

## 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	CBH's complaints policy reflects the definition within the Housing Ombudsman Complaint Handling Code.  <a href="#">CBH-Complaints-Policy</a>
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	Any contact with CBH can be considered a complaint whether it is made in the form of a request for a complaint.  A complaint can be made on behalf of a customer with their permission and will be handled in line with our complaints policy.
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	If a customer asks to make a complaint, then we will log it as a complaint and deal with it in accordance with the complaints policy and Housing Ombudsman Complaint Handling Code.
1.7	A landlord must accept a complaint unless there is a valid reason not to do so.	Yes	In line with guidance, we will accept a complaint unless there is a valid reason not to do so. If we do not accept a complaint, we will explain to the customer why it has been excluded from the Complaints process (for examples please see 1.8)
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	In line with guidance the following areas are excluded under the policy: insurance claims; cases where legal proceedings have been commenced or indicated; cases where a legal right to review of a decision made such as homeless decisions and accommodation offers made under homelessness duties; banding awards made under the Gateway to Homechoice allocations policy where there is a right to a review; cases regarding services not provided by or on behalf of Colchester borough homes; when approaching Colchester borough homes for a service for the first time (e.g. reporting a repair; neighbour nuisance; anti-social behaviour); matters where legal proceedings have been commenced or indicated.

			<p>Vexatious or unreasonable customer behaviour may cause us to limit the amount of contact a customer has with us. If this is considered, we will write to the customer to explain and such action will only be taken with the approval of a senior manager and will be reviewed by the Board with a further review set for 6 months and the customer advised of the outcome.</p> <p>These are set out in the complaints policy.</p> <p><b>ACTION</b> : A proposed amendment to the complaints policy is to add 'Matters which have previously been considered under the complaints policy unless new information has been provided'.</p>
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	In line with guidance we will accept a complaint unless there is a valid reason not to do so. If we do not accept a complaint, we will explain to the customer why it has been excluded from the Complaints process.

### 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 <b>service request</b> , where a resident may be unhappy with a <b>situation</b> that they wish to have rectified, and a <b>complaint</b> about the <b>service</b> they have/have not received.	Yes	To reflect the revised Housing Ombudsman Complaint Handling Code an amendment to the complaints policy under review will include an explanation of a service request. If a customer states they wish to make a complaint then we will log as a complaint.
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	We value all customer feedback from telephone surveys or other survey methods, and customers are advised how to pursue dissatisfaction as a complaint should they wish to do so. Complaints can be made by phone call, website submission, via letter or email, in person to any CBH officer, via social media or through a third-party advocate or elected Member.

## 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	Customers can complain to us via website submission, phone call, via letter or email, in person to any CBH officer, via social media or through a third-party advocate or elected Member.
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 the CBH website <a href="#">CBH Complaints Policy</a> <b>Action:</b> <i>In progress - The complaints policy is currently under review to ensure compliance with the revised Housing Ombudsman Complaints Handling Code, also to consider an 'Easy Read' version of the complaints policy.</i>
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	Information is provided on the CBH website on how to make a complaint. <a href="#">Complaints, Compliments and Comments - Colchester Borough Homes (cbhomes.org.uk)</a> This is accessed via the 'Contact Us' drop- down menu on the CBH website. <b>Action:</b> <i>include 'Complaints' on website landing page as well as via 'Contact Us' dropdown – to be more visible to customers. This will be discussed as part of the forthcoming website review</i>

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	The complaints policy reflects reasonable adjustments. This includes communicating with customers in a way that reflects specific needs for impairments such as but not limited to larger print documents, braille, easy read versions of decisions or use of an interpreter. To ensure we comply with the Equality Act 2010 we will ensure new policies have an Equality Impact Assessment to ensure identified disproportionate negative impacts are effectively mitigated.
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	The complaints policy and process is publicised on our website, Housing News and Views newsletters, Tenant and Leaseholder Newsletters and on social media.  <b>Action:</b> <i>In progress - CBH Communications and Customer Experience Team to produce updated leaflet on 'How to make a Complaint' and place in local office and on website as per the Housing Ombudsman Complaint Handling Code</i>
2.7	Landlords must provide residents with contact information for the Ombudsman as part of its regular correspondence with residents.	Yes	The Housing Ombudsman Complaint Handling Code is publicised on the <a href="#">CBH website</a> and contact information via Housing News and Views newsletters, Tenant and Leaseholder Newsletters and on social media. <a href="#">The Housing ombudsman's Complaint Handling Code</a>
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	Customers are advised of their right to access the Housing Ombudsman Service at any time for support or advice regarding their complaint when we first contact the customer with their personalised acknowledgement of receipt of their complaint. The acknowledgement also provides a copy of our complaints policy which sets out their right to contact the Housing Ombudsman.

