions in place and must keep restrictions under regular review.		The complaints policy includes a section on unacceptable behaviour when pursuing complaints.	A restriction has never had to be placed on a complainant in the past, so this not been used to test.
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.		The complaints policy includes a section on unacceptable behaviour when pursuing complaints.	A restriction has never had to be placed on a complainant in the past, so this not been used to test. An equality impact assessment is carried out on all association policies.

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.		Included in the Complaints Policy	

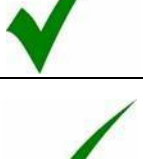
	Most stage 1 complaints can be resolved promptly, and an explanation, apology or resolution provided to the resident.			
6.2	Complaints must be acknowledged, defined and logged at stage 1 of the complaints procedure <u>within five working days of the complaint being received.</u>		Included in the Complaints Policy	
6.3	Landlords must issue a full response to stage 1 complaints <u>within 10 working days</u> of the complaint being acknowledged.		Included in the Complaints Policy	
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.		Included in the Complaints Policy	
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.		Included in correspondence to the complainant	
6.6	A complaint response must be provided to the resident when the answer to the complaint is known, not when the		Included in the complaints policy	If a complaint is upheld and requires action, the tenant is

	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.			updated throughout the complaints process.
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.		Included in the complaints process	
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.		Included in the complaints process	All complaints are logged as a new complaint.
6.9	Landlords must confirm the following in writing to the resident at the completion of stage 1 in clear, plain language: a. the complaint stage; b. the complaint definition; c. the decision on the complaint; d. the reasons for any decisions made; e. the details of any remedy offered to put things right; f. details of any outstanding actions; and		Included in the complaints policy Included in correspondence to complainant	

	details of how to escalate the matter to stage 2 if the individual is not satisfied with the response.			
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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.		Included in the complaints policy	Complaints process is set out in Appendix 1 of the complaints policy
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.		Covered within complaints process	If a complainant is not satisfied with the stage 1 outcome, they may submit an appeal in writing or via email. Such a request will be acknowledged within 5 working days.
6.12	Residents must not be required to explain their reasons for requesting a stage 2 consideration. Landlords are expected to make reasonable efforts to understand why a resident remains unhappy as part of its stage 2 response.		Covered within complaints process	If a complainant is not satisfied with the stage 1 outcome, they may submit an appeal in writing or via email. We will do our best to ensure that we understand why the complainant remains unhappy.
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.		Included in the complaints policy	As part of the associations complaints handling process, the investigating manager is selected by the complaints lead to avoid conflict of interest and all complainants should expect a fair and independent review.

6.14	Landlords must issue a final response to the stage 2 <u>within 20 working days</u> of the complaint being acknowledged.		Covered within complaints process	
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.		Covered within complaints process	Where more time may be needed to further investigate, we will let the complainant know that this is the case and keep them updated Throughout
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.		Included in the complaints policy Complaints section of website	Included in correspondence to the complainant
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.		Included in the complaints policy	If a complaint is upheld and requires action, the tenant is updated throughout the complaints process.
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.		Included in the complaints process	
	Landlords must confirm the following in writing to the resident at the completion of stage 2 in clear, plain language: a. the complaint stage;		Included in correspondence to complainant	

6.19	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.			
6.20	Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.		Included in the complaints process	

Section 7: Putting things right

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
7.1	Where something has gone wrong a landlord must acknowledge this and set out the actions it has already taken, or intends to take, to put things right. These can include: • Apologising; • Acknowledging where things have gone wrong; • Providing an explanation, assistance or reasons; • Taking action if there has been delay; • Reconsidering or changing a		Included in Complaints Policy	

	- decision; - Amending a record or adding a correction or addendum; - Providing a financial remedy; - Changing policies, procedures or practices.			
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.		Included in Complaints Policy	
7.3	The remedy offer must clearly set out what will happen and by when, in agreement with the resident where appropriate. Any remedy proposed must be followed through to completion.		Included in Complaints Policy	
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.		Included in Complaints Policy	Ombudsman guidance used to produce the complaints policy including section on resolution

Section 8: Putting things right

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	Landlords must produce an annual complaints performance and service improvement report for scrutiny and challenge, which must include: a. the annual self-assessment against this Code to ensure their complaint handling policy remains in		Complaints section of website	a. Self-assessment against Complaint Handling Code b. Annual Complaints Report presented to TRVP before

8.1	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.			being approved by Board and published on website c. Included in the above. d. Included in the above e. N/A for 2025/26 f. N/A for 2025/26
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.		Complaints section of website	Self-assessment of Complaint Handling Code scheduled to published on the website
8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.		N/A for 2025/26	N/A for 2025/26 but this would happen if any of the circumstances listed occurred

8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.		N/A for 2025/26	N/A for 2025/26 but this would happen if such circumstance occurred
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.			CHA would update the Housing Ombudsman and any affected customers if such circumstance occurred

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.		Complaints section of website	CHA look to learn from all complaints received. Learning is captured in the Annual Complaints Report which is to be published on the website in August.
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.		Included in Complaints Policy Complaints section of website	CHA look to learn from all complaints received. Learning is captured in the Annual Complaints Report which is to be published on the website in August.
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 section of website	Annual Complaints Report to be presented to TRVP before being approved by Board and published on website in August

	complaints to stakeholders, such as residents' panels, staff and relevant committees.			
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.		HR & Governance Manager is CHA's complaints lead and works closely with the senior management team	
9.5	In addition to this a member of the governing body (or equivalent) must be appointed to have lead responsibility for complaints to support a positive complaint handling culture. This person is referred to as the Member Responsible for Complaints ('the MRC').		Board section of our website Quarterly updates Annual updates	The full Board have oversight of complaints through quarterly performance reports, annual report and the annual complaints report
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.		Board section of our website Quarterly updates Annual updates	The full Board have oversight of complaints through quarterly performance reports, annual report and the annual complaints report.
9.7	As a minimum, the MRC and the governing body (or equivalent) must receive: a. regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance; b. regular reviews of issues and trends arising from complaint		Board section of our website Quarterly updates Annual updates	a. The full Board have oversight of complaints through quarterly performance reports, annual report and the annual complaints report b. The full Board have oversight of complaints through quarterly

	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.			performance reports, annual report and the annual complaints report c. Where applicable, updates are reported to the Board through the Chief Executive's report, ensuring members remain informed of any significant developments and actions taken. d. The full Board have oversight of complaints through quarterly performance reports, annual report and the annual complaints report
9.8	Landlords must have a standard objective in relation to complaint handling for all relevant employees or third parties that reflects the need to: a. have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments; b. take collective responsibility for any shortfalls identified through complaints, rather than blaming others; and c. act within the professional standards for engaging with complaints as set by any relevant professional body.		Included in Complaints Policy – complaints process	