

Housing Ombudsman Complaint Handling Code

Our self-assessment: 29 September 2023



Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
Section 1: Definition of a complaint			
Mandatory 'must' requirements			
1.2	A complaint must be defined as: 'an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the organisation, its own staff, or those acting on its behalf, affecting an individual resident or group of residents.'	Yes	Definition adopted and contained within policy and published standards. See policy at: www.cottsway.co.uk/complaints
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	The complaint procedure explicitly highlights that a third party i.e. someone acting on behalf of a person or organisation receiving or seeking to receive a service from the Cottsway (e.g. Councillor, MP, next of kin), may use the complaints procedure.
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	The feedback and complaints policy explains that a first-time request for a service or, for example information on an anti-social behaviour case, should not be seen as a complaint. However, a repeated request for the same service or information is a clear indication that Cottsway may not have performed according to its service standards. A repeated request will therefore initiate a complaint.
1.7	A landlord must accept a complaint unless there is a valid reason not to do so.	Yes	All complaints will be accepted unless the matter being raised is not covered under Cottsway's Complaints Policy and Process. (See 1.8 below)
1.8	A complaints policy must clearly set out the circumstances in which a matter will not be considered, and these circumstances should be fair and reasonable to residents.	Yes	The feedback and complaints policy includes circumstances in which a matter will not be considered under the complaints process. See policy at: www.cottsway.co.uk/complaints

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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	Where a request to use the complaints process is received, and the matter is not covered under the feedback and complaints policy (as explained in 1.8), Cottsway will write to the customer clearly explaining why the matter is not suitable for the complaints process and the right to take that decision to the Ombudsman.
Best practice 'should' requirements			
1.4	Landlords should recognise the difference between a service request , where a resident may be unhappy with a situation that they wish to have rectified, and a complaint about the service they have/have not received.	Yes	The feedback and complaints policy includes advice as to what constitutes a complaint, emphasising the importance of recognising the difference between a formal complaint and a service request. The policy explains that a first-time request for a service should not be seen as a complaint. Complaints can be broadly categorised as follows: 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.
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	Cottsway uses independent survey feedback to understand customer satisfaction with the services provided. All surveys include the following in the interview script: <p>“If you are dissatisfied with the service provided by Cottsway, they do have a complaints process you can access by calling 01993 890000, emailing contact@cottsway.co.uk or by completing a form on their website where you will find more information.”</p> <p>In addition, all comments received via the survey are reviewed and responded to as necessary, including raising as a complaint if required.</p>

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
Section 2: Accessibility and awareness			
Mandatory 'must' requirements			
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	Complaints can be made using a range of channels including online, telephone, web, social media, in person, via a third party or in writing.
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	<p>The feedback and complaints policy and procedure are available in a clear and accessible format for all residents on our website: www.cottsway.co.uk/complaints</p> <p>This includes the following information:</p> <ul style="list-style-type: none"> • Informal feedback and formal complaints procedure and form. • The various stages of our feedback and complaints procedure. • Help and advice on complaints procedure. • Complaints factsheet • Information on the Housing Ombudsman and their complaints code. • Cottsway's published self-assessment and how customers can contact the Housing Ombudsman. <p>Company communications also contain information about how to complain.</p>
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	As explained in 2.3 above – the feedback and complaints policy is available in a clear and accessible format for all residents on our website: www.cottsway.co.uk/complaints
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 feedback and complaints policy explains how Cottsway will make reasonable adjustments to our ways of working to achieve equal and fair treatment of all customers. We recognise that we have an ethical and a legal duty (through the Equalities Act 2010) to advance equality of opportunity and prevent discrimination on the grounds of age, sex and sexual orientation, disability, race, religion or belief, gender reassignment, pregnancy and maternity, marriage, and civil partnership. All staff undergo annual equality, diversity and inclusion training.

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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	Customers are advised about the complaints process through various channels, including on the website, general company communications, over the phone, in customer correspondence, and in policies etc. The Complaint Handling Code and the Housing Ombudsman service is publicised on the website: www.cottsway.co.uk/complaints Cottsway's annual report and bi-annual digital customer ezine also publicise the complaint policy.
2.7	Landlords must provide residents with contact information for the Ombudsman as part of its regular correspondence with residents.	Yes	Following last year's self-assessment, our letter templates and email signatures have been updated to provide a link to our website with information about our feedback and complaint service.
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	Cottsway's website includes information on complaints and the right to access the Housing Ombudsman Service: www.cottsway.co.uk/complaints In addition, we provide information about the Ombudsman service as part of our standard communications when customers engage with us via the complaints service or as a result of a service failure.
Best practice 'should' requirements			
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.	No	Currently any contact received from a customer via social media is privately messaged therefore taking the communication out of the public domain to ensure customer privacy is maintained. ACTION: Policy update required to capture to this action.

