

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	BCH Complaint Policy & Procedure BCH Complaint Booklet BCH Website	Exact definition included in current BCH Complaint Policy and Procedure (Pages 4/5), BCH Complaint Booklet and definition is stipulated on website. https://www.bch.co.uk/complaints-compliments-and-customer-feedback/how-to-make-a-complaint
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	BCH Complaint Policy & Procedure BCH Complaint Booklet BCH Website BCH Staff Complaint Guidance	This is stipulated in the BCH Complaint Policy and Procedure (Page 5), and the BCH Complaint Booklet. Staff Complaint Guidance is also available and cascaded to ensure staff understand the complaints process and that dissatisfaction should be addressed by all staff at point of contact and the choice given to make a complaint. The guidance also stipulates that a complaint from a third party or representative is handled using the same policy and procedure. Ongoing internal communications are produced to staff regarding complaint processes and all staff are in the process of completing mandatory customer care training with a focus of 'Right First Time'.

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	<p>BCH Complaint Policy & Procedure</p> <p>BCH Complaint Booklet</p> <p>BCH Website</p> <p>BCH Staff Complaint Guidance</p> <p>Housing Ombudsman Flowcharts</p> <p>BCH Newsletter March 2024</p>	<p>This is stipulated in the BCH Complaint Policy and Procedure (Page 5), and the BCH Complaint Booklet</p> <p>Staff Complaint Guidance also outlines this and Housing Ombudsman flow charts regarding service requests have been cascaded to staff and are available on the Staff Intranet in the Complaints quick link.</p> <p>BCH's recognition between service requests and complaints was also communicated to customers in the March 2024 all customer newsletter.</p>
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	<p>BCH Complaint Policy & Procedure</p> <p>BCH Complaint Booklet</p> <p>BCH Staff Complaint Guidance</p>	<p>This is stipulated in the BCH Complaint Policy and Procedure (Page 5), the BCH Complaint Booklet and Staff Complaint Guidance.</p>
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	Yes	<p>BCH Complaint Policy & Procedure</p> <p>BCH Complaint Booklet –BCH Staff</p>	<p>This is stipulated in the BCH Complaint Policy and Procedure (Page 6), and the BCH Complaint Booklet and Staff Complaint Guidance (FAQ section).</p>

	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.		Complaint Guidance	
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Section 2: Exclusions

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
2.1	Landlords must accept a complaint unless there is a valid reason not to do so. If landlords decide not to accept a complaint they must be able to evidence their reasoning. Each complaint must be considered on its own merits	Yes	BCH Complaint Policy & Procedure BCH Complaint Booklet	This is stipulated in the BCH Complaint Policy and Procedure (Page 6), and the BCH Complaint Booklet
2.2	A complaints policy must set out the circumstances in which a matter will not be considered as a complaint or escalated, and these circumstances must be fair and reasonable to residents. Acceptable exclusions include: <ul style="list-style-type: none"> The issue giving rise to the complaint occurred over twelve months ago. 	Yes	BCH Complaint Policy & Procedure BCH Complaint Booklet BCH Website	This is stipulated in the BCH Complaint Policy and Procedure (Page 5 and 6), and the BCH Complaint Booklet

	<ul style="list-style-type: none"> • 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. 			
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	<p>BCH Complaint Policy & Procedure</p> <p>BCH Complaint Booklet</p>	This is stipulated in the BCH Complaint Policy and Procedure (Pages 6 & 7), and the BCH Complaint Booklet
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	<p>BCH Complaint Policy & Procedure</p> <p>BCH Complaint Booklet</p>	This is stipulated in the BCH Complaint Policy and Procedure (Page 6), and the BCH Complaint Booklet
2.5	Landlords must not take a blanket approach to excluding complaints; they	Yes	BCH Complaint Policy & Procedure	This is stipulated in the BCH Complaint Policy and Procedure (Page 5)

	must consider the individual circumstances of each complaint.			
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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	<p>BCH Complaint Policy & Procedure</p> <p>BCH Complaint Booklet</p> <p>Reasonable Adjustments Policy</p> <p>BCH Website</p> <p>MRI Housing Management System</p>	<p>This is stipulated in the BCH Complaint Policy and Procedure (Pages 6 & 7)</p> <p>In writing</p> <p>By email</p> <p>Website</p> <p>Via message on the MyBCH Self-service portal</p> <p>By telephone</p> <p>By private message on Social Media</p> <p>In person</p> <p>BCH have a Reasonable Adjustments Policy to support customers with disabilities and an Advocacy Policy to support vulnerable customers.</p> <p>All staff have access to language interpretation and print services and there is a specific section on the Staff</p>

