# 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

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| Code provision | Code requirement | Comply: Yes / No | Evidence | Commentary / explanation |
| 1.2 | A complaint must be defined as:  *‘an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the landlord, its own staff, or those acting on its behalf, affecting a resident or group of residents.’* | Yes | * Complaints Policy * BHA website * Easy to read Guide | 6.1 of the complaints policy outlines the definition required for compliance |
| 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 | * Complaints Policy * BHA website * Easy to read guide * BHA Service standards | s. 6.2 and s. 7. Outline the requirements for compliance |
| 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 | * Complaints Policy explicitly states this requirement and is detailed on our website | s.9 outlines the definition of a service request.  All service requests are logged and monitored for completion and compliance |
| 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 * Website * Easy to read complaint leaflet * BHA service standards | s.9.5 and 9.6 of the Complaints Policy outlines the requirement. |
| 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 | * Complaints Policy | s. 14.7 outlines how to complain in all correspondence to tenants |

# Section 2: Exclusions

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| 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 | * Complaints Policy * BHA website * Easy to read leaflet * Service Standards | s. 1.3, 1.4, 6.4, 6.5, 6.6 and section 13 outlines the requirements |
| 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. * Matters that have previously been considered under the complaints policy. | Yes | * Complaints Policy * BHA website * Easy to read leaflet * Service Standards | sections 1.3, 1.4, 6.4, 6.5 6.6 and section 13 of the policy explains the circumstances of exclusion and escalation, and lists the acceptable exclusions, this would include unreasonable behaviour |
| 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 | * Complaints Policy * BHA website * Easy to read leaflet * Service Standards | Complaints Policy sections 6.4, outlines the discretion to accept a complaint outside of these times |
| 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 explicitly states this requirement and is detailed on our website | Complaints Policy sections 1.3 6.5, 6.6 ,6.7 outlines the process for accepting a complaint and the rights of the resident to contact the ombudsman and that the ombudsman can overturn this decision |
| 2.5 | Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint. | Yes | * Complaints Policy and tenant friendly complaints leaflet explicitly states this requirement and is detailed on our website | Each complaint is considered on its own merit. |

# Section 3: Accessibility and Awareness

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| 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 | * Complaints Policy * BHA website * Easy to read leaflet * Service Standards | Section 5.1 and 5.2 ensures the policy is applied in line with the Equality Act 2010 and reasonable adjustments  Throughout section 7 the policy advises tenants the formats and forums they can use to complain, providing advice on third party involvement and that any reasonable adjustments required to make a complaint will be considered |
| 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 | * Complaints Policy * BHA website * Easy to read leaflet * Service Standards * Staff Training records | Section 4 explains how tenants can raise complaints.  Staff attend annual training on complaints and internal processes |
| 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 | * Complaints Policy * BHA website * Published service standards * Easy to read guide * Notice boards * E- news and newsletter | Tenant friendly leaflet is available to all tenants  Posters across properties and notice boards  Regular newsletter articles  Website has all the information required  BHA publicise lessons learnt from complaints |
| 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 | * Complaints Policy * BHA website * Published service standards * Easy to read guide * Notice boards | Other formats are available on various platforms and BHA website. We have an easy-to-read guide for tenants on our website which is included in sign up packs and as posters across our properties outlining the 2-stage process |
| 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 | * Complaints Policy * BHA website * Published service standards * Easy to read guide | S4.5 and 14.8 of the policy details where we publicise the complaints process, ombudsman scheme and how we monitor the handling code compliance |
| 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 | * Complaints Policy * BHA website * Published service standards * Easy to read guide | S.5.1, 7, 10.4 and 11.7 of the policy, outlines the requirements, it is also on the website and our easy-to-read guide and advises of resident’s rights to be accompanied or represented |
| 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 | * Complaints Policy * BHA website * Published service standards * Easy to read guide | S. 1.4,6.7, 7.6, 8.6, 9.7, 10.8, 10.13, 11.3, and 12 outline the tenants’ rights to contact the Housing Ombudsman at any stage of the process. It is also on BHA website, posters on the estates and contained in the easy-to-read guide |