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
Section 3: Complaint handling personnel			
Mandatory 'must' requirements			
3.1	Landlords must have a person or team assigned to take responsibility for complaint handling to ensure complaints receive the necessary attention, and that these are reported to the governing body. This Code will refer to that person or team as the "complaints officer".	Yes	The customer services manager and customer services team manage all complaints received from customers. A report is published quarterly for Cottsway's Board. In addition, a Customer Committee, made up of board representatives, receives regular insight about performance and case studies from our complaints services.
3.2	...the complaint handler appointed must have appropriate complaint handling skills and no conflicts of interest.	Yes	All complaint handlers receive regular training including Housing Ombudsman newsletters, webinars, as well as peer-to-peer learning. Clear distinction within the process determines that each stage is independently reviewed by separate team members.
Best practice 'should' requirements			
3.3	Complaint handlers should: <ul style="list-style-type: none"> • be able to act sensitively and fairly. • be trained to handle complaints and deal with distressed and upset residents. • have access to staff at all levels to facilitate quick resolution of complaints. • have the authority and autonomy to act to resolve disputes quickly and fairly. 	Yes	The customer services team investigate all complaints on behalf of our customers and will co-ordinate responses from across the business. They are given full autonomy to investigate the complaint independently and offer resolutions and compensation as necessary. All Cottsway staff have received customer service training across the whole business as well as new staff being inducted. The skills of the customer service team mean they are dealing with our customers in a competent, empathetic and efficient manner.

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Section 4: Complaint handling principles			
Mandatory 'must' requirements			
4.1	Any decision to try and resolve a concern must be taken in agreement with the resident and a landlord's audit trail/ records should be able to demonstrate this. Landlords must ensure that efforts to resolve a resident's concerns do not obstruct access to the complaints procedure or result in any unreasonable delay. It is not appropriate to have extra named stages (such as 'stage 0' or 'pre-complaint stage') as this causes unnecessary confusion for residents. When a complaint is made, it must be acknowledged and logged at stage one of the complaints procedure within five days of receipt .	Yes	Cottsway always responds to formal complaints within set timescales and we monitor this through business management reporting mechanisms. Customer's complaints are not delayed when they are initially reviewed via any feedback route. The timescales for resolving any formal complaints remain unchanged. Our contact management system contains all agreed documented actions and timelines.
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 initial response to complaints after investigation describes this detail. However, following last year's self-assessment review, we now include this in the acknowledgement stage to ensure we capture this requirement.
4.6	A complaint investigation must be conducted in an impartial manner.	Yes	We ensure that no complaint is investigated or responded to by a member of staff about whom the complaint has been made, or who has a conflict of interest in the matter. We ask staff members and contractors to distance themselves from the investigation of, or involvement in, any complaint in which they are directly or indirectly implicated. Each stage of an investigation is conducted independently by the customer services team and each stage is appointed to a different member of staff within that team to enable oversight.
4.7	The complaint handler must: <ul style="list-style-type: none"> • deal with complaints on their merits. • act independently and have an open mind. • take measures to address any actual or perceived conflict of interest. • consider all information and evidence carefully. • keep the complaint confidential as far as possible, with information only disclosed if necessary to properly investigate the matter. 	Yes	As per 4.6 point above. Our policy aligns with the Housing Ombudsman's complaint handling code and dispute resolution principles. Staff are trained to objectively review information and evidence provided, whether the facts of the case have been determined or not. Any request for the identity of the complainant to remain confidential will be respected as far as possible.

