

# Housing Ombudsman Complaint Handling Code

Our self-assessment: April 2024

## Section 1: Definition of a complaint

| Code provision | Code requirement   | Comply Yes/No: | Evidence   | Commentary / explanation   |
|----------------|--|----------------|--|--|
| 1.2            | A complaint must be defined as:<br>'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.'   | Yes            | Section 1 of our policy:<br><a href="http://www.cottsway.co.uk/complaints">www.cottsway.co.uk/complaints</a>     | Definition adopted and contained within policy and published standards   |
| 1.3            | A resident does not have to use the word 'complaint' for it to be treated as such. Whenever a resident expresses dissatisfaction landlords must give them the choice to make complaint. A complaint that is submitted via a third party or representative must be handled in line with the landlord's complaints policy.                             | Yes            | Section 2 & 7 of our policy:<br><a href="http://www.cottsway.co.uk/complaints">www.cottsway.co.uk/complaints</a> | 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. |
| 1.4            | 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. | Yes            | Section 6 of our policy:<br><a href="http://www.cottsway.co.uk/complaints">www.cottsway.co.uk/complaints</a>     | 'Service requests' and their definition are included within policy. We use service requests as part of our feedback mechanism and an opportunity for learning. These will be captured and reported to service managers, customer insight group and board     |

| Code provision | Code requirement   | Comply Yes/No: | Evidence   | Commentary / explanation   |
|----------------|--|----------------|--|--|
| 1.5            | A complaint must be raised when the resident expresses dissatisfaction with the response to their service request, even if the handling of the service request remains ongoing. Landlords must not stop their efforts to address the service request if the resident complains.  | Yes            | Section 6 of our policy: <a href="http://www.cottsway.co.uk/complaints">www.cottsway.co.uk/complaints</a>  | Provided within our policy and procedure.  |
| 1.6            | An expression of dissatisfaction with services made through a survey is not defined as a complaint, though wherever possible, the person completing the survey should be made aware of how they can pursue a complaint if they wish to. Where landlords ask for wider feedback about their services, they also must provide details of how residents can complain. | Yes            | Cottsway uses independent survey feedback to understand customer satisfaction with the services we provide.<br><br>All surveys include the following in the interview script:<br><br>"If you are dissatisfied with the service provided by Cottsway, they do have a complaints process you can access by calling 01993 890000, emailing <a href="mailto:contact@cottsway.co.uk">contact@cottsway.co.uk</a> or by completing a form on their website where you will find more information." | In addition, all comments received via the survey are reviewed and responded to as necessary, including raising a complaint if required. |

## Section 2: Exclusions

| Code provision | Code requirement  | Comply Yes/No: | Evidence   | Commentary / explanation  |
|----------------|---|----------------|--|---|
| 2.1            | Landlords must accept a complaint unless there is a valid reason not to do so. If landlords decide not to accept a complaint they must be able to evidence their reasoning. Each complaint must be considered on its own merits.  | Yes            | Section 5 of our policy:<br><a href="http://www.cottsway.co.uk/complaints">www.cottsway.co.uk/complaints</a> | Provided for within the feedback and 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: <ul style="list-style-type: none"> <li>• The issue giving rise to the complaint occurred over twelve months ago.</li> <li>• 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.</li> <li>• Matters that have previously been considered under the complaints policy.</li> </ul> | Yes            | Section 5 of our policy:<br><a href="http://www.cottsway.co.uk/complaints">www.cottsway.co.uk/complaints</a> | The feedback and complaints policy sets out the circumstances in which a matter will not be considered and escalated. If we decide not to accept 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. |
| 2.3            | Landlords must accept complaints referred to them within 12 months of the issue occurring or the resident becoming aware of the issue, unless they are excluded on other grounds. Landlords must consider whether to apply discretion to accept complaints made outside this time limit where there are good reasons to do so.  | Yes            | Section 5 of our policy:<br><a href="http://www.cottsway.co.uk/complaints">www.cottsway.co.uk/complaints</a> | The feedback and complaints policy has been amended to reflect the Code change to 12 months.  |

| Code provision | Code requirement   | Comply Yes/No: | Evidence   | Commentary / explanation  |
|----------------|--|----------------|--|---|
| 2.4            | If a landlord decides not to accept a complaint, an explanation must be provided to the resident setting out the reasons why the matter is not suitable for the complaints process and the right to take that decision to the Ombudsman. If the Ombudsman does not agree that the exclusion has been fairly applied, the Ombudsman may tell the landlord to take on the complaint. | Yes            | Section 5 of our policy:<br><a href="http://www.cottsway.co.uk/complaints">www.cottsway.co.uk/complaints</a> | Where a request to use the complaints process is received, and the matter is not covered under the feedback and complaints policy. 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. |
| 2.5            | Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.   | Yes            | Section 5 of our policy:<br><a href="http://www.cottsway.co.uk/complaints">www.cottsway.co.uk/complaints</a> | All complaints will be accepted unless the matter being raised is not covered under Cottsway's Complaints Policy and process as set out in 2.4. Each case will be considered on its own merits.   |