# Section 4: Complaint Handling Staff

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| 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 | * Complaints Policy * BHA website * Published service standards * Easy to read guide | The Operations Director for BHA is the responsible complaints handler with full authority and autonomy across the entire process of complaint handling |
| 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 | * Complaints Policy * BHA website * Published service standards * Easy to read guide | The Operations Director for BHA is the responsible complaints handler with full authority and autonomy across the entire process of complaint handling and manages all staff that are responsible for front line complaints. |
| 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 | * Complaints Policy * Service Standards * Staff Training records * Annual reports * KPIS * Board and committee reports | Staff attend annual complaints training, and ensure staff are trained on unconscious bias and equality which all feed into the delivery of the complaints policy. Our board members monitor complaints through KPI outputs and ensure the effectively delivery of the complaint services and what lessons have been learnt. Our annual report informs residents of our lessons learnt, actions we have taken and how we have changed services because of complaints. |

# Section 5: The Complaint Handling Process

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| --- | --- | --- | --- | --- |
| 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 | * Complaints Policy * Service Standards * Staff Training records * Annual reports * KPIS * Board and committee reports | BHA have one single complaints policy, which incorporates the equality act and treats people fairly and objectively, with each complaint considered on its own merits Our policy informs that we welcome feedback, and this is reviewed at senior and board level |
| 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 | * Complaints Policy * BHA website * Published service standards * Easy to read guide | BHA acts promptly to identify the issues in a complaint and put them right in a fair and consistent manner. BHA policy is two stages only. |
| 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 | * Complaints Policy * BHA website * Published service standards * Easy to read guide | BHA policy is two stages only. |
| 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 | Not applicable to BHA |  |
| 5.5 | Landlords are responsible for ensuring that any third parties handle complaints in line with the Code. | N/A | Not applicable to BHA |  |
| 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 | * Complaints Policy * BHA website * Published service standards * Easy to read guide * BHA complaint template letters | BHA will always set out their understanding of a complaint and what resolution the tenant requires asking for clarifications if required. BHA have template letters promoting staff when completing the complaint to ensure consistency |
| 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 | * Complaints Policy * BHA website * Published service standards * Easy to read guide * BHA complaint template letters | The policy and other literature outline the steps BHA will take when acknowledging, clarifying, and investigating a complaint. |
| 5.8 | At each stage of the complaints process, complaint handlers must:   1. deal with complaints on their merits, act independently, and have an open mind; 2. give the resident a fair chance to set out their position. 3. take measures to address any actual or perceived conflict of interest; and 4. consider all relevant information and evidence carefully. | Yes | * Complaints Policy * BHA website * Published service standards * Easy to read guide * BHA complaint template letters | The complaints handler will adhere to all the code requirements in relation to the stages of the complaints process and ensure transparency, consider any conflicts of interest, look at all evidence independently with an open mind and aim to resolve complaints amicably. |
| 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 | * Complaints Policy * BHA website * Published service standards * Easy to read guide | Sections 10.6, 10.7, 10.8, 11.7, 11.8 of the complaints policy explains the timescales for extensions to the investigation, when this can be expected, how the resident will be kept informed and how they can make another complaint |
| 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 | * Complaints Policy * BHA website * Published service standards * Easy to read guide * Equality and Diversity Policy | Section 3.2 outlines the policies and regulation that BHA have in place that underpins the complaints process  4.5 and 4.6 informs the tenants and BHA Board, our reporting systems, which include the number of reported complaints that fall under the protected characteristics  Section 7 explains the support processes in place for those tenants who require help to log a complaint.  BHA will make any reasonable adjustments required to break down barriers to complaints.  BHA will look at any emerging themes and lessons learnt to ensure this is not due to any barriers for those that fall under the Equality Act 2010 |
| 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 | * Complaints Policy * BHA website * Published service standards * Easy to read guide * Equality and Diversity Policy * Unreasonable behaviour Policy * Good Neighbourhood Policy | BHA policies including complaints outline the discretion that can be applied when assessing complaints. Details of how to proceed outside of the complaint process is detailed  BHA are committed to making the process fair and will not refuse to escalate unless with a valid reason, each complaint is assessed on its own merit |
| 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 | * Complaints Policy | The Business Support Co-Ordinator and the complaints handler are responsible for the logging and detailing of each complaints case, this is kept within a password protected spreadsheet. All stages are recorded, and individual folders are made for each complaint. All investigation notes and letters are safely stored on our internal systems. |
| 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 | * Complaints Policy * BHA website * Published service standards * Easy to read guide | BHA always try and resolve complaints at an early stage to the tenant's satisfaction throughout the process. This includes asking the tenant how they would like their complaint resolved and/or what outcome they are seeking. |
| 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 | * Complaints Policy * BHA website * Published service standards * Easy to read guide * Equality and Diversity Policy * Unreasonable behaviour Policy * Good Neighbourhood Policy | BHA’s unreasonable behaviour policy is reviewed every three years or when a significant change has occurred within the association. We also keep a log of cases that are review. regularly reviewed through our case management systems  Section 13 of the complaints policy outlines all the behaviours we would consider unreasonable and steps we would take when faced with a case. |
| 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 | * Complaints Policy * BHA website * Published service standards * Easy to read guide * Equality and Diversity Policy * Unreasonable behaviour Policy | S 3.2 5.1, 7.7 and 13.6 of the complaints clearly outlines our unreasonable behaviour exclusion list and unreasonable behaviour policy considers and is proportionate and demonstrates regard for the provisions in the Equality Act 2010 |

