

Appendix A: Self-assessment form

This self-assessment form should be completed by the complaints officer and it must be reviewed and approved by the landlord's governing body at least annually.

Once approved, landlords must publish the self-assessment as part of the annual complaints performance and service improvement report on their website. The governing body's response to the report must be published alongside this.

Landlords are required to complete the self-assessment in full and support all statements with evidence, with additional commentary as necessary.

We recognise that there may be a small number of circumstances where landlords are unable to meet the requirements, for example, if they do not have a website. In these circumstances, we expect landlords to deliver the intentions of the Code in an alternative way, for example by publishing information in a public area so that it is easily accessible.

Section 1: Definition of a complaint

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
1.2	A complaint must be defined as: <i>‘an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the landlord, its own staff, or those acting on its behalf, affecting a resident or group of residents.’</i>	Yes	Complaints policy	How we deal with complaints – Cornerstone Housing
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	Policy	Our policy states ‘Customers can make a complaint via a third party, for example, friends or family, a neighbour, their MP, a councillor or another advocate. These will be logged and this policy will be followed’. All complaints are handled via the same process, no matter who submits them and our policy states ‘ the customer does not need to ask to make a complaint or use the word ‘complaint’, we will recognise what a complaint is from talking to them’. This is covered in staff training.
1.4	Landlords must recognise the difference between a service request	yes	Complaints policy and CRM	Complaints have a specified case workflow in our CRM system

	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.			which separates them from other cases (service requests). Staff training covers what is and is not a complaint.
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	Complaints policy and CRM	Complaints have a specified case workflow in our CRM system which separates them from other cases (service requests). and a complaint or disrepair claim will not affect ongoing service delivery.
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	policy	We aim to contact all customers following dissatisfaction in surveys and will record a complaint in line with our Complaints Policy. We regularly publicise details of our complaints process.

Section 2: Exclusions

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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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	CRM record	Our policy states 'we will explain to the customer the reasons why the issue is not suitable for the complaints process if we decide not to accept it as a complaint. In CRM we log letters, notes and activities as evidence directly related to the complaints case on the case timeline.
2.2	<p>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:</p> <ul style="list-style-type: none"> • 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. • Matters that have previously been considered under the complaints policy. 	yes	Complaint policy	The policy clearly sets out circumstances where a complaint will not be accepted
2.3	Landlords must accept complaints referred to them within 12 months of	yes	Complaints policy	The policy states that where a complaint relates to

	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.			something that happened more than 12 months ago this would not usually be investigated. However, this will be reviewed on a case by case basis.
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	Complaints policy and website	Information on how to contact the ombudsman is included in our complaints policy, on the website and within standard complaint response letters
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	yes	Complaint policy	Each complaint is reviewed on an individual basis

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	Policy, website and CRM	Complaints do not need to be in writing and can come via telephone call, email, sms, in person and on our website. This is set out in the policy and covered in staff training. This is evidenced in CRM as the origin of contact is logged and reportable. Further work on collecting equality data in 2025/26 will enable communications to be more accessible.
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	Policy, website, training records	All staff have had complaints training, the majority have access to CRM or can report to someone with access to CRM to record a complaint. All manager and board members completed the Housing ombudsman training on complaints in 2024.

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	Policy, website, newsletters	Cornerstone have provided staff training on recognising complaints and we encourage feedback and complaints from our residents. Information has been provided in the tenant newsletter and complaint numbers have increased. In addition we have a CRM Dashboard as the landing page for all staff so numbers are always visible
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	Policy and customer leaflet	Comprehensive complaints information is available on our website and the complaints leaflet is available in alternative formats if required. The policy clearly states the two stages and timeframes
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	Policy and website	Our policy says 'We will publish this policy on our website and in a customer leaflet, we will also publicise information about complaints in our customer newsletter.'
3.6	Landlords must give residents the opportunity to have a		yes	policy	Recorded on CRM

	representative deal with their complaint on their behalf, and to be represented or accompanied at any meeting with the landlord.				
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	Policy, website and leaflet	Details of how to access the Ombudsman Service are included in our policy, on our website and within complaint response letters to residents. Auto acknowledgement emails from CRM also contain links to the Ombudsman service

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	CRM	We have a nominated "Complaints team" with overall responsibility for complaint handling. The Governance Manager will liaise with the Ombudsman Service where applicable. Each complaint is assigned an owner, and can be reassigned if needed.
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	CRM	Our Complaints team has access all staff directly and indirectly via the responsible Director or Chief Executive. .
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	CRM reporting	All staff have had complaints training. The management team have had advanced training. The CRM has a learning activity that is completed at the end of a complaint.

