

SECTION 1: DEFINITION OF A COMPLAINT

Code provision	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 landlord, its own staff, or those acting on its behalf, affecting a resident or group of residents.'</i>	YES	The section within the policy titled "What is a Complaint?" defines a complaint as "an expression of dissatisfaction, however made, about the standard of service... affecting an individual resident or group of residents."
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	In "Introduction and Aims" (p. 1), it is stated that Cromwood treats complaints through various methods, even if "complaint" is not explicitly used. Third-party complaints, such as through advocates, are accepted.
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	YES	In the policy, "Complaints that cannot be dealt with under this policy" distinguishes complaints from service requests, excluding certain initial tenant issues from being classified as complaints.

	recorded, monitored, and reviewed regularly.		
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	The policy specifies that dissatisfaction following a service request response can be raised as a formal complaint.
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	In "How to make a complaint," the policy specifies that survey feedback includes instructions on filing a formal complaint, offering tenants a path to express dissatisfaction.

SECTION 2: EXCLUSIONS

Code provision	Code requirement	Comply: Yes / No	Evidence, commentary, and any explanations
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	The “Complaints that cannot be dealt with under this policy” section lists valid exclusions and confirms a case-by-case approach.
2.2	A complaints policy must set out the circumstances in which a matter will not be considered as a complaint or escalated, and these circumstances must be fair and reasonable to residents. Acceptable exclusions include: • The issue giving rise to the complaint occurred over twelve months ago. Legal proceedings have started. This is defined as details of the claim, such as the Claim Form and Particulars of Claim, having been filed at court. •	YES	Reasonable exclusions include issues beyond 12 months and matters under active legal proceedings, detailed in the same section.

	Matters that have previously been considered under the complaints policy.		
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	The policy allows discretion for complaints submitted outside the 12-month window where justified, under the “Complaints that cannot be dealt with under this policy”
2.4	If a landlord decides not to accept a complaint, an explanation must be provided to the resident setting out the reasons why the matter is not suitable for the complaints process and the right to take that decision to the Ombudsman. If the Ombudsman does not agree that the exclusion has been fairly applied, the Ombudsman may tell the landlord to take on the complaint.	YES	If a complaint is excluded, reasons and the right to escalate to the Ombudsman are provided.
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	YES	The policy emphasises evaluating individual circumstances before applying exclusions.

SECTION 3: ACCESSIBILITY AND AWARENESS

Code provision	Code requirement	Comply: Yes / No	Evidence, commentary, and any explanations
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	The "How to make a complaint" section specifies multiple channels and ensures accessibility, considering duties under the Equality Act 2010.
3.2	Residents must be able to raise their complaints in any way and with any member of staff. All staff must be aware of the complaints process and be able to pass details of the complaint to the appropriate person within the landlord.	YES	The policy states that complaints can be raised with any staff member and must be directed to the Complaints Officer, ensuring proper referral.
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	High complaint volumes are viewed as positive engagement feedback, reflecting accessibility rather than negativity.
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	YES	The policy details are published on the website, with accessible formats available upon request.

	will happen at each stage, and the timeframes for responding. The policy must also be published on the landlord's website.		
3.5	The policy must explain how the landlord will publicise details of the complaints policy, including information about the Ombudsman and this Code.	YES	In our 2024 self-assessment, we recorded partial compliance for 3.5. We have since updated our Complaints Policy (Section 12) to codify a monthly reporting cycle to Board, routine sharing of complaints learning and wider insight with residents, partners, staff and managing agents, and an expanded annual complaints performance and service improvement report. These changes have been implemented and evidenced through Board packs and the 2024/25 annual report. On this basis, we are now compliant with 3.5.
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	The policy permits representatives like advocates or care providers to file complaints on a tenant's behalf.
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	Signposting to the Housing Ombudsman is contained in the Complaints policy and Stage 2 letters. This provides contact information to the complainant of how they can contact the Ombudsman Service. Details of how to contact the Housing Ombudsman is detailed in the policy and our Stage 2 responses.