# 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 | * Complaints Policy * BHA website * Published service standards * Easy to read guide * Annual report * Newsletter and e-news | The Complaints policy outlines the requirements for quick resolution, to apologise for mistakes made and lessons learnt which change service delivery It also outlines the process to minimise the timescales of responses considering tenants vulnerabilities Each complaint will be assessed on its own merit and case management takes place to assess vulnerabilities |
| 6.2 | Complaints must be acknowledged, defined and logged at stage 1 of the complaints procedure **within five working days of the complaint being received**. | Yes | * Complaints Policy * BHA website * Published service standards * Easy to read guide | Complaints Policy is compliant with this requirement |
| 6.3 | Landlords must issue a full response to stage 1 complaints **within 10 working days** of the complaint being acknowledged. | Yes | * Complaints Policy * BHA website * Published service standards * Easy to read guide | Complaints Policy is compliant with this requirement |
| 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 good reason, and the reason(s) must be clearly explained to the resident. | Yes | * Complaints Policy * BHA website * Published service standards * Easy to read guide | Complaints Policy is compliant with this requirement |
| 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 | * Complaints Policy * BHA website * Published service standards * Easy to read guide | Complaints Policy is compliant with this requirement |
| 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 | * Complaints Policy * Tracking spreadsheet * Case management | Complaints are investigated and recorded with all actions and discussed at case management all complaint letters are reviewed by the Operations Director for completeness and compliance |
| 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 | * Complaints Policy * Tracking spreadsheet * Case management * Oversight from Operations Director * Letter templates | Letter templates guide staff to complete investigation in full referencing definitions decisions and any relevant regulation or laws. |
| 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 | * Complaints Policy * BHA website * Published service standards * Easy to read guide | S. 10.9 and 10.10 of the complaints policy clearly outlines the residents’ rights to make further complaints and our process to deal with these during an investigation |
| 6.9 | Landlords must confirm the following in writing to the resident at the completion of stage 1 in clear, plain language:   1. the complaint stage; 2. the complaint definition; 3. the decision on the complaint; 4. the reasons for any decisions made; 5. the details of any remedy offered to put things right; 6. details of any outstanding actions; and 7. details of how to escalate the matter to stage 2 if the individual is not satisfied with the response. | Yes | * Complaints Policy * Tracking spreadsheet * Case management * Oversight from Operations Director * Letter templates | Letter templates guide staff to complete investigation in full and adhere to the required handling code . |