### 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	The complaints policy sets out how customers can complain to CBH via social media and that we will deal with the complaint in line with data protection policies and legislation.  Link to <a href="#">Social Media Policy statement</a>

### 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	<p>The Customer Experience Team receives, logs and allocates complaints to responding officers.</p> <p>Complaint Handling is reported to Operations and Performance Committee on a quarterly basis and to the CBH Board annually.</p>
3.2	...the complaint handler appointed must have appropriate complaint handling skills and no conflicts of interest.	Yes	<p>Staff have received Mary Gobar International customer service training on dealing with customers and appropriate messaging.</p> <p>Staff have also received Equality training enabling customer complaints to be treated fairly and sensitively.</p> <p>Training in complaints handling is also available via the Housing Ombudsman website and support is provided from the Customer Experience Team to assist in complaint handling.</p> <p><b>Action:</b> We aim to provide further training to appointed complaint handlers as part of the service improvement process.</p>

### 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"> <li>• be able to act sensitively and fairly</li> <li>• be trained to handle complaints and deal with distressed and upset residents</li> <li>• have access to staff at all levels to facilitate quick resolution of complaints</li> <li>• have the authority and autonomy to act to resolve disputes quickly and fairly.</li> </ul>	Yes	<p>Ownership for resolving complaints resides with the service areas about which the complaints originate, with the relevant Head of Service ultimately responsible for the resolution of Complaints. Complaints are managed by the Customer Experience Team Leader, who also has the authority to challenge Heads of Service on responses and decisions.</p> <p><b>Action:</b> All staff will have a Complaint Handling objective in line with the Housing Ombudsman Complaint Handling Code.</p> <p>See also 3.2.</p>

## Section 4 - Complaint handling principles

### Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
4.1	Any decision to try and resolve a concern must be taken in agreement with the resident and a landlord's audit trail/records should be able to demonstrate this. Landlords must ensure that efforts to resolve a resident's concerns do not obstruct access to the complaints procedure or result in any unreasonable delay. It is not appropriate to have extra named stages (such as 'stage 0' or 'pre-complaint stage') as this causes unnecessary confusion for residents. When a complaint is made, it must be acknowledged and logged at stage one of the complaints procedure <b>within five days of receipt</b> .	Yes	In line with the Housing Ombudsman Complaint Handling Code, complaints are logged and acknowledged at stage one of the complaints procedure within 5 days.  In line with the Housing Ombudsman Code, Colchester Borough Homes has a 2-stage complaint handling process.
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	Our understanding of the complaint is set out in the acknowledgement to the customer.  If any aspect is not clear, the customer is contacted for clarification and the full definition which is agreed by both parties.
4.6	A complaint investigation must be conducted in an impartial manner.	Yes	Our complaints policy sets out that we will be fair, treat people fairly and follow fair process when investigating a complaint.