				<p>Intranet regarding reasonable adjustments.</p> <p>Any known communication needs, required adjustments or disabilities are recorded on the MRI Housing Management System.</p>
3.2	<p>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.</p>	Yes	<p>BCH Complaint Policy & Procedure</p> <p>BCH Staff Complaint Guidance</p> <p>BCH Staff Intranet</p> <p>Staff Briefings</p> <p>Team Meetings</p> <p>'Right First Time' all staff mandatory training,</p>	<p>This is stipulated in the BCH Complaint Policy and Procedure (Page 4)</p> <p>All staff have been issued with BCH's Staff Complaint Handling Guidance. This includes information about the complaints process and FAQ's on what to do and are advised to refer the complaint to the dedicated Involvement and Communications Team. This information is also available on the Staff Intranet in the Complaint quick link so can be accessed by all staff and new starters. The staff induction process also covers information on complaints and the process.</p>

				<p>Complaints and the process has been covered at staff briefings and continues to be an ongoing agenda item. At the end of 2023 the Chief Exec and/or Directors attended all team meetings to highlight the importance or complaints and the process. This is continuing in Spring 2024 with the Involvement & Communications Manager attending all team meetings.</p> <p>All staff have either undergone or or booked on 'Right First Time' training which is a bespoke customer care and complaint mandatory training course.</p>
3.3	<p>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.</p>	Yes	<p>BCH Complaint Policy & Procedure</p> <p>BCH Complaint Booklet</p> <p>BCH Website</p> <p>Staff Complaint Guidance</p>	<p>This is stipulated in the BCH Complaint Policy and Procedure (Page 4) and the BCH Complaint Booklet.</p> <p>There is clear message on this with ongoing publication of the complaints process to both customers and staff.</p>

			<p>BCH Staff Intranet</p> <p>Customer Complaint Comms</p>	<p>BCH have supported national campaigns on our website and social media channels such as the 'Put things Right' campaign and the 'Four Million Homes' campaign. The complaints process is also communicated with residents in printed newsletters, sent out to all customers at least bi-annually.</p>
3.4	<p>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.</p>	Yes	<p>BCH Complaint Policy & Procedure</p> <p>BCH Complaint Booklet</p> <p>BCH Website</p>	<p>The Complaint Policy and Procedure is available on the BCH website as a PDF but also as a web page for web accessibility.</p> <p>The policy includes the 2 stage process, what happens at each step and timeframes for responding.</p> <p>Hard copies are available upon request.</p> <p>A copy of the Complaint Policy and Procedure is sent out with all Stage 1 Acknowledgement letters, either by post or email,</p>

				<p>dependent on the customer preference.</p> <p>The Complaint Booklet was developed to summarises the complaint policy and process and was approved by our Customer Reading Panel as being easy to read and understand. The booklet is available in Coastal House Reception, @the Grange, at BCH roadshows and events and upon request.</p>
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	<p>BCH Complaint Policy & Procedure</p> <p>BCH Website</p>	<p>This is stipulated in the BCH Policy and Procedure (Page 13)</p> <p>The complaint section of the website has the published policy, along with links to the Housing Ombudsman Complaint Handling Code and the Housing Ombudsman Website.</p>
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	<p>BCH Complaint Policy & Procedure</p> <p>BCH Complaint Booklet</p>	<p>This is stipulated in the BCH Complaint Policy and Procedure (Pages 5, 6, 7,8,11)</p>