Stage 2

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| --- | --- | --- | --- | --- |
| 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 | * Complaints Policy * BHA website * Published service standards * Easy to read guide | Complaints Policy is compliant with this requirement |
| 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 | * Complaints Policy * BHA website * Published service standards * Easy to read guide | Complaints Policy is compliant with this requirement |
| 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 | * Complaints Policy * BHA website * Published service standards * Easy to read guide | Complaints Policy is compliant with this requirement |
| 6.13 | The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1. | Yes | * Complaints Policy * BHA website * Published service standards * Easy to read guide | Complaints Policy is compliant with this requirement |
| 6.14 | Landlords must issue a final response to the stage 2 **within 20 working days** of the complaint being acknowledged. | Yes | * Complaints Policy * BHA website * Published service standards * Easy to read guide | Complaints Policy is compliant with this requirement |
| 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 | * Complaints Policy * BHA website * Published service standards * Easy to read guide | Complaints Policy is compliant with this requirement |
| 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 | * Complaints Policy * BHA website * Published service standards * Easy to read guide | Complaints Policy is compliant with this requirement |
| 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 | * Complaints Policy * BHA website * Published service standards * Easy to read guide * Tracking spreadsheet * Case management * Oversight from Operations Director | Complaints Policy is compliant with this requirement and all actions tracked for completion, with an oversight from the Operations Director through case management and monitoring |
| 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 | * Complaints Policy * Tracking spreadsheet * Case management * Oversight from Operations Director * Letter templates | Letter templates guide staff to complete investigation in full referencing definitions decisions and any relevant regulation or laws. |
| 6.19 | Landlords must confirm the following in writing to the resident at the completion of stage 2 in clear, plain language:   1. the complaint stage; 2. the complaint definition; 3. the decision on the complaint; 4. the reasons for any decisions made; 5. the details of any remedy offered to put things right; 6. details of any outstanding actions; and 7. details of how to escalate the matter to the Ombudsman Service if the individual remains dissatisfied. | Yes | * Complaints Policy * Tracking spreadsheet * Case management * Oversight from Operations Director * Letter templates | Letter templates guide staff to complete investigation in full and adhere to the required handling code. |
| 6.20 | Stage 2 is the landlord’s final response and must involve all suitable staff members needed to issue such a response. | Yes | * Complaints Policy * Case management * Oversight from Operations Director * Letter templates | Complaints Policy is compliant with this requirement |

# Section 7: Putting things right

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| Code provision | Code requirement | Comply: Yes / No | Evidence | Commentary / explanation |
| 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 or practices. | Yes | * Complaints Policy * Case management * Oversight from Operations Director * Letter templates * Lesson Learnt report to board * Annual report * KPIs | 5.2 and 7.9 of the complaint policy outlines the approach and steps we will take to acknowledge the lessons learnt from the complaints and the steps we will take to put things right and change the service delivery.  This is reported through our KPIs and to the board |
| 7.2 | Any remedy offered must reflect the impact on the resident as a result of any fault identified. | Yes | * Home loss, disturbance and compensation policy * Complaints Policy * BHA website * Published service standards * Easy to read guide * Compensation tracking | BHA have a compensation policy outlining our process which feeds int the complaints policy, this is also detailed in the complaints policy for compliance with the code |
| 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 | * c * Case management * Oversight from Operations Director * Letter templates * Lesson Learnt report to board * Annual report * KPIs * Complaints tracking spreadsheet | BHA have a compensation policy outlining our process which feeds int the complaints policy, this is also detailed in the complaints policy for compliance with the code  The Operations Director will ensure completion through the process |
| 7.4 | Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies. | Yes | * Complaints Policy | BHA will take account to all guidance issued by the Ombudsmen; this is outlined throughout the complaints policy |