4.7	<p>The complaint handler must:</p> <ul style="list-style-type: none"> <li>• deal with complaints on their merits</li> <li>• act independently and have an open mind</li> <li>• take measures to address any actual or perceived conflict of interest</li> <li>• consider all information and evidence carefully</li> <li>• keep the complaint confidential as far as possible, with information only disclosed if necessary to properly investigate the matter.</li> </ul>	Yes	<p>We use a customer-centred approach and review each complaint case on its own merit.</p> <p>We expect colleagues to be fair and follow fair process, put things right, and learn from outcomes as set out in the complaints policy.</p> <p>Information is only disclosed to assist with the complaint investigation and with the permission of the customer.</p>
4.11	Landlords must adhere to any reasonable arrangements agreed with residents in terms of frequency and method of communication	Yes	Customers can specify their preferred method of communication and we will contact them via that method wherever possible.
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"> <li>• set out their position</li> <li>• comment on any adverse findings before a final decision is made.</li> </ul>	Yes	<p>As part of the complaint handling process customers can set out their position or update their views at any time and this will be taken into consideration as part of the complaint investigation.</p> <p>Any staff member subject to a complaint will have the opportunity to set out their position as part of the complaint investigation.</p> <p>We take a collaborative company approach and do not encourage a 'blame culture' when investigating complaints about staff.</p>
4.13	A landlord must include in its complaints policy its timescales for a resident to request escalation of a complaint	No	<p><b>Action: In progress</b> - The complaints policy is currently under review to ensure compliance with the revised Housing Ombudsman Complaints Handling Code. Customers have been consulted as part of a Task &amp; Finish group and have suggested a timescale for inclusion in the reviewed CBH complaints policy, which is scheduled for approval by the CBH Board in September 2022.</p>
4.14	A landlord must not unreasonably refuse to escalate a complaint through all stages of the complaints	Yes	<p>The current process allows for the customer to escalate the complaint following the outcome of Stage 1 to stage 2 to challenge the outcome, but the customer is not able to challenge before the decision of each stage is made. The outcome is made clear at the end of each stage of the investigation.</p> <p>In the unlikely event that we would refuse to escalate a complaint, a detailed explanation will be given to the customer, along with details of the Housing</p>

			Ombudsman Service.
	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.		Reasons for declining to accept a complaint are set out in the complaints policy.
<b>4.15</b>	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	Electronic records are kept in the form of spreadsheets and emails. We keep records of when a complaint is received, all correspondence, reviews, and outcomes. Details of any reports or surveys arranged are noted.
<b>4.18</b>	Landlords must have policies and procedures in place for managing unacceptable behaviour from residents and/or their representatives when pursuing a complaint.	Yes	This is set out in point 7 of our complaints policy "Vexatious or unreasonable complainants"

### 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	Customers are given an explanation if a desired outcome is unreasonable or unrealistic. We will try to find an alternative acceptable solution to meet the customers need wherever possible.
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	We aim to resolve any dissatisfaction at the earliest opportunity based on the evidence. Urgent actions will be addressed to resolve issues in a timely manner wherever possible.
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	Customers who give permission can be represented by or accompanied by a third party who is acting on their behalf.
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	We consult and seek the support of Colchester Borough Council's legal and/or insurance officers should any key issue of a complaint relate to the parties' legal obligations.

4.9	Communication with the resident should not generally identify individual members of staff or contractors.	Yes	We take a collaborative 'company' approach when dealing with and responding to complaints and would only ally identify individual members of staff or contractors unless the resident has already identified them.
4.10	Landlords should keep residents regularly updated about the progress of the investigation.	No	Responding Officers can ask for an extension in the timescale should they need further time to investigate but must inform the Customer Experience Team so that this can be agreed with the customer. <b>Action:</b> Improvement is needed in this area.
4.16	Landlords should seek feedback from residents in relation to the landlord's complaint handling as part of the drive to encourage a positive complaint and learning culture.	Yes	All customers receive a link to a form to complete a satisfaction survey and a follow up telephone call so that outcomes and learning can be recorded and used for service improvement.
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	We recognise that complaints can impact our satisfaction levels and if issues are not listened to and resolved that it will have a detrimental effect on our performance and service delivery to our customers. Staff are supported by the Customer Experience Team and line management throughout the process and there is the opportunity to request additional support if required. We have an Improvements log which highlights areas of complaint and lessons to be learnt and rectified. Learning from complaints is monitored by the Corporate Management Team.
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	As set out in the complaints policy any decision on restrictions placed on contact are by approval of a senior manager, will be explained to them in writing and reviewed in a timely manner, considering the Equality Act 2010.