			<p>BCH Customer Reasonable Adjustments Policy</p> <p>BCH Authority to Act and Advocacy Policy</p> <p>BCH Staff Complaint Handler Guidance</p> <p>BCH Staff Intranet</p>	<p>BCH have a Reasonable Adjustments Policy and an Authority to Act and Advocacy Policy which supports residents to have representatives deal with their complaint or represent them.</p>
3.7	<p>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.</p>	Yes	<p>BCH Complaint Policy & Procedure</p> <p>BCH Complaint Booklet</p> <p>BCH Website</p> <p>Stage 1 and Stage 2 Complaint template letters</p> <p>BCH Facebook and Twitter pages</p>	<p>Reference to the Housing Ombudsman and customers right to access is stipulated in the Complaint Policy and Procedure (Pages 6, 8,10 11, 12,13,15 and 16) Page 11 specifically references the Complaint Handling Code and a link to access.</p> <p>The Housing Ombudsman website and complaint handling code are direct links on the BCH website under the complaint section,</p> <p>Tenant and Leaseholder complaint templates letters have the Housing Ombudsman and contact details in the footer.</p>

				<p>Information is detailed in the BCH Complaint Booklet</p> <p>The Housing Ombudsman Service is publicised in BCH Newsletters and on Social Media.</p> <p>BCH have also supported the government 'Making Things Right' campaign and the 4 Million Homes campaign on social media and the BCH website.</p>
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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	<p>BCH Complaint Policy & Procedure</p> <p>BCH Staff Complaint Guidance</p> <p>Housing Ombudsman Portal</p> <p>Training Records</p>	<p>This is stipulated in the Complaint Policy and procedure – Page 9</p> <p>The Involvement and Communications Team are the designated team to record, allocate and manage complaints to ensure compliance with the</p>

				<p>Housing Ombudsman Complaint Handling Code. All complainants are allocated a designated officer from within the team as their 'Complaint Officer'. The team then allocate Stage 1 and Stage 3 complaints to the 'Complaint Handler' who is the manager or Director of the service and monitors timescales and outcomes.</p> <p>The Complaint Officers have all had training on the Housing Ombudsman Complaint Handling Code, Housing Ombudsman Conflict Training and attend regular webinars and networking meetings.</p> <p>As an ALMO, the link officer with the Housing Ombudsman sits with Blackpool Council. The link officer allocates any Housing Ombudsman requests to the Involvement and Communications Team.</p>
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				Both the Link Officer and the Involvement and Communications Team have access to the Housing Ombudsman Portal.
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	BCH Complaints Policy & Procedure	This is stipulated in the Complaint Policy and procedure – (Page 9)
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	<p>BCH Complaints Policy & Procedure</p> <p>Housing Ombudsman Conflict Resolution Training</p> <p>BCH Staff Complaint Guidance</p> <p>BCH Intranet Complaint Section</p> <p>Ipool Online Training Courses</p> <p>Right First Time mandatory training programme</p> <p>BCH Customer Newsletters</p> <p>Team Meeting Minutes</p>	<p>Learning from complaints is stipulated in the Complaint Policy and Procedure (Pages 4,8,13 and14)</p> <p>Complaints are centrally managed by the Involvement and Communications Team and the team has been allocated and additional resource by means of a full time Involvement and Communications Officer has been allocated to prioritise complaints and ensure effective complaint management and</p>