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	policy	Single policy in place
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	policy	There are 2 stages
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	policy	There are 2 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 expected to go through two complaints processes.	n/a		Complaints are dealt with internally. If additional information is required from a third party communication will be handled by Cornerstone.

5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	n/a		With the exception of the reasonable ground for excluding a complaint, our complaint process would deal with any complaint independently of any third party.
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	letters	Our understanding of the complaint is clearly set out within our complaint responses (and our internal guides and templates).
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	letters	Our understanding of the complaint is clearly set out within our complaint responses (including any areas we are not responsible for). Acknowledgement letters clarify responsibility for residents regarding complaint
5.8	At each stage of the complaints process, complaint handlers must: <ul style="list-style-type: none"> 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; 	yes	Complaint standard	

	<p>c. take measures to address any actual or perceived conflict of interest; and</p> <p>d. consider all relevant information and evidence carefully.</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	policy	Clearly sets out timeframes
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	policy	Appendix one of the complaints policy is specifically about reasonable adjustments for complaints handling
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	policy	Complaints will be escalated as requested.
5.12	A full record must be kept of the complaint, and the outcomes at each stage. This must include the original	yes	CRM	Complaints records are held electronically There is a separate workflow for each

	complaint and the date received, all correspondence with the resident, correspondence with other parties, and any relevant supporting documentation such as reports or surveys.			stage within a complaint case in CRM, at each of these stages the dates are recorded for the date of the incident, the date received and the escalation date if necessary.
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	policy	We seek to respond to and resolve the root cause of the complaint as a priority, with the complaint process used to provide clarity and a performance benchmark.
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	policy	Definition is in complaints policy. There is an Unacceptable User Policy
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	policy	Policy refers to Equality Act Assessments being completed

Section 6: Complaints Stages

Stage 1

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
6.1	Landlords must have processes in place to consider which complaints can be responded to as early as possible, and which require further investigation. Landlords must consider factors such as the complexity of the complaint and whether the resident is vulnerable or at risk. Most stage 1 complaints can be resolved promptly, and an explanation, apology or resolution provided to the resident.	yes	Complaint policy	We seek an early resolution to complaints and try to meet with residents personally (if possible), to ensure we fully understand their complaint, their circumstances and what resolution is sought. Vulnerabilities and risks will be considered and other relevant guidance followed. At the beginning of each case process flow in CRM staff are prompted to check vulnerabilities and other warning markers. These are clearly recorded against the contact(resident) record
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	policy	Our current policy fully complies with this requirement, 88% were acknowledged within 5 days
6.3	Landlords must issue a full response to stage 1 complaints <u>within 10 working days</u> of the complaint being acknowledged.	no		Policy compliant but performance is 78%
6.4	Landlords must decide whether an extension to this timescale is needed when considering the complexity of the complaint and then inform the resident of the expected timescale for response. Any extension must be no more than 10 working days without	yes	CRM	Stated in policy, residents were notified where there was an expected delay. CRM records agreed extensions for reporting

	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	CRM	Recorded on CRM All acknowledgement letters and email templates in CRM include ombudsman contact details and information
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	CRM, letters	Outstanding actions will continue and not be delayed due to a complaint being raised. CRM logs auditable records of all communication in the Complaint case timeline, this includes complaint response and retrospective actions are able to be added afterwards.
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	letters	This is included in the response letter which are also logged in CRM case timeline
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	yes	Policy/ letters	We fully comply with this requirement and are clear with residents if we are treating a further complaint as part of their original issue or as a new complaint. All communication regarding the case is either automatically (email) or manually tracked in the complaint case timeline, included but not

	delay the response, the new issues must be logged as a new complaint.			limited to additional related complaints.
6.9	Landlords must confirm the following in writing to the resident at the completion of stage 1 in clear, plain language: <ul style="list-style-type: none"> 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	Template letter	