## Section 5 - Complaint stages

### Mandatory 'must' requirements

#### Stage 1

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
5.1	Landlords must respond to the complaint <b><u>within 10 working days</u></b> 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.	No	We aim to respond to all complaints within the set timescale and explain if this is not possible. 61% of complaints logged April 2021 – March 2022 were recorded as being answered within the 10-day timescale (or agreed timescale if an extension is needed)  <b>Action:</b> Action plan is in place to improve response times.
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 when the answer is known. Outstanding actions are monitored, and updates requested from the relevant service areas for the benefit of the customer. Improvement in concluding outstanding actions and communicating to the customer is required in some service areas.
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	If all points are not addressed the responding officer will be asked to resubmit their response to the Customer Experience Team again, ensuring all points are answered.
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"> <li>the complaint stage</li> <li>the decision on the complaint</li> <li>the reasons for any decisions made</li> <li>the details of any remedy offered to put things right</li> <li>details of any outstanding actions</li> <li>details of how to escalate the matter to stage two if the resident is not satisfied with the answer</li> </ul>	Yes	A template is sent to all responding officers to ensure all the points in 5.8 are covered in their stage 1 responses. All responses are checked by the Customer Experience Team prior to sending to the customer.

## 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	We will progress a complaint to Stage 2 if the complaint has not been resolved to the customer's satisfaction as per the complaints policy.  If we decline to escalate, we will advise in writing explaining why and inform the customer of their right to contact the Housing Ombudsman.
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	In our stage 2 acknowledgement to the customer, we set out our understanding of issues and outcomes they may be seeking. We will contact customers for further information if needed.
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	As per complaints policy



### Stage 3

Code section	Code requirement	Compl y: Yes/No	Evidence, commentary and any explanations
5.17	Two stage landlord complaint procedures are ideal. This ensures that the complaint process is not unduly long. If landlords strongly believe a third stage is necessary, they must set out their reasons for this as part of their self-assessment. A process with more than three stages is not acceptable under any circumstances.	Yes	We have a 2 stage Complaints process in line with the Ombudsman Code.
5.20	Landlords must confirm the following in writing to the resident at the completion of stage three in clear, plain language: <ul style="list-style-type: none"> <li>• the complaint stage</li> <li>• the complaint definition</li> <li>• the decision on the complaint</li> <li>• the reasons for any decisions made</li> <li>• the details of any remedy offered to put things right</li> <li>• details of any outstanding actions</li> <li>• details of how to escalate the matter to the Housing Ombudsman Service if the resident remains dissatisfied</li> </ul>	N/A	Not applicable as we do not have a 3 stage complaints process.



## Best practice 'should' requirements

### Stage 1

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	The customer is consulted, and an extension mutually agreed if required.
5.3	Where agreement over an extension period cannot be reached, landlords should provide the Housing Ombudsman's contact details so the resident can challenge the landlord's plan for responding and/or the proposed timeliness of a landlord's response.	Yes	The customer is advised of their right to contact the Ombudsman at all stages of the Complaints handling process.
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	We will look at historical issues when handling Complaints to resolve matters for the customer.
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	New information relating to an ongoing complaint is forwarded to the responding officer for review as part of the complaint.  A new complaint would be logged if the stage 1 response has already been issued.

### 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	The customer is consulted, and an extension mutually agreed if required.
5.15	Where agreement over an extension period cannot be reached, landlords should provide the Housing Ombudsman's contact details so the resident can challenge the landlord's plan for responding and/or the proposed timeliness of a landlord's response	Yes	The customer is advised of their right to contact the Ombudsman at all stages of the Complaints handling process.

### 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 <b><u>within 20 working days</u></b> of the complaint being escalated. Additional time will only be justified if related to convening a panel. An explanation and a date for when the stage three response will be received should be provided to the resident.	N/A	We do not have a 3-stage complaint process
5.19	Where agreement over an extension period cannot be reached, landlords should provide the Housing Ombudsman's contact details so the resident can challenge the landlord's plan for responding and/or the proposed timeliness of a landlord's response.	N/A	We do not have a 3-stage complaint 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	We will acknowledge where we have been at fault. Actions required to put things right will be set out in the complaint response to the customer and monitored to ensure completion
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	Remedies are considered on a case-by-case basis to ensure that expectations are managed and fairness to all customers.
6.5	The remedy offer must clearly set out what will happen and by when, in agreement with the resident where appropriate. Any remedy proposed must be followed through to completion.	Yes	Actions required to put things right will be set out in the response to the customer, a timescale agreed and monitored to ensure completion
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	Financial compensation is considered on a case-by-case basis and will consider whether we have been at fault, statutory payments, financial losses incurred, and inconvenience and distressed caused to the customer. <a href="#">CBH Remedies policy</a>