### Section 3: Accessibility and awareness

| Code provision | Code requirement  | Comply Yes/No: | Evidence   | Commentary / explanation  |
|----------------|---|----------------|--|---|
| 3.1            | Landlords must make it easy for residents to complain by providing different channels through which they can make a complaint. Landlords must consider their duties under the Equality Act 2010 and anticipate the needs and reasonable adjustments of residents who may need to access the complaints process. | Yes            | Section 7 of our policy:<br><a href="http://www.cottsway.co.uk/complaints">www.cottsway.co.uk/complaints</a> | Complaints can be made using a range of channels including online, telephone, social media, in person, via a third party or in writing. We also invite customers to have a family member or friend present when meeting with Cottsway staff dealing with complaints. We have tenancy support officers who can assist customers to access our services in the most appropriate for them. |
| 3.2            | Residents must be able to raise their complaints in any way and with any member of staff. All staff must be aware of the complaints process and be able to pass details of the complaint to the appropriate person within the landlord.   | Yes            | Section 4 of our policy:<br><a href="http://www.cottsway.co.uk/complaints">www.cottsway.co.uk/complaints</a> | As 3.1. All staff are aware of our complaints process within Cottsway and how to pass on a complaint or dissatisfaction with our services to the relevant team.   |

| Code provision | Code requirement   | Comply Yes/No: | Evidence   | Commentary / explanation   |
|----------------|--|----------------|--|--|
| 3.3            | High volumes of complaints must not be seen as a negative, as they can be indicative of a well-publicised and accessible complaints process. Low complaint volumes are potentially a sign that residents are unable to complain.   | Yes            | <a href="http://www.cottsway.co.uk/performance">www.cottsway.co.uk/performance</a>   | We regularly publish performance information and customer feedback to demonstrate how we are doing.  |
| 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. | Yes            | Section 6 of our policy:<br><a href="http://www.cottsway.co.uk/complaints">www.cottsway.co.uk/complaints</a>                     | The feedback and complaints policy and procedure are available in a clear and accessible format for all customers on our website or on request: We have a dedicated webpage which includes the following: <ul style="list-style-type: none"> <li>• The stages of our feedback and complaints procedure.</li> <li>• Timeframes for responses.</li> <li>• Help and advice on our complaints procedure.</li> <li>• Complaints factsheet.</li> <li>• Information about Housing Ombudsman.</li> </ul> |
| 3.5            | The policy must explain how the landlord will publicise details of the complaints policy, including information about the Ombudsman and this Code.   | Yes            | Section 3 & 6 of our policy and our webpage:<br><a href="http://www.cottsway.co.uk/complaints">www.cottsway.co.uk/complaints</a> | As 3.4 our policy includes information about the Housing Ombudsman Service and the complaint code.   |
| 3.6            | Landlords must give residents the opportunity to have a representative deal with their complaint on their behalf, and to be represented or accompanied at any meeting with the landlord.   | Yes            | Section 2 of our policy:<br><a href="http://www.cottsway.co.uk/complaints">www.cottsway.co.uk/complaints</a>                     | Customers have the opportunity to have a representative deal with their complaint or to accompany them at any meeting.   |
| 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.   | Yes            | Section 2 of our policy:<br><a href="http://www.cottsway.co.uk/complaints">www.cottsway.co.uk/complaints</a>                     | We include the Housing Ombudsman's contact details whenever we correspond with customers about our feedback and complaint procedure. We also publish information on our 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. | Yes            | Section 4 of our policy:<br><a href="http://www.cottsway.co.uk/complaints">www.cottsway.co.uk/complaints</a>   | The customer service manager and customer services team manage all complaints received from customers.<br><br>A report is published quarterly for Cottsway's Board.<br><br>In addition, a Customer Committee, made up of board representatives, receives regular insight about performance, case studies and learning from our complaints services. |
| 4.2            | The complaints officer must have access to staff at all levels to facilitate the prompt resolution of complaints. They must also have the authority and autonomy to act to resolve disputes promptly and fairly.   | Yes            | The customer services team investigate all complaints on behalf of our customers and will co-ordinate responses from across the business.<br><br>They are given full autonomy to investigate the complaint independently and offer resolutions and compensation as necessary.<br><br>The skills of the customer service team mean they are dealing with our customers in a competent, empathetic and efficient manner. | In addition, all Cottsway staff have received customer service training across the whole business as well as new staff being inducted to help facilitate prompt responses to customer enquiries.  |
| 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                            |                | All complaint handlers have regular training, including Housing Ombudsman newsletters and webinars, as well as peer-to-peer learning. The customer service team is fully resourced to manage all complaints made.  |   |