# Section 8: Self-assessment, reporting and compliance

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| Code provision | Code requirement | Comply: Yes / No | Evidence | Commentary / explanation |
| 8.1 | Landlords must produce an annual complaints performance and service improvement report for scrutiny and challenge, which must include:   1. the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements. 2. 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; 3. any findings of non-compliance with this Code by the Ombudsman; 4. the service improvements made as a result of the learning from complaints; 5. any annual report about the landlord’s performance from the Ombudsman; and 6. any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord. | Yes | * Complaints Policy * BHA website * Published service standards * Easy to read guide | BHA reports quarterly to the Board the complaints statistical information, themes and risks associated to the complaints received, any cases that are within ombudsman jurisdiction and would report if any non- compliance was reported by the ombudsmen. The annual report includes the performance of complaints through the year |
| 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 | * Complaints Policy * BHA website * Published service standards * Easy to read guide | TSM survey for 2025 will be completed and publicised on the website and any actions relating to complaint will have an action plan for improvement. BHA board members receive regular updates and overview of the complaints, with an end of year report on the trends and themes. |
| 8.3 | Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures. | Yes | * Complaints Policy * BHA website * Business Change Policy | Complaints Policy is compliant with this requirement |
| 8.4 | Landlords may be asked to review and update the self-assessment following an Ombudsman investigation. | Yes | * Complaints Policy * BHA website | Complaints Policy is compliant with this requirement and understand the requirement if requested |
| 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 | * Complaints Policy * BHA website | Complaints Policy is compliant with this requirement and understand the requirement if requested |

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

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| --- | --- | --- | --- | --- |
| 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 | * Lesson learnt report to the board * Annual report * KPIs * Complaint Policy | Our approach is to learn wider lessons from any complaint and publish lessons learnt |
| 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 | * Complaint Policy * Board reports * Annual Report | BHA board champion and the Operations Director are responsible for embedding positive complaint culture throughout the association. They will oversee the implementation of changes where required and ensure lessons learnt are core to changes to service delivery |
| 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 | * Complaint Policy * Board reports * Annual Report * Newsletters * Resident voice panel | A lesson learnt report will be included in the agenda for the Residents Panel each year Board reports on annual lessons learnt and the MRC will have oversight on all reports relating to the complaints handling |
| 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 | * Complaint Policy | Operations Director has overall responsibility for the complaints process end to end |
| 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 | * Complaints Policy * BHA website * Annual report * Newsletter * Easy to read guide | BHA Board member has been appointed as MRC and is advertised on our website |
| 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 | * Complaints Policy * BHA website * Annual report * Board reports * KPIS | The Board champion will oversee the compliance with regulatory requirements, adherence to the handling code and received regular information relating to complaints |
| 9.7 | As a minimum, the MRC and the governing body (or equivalent) must receive:   1. regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance; 2. regular reviews of issues and trends arising from complaint handling; 3. regular updates on the outcomes of the Ombudsman’s investigations and progress made in complying with orders related to severe maladministration findings; and 4. annual complaints performance and service improvement report. | Yes | * Complaints Policy * BHA website * Annual report * Board reports * KPIS | The Board champion will oversee the compliance with regulatory requirements, adherence to the handling code and received regular information relating to complaints  Board receives regular updates on any cases that are under investigation with the ombudsman and outcomes |
| 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:   1. have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments; 2. take collective responsibility for any shortfalls identified through complaints, rather than blaming others; and 3. act within the professional standards for engaging with complaints as set by any relevant professional body. | Yes | * Complaints Policy * BHA website * Annual report * Board reports * KPIS | All staff members where relevant are involved in the efficient and timely completion and closure of complaints The definition and actions BHA take is consistent across the board on how we are dealing with complaints, each department responsible for delivering actions and outcomes arising from a complaint. Feedback on complaints is shared with staff so a positive learning environment |