			<p>Staff Briefings</p>	<p>compliance with the Housing Ombudsman Code.</p> <p>The Complaint Officers have all had training on the Housing Ombudsman Complaint Handling Code, Housing Ombudsman Conflict Training and attend regular webinars and networking meetings.</p> <p>Complaint cases are monitored by the Involvement and Communications Manager for quality and audit purposes.</p> <p>All staff have undergone mandatory customer care and complaint training with a focus of 'Right First Time'.</p> <p>Ongoing internal communications are produced to staff regarding the importance of complaint management and complaint processes, both on the Staff Intranet and at face to face staff briefings.</p>
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				<p>The BCH Chief Executive and Service Directors have recently attended all team meetings to highlight the importance of complaints, and highlight that they should not be seen as a negative and are instead an opportunity to learn.</p> <p>The Involvement and Communications Manager regularly attends Team meetings to discuss complaints and lessons learnt.</p> <p>Online 'Ipool' training is currently in development for Stage 1 and Stage 2 complaint handler.</p> <p>Complaint information and lessons learnt is sent to customers in our all customer newsletters, in our annual report and a web page is currently in development.</p>
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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	BCH Complaint Policy & Procedure BCH Complaint Booklet	BCH Complaint Policy & Procedure Specific reference to residents not being treated differently if they complain is stipulated on page 4.
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	BCH Complaint Policy & Procedure BCH Staff Compliant Guidance 'Right First Time' mandatory training	The BCH Complaint Policy and Procedure (Pages 5 and 8) supports early and local resolution in agreement with the customer, however at such interactions then customers are advised of their choice to make a complaint. There is no Stage 0.
5.3	A process with more than two stages is not acceptable under any circumstances as this will make the	Yes	BCH Complaint Policy & Procedure	There are only 2 Stages in the BCH complaint process.

	complaint process unduly long and delay access to the Ombudsman.			
5.4	Where a landlord's complaint response is handled by a third party (e.g. a contractor or independent adjudicator) at any stage, it must form part of the two stage complaints process set out in this Code. Residents must not be expected to go through two complaints processes.	Yes	BCH Complaint Policy & Procedure BCH Staff Complaint Guidance	This is stipulated in the Complaint Policy and Procedure – Page 4 Any complaints regarding contractors or third parties working on behalf of BCH will be logged, investigated and responded to by BCH, in line with our policy. BCH do not have any 3 rd parties handling complaints.
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Yes	BCH Complaint Policy & Procedure BCH Staff Complaint Guidance	Any complaints regarding contractors or third parties working on behalf of BCH will be logged and managed by BCH. (Page 4)
5.6	When a complaint is logged at Stage 1 or escalated to Stage 2, landlords must set out their understanding of the complaint and the outcomes the resident is seeking. The Code will refer to this as “the complaint definition”. If any aspect of the complaint is unclear, the resident must be asked for clarification.	Yes	BCH Complaint Policy & Procedure BCH Staff Complaint Guidance	This is stipulated in the Complaint Policy and Procedure – (Pages 9,10,11) Stage 1 and 2 response letters use recommended Housing Ombudsman response templates.
5.7	When a complaint is acknowledged at either stage, landlords must be clear which aspects of the complaint they	Yes	BCH Complaint Policy & Procedure	This is stipulated in the Complaint Policy and

	are, and are not, responsible for and clarify any areas where this is not clear.			<p>Procedure – (Pages 9,10,11)</p> <p>The complaint definition is included in all Stage 1 and 2 acknowledgement letters. This confirms the aspect of the complaint we are responsible for. For elements within the complaint that are not the responsibility of BCH, this is stipulated in the Acknowledgement letters, with an explanation and signposting where necessary.</p>
5.8	<p>At each stage of the complaints process, complaint handlers must:</p> <ol style="list-style-type: none"> deal with complaints on their merits, act independently, and have an open mind; give the resident a fair chance to set out their position; take measures to address any actual or perceived conflict of interest; and consider all relevant information and evidence carefully. 	Yes	<p>BCH Complaint Policy & Procedure</p> <p>BCH Staff Complaint Guidance</p>	<p>This is stipulated in the Complaint Policy and Procedure (Page 9 and page 11)</p> <p>BCH Staff Complaint Guidance includes specific sections on Stage 1 and Stage 2 complaint handling</p>
5.9	Where a response to a complaint will fall outside the timescales set out in	Yes	BCH Complaint Policy & Procedure	This is stipulated in the Complaint Policy and