SECTION 4: COMPLAINT HANDLING STAFF

Code provision	Code requirement	Comply: Yes / No	Evidence, commentary, and any explanations
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	A designated complaints officer manages the process, ensuring compliance with the Code.
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 complaints officer has access to all relevant staff for resolving issues. The policy reinforces this.
4.3	Landlords are expected to prioritise complaint handling and a culture of learning from complaints. All relevant staff must be suitably trained in the importance of complaint handling. It is important that complaints are seen as a core service and must be resourced to handle complaints effectively.	YES	Staff are trained on complaint handling and there is a focus on learning from complaints.

SECTION 5: THE COMPLAINT HANDLING PROCESS

Code provision	Code requirement	Comply: Yes / No	Evidence, commentary, and any explanations
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	A single policy is in place for complaints handling. The two-stage process is outlined clearly, compliant with the Code.
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	Informal complaints are avoided, and early resolution is encouraged as per the Code's requirements.
5.3	A process with more than two stages is not acceptable under any circumstances as this will make the complaint process unduly long and delay access to the Ombudsman.	YES	The policy uses a two-stage process as required, without unnecessary additional stages.
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	YES	All complaints are handled within Cromwood

	expected to go through two complaints processes.		
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	YES	All complaints are handled within Cromwood
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	Our Stage 1 Responses have sections which detail “Our Understanding of the Issue” and defines the complaint and expected outcome.
5.7	When a complaint is acknowledged at either stage, landlords must be clear which aspects of the complaint they are, and are not, responsible for and clarify any areas where this is not clear.	YES	Our Stage 1 and Stage 2 responses have sections which clarify responsibilities and outline Cromwood’s commitment to transparency.

5.8	At each stage of the complaints process, complaint handlers must: a. deal with complaints on their merits, act independently, and have an open mind; b. give the resident a fair chance to set out their position; c. take measures to address any actual or perceived conflict of interest; and	YES	Both our response at Stages 1 and 2 ensure an independent and fair review, reflecting policy standards.
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	d. consider all relevant information and evidence carefully.		
5.9	Where a response to a complaint will fall outside the timescales set out in this Code, the landlord must agree with the resident suitable intervals for keeping them informed about their complaint.	YES	On acknowledging a complaint, we confirm that if additional time is required, Cromwood will reach an agreement with the resident
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 7.2 of the policy states that a team member will contact the complainant to discuss their complaint and identify any required support. During this interaction, the staff member will assess and record any necessary reasonable adjustments to accommodate the complainant's needs, in compliance with the Equality Act 2010. This process includes actively reviewing these adjustments to ensure they remain suitable throughout the complaint process.
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	Sections 7.14 and 7.15 of the policy outline Cromwood's approach to escalation. If a complainant remains dissatisfied after Stage 1, they may request a review without needing to provide a specific reason. Cromwood makes reasonable efforts to understand why they are dissatisfied, and valid grounds for escalation are outlined in the policy. If a complaint does not meet the criteria for Stage 2, the decision, and reasons for not escalating are clearly communicated to the complainant.

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	YES	Full records of complaints, including all relevant documents, are maintained in line with policy
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	any relevant supporting documentation such as reports or surveys.		
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 the policy, titled "Putting Things Right," indicates Cromwood's commitment to resolving complaints as early as possible. It states that we will "always aim to resolve expressions of dissatisfaction quickly and wherever possible at first point of contact," which allows for appropriate remedies at any stage of the complaint process without requiring escalation.
5.14	Landlords must have policies and procedures in place for managing unacceptable behaviour from residents and/or their representatives. Landlords must be able to evidence reasons for putting any restrictions in place and must keep restrictions under regular review.	YES	Cromwood has a dedicated Managing Unacceptable Behaviour Policy & Procedure related to the Complaints Policy and Complaints Handling Procedure. This policy includes a specific section titled "Complaint Management," which outlines procedures for addressing unacceptable behaviour from residents or their representatives. Reasons for any restrictions placed due to such behaviour are documented, with a commitment to regular review to ensure that restrictions remain appropriate and fair.
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	Section 9 of the Complaints Policy outlines Cromwood's approach to managing unreasonable, abusive, or persistently inappropriate complaints. It reserves the right to restrict access to the complaints process if a complainant's behaviour impacts service delivery. The policy ensures that any restrictions are proportionate, with regard to the Equality Act 2010, and includes clear grounds for when these measures may be applied (e.g., harassment, refusal to specify a complaint, or unjustified complaints).