### 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	Thematic data is collected when logging complaints to ensure any process or system issues are quickly identified to drive service improvements for all customers. A log of service improvements arising from complaints is kept and monitored at senior management level.
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	Colchester Borough Council's legal and/or insurance officers are consulted for advice and wording for any resolution where a customer may have a right to legal redress.

## 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 are reviewed at all levels including Corporate Management Team, to ensure learning and improvements are made from complaint outcomes. We have a service improvement log to record, track and implement changes and improvements. These are reported back to customers via Housing News and Views 'You said, We Did' The complaints handling annual report is published on our website.

### 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.	No	<b>In Progress</b> - The Board is currently working to identify a member to have lead responsibility for complaints. A decision is expected in July 2022.
7.4	As a minimum, governing bodies should receive: <ul style="list-style-type: none"> <li>Regular updates on the volume, categories and outcome of complaints, alongside complaint handling performance including compliance with the Ombudsman's orders</li> <li>Regular reviews of issues and trends arising from complaint handling,</li> <li>The annual performance report produced by the Ombudsman, where applicable</li> <li>Individual complaint outcomes where necessary, including where the Ombudsman made findings of severe maladministration or referrals to regulatory bodies. The implementation of management responses should be tracked to ensure they are delivered to agreed timescales.</li> </ul>	Yes Yes Yes Yes Yes	Complaint volumes and Complaint Handling Performance are reported and discussed at Corporate Management Team level monthly and at the Operational and Performance Committee on a quarterly basis.  Upheld and partially upheld complaint outcomes are reviewed monthly at Corporate Management Team meetings.  Maladministration findings or referrals made to regulators are reported immediately to the Corporate Management Team for review and management response and timescales for action to put things right.

	The annual self-assessment against the Complaint Handling Code for scrutiny and challenge.		Self-assessment is completed annually and is presented to the Governing body and published on our website
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	Themes and trends are reported to senior management on a regular basis. Any issues or recurring issues are discussed and procedures and processes revised if necessary. For example, communications, management of repairs work in progress and the repairs customer journey have been identified as key areas to review as part of the CBH strategic plan, based on complaints and other customer satisfaction feedback.
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"> <li>• have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments</li> <li>• take collective responsibility for any shortfalls identified through complaints rather than blaming others</li> <li>• act within the Professional Standards for engaging with complaints as set by the Chartered Institute of Housing.</li> </ul>	No	<i>In progress</i> - This has been raised with senior management for action. We have also consulted with our involved customers for their opinion on what the objective should be via a Task and Finish group review on our Complaints policy.

## Section 8 - Self-assessment and compliance

### Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
8.1	Landlords must carry out an annual self-assessment against the Code to ensure their complaint handling remains in line with its requirements.	Yes	A self-assessment against the Code was carried out in June 2021 and published on our website. The self-assessment for 2022 has been reviewed to ensure we are in line with revised requirements and will also be published on our website.
8.2	Landlords must also carry out a self-assessment following a significant restructure and/or change in procedures.	Yes	The previous self-assessment was carried out in June 2021 following a restructure and was published on our website.
8.3	<p>Following each self-assessment, a landlord must:</p> <ul style="list-style-type: none"> <li>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</li> <li>publish the outcome of their assessment on their website if they have one, or otherwise make accessible to residents</li> <li>include the self-assessment in their annual report section on complaints handling performance</li> </ul>	<p>Yes</p> <p>Yes</p> <p>Yes</p>	<p>The self-assessment outcome will be reported at Board level and to elected members.</p> <p>The self-assessment is published on our website</p> <p>The self-assessment will be included in the annual report section on complaints handling performance.</p>