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	policy	Policy, information on our website and responses to Stage one complaint letters includes details of how to escalate.
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.	no	policy	Policy fully compliant, 79% acknowledged within 5 days

6.12	Residents must not be required to explain their reasons for requesting a stage 2 consideration. Landlords are expected to make reasonable efforts to understand why a resident remains unhappy as part of its stage 2 response.	yes	letter	Complaints will be escalated to stage two as requested. The complaint lead will then discuss with them the reasons they are unhappy with the response.
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	yes	policy	Complaints are dealt with at stage one by the management team and at stage two by the executive team
6.14	Landlords must issue a final response to the stage 2 <u>within 20 working days</u> of the complaint being acknowledged.	yes	policy	Policy compliant, 88% responded to in 20 days
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	policy	Where an extension is required this will be discussed with the resident and agreed.
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	Policy and letters	All complaints letters contain details of the ombudsman. Ombudsman contact details and information, are included in all automatic and manual Letter/email templates in CRM

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	CRM	Outstanding actions will continue and not be delayed due to a complaint being raised. CRM logs auditable records of all communication in the Complaint case timeline, this includes complaint response and retrospective actions are able to be added afterwards
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	letters	CRM logs auditable records of all communication in the Complaint case timeline, this includes complaint response and retrospective actions are able to be added afterwards.
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	yes	letters	Responses follow a template and include all of this information Response letter templates are defined to include this and are recorded in the complaint case timeline in CRM

	Service if the individual remains dissatisfied.			
6.20	Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.	yes	policy	Cornerstone has a two stage process. Stage two is the final stage and complaints at this level will be investigated by a member of the executive team. Executive team issue response to stage 2 complaints via CRM this is auditable and clearly identifies the staff member

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.</p> <p>These can include:</p> <ul style="list-style-type: none"> • 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; 	yes	policy	This will depend on the individual case and will be documented in the response letter.

	<ul style="list-style-type: none"> • Amending a record or adding a correction or addendum; • Providing a financial remedy; • Changing policies, procedures or practices. 			
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	yes	Complaints policy and compensation policy	Response letter-compensation will be awarded as appropriate.
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	CRM	case records indicate resolutions – any further dissatisfaction is raised as Stage 2 complaint
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	yes	policy	Policy and guidance is based on that provided by the ombudsman

Section 8: Self-assessment, reporting and compliance

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> <ul style="list-style-type: none"> 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	Board report	<p>A this assessment which will be submitted to the ombudsman B compiled in complaint summary report to REP and board C present in complaint summary report D included in annual report. E n/a</p>

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	Board report	To May 2025 board meeting
8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	n/a		
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	n/a		
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.	n/a		

Section 9: Scrutiny & oversight: continuous learning and improvement

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
9.1	Landlords must look beyond the circumstances of the individual complaint and consider whether service improvements can be made as a result of any learning from the complaint.	yes	Learning in annual report	Themes from complaints discussed and cross referenced with other feedback
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	Annual report	Includes section on learning
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	Annual resident report, newsletters	You said, we did and examples of complaint learning
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		Nicky Hallam (Governance Manager) responsible for monitoring complaint assignments and response times. Reports to executive team monthly. Director of Housing responsible for reporting on overall

				customer feedback, reviews and improvement plans.
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 CEO as an executive board member has been appointed as MRC.
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		Access to complaint handling reporting on a monthly basis. Dashboard on CRM provides overview. CEO has defined access to all complaint case records in CRM and physical access to all staff
9.7	As a minimum, the MRC and the governing body (or equivalent) must receive: <ul style="list-style-type: none"> 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	reports	Executive team has monthly reporting on complaints. KPI quarterly reporting goes to the board. Annual report in May

	d. annual complaints performance and service improvement report.			
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> <p>a. have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments;</p> <p>b. take collective responsibility for any shortfalls identified through complaints, rather than blaming others; and</p> <p>c. act within the professional standards for engaging with complaints as set by any relevant professional body.</p>	yes	policy	Set out in policy and training