SECTION 6: COMPLAINTS STAGES

Stage 1

Code provision	Code requirement	Comply: Yes / No	Evidence, commentary, and any explanations
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 7.2 of the Policy outline Cromwood's approach to identifying and responding to complaints as early as possible. Upon receiving a complaint, a team member contacts the complainant to define the complaint, assess the appropriate resolution, and identify any necessary support or reasonable adjustments, particularly in cases involving vulnerable residents. Section 7.4 further emphasizes Cromwood's commitment to resolving complaints promptly whenever possible.
6.2	Complaints must be acknowledged, defined, and logged at stage 1 of the complaints procedure <u>within five working days of the complaint being received.</u>	YES	Complaints are acknowledged within five working days
6.3	Landlords must issue a full response to stage 1 complaints <u>within 10 working days</u> of the complaint being acknowledged.	YES	The Stage 1 response follows this timeline, demonstrating compliance with the Code by providing a full response within 10 working days, and allowing for extensions if necessary.
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	YES	Our Request for Extension of Time to Respond communication to a complainant shows Cromwood's approach to managing response timelines for complex complaints. The letter explains the need for an extension, citing the complexity of the complaint and detailing additional time needed to gather information from multiple departments. It also clearly communicates the new expected response date and expresses an apology for the delay,

			aligning with the Complaint Handling Code's requirements.
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	of the expected timescale for response. Any extension must be no more than 10 working days without good reason, and the reason(s) must be clearly explained to the resident.		
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	Following our 2024 self-assessment, we identified that Stage 1 extension notifications did not include Housing Ombudsman contact details. This was noted an Action Point in our 2024 self-assessment. We addressed this by updating the Stage 1 extension letters to add the Ombudsman's phone, email and web address in the following format: <i>"Further Assistance:</i> <i>If you have any concerns about the extended timeline or require additional support, you may seek guidance from the Housing Ombudsman. You can reach them at:</i> • <i>Phone: 0300 111 3000</i> • <i>Email: info@housing-ombudsman.org.uk</i> • <i>Online: www.housing-ombudsman.org.uk</i> <i>The Ombudsman provides impartial assistance and can offer further information on handling complaints."</i> The updated letter has been in use since the assessment submission date. On this basis, we are now compliant with 6.5. (A parallel update has been made/maintained for Stage 2 under 6.16.)

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 7.9 of the policy specifies that the complaint response is sent to the complainant as soon as the investigation outcome is determined, rather than waiting for any outstanding actions to be completed. If there are additional actions required to fully resolve the issue, these are outlined in the response, and Cromwood commits to providing regular updates to the complainant until all actions are completed.
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 7.2 of the policy establishes that a team member at Cromwood will contact the complainant to confirm the complaint definition, ensuring all issues and expectations are clearly understood and addressed in the response. Section 7.13 specifies that the final Stage 1 response will include the complaint definition, the decision on each point raised, and reasons for each decision. All remedies offered, outstanding actions, and escalation details are provided to the complainant, with references to relevant policy, law, and good practice where applicable.
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	YES	Sections 7.10 to 7.12 of the policy outline Cromwood's approach when additional complaints are raised during the Stage 1 process. If the additional issues are related to the existing complaint, they are incorporated into the ongoing investigation and included in the Stage 1 response. If the new issues are unrelated, they are treated as separate complaints and logged accordingly, in line with policy guidelines.