## Section 5: The complaint handling process

| Code provision | Code requirement   | Comply Yes/No: | Evidence  | Commentary / explanation   |
|----------------|--|----------------|---|--|
| 5.1            | Landlords must have a single policy in place for dealing with complaints covered by this Code. Residents must not be treated differently if they complain.   | Yes            | See policy: <a href="http://www.cottsway.co.uk/complaints">www.cottsway.co.uk/complaints</a>              | Our single policy highlights the details in which customers can complain and details our approach to complaint handling.   |
| 5.2            | The early and local resolution of issues between landlords and residents is key to effective complaint handling. It is not appropriate to have extra named stages (such as 'stage 0' or 'informal complaint') as this causes unnecessary confusion.  | Yes            | Section 6 of our policy: <a href="http://www.cottsway.co.uk/complaints">www.cottsway.co.uk/complaints</a> | Every effort is made to resolve complaints at the earliest opportunity, having due regard to the complexity of the case and any urgent issues are dealt with in a timely manner, where necessary, before the complaint response is sent out. Our processes have been updated to reflect a two-stage complaint handling approach. |
| 5.3            | A process with more than two stages is not acceptable under any circumstances as this will make the complaint process unduly long and delay access to the Ombudsman.   | Yes            | Section 6 of our policy: <a href="http://www.cottsway.co.uk/complaints">www.cottsway.co.uk/complaints</a> | As 5.2   |
| 5.4            | Where a landlord's complaint response is handled by a third party (e.g. a contractor or independent adjudicator) at any stage, it must form part of the two stage complaints process set out in this Code. Residents must not be expected to go through two complaints processes.  | Yes            | Section 4 of our policy: <a href="http://www.cottsway.co.uk/complaints">www.cottsway.co.uk/complaints</a> | All complaints to Cottsway are managed by the customer service team who are trained in complaint handling. No third parties are involved in complaint responses.   |
| 5.5            | Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.   | Yes            | Section 4 of our policy: <a href="http://www.cottsway.co.uk/complaints">www.cottsway.co.uk/complaints</a> | As 5.4   |
| 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. | Yes            | Section 6 of our policy: <a href="http://www.cottsway.co.uk/complaints">www.cottsway.co.uk/complaints</a> | All our formal responses summarise the definition of the complaint.  |
| 5.7            | When a complaint is acknowledged at either stage, landlords must be clear which aspects of the   | Yes            | Section 6 of our policy: <a href="http://www.cottsway.co.uk/complaints">www.cottsway.co.uk/complaints</a> | Our initial response to complaints after investigation describes this. We also include   |

| Code provision | Code requirement   | Comply Yes/No: | Evidence  | Commentary / explanation   |
|----------------|--|----------------|---|--|
|                | complaint they are, and are not, responsible for and clarify any areas where this is not clear.  |                |   | this in the acknowledgement stages to ensure we capture this requirement.  |
| 5.8            | <p>At each stage of the complaints process, complaint handlers must:</p> <ul style="list-style-type: none"> <li>• Deal with complaints on their merits, act independently and have an open mind;</li> <li>• Give the resident a fair chance to set out their position;</li> <li>• Take measures to address any actual or perceived conflict of interest; and</li> <li>• Consider all relevant information and evidence carefully.</li> </ul> |                | See policy: <a href="http://www.cottsway.co.uk/complaints">www.cottsway.co.uk/complaints</a>              | <p>Our policy aligns with the Housing Ombudsman’s complaint handling code and dispute resolution principles.</p> <p>Staff are trained to objectively review information and evidence provided, whether the facts of the case have been determined or not. The skills of the customer service team mean they are dealing with our customers in a competent, empathetic and efficient manner.</p> <p>Clear distinction within the process determines that each stage is independently reviewed by separate team members. 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.</p> <p>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.</p> <p>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.</p> |
| 5.9            | Where a response to a complaint will fall outside the timescales set out in this Code, the landlord must agree with the resident suitable intervals for keeping them informed about their complaint.   | Yes            | Section 6 of our policy: <a href="http://www.cottsway.co.uk/complaints">www.cottsway.co.uk/complaints</a> | Our policy ensures customers have by agreement, regular contact with the complaint handler until their enquiry is concluded.   |