	<p>this Code, the landlord must agree with the resident suitable intervals for keeping them informed about their complaint.</p>		<p>BCH Complaint Booklet</p> <p>MRI Housing Management System</p>	<p>Procedure – Pages 10 and 11)</p>
5.10	<p>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.</p>	Yes	<p>BCH Complaint Policy & Procedure</p> <p>BCH Complaint Booklet</p> <p>BCH Complaint Form</p> <p>BCH Staff Intranet</p> <p>Staff Complaint Guidance</p> <p>Customer Reasonable Adjustments Policy</p> <p>BCH Customer Advocacy Policy</p> <p>BCH Website</p> <p>MRI Housing Management System</p>	<p>This is stipulated in the Complaint Policy and Procedure (Page 7)</p> <p>Our Reasonable Adjustments Policy is published on our website</p> <p>There is a specific section on the Staff Intranet relating to Reasonable Adjustments, which includes the policy and access to language interpretation and print services.</p> <p>When a complaint is taken, the customer (or their advocate) are asked if any reasonable adjustments are needed or if there are any specific communication needs.</p> <p>BCH are in the process of completing a full customer profiling exercise and all</p>

				information will be recorded on our MRI Housing Management system.
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	BCH Complaint Policy & Procedure BCH Complaint Booklet BCH Website	This is stipulated in the Complaint Policy and Procedure (Pages 5, 6,10 and 11))
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	MRI Housing Management System	This is stipulated in the Complaint Policy and Procedure (Page 14) All complaints are centrally recorded and managed by the Involvement and Communications Team using the Feedback Module on the MRI Housing Management System. All complaint cases logged receive a unique reference number and all complaint information documentation relating to the case is recorded on the system against the specific reference number.
5.13	Landlords must have processes in place to ensure a complaint can be	Yes	BCH Complaint Policy and Procedure	Stage 1 formal complaints are investigated by a

	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.		<p>Staff Complaint Handler Guidance</p> <p>BCH Staff Intranet</p> <p>Right First Time Training</p>	<p>Manager or Team Leader of the service (Policy Page 9)</p> <p>Stage 2 complaints are considered by the Director of the Service or the Chief Executive.</p> <p>Complaint Handlers all have the authority and autonomy to act and make decisions and offer remedial action, apologies, good will gestures and financial compensation to resolve the complaint at any stage. They all have access to the BCH Compensation Policy and the Housing Ombudsman Guidance on Remedies.</p> <p>Early Resolution is referred to in the Policy (Page 8) and all staff have undergone Right First Time Training with a focus on resolving issues at the first opportunity.</p>
5.14	Landlords must have policies and procedures in place for managing unacceptable behaviour from residents and/or their representatives. Landlords	Yes	Unacceptable Behaviour Policy	BCH have an Unacceptable Behaviour Policy that has been developed in line with the Housing Ombudsman

	must be able to evidence reasons for putting any restrictions in place and must keep restrictions under regular review.			Unacceptable user action 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	Customer Reasonable Adjustments Policy Unacceptable Behaviour Policy	The BCH Customer Reasonable Adjustments Policy has been developed in line with the Equality Act 2020 and the Housing Ombudsman Reasonable adjustment and special considerations guidance. The BCH Unacceptable Behaviour Policy has been developed in line with the Housing Ombudsman Unacceptable user action policy.

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	BCH Complaint Policy and Procedure Staff Complaint Handler Guidance Complaint Handler Checklist BCH Staff Intranet Right First Time Training	Complaint Handlers all have the authority and autonomy to act and make decisions and offer remedial action, apologies, good will gestures and financial compensation to resolve the complaint at any stage. They all have access to the BCH Compensation Policy and the Housing Ombudsman Guidance on Remedies. Early Resolution is referred to in the Policy (Page 8) and all staff have undergone Right First Time Training with a focus on resolving issues at the first opportunity.
6.2	Complaints must be acknowledged, defined and logged at stage 1 of the complaints procedure <u>within five</u>	Yes	BCH Complaint Policy & Procedure BCH Complaint Booklet	This is stipulated in the Complaint Policy and Procedure –(Page 9)