	investigated or it would unreasonably delay the response, the new issues must be logged as a new complaint.		
6.9	Landlords must confirm the following in writing to the resident at the completion of stage 1 in clear, plain language: a. the complaint stage; b. the complaint definition; c. the decision on the complaint; d. the reasons for any decisions made; e. the details of any remedy offered to put things right; f. details of any outstanding actions; and g. details of how to escalate the matter to stage 2 if the individual is not satisfied with the response.	YES	Our responses at Stage 1 Response Template information on the complaint stage, decision, and remedies, along with escalation options

Stage 2

Code provision	Code requirement	Comply: Yes / No	Evidence, commentary, and any explanations
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	Unresolved complaints proceed to Stage 2 as per the escalation process when acknowledging Stage 2 complaints

6.11	Requests for stage 2 must be acknowledged, defined, and logged at stage 2 of the complaints procedure	YES	Section 7.17 of the Complaints Policy states that Stage 2 complaints will be acknowledged within five working days of receiving the escalation request. The Acknowledgement of
			Stage 2 Complaint Letter further supports this by providing a timely acknowledgment, detailing next steps, and confirming that a full response will follow within 20 working days. This letter is sent within the five-day requirement, as per policy.

	within five working days of the escalation request being received.		
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 7.14 of the policy states that if a complainant is dissatisfied with the Stage 1 outcome, they may request a review at Stage 2 without needing to provide a reason. Cromwood commits to making reasonable efforts to understand why the resident remains dissatisfied as part of the Stage 2 investigation. Examples outlined in the policy include incomplete handling at Stage 1, potential inaccuracies, or new information presented by the resident.
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	YES	Sections 7.17 and 7.18 of the policy ensure that Stage 2 complaints are handled by a different staff member than those managing Stage 1 complaints. The Head of Operations is designated to review Stage 2 complaints to guarantee a fresh, thorough examination of the initial investigation. In cases where the Head of Operations is unavailable, the Chief Executive assumes responsibility, further ensuring independence at Stage 2.
6.14	Landlords must issue a final response to the stage 2 <u>within 20 working days</u> of the complaint being acknowledged.	YES	Section 7.19 of the Complaints Policy states that all Stage 2 complaints will receive a response within 20 working days of the escalation request being received, aligning with the code's requirement for a timely final response.

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 7.20 of the policy states that if the response time for a Stage 2 complaint is expected to exceed the initial 20-working-day limit, the Head of Operations or Chief Executive will contact the complainant to agree on an extension of up to an additional 20 working days. The extension is granted only for good reason.
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	Following our 2024 self-assessment, we identified that Stage 2 extension notifications did not include Housing Ombudsman contact details. This was noted as an Action Point in our 2024 self-assessment. We addressed this by updating the Stage 2 extension letters to add the Ombudsman's phone, email and web address in the following format: <i>“Further Support Options:</i> <i>We understand that extended response times can be inconvenient, and if you would like additional guidance, you may contact the Housing Ombudsman. They provide impartial assistance regarding complaint handling and can offer further information if needed. The Ombudsman's contact details are as follows:</i> Phone: 0300 111 3000 Email: info@housing-ombudsman.org.uk Website: www.housing-ombudsman.org.uk <i>We sincerely apologise for any inconvenience this may cause and appreciate your understanding as we work to ensure a comprehensive response.”</i>

			The updated letter has been in use since the assessment submission date. On this basis, we are now compliant with 6.16. (A parallel update has been made/maintained for Stage 2 under 6.5.)
6.17	A complaint response must be provided to the resident when the answer to the complaint is known, not when the	YES	Section 7.21 of the Policy confirms that Cromwood will send the complaint response to the resident as soon as the investigation outcome is determined, without waiting for any outstanding actions to be completed. If there are actions remaining to fully resolve the issue, these are outlined in the response, with a commitment to provide the resident with regular updates until all actions are completed.