| Code provision | Code requirement   | Comply Yes/No: | Evidence   | Commentary / explanation  |
|----------------|--|----------------|--|---|
| 5.10           | Landlords must make reasonable adjustments for residents where appropriate under the Equality Act 2010. Landlords must keep a record of any reasonable adjustments agreed, as well as a record of any disabilities a resident has disclosed. Any agreed reasonable adjustments must be kept under active review. | Yes            | Section 12 of our policy: <a href="http://www.cottsway.co.uk/complaints">www.cottsway.co.uk/complaints</a>   | We ask questions at the point of a service enquiry - these are captured within our housing management systems and are reviewed at each point of enquiry to ensure continuity is maintained.   |
| 5.11           | Landlords must not refuse to escalate a complaint through all stages of the complaints procedure unless it has valid reasons to do so. Landlords must clearly set out these reasons, and they must comply with the provisions set out in section 2 of this Code.   | Yes            | Section 5 of our policy: <a href="http://www.cottsway.co.uk/complaints">www.cottsway.co.uk/complaints</a>  | Our feedback and complaints policy sets out the circumstances in which a matter will not be considered. 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. |
| 5.12           | A full record must be kept of the complaint, and the outcomes at each stage. This must include the original complaint and the date received, all correspondence with the resident, correspondence with other parties, and any relevant supporting documentation such as reports or surveys.                      | Yes            | All formal complaints and correspondence, including call recordings, are digitally logged onto a central contact management system (CRM). This ensures that complaint records are securely maintained and fully preserved. |   |
| 5.13           | Landlords must have processes in place to ensure a complaint can be remedied at any stage of its complaints process. Landlords must ensure appropriate remedies can be provided at any stage of the complaints process without the need for escalation.  | Yes            | Section 6 of our policy: <a href="http://www.cottsway.co.uk/complaints">www.cottsway.co.uk/complaints</a>  | Our process provides for early resolution where possible to avoid any unnecessary delays to our customers.  |
| 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.  | Yes            | <a href="http://www.cottsway.co.uk/unreasonablebehaviour">www.cottsway.co.uk/unreasonablebehaviour</a>   | Our unreasonable behaviour policy is published on our website or can be provided on request. This sets out our approach to managing any restrictions and the review period under which the action is placed.  |

| Code provision | Code requirement   | Comply Yes/No: | Evidence   | Commentary / explanation   |
|----------------|--|----------------|--|--|
| 5.15           | Any restrictions placed on contact due to unacceptable behaviour must be proportionate and demonstrate regard for the provisions of the Equality Act 2010. | Yes            | <a href="http://www.cottsway.co.uk/unreasonablebehaviour">www.cottsway.co.uk/unreasonablebehaviour</a> | Our policy has due regard to the Equality Act which places an emphasis on making reasonable adjustments while keeping actions under appropriate review in collaboration with the customer. |

## Section 6: Complaints stages

### Stage one

| Code provision | Code requirement  | Comply Yes/No: | Evidence  | Commentary / explanation  |
|----------------|---|----------------|---|---|
| 6.1            | Landlords must have processes in place to consider which complaints can be responded to as early as possible, and which require further investigation. Landlords must consider factors such as the complexity of the complaint and whether the resident is vulnerable or at risk. Most stage 1 complaints can be resolved promptly, and an explanation, apology or resolution provided to the resident. | Yes            | Section 6 of our policy: <a href="http://www.cottsway.co.uk/complaints">www.cottsway.co.uk/complaints</a> | 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. |
| 6.2            | Complaints must be acknowledged, defined and logged at stage 1 of the complaints procedure <b>within five working days of the complaint being received.</b>   | Yes            | Section 6 of our policy: <a href="http://www.cottsway.co.uk/complaints">www.cottsway.co.uk/complaints</a> | All complaints are acknowledged and defined at stage 1 and (within five working days of the initial complaint being made) as set out in our policy and procedure.   |
| 6.3            | Landlords must issue a full response to stage 1 complaints <b>within 10 working days</b> of the complaint being acknowledged.   | Yes            | Section 6 of our policy: <a href="http://www.cottsway.co.uk/complaints">www.cottsway.co.uk/complaints</a> | All complaints are responded to within 10 working days as set out in our policy and procedure.  |
| 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  | Yes            | Section 6 of our policy: <a href="http://www.cottsway.co.uk/complaints">www.cottsway.co.uk/complaints</a> | Any agreement to extend beyond our published timescales are first agreed with the customer.<br><br>Any extensions will not exceed 10 working days unless an appropriate outcome cannot be achieved.   |