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4.11	Landlords must adhere to any reasonable arrangements agreed with residents in terms of frequency and method of communication.	Yes	The complaints process takes account of any specific needs of the complainant. We will readily make reasonable adjustments to our ways of working to achieve equal and fair treatment of all customers and will take account of their preferences and frequency of communication. We promote third party assistance for example a friend, relative, Councillor, MP or an advocacy service. Customers have free access to Language Line as required.
4.12	The resident, and if applicable any staff member who is the subject of the complaint, must also be given a fair chance to: <ul style="list-style-type: none"> • set out their position. • comment on any adverse findings before a final decision is made. 	Yes	The complainant is given the opportunity to have their concerns heard as part of the case investigation. All phone calls are recorded to enable complaint handlers to fairly review and investigate information. All actions are clearly documented within the resolution offered to the complainant.
4.13	A landlord must include in its complaints policy its timescales for a resident to request escalation of a complaint.	Yes	This is clearly set out in our policy and details of our procedure can be found on our website: www.cottsway.co.uk/complaints
4.14	A landlord must not unreasonably refuse to escalate a complaint through all stages of the complaints procedure and must have clear and valid reasons for taking that course of action. Reasons for declining to escalate a complaint must be clearly set out in a landlord's complaints policy and must be the same as the reasons for not accepting a complaint.	Yes	The feedback and complaints policy sets out the circumstances in which a matter will not be considered. See policy via: www.cottsway.co.uk/complaints If we decide not to accept or escalate a complaint, we will explain why and the customer will have the right to challenge this decision by bringing the matter to the Housing Ombudsman.
4.15	A full record must be kept of the complaint, any review and the outcomes at each stage. This must include the original complaint and the date received, all correspondence with the resident, correspondence with other parties and any reports or surveys prepared.	Yes	All formal complaints and correspondence (including call recordings) are digitally logged onto a central contact management system. This ensures that complaint records are securely maintained and fully preserved.
4.18	Landlords must have policies and procedures in place for managing unacceptable behaviour from residents and/or their representatives when pursuing a complaint.	Yes	Our unreasonable behaviour policy is published on our website or can be provided on request: www.cottsway.co.uk/unreasonablebehaviour

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Best practice 'should' requirements			
4.3	Landlords should manage residents' expectations from the outset, being clear where a desired outcome is unreasonable or unrealistic	Yes	This is determined through discussions with the customer at the first point of contact to clearly manage expectations. Clear timeframes are communicated to the customer and regular updates provided.
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	Informal resolutions and an apology are offered immediately where possible. Customers most often want an explanation, an apology and reassurance that we have listened and acted. We aim to identify learning and implement service improvements from complaints or feedback 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	As explained at 1.3, the feedback and complaints policy states that someone acting on behalf of a person or organisation receiving or seeking to receive a service from Cottsway (e.g. councillor, MP, next of kin), may use the complaints process.
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	Clear explanations are provided to the customer which sets out our limitations within the context of tenancy agreements and landlord obligations.
4.9	Communication with the resident should not generally identify individual members of staff or contractors.	Yes	<p>We pride ourselves in providing a supportive and professional service to our customers to ensure they know who they are dealing with in the organisation. Very often the customer will have been dealing with a named member of staff up to the point a complaint is received.</p> <p>Following last year's self-assessment, we have reviewed our communications with customers and, where appropriate, we will ensure that staff and contractors are not generally referred to by name but will use their job title or organisation. Individuals are not identified unless necessary.</p>
4.10	Landlords should keep residents regularly updated about the progress of the investigation.	Yes	Policy states we will keep the complainant updated with progress as agreed with the customer.
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	Regular transactional satisfaction surveys and perception surveys as part of the Tenant Satisfaction Measures (TSM's) are carried out by an independent external organisation. Results are reviewed internally and shared with service managers and staff to drive service improvements.

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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 take all opportunities to use feedback and learning to improve our services to customers. We publish quarterly information on our website as well as reviewing and sharing learning points with members of staff.
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	Cottsway's unreasonable behaviour policy sets out our responsibilities concerning the way we provide our services and will make all reasonable adjustments as required by the Equality Act 2010. This is published online or can be provided on request: www.cottsway.co.uk/unreasonablebehaviour
Section 5: Complaint stages			
Mandatory 'must' requirements			
Stage 1			
5.1	Landlords must respond to the complaint within 10 working days of the complaint being logged. Exceptionally, landlords may provide an explanation to the resident containing a clear timeframe for when the response will be received. This should not exceed a further 10 days without good reason.	Yes	All complaints are responded to within 10 working days as set out in policy and procedure: www.cottways.co.uk/complaints
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	Provision is made within policy to respond to the complaint in a timely manner and to track any outstanding actions.
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	This is set out in all communications with customers when determining outcomes to their complaints.