	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.		
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 7.22 of the Complaints Policy specifies that the final Stage 2 response will communicate a decision on the complaint's outcome (upheld or not upheld) and address all points outlined in the complaint definition. The response will provide clear reasons for decisions made, referencing relevant policy, law, and best practices as applicable. Additionally, Cromwood's complaint outcome letter templates reinforce this requirement by ensuring that every point within the complaint scope is addressed in detail.

6.19	Landlords must confirm the following in writing to the resident at the completion of stage 2 in clear, plain language: a. the complaint stage; b. the complaint definition; c. the decision on the complaint; d. the reasons for any decisions made; e. the details of any remedy offered to put things right; f. details of any outstanding actions; and g. details of how to escalate the matter to the Ombudsman Service if the individual remains dissatisfied.	YES	Our Stage 2 response includes a clear explanation of the final decision and provides the complainant with details for escalating to the Housing Ombudsman if they are not satisfied with the outcome
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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 7 of the Complaints Policy confirms that Stage 2 is the final stage of the internal complaints process, with escalation available to the Housing Ombudsman if needed. The Legal Services Manager has the authority to resolve complaints at this stage and will coordinate with directors and other staff members to ensure comprehensive resolution. This approach allows consultation with other business areas as needed, ensuring a well-informed resolution process.
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SECTION 7: PUTTING THINGS RIGHT

Code provision	Code requirement	Comply: Yes / No	Evidence, commentary, and any explanations
7.1	Where something has gone wrong a landlord must acknowledge this and set out the actions it has already taken, or intends to take, to put things right. These can include: Apologising; • Acknowledging where things have gone wrong; • Providing an explanation, assistance or reasons; • Taking action if there has been delay; • Reconsidering or changing a decision; • Amending a record or adding a correction or addendum; Providing a financial remedy; Changing policies, procedures, practices. •	YES	The complaints records show that compensation was offered in cases where it was deemed necessary. Apologies and other remedies, such as corrective actions, are also evidenced in the records.
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	YES	The records show that remedies are proportional to the complaint and its impact. For example, tenants were updated about outcomes and actions taken.
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	Sections 6.5 and 7.25 of the Complaints Policy specify that any remedy offered will outline the actions to be taken, the timeline for completion, and will be agreed upon with the complainant where appropriate. Cromwood commits to fully implementing any proposed remedy, ensuring it addresses the impact on the

			complainant and avoids any detriment or unequal treatment of other tenants.
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7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	YES	We integrate the Ombudsman's guidance into decision-making for appropriate remedies. Section 6.3 of the Complaints Policy confirms that all remedies are informed by the guidance issued by the Housing Ombudsman, ensuring that Cromwood's approach to resolving complaints aligns with best practices and standards set by the Ombudsman.
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SECTION 8: SELF-ASSESSMENT, REPORTING AND COMPLIANCE

Code provision	Code requirement	Comply: Yes / No	Evidence, commentary, and any explanations
8.1	Landlords must produce an annual complaints performance and service improvement report for scrutiny and challenge, which must include: a. the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements. b. a qualitative and quantitative analysis of the landlord's complaint handling performance. This must also include a summary of the types of complaints the landlord has refused to accept. c. any findings of non-compliance with this Code by the Ombudsman; d. the service improvements made as a result of the learning from complaints; e. any annual report about the landlord's performance from the Ombudsman; and f. any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord.	YES	See Annual Complaints Performance Report This annual self-assessment is published alongside the report and will be updated as required

8.2	The annual complaints performance and service improvement report must be reported to the landlord's governing body (or equivalent) and published on the on the section of its website relating to complaints. The governing body's response to the report must be published alongside this.	YES	See Annual Complaints Performance Report In addition to this we will also publish the Board's response to the report alongside this on our website.
8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	YES	No significant changes are anticipated.
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	YES	We will review and update this self-assessment as needed.
8.5	If a landlord is unable to comply with the Code due to exceptional circumstances, such as a cyber incident, they must inform the Ombudsman, provide information to residents who may be affected, and publish this on their website Landlords must provide a timescale for returning to compliance with the Code.	YES	We are compliant with the Code. If we are unable to comply at any point, we will notify the Ombudsman and provide a timeline for achieving compliance.