| Code provision | Code requirement  | Comply Yes/No: | Evidence  | Commentary / explanation  |
|----------------|---|----------------|---|---|
|                | days without good reason, and the reason(s) must be clearly explained to the resident.  |                |   | Regular updates are provided to the customer to maintain clear communication channels about progress and outcomes.  |
| 6.5            | When an organisation informs a resident about an extension to these timescales, they must be provided with the contact details of the Ombudsman.  | Yes            | Section 6 of our policy: <a href="http://www.cottsway.co.uk/complaints">www.cottsway.co.uk/complaints</a> | 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.  |
| 6.6            | A complaint response must be provided to the resident when the answer to the complaint is known, not when the outstanding actions required to address the issue are completed. Outstanding actions must still be tracked and actioned promptly with appropriate updates provided to the resident.   | Yes            | Section 6 of our policy: <a href="http://www.cottsway.co.uk/complaints">www.cottsway.co.uk/complaints</a> | Written complaint responses are sent to the resident when the answer to complaint is known. Where there are any outstanding actions, these are included with target dates.<br><br>The complaint handler logs any outstanding actions and tracks these to completion by working with the relevant team or department area.           |
| 6.7            | Landlords must address all points raised in the complaint definition and provide clear reasons for any decisions, referencing the relevant policy, law and good practice where appropriate.   | Yes            | Section 6 of our policy: <a href="http://www.cottsway.co.uk/complaints">www.cottsway.co.uk/complaints</a> | All information is clearly summarised in writing to the customer at each stage of the investigation.  |
| 6.8            | Where residents raise additional complaints during the investigation, these must be incorporated into the stage 1 response if they are related and the stage 1 response has not been issued. Where the stage 1 response has been issued, the new issues are unrelated to the issues already being investigated or it would unreasonably delay the response, the new issues must be logged as a new complaint. | Yes            | Section 6 of our policy: <a href="http://www.cottsway.co.uk/complaints">www.cottsway.co.uk/complaints</a> | When there is a live complaint in process, customers can raise additional related issues prior to the investigation starting.<br><br>If they wish to raise additional but unrelated issues, the customer will be advised that these will be logged as a service request, or asked if they want to register a new Stage 1 complaint. |

| Code provision | Code requirement   | Comply Yes/No: | Evidence   | Commentary / explanation  |
|----------------|--|----------------|--|---|
| 6.9            | <p>Landlords must confirm the following in writing to the resident at the completion of stage 1 in clear, plain language:</p> <ul style="list-style-type: none"> <li>a. the complaint stage;</li> <li>b. the complaint definition;</li> <li>c. the decision on the complaint;</li> <li>d. the reasons for any decisions made;</li> <li>e. the details of any remedy offered to put things right;</li> <li>f. details of any outstanding actions; and</li> <li>g. details of how to escalate the matter to stage 2 if the individual is not satisfied with the response.</li> </ul> | Yes            | Section 6 of our policy:<br><a href="http://www.cottsway.co.uk/complaints">www.cottsway.co.uk/complaints</a> | <p>All information is clearly summarised in writing to the customer at the conclusion of stage one as required by the code.</p> <p>We will also provide details of how to escalate to stage 2 and include the right to raise their matter with the Housing Ombudsman.</p> <p>In addition, we have adopted the Housing Ombudsman's template response letters, to ensure compliance with responses.</p> |