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
5.8	Landlords must confirm the following in writing to the resident at the completion of stage one in clear, plain language: <ul style="list-style-type: none"> the complaint stage. the decision on the complaint. the reasons for any decisions made. the details of any remedy offered to put things right. details of any outstanding actions. details of how to escalate the matter to stage two if the resident is not satisfied with the answer. 	Yes	All detailed information is summarised in writing to the customer at the conclusion of stage one, including the right to escalate their matter to the Housing Ombudsman.
Stage 2			
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	As per policy statement published at: www.cottsway.co.uk/complaints
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	This forms part of the investigation undertaken by the complaint handler. All responses will detail what the complaint is about and the desired outcome the customer is seeking.
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 policy statement published at: www.cottsway.co.uk/complaints
5.12	The person considering the complaint at stage two must not be the same person that considered the complaint at stage one.	Yes	Each stage of an investigation is conducted independently by the customer services team with each stage appointed to a different member of staff within that team to enable transparency and oversight.
5.13	Landlords must respond to the stage two complaint within 20 working days of the complaint being escalated. Exceptionally, landlords may provide an explanation to the resident containing a clear timeframe for when the response will be received. This should not exceed a further 10 days without good reason.	Yes	Stage two complaints are responded to within 5 working days as set out in policy and process – available via: www.cottsway.co.uk/complaints

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
5.16	<p>Landlords must confirm the following in writing to the resident at the completion of stage two in clear, plain language:</p> <ul style="list-style-type: none"> • the complaint stage. • the complaint definition. • the decision on the complaint. • the reasons for any decisions made. • the details of any remedy offered to put things right. • details of any outstanding actions. <p>and</p> <ul style="list-style-type: none"> • if the landlord has a third stage, details of how to escalate the matter to stage three. • if this was the final stage, details of how to escalate the matter to the Housing Ombudsman Service if the resident remains dissatisfied. 	Yes	All information is summarised in writing to the customer at the conclusion of stage two, including the right to escalate their matter to the Housing Ombudsman.
Stage 3			
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	Cottsway does not have a three-stage process. Our procedure can be seen at: www.cottsway.co.uk/complaints
5.20	<p>Landlords must confirm the following in writing to the resident at the completion of stage three in clear, plain language:</p> <ul style="list-style-type: none"> • the complaint stage. • the complaint definition. • the decision on the complaint. • the reasons for any decisions made. • the details of any remedy offered to put things right. • details of any outstanding actions. • details of how to escalate the matter to the Housing Ombudsman Service if the resident remains dissatisfied. 	Yes	As above at 5.17. Our policy and procedure can be seen at: www.cottsway.co.uk/complaints

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
Best practice 'should' requirements			
Stage 1			
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	Any agreement to extend beyond our published timescales are first agreed with the customer.
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	We would always ensure that the customer is provided with the Housing Ombudsman's contact details so the customer can challenge our plans for responding and/or the proposed timeliness of the response. Contact details are provided to the customer at each stage of the complaint 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	Background information, including older reports, are considered during the complaint investigation to provide a fuller picture to help determine an outcome and resolution.
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	Any additional matters raised during the complaint investigation will be incorporated into the complaint (if relevant) as long as the issue raised does not cause unreasonable delay to the complaint response. As published in our feedback and complaint policy at: www.cottsway.co.uk/complaints
Stage 2			
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	Every complaint is acknowledged, and the complainant is informed that the customer services manager is responsible for investigating this stage of the complaint and the target date for the response. If it is not possible to provide the customer with a full response within the published target timeframe and in agreement with the customer, they are kept informed of progress.
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	We ensure that the customer is provided with the Ombudsman's contact details so the customer can challenge our plans for responding and/or the proposed timeliness of the response. Contact details are provided to the customer at each stage of the complaint process.

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
Stage 3			
5.18	Complaints should only go to a third stage if the resident has actively requested a third stage review of their complaint. Where a third stage is in place and has been requested, landlords must respond to the stage three complaint within 20 working days of the complaint being escalated. Additional time will only be justified if related to convening a panel. An explanation and a date for when the stage three response will be received should be provided to the resident.	Yes	Cottsway does not have a third stage to the feedback and complaints process.
5.19	Where agreement over an extension period cannot be reached, landlords should provide the Housing Ombudsman's contact details so the resident can challenge the landlord's plan for responding and/or the proposed timeliness of a landlord's response.	Yes	As above (5.18)
Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
Section 6: Putting things right			
Mandatory 'must' requirements			
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	Remedies for complainants under the feedback and complaint policy will normally take the form of putting things right and an apology, however there are some occasions where financial redress is offered. We organise learning from complaints and feedback cases and make recommendations to drive service improvement across Cottsway. We will publish improvements made as a result and the customer is informed of this when providing them with our resolution to their complaint.