SECTION 9: SCRUTINY & OVERSIGHT: CONTINUOUS LEARNING AND IMPROVEMENT

Code provision	Code requirement	Comply: Yes / No	Evidence, commentary, and any explanations
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	See Annual Complaints Performance Report
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	See Annual Complaints Performance Report
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	See Annual Complaints Performance Report
9.4	Landlords must appoint a suitably senior lead person as accountable for their complaint handling. This person must assess any themes or trends to identify potential systemic issues, serious risks, or policies and procedures that require revision.	YES	Our Legal Services Manager, who reports to the Strategic Director and Chief Operations Director, is the Complaints Senior Lead and Officer responsible for complaints. Lessons from complaints and other sources are reviewed by the Strategy Director and Chief Operations Director and trends reported to the governing board, and senior management team.

9.5	In addition to this a member of the governing body (or equivalent) must be appointed to have lead responsibility for complaints to support a positive complaint handling culture. This person is referred to as the Member Responsible for Complaints ('the MRC').	YES	The Strategic Director (MRC) and Chief Operations Director have oversight into complaints, both of whom are Company Secretary and Director respectively.
9.6	The MRC will be responsible for ensuring the governing body receives regular information on complaints that provides insight on the landlord's complaint handling performance. This person must have access to suitable information and staff to perform this role and report on their findings.	YES	The MRC maintains direct access to the Senior Lead for Complaints, the Complaints Officer, and the broader executive team. This Self-Assessment, along with the Annual Complaints Performance and Service Improvement Report, has been reviewed, discussed, and approved in collaboration with the MRC.
9.7	As a minimum, the MRC, and the governing body (or equivalent) must receive: a. regular updates on the volume, categories, and outcomes of complaints, alongside complaint handling performance; b. regular reviews of issues and trends arising from complaint handling; c. regular updates on the outcomes of the Ombudsman's investigations and progress made in complying with orders related to severe maladministration findings; and	YES	The MRC and the governing body receive updates through our structured meetings. We have Senior Management Team meetings every month where complaint handling performance, including volume, categories, and outcomes of complaints, is reviewed. Additionally, the Senior Lead for Complaints participates in a monthly KPI meetings with the MRC where complaint handling, issues, and trends, as well as the outcomes of Ombudsman investigations, are discussed. Progress on complying with any Ombudsman orders, including those related to severe maladministration findings, is also reviewed during these meetings to ensure ongoing compliance and improvement.

	d. annual complaints performance and service improvement report.		
9.8	Landlords must have a standard objective in relation to complaint handling for all relevant employees or third parties that reflects the need to: a. have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments; b. take collective responsibility for any shortfalls identified through complaints, rather than blaming others; and c. act within the professional standards for engaging with complaints as set by any relevant professional body.	YES	We have built a complaint-handling approach that prioritises teamwork, accountability, and maintaining high professional standards. Our structure places the Legal Services Manager as the Complaints Senior Lead, working closely with the Strategy Director and Chief Operations Director. This setup ensures that complaints receive thorough oversight and is approached with a strong sense of responsibility. Our commitment to continuous improvement is evident in our Annual Complaints Performance Report, where we examine trends and share insights across departments. These findings are discussed openly during monthly Senior Management Team and KPI meetings with the MRC, creating a space for ongoing learning and collaboration. ACTION POINT: Moving forward, Cromwood will continue to integrate feedback from complaint handling into staff training to strengthen our approach and maintain high standards of accountability.