## Stage 2

| Code provision | Code requirement  | Comply Yes/No: | Evidence  | Commentary / explanation   |
|----------------|---|----------------|---|--|
| 6.10           | If all or part of the complaint is not resolved to the resident's satisfaction at stage 1, it must be progressed to stage 2 of the landlord's procedure. Stage 2 is the landlord's final response.                              | Yes            | Section 6 of our policy: <a href="http://www.cottsway.co.uk/complaints">www.cottsway.co.uk/complaints</a> | Our policy clearly sets out how a customer can progress their complaint.   |
| 6.11           | Requests for stage 2 must be acknowledged, defined and logged at stage 2 of the complaints procedure within five working days of the escalation request being received.   | Yes            | Section 6 of our policy: <a href="http://www.cottsway.co.uk/complaints">www.cottsway.co.uk/complaints</a> | Our policy and procedure clearly sets out this timeframe.  |
| 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. | Yes            | Section 6 of our policy: <a href="http://www.cottsway.co.uk/complaints">www.cottsway.co.uk/complaints</a> | As set out in our policy, the customer is made aware and given the opportunity to escalate their complaint if they remain dissatisfied with all or part of the outcome.  |
| 6.13           | The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.   | Yes            | Section 6 of our policy: <a href="http://www.cottsway.co.uk/complaints">www.cottsway.co.uk/complaints</a> | 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.<br><br>Stage 2 investigations are undertaken by the Customer Service Manager or another appointed Service Manager with oversight from the Head of Housing. |
| 6.14           | Landlords must issue a final response to the stage 2 <b>within 20 working</b> days of the complaint being acknowledged.   | Yes            | Section 6 of our policy: <a href="http://www.cottsway.co.uk/complaints">www.cottsway.co.uk/complaints</a> | Our policy and procedure have been brought in line with the timeframes of the Housing Ombudsman Code (previously 5 working days).  |

| Code provision | Code requirement  | Comply Yes/No: | Evidence   | Commentary / explanation   |
|----------------|---|----------------|--|--|
| 6.15           | Landlords must decide whether an extension to this timescale is needed when considering the complexity of the complaint and then inform the resident of the expected timescale for response. Any extension must be no more than 20 working days without good reason, and the reason(s) must be clearly explained to the resident. | Yes            | Section 6 of our policy:<br><a href="http://www.cottsway.co.uk/complaints">www.cottsway.co.uk/complaints</a> | Any agreement to extend beyond our published timescales are first agreed with the customer.<br><br>Any extensions will not exceed 20 working days unless an appropriate outcome cannot be achieved.<br><br>Regular updates will be provided to the customer to maintain clear communication channels about progress and outcomes.        |
| 6.16           | When an organisation informs a resident about an extension to these timescales, they must be provided with the contact details of the Ombudsman.  | Yes            | Section 6 of our policy:<br><a href="http://www.cottsway.co.uk/complaints">www.cottsway.co.uk/complaints</a> | Our policy and procedure clearly set out what information will be provided to the customer should an extension of timescales be required.  |
| 6.17           | A complaint response must be provided to the resident when the answer to the complaint is known, not when the outstanding actions required to address the issue are completed. Outstanding actions must still be tracked and actioned promptly with appropriate updates provided to the resident.                                 | Yes            | Section 6 of our policy:<br><a href="http://www.cottsway.co.uk/complaints">www.cottsway.co.uk/complaints</a> | Written complaint responses are sent to the customer when the answer to complaint is known. Where there are any outstanding actions, these are listed within the written response with target dates.<br><br>The complaint handler logs any outstanding actions and tracks these to completion by working with the relevant service area. |
| 6.18           | Landlords must address all points raised in the complaint definition and provide clear reasons for any decisions, referencing the relevant policy, law and good practice where appropriate.   | Yes            | Section 6 of our policy:<br><a href="http://www.cottsway.co.uk/complaints">www.cottsway.co.uk/complaints</a> | All information is clearly summarised in writing to the customer at each stage of the investigation.   |
| 6.19           | Landlords must confirm the following in writing to the resident at the completion of stage 2 in clear, plain language:  | Yes            | Section 6 of our policy:<br><a href="http://www.cottsway.co.uk/complaints">www.cottsway.co.uk/complaints</a> | Our responses follow the guidance in line with the Housing Ombudsman Complaint Handling Code.  |

| Code provision | Code requirement   | Comply Yes/No: | Evidence  | Commentary / explanation  |
|----------------|--|----------------|---|---|
|                | <ul style="list-style-type: none"> <li>a. the complaint stage;</li> <li>b. the complaint definition;</li> <li>c. the decision on the complaint;</li> <li>d. the reasons for any decisions made;</li> <li>e. the details of any remedy offered to put things right;</li> <li>f. details of any outstanding actions; and</li> <li>g. details of how to escalate the matter to the Ombudsman Service if the individual remains dissatisfied.</li> </ul> |                |   | <p>All information is clearly summarised in writing to the customer at the conclusion of stage two as required by the code.</p> <p>We also provide details of how to raise their matter with the Housing Ombudsman if they remain dissatisfied with the outcome.</p> <p>In addition, we have adopted the Housing Ombudsman's template response letters, to ensure compliance.</p> |
| 6.20           | Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.  | Yes            | Section 6 of our policy: <a href="http://www.cottsway.co.uk/complaints">www.cottsway.co.uk/complaints</a> | Stage 2 investigations are undertaken by the Customer Service Manager or another appointed Service Manager with oversight from the Head of Housing.   |