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
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	When considering an appropriate remedy, we consider the following actions when investigating a complaint: <ul style="list-style-type: none"> • What resolution is the customer seeking? • What has gone wrong? • Can action be taken to put the person affected back in the position they would have been in if nothing had gone wrong? • Is there any financial loss, such as costs incurred, or payments not received? • How severe was the impact in terms of distress, harm or risk? • Is there a more appropriate form of payment than monetary?
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	The resolution communication will clearly set out any remedial actions and this will include any follow-on actions that need to be tracked as part of the resolution offered. All this information will be logged on the complaint case located on the contact record management system.
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	There may be occasions where, if we feel there has been a failure in our service, we may consider a financial remedy by way of compensation. When offering compensation or gestures of goodwill, the complaint handler will consider delays, impact (e.g. inconvenience, stress), incurred costs, loss of value (valuables that have been damaged and not insured).
Best practice 'should' requirements			
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	The customer services manager shares points of learning with other service managers to ensure this is fed into service delivery and captures any changes as a result. We publish a summary of feedback and learning quarterly: www.cottsway.co.uk/feedback
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	We consult with our legal representatives as and when required and within the context of complaint handling.

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
Section 7: Continuous learning and improvement			
Mandatory 'must' requirements			
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	<p>We publish quarterly updates on our website: www.cottsway.co.uk/feedback</p> <p>We publish information in the annual report at financial year end.</p> <p>Points of learning are also shared within the context of the Customer Insight Group (CIG) whose membership includes senior management, staff and Scrutiny Group members.</p>
Best practice 'should' requirements			
7.3	A member of the governing body should be appointed to have lead responsibility for complaints to support a positive complaint handling culture. This role will be responsible for ensuring the governing body receives regular information on complaints that provides insight to the governing body on the landlord's complaint handling performance.	Yes	Our Customer Committee which includes members of senior management, staff and Board receive insight on complaints, including numbers of complaints received, any trends identified and quality of responses, case studies and deep dives into particular topics.
7.4	<p>As a minimum, governing bodies should receive:</p> <ul style="list-style-type: none"> • Regular updates on the volume, categories and outcome of complaints, alongside complaint handling performance including compliance with the Ombudsman's orders. • Regular reviews of issues and trends arising from complaint handling. • The annual performance report produced by the Ombudsman, where applicable. • Individual complaint outcomes where necessary, including where the Ombudsman made findings of severe maladministration or referrals to regulatory bodies. The implementation of management responses should be tracked to ensure they are delivered to agreed timescales. The annual self-assessment against the Complaint Handling Code for scrutiny and challenge. 	Yes	<ul style="list-style-type: none"> • As part of the governance and oversight of complaint handling, quarterly updates are shared with Board via our business reports. • We capture complaint handling performance within our monthly management key performance indicators and tenant satisfaction measures. • The Customer Committee meets to review trends and issues (as per 7.3). • The annual self-assessment is presented to Board each year clearly setting out our position against the Code and receives approval.

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
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	As per statement at 7.2 and 7.3.
7.6	Landlords should have a standard objective in relation to complaint handling for all employees that reflects the need to: <ul style="list-style-type: none"> have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments. take collective responsibility for any shortfalls identified through complaints rather than blaming others. act within the Professional Standards for engaging with complaints as set by the Chartered Institute of Housing. 	No	The complaint handlers within the customer service team have a specific objective in relation to complaints. We take a proactive approach to learning and improving and share outcomes with services managers across the business. ACTION CARRIED FORWARD: We are investigating our approach to engage with the professional standards as set out by the Chartered Institute of Housing.
Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations

Section 8: Self-assessment and compliance

Mandatory 'must' requirements

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	We undertake a yearly self-assessment of our complaint handling process against the Housing Ombudsman complaint code, or sooner should the need arise, to gauge how we are performing and to identify learning and trends. Publication of the review will be made available to our customers via our website: www.cottsway.co.uk/complaints
8.2	Landlords must also carry out a self-assessment following a significant restructure and/or change in procedures.	Yes	As per above (8.1). This is defined within policy.
8.3	Following each self-assessment, a landlord must: <ul style="list-style-type: none"> report the outcome of their self-assessment to their governing body. In the case of local authorities, self- assessment outcomes should be reported to elected members. publish the outcome of their assessment on their website if they have one, or otherwise make accessible to residents include the self-assessment in their annual report section on complaints handling performance. 	Yes	The annual self-assessment is presented to Board and published via our website: www.cottsway.co.uk/complaints Our annual report captures and publishes information on performance and will provide a link to the full assessment. This is published on our website and is available on request.: www.cottsway.co.uk/publications