## Section 7: Putting things right

| Code provision | Code requirement   | Comply Yes/No: | Evidence   | Commentary / explanation   |
|----------------|--|----------------|--|--|
| 7.1            | <p>Where something has gone wrong a landlord must acknowledge this and set out the actions it has already taken, or intends to take, to put things right. These can include:</p> <ul style="list-style-type: none"> <li>• Apologising;</li> <li>• Acknowledging where things have gone wrong;</li> <li>• Providing an explanation, assistance or reasons;</li> <li>• Taking action if there has been delay;</li> <li>• Reconsidering or changing a decision;</li> <li>• Amending a record or adding a correction or addendum;</li> <li>• Providing a financial remedy;</li> <li>• Changing policies, procedures or practices.</li> </ul> | Yes            | Section 6 of our policy:<br><a href="http://www.cottsway.co.uk/complaints">www.cottsway.co.uk/complaints</a> | <p>Our complaints procedure is in place to effectively resolve disputes from initial contact to final resolution.</p> <p>It helps us to identify what has gone wrong and the actions needed to put things right and, where relevant, we will make the necessary service improvements.</p> <p>We provide for compensation or other remedies contained with our compensation policy.</p> |
| 7.2            | Any remedy offered must reflect the impact on the resident as a result of any fault identified.  | Yes            | Section 6 of our policy:<br><a href="http://www.cottsway.co.uk/complaints">www.cottsway.co.uk/complaints</a> | We recognise where there are failings and manage the expectation of the complainants and what we are then able to deliver. Remedies include apologies, compensation, ex-gratia payments or a goodwill gesture e.g. charitable contribution.  |
| 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.  | Yes            | Section 6 of our policy:<br><a href="http://www.cottsway.co.uk/complaints">www.cottsway.co.uk/complaints</a> | On conclusion of the investigation, we will work with the customer to agree a suitable remedy where appropriate. This will then be monitored through to completion.  |



| Code provision | Code requirement   | Comply Yes/No: | Evidence   | Commentary / explanation |
|----------------|--|----------------|--|--------------------------|
| 7.4            | Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies. | Yes            | As good practice, we refer to Cottsway Housing Association's compensation policy and the Housing Ombudsman guidance when deciding on appropriate remedies. |                          |

## Section 8: Putting things right

| Code provision | Code requirement   | Comply Yes/No: | Evidence               | Commentary / explanation  |
|----------------|--|----------------|------------------------|---|
| 8.1            | <p>Landlords must produce an annual complaints performance and service improvement report for scrutiny and challenge, which must include:</p> <ol style="list-style-type: none"> <li>the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements.</li> <li>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;</li> <li>any findings of non-compliance with this Code by the Ombudsman;</li> <li>the service improvements made as a result of the learning from complaints;</li> <li>any annual report about the landlord's performance from the Ombudsman; and</li> <li>any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord.</li> </ol> | Yes            | <b>To be actioned.</b> | <p>Complaint handling performance is reported to our governing body through the Customer Committee and Board.</p> <p>Our Annual Complaints Report 2023-24 will incorporate all the required elements and this self-assessment will be updated to reflect these measures on publication of this report</p> |
| 8.2            | The annual complaints performance and service improvement report must be reported to the   | Yes            | <b>To be actioned.</b> | As above.   |

| Code provision | Code requirement   | Comply Yes/No: | Evidence   | Commentary / explanation |
|----------------|--|----------------|--|--------------------------|
|                | landlord's governing body (or equivalent) and published on the section of its website relating to complaints. The governing body's response to the report must be published alongside this.  |                |  |                          |
| 8.3            | Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.   | Yes            | We acknowledge and will comply as per the requirement of the code. |                          |
| 8.4            | Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.  | Yes            | We acknowledge and will comply as per requirement of the code.     |                          |
| 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<br>Landlords must provide a timescale for returning to compliance with the Code. | Yes            | We acknowledge and will comply as per the requirement of the code. |                          |

## Section 9: Scrutiny and oversight - continuous learning and improvement

| Code provision | Code requirement   | Comply Yes/No: | Evidence   | Commentary / explanation   |
|----------------|--|----------------|--|--|
| 9.1            | Landlords must look beyond the circumstances of the individual complaint and consider whether service improvements can be made as a result of any learning from the complaint.   | Yes            | <a href="http://www.cottsway.co.uk/performance">www.cottsway.co.uk/performance</a>   | We proactively seek learning outcomes from feedback and complaints about our services.<br><br>Any learning outcomes are published on our website every quarter.  |
| 9.2            | A positive complaint handling culture is integral to the effectiveness with which landlords resolve disputes. Landlords must use complaints as a source of intelligence to identify issues and introduce positive changes in service delivery.                     | Yes            | <a href="http://www.cottsway.co.uk/performance">www.cottsway.co.uk/performance</a>   | As a landlord we recognise the positive impact complaints have on future service delivery, which is supported through the investigation process.<br><br>Learning from complaints is regularly shared across service areas to help improve the customer experience of our services. |
| 9.3            | Accountability and transparency are also integral to a positive complaint handling culture. Landlords must report back on wider learning and improvements from complaints to stakeholders, such as residents' panels, staff and relevant committees.               | Yes            | Complaints, feedback and learning outcomes are discussed within the Customer Insight Group (CIG) which has representation from the Scrutiny Group, staff and senior members of the executive team. | We regularly publish information on our website and in communications to customers   |
| 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.             |                | Section 6 of our policy:<br><a href="http://www.cottsway.co.uk/complaints">www.cottsway.co.uk/complaints</a>   | The Customer Service Manager has accountability for complaints handling, as well as assessing any themes or trends to identify potential system issues with oversight from the Head of Housing.  |
| 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'). |                | The Chair of the Customer Committee (and Board member) is the Complaints Lead (MRC) as required by the Housing Ombudsman Code.   |  |
| 9.6            | The MRC will be responsible for ensuring the governing body receives regular information on  |                | The Customer Committee, made up of Board representatives, receives   |  |

| Code provision | Code requirement   | Comply Yes/No: | Evidence  | Commentary / explanation   |
|----------------|--|----------------|---|--|
|                | 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.   |                | regular insight about performance, case studies and learning from our complaints services.  |  |
| 9.7            | <p>As a minimum, the MRC and the governing body (or equivalent) must receive:</p> <ul style="list-style-type: none"> <li>a. regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance;</li> <li>b. regular reviews of issues and trends arising from complaint handling;</li> <li>c. regular updates on the outcomes of the Ombudsman's investigations and progress made in complying with orders related to severe maladministration findings; and</li> <li>d. annual complaints performance and service improvement report.</li> </ul>          | Yes            | <b>To be actioned.</b>  | <p>Our Annual Complaints Report 2023-24 will incorporate all of the required elements and will be published on Cottsway Housing Association website.</p> <p>This self-assessment will be updated to reflect this measure on publication of our Annual Complaints Report.</p> |
| 9.8            | <p>Landlords must have a standard objective in relation to complaint handling for all relevant employees or third parties that reflects the need to:</p> <ul style="list-style-type: none"> <li>a. have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments;</li> <li>b. take collective responsibility for any shortfalls identified through complaints, rather than blaming others; and</li> <li>c. act within the professional standards for engaging with complaints as set by any relevant professional body.</li> </ul> | Yes            | <p>Following last years' self-assessment - all Cottsway job descriptions have been updated to include a specific objective for complaints as part of our commitment to embedding a positive complaint handling culture at Cottsway. This includes job descriptions for people already in post and those included in recruitment packs.</p> <p><b>All staff:</b><br/>Must respond to complaints positively and professionally, cooperating and working collaboratively with colleagues</p> |  |

| Code provision | Code requirement | Comply Yes/No: | Evidence  | Commentary / explanation |
|----------------|------------------|----------------|---|--------------------------|
|                |                  |                | <p>across teams and departments to support resolution.</p> <p>And in addition:</p> <p><b>All managers:</b></p> <ul style="list-style-type: none"> <li>Managers are also required to use outcomes from feedback and complaints to further improve our services to customers.</li> <li>All relevant complaint handling staff have an additional objective in relation to complaint handling.</li> </ul> |                          |