	<u>working days of the complaint being received.</u>		<p>MRI Housing Management System</p> <p>BCH Website</p> <p>BCH Staff Complaint Guidance</p> <p>BCH Service Standards</p>	This is also a BCH service standard.
6.3	Landlords must issue a full response to stage 1 complaints <u>within 10 working days</u> of the complaint being acknowledged.	Yes	<p>BCH Complaint Policy & Procedure</p> <p>BCH Complaint Booklet</p> <p>MRI Housing Management System</p> <p>BCH Website</p> <p>BCH Staff Complaint Guidance</p>	<p>This is stipulated in the Complaint Policy and Procedure (Page 10)</p> <p>This is also a BCH service standard.</p>
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	<p>BCH Complaint Policy & Procedure</p> <p>BCH Complaint Booklet</p> <p>BCH Website</p> <p>BCH Staff Complaint Guidance</p>	This is stipulated in the Complaint Policy and Procedure (Page 10)

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	BCH Complaint Policy & Procedure BCH Complaint Booklet BCH Website BCH Staff Complaint Guidance	This is stipulated in the Complaint Policy and Procedure (Page 10)
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	BCH Complaint Policy & Procedure BCH Complaint Booklet BCH Website BCH Staff Complaint Guidance	This is stipulated in the Complaint Policy and Procedure (Page 9) Stage 1 and 2 Complaint Handler Guidance also outlines this
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	BCH Complaint Policy & Procedure BCH Staff Complaint Guidance	This is stipulated in the Complaint Policy and Procedure (Pages 10 and 12) Stage 1 and 2 Complaint Handler Guidance also outlines this
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	BCH Complaint Policy & Procedure BCH Complaint Booklet BCH Website BCH Staff Complaint Guidance	This is stipulated in the Complaint Policy and Procedure (Page 9) Stage 1 and 2 Complaint Handler Guidance also outlines this

	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: <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	BCH Complaint Policy & Procedure BCH Complaint Booklet BCH Website BCH Staff Complaint Guidance	This is stipulated in the Complaint Policy and Procedure (Page 10) Stage 1 and 2 Complaint Handler Guidance also outlines this

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	BCH Complaint Policy & Procedure BCH Complaint Booklet BCH Website BCH Staff Complaint Guidance	This is stipulated in the Complaint Policy and Procedure (Pages 10 and 12)

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	<p>BCH Complaint Policy & Procedure</p> <p>BCH Complaint Booklet</p> <p>BCH Website</p> <p>MRI Housing Management system</p> <p>BCH Staff Complaint Guidance</p>	<p>This is stipulated in the Complaint Policy and Procedure (Page 11)</p> <p>Stage 1 and 2 Complaint Handler Guidance outlines this.</p>
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	<p>BCH Complaint Policy & Procedure</p> <p>BCH Complaint Booklet</p> <p>BCH Website</p> <p>BCH Staff Complaint Guidance</p>	<p>This is stipulated in the Complaint Policy and Procedure (Page 11)</p> <p>Stage 1 and 2 Complaint Handler Guidance also outlines this</p>
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Yes	<p>BCH Complaint Policy & Procedure</p> <p>BCH Complaint Booklet</p> <p>BCH Staff Complaint Guidance</p>	<p>This is stipulated in the Complaint Policy and Procedure (Page 11)</p> <p>Stage 1 and 2 Complaint Handler Guidance also outlines this</p> <p>All Stage 2 complaints are heard by the Director of the Service or the Chief Executive</p>

6.14	Landlords must issue a final response to the stage 2 <u>within 20 working days</u> of the complaint being acknowledged.	Yes	BCH Complaint Policy & Procedure BCH Complaint Booklet BCH Website BCH Staff Complaint Guidance BCH Service Standards	This is stipulated in the Complaint Policy and Procedure (Page 11) Stage 1 and 2 Complaint Handler Guidance outlines this. This is also a BCH service standard.
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	BCH Complaint Policy & Procedure BCH Complaint Booklet BCH Website BCH Staff Complaint Guidance	This is stipulated in the Complaint Policy and Procedure (Page 11) Stage 1 and 2 Complaint Handler Guidance also outlines this
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	BCH Complaint Policy & Procedure BCH Complaint Booklet BCH Website	This is stipulated in the Complaint Policy and Procedure (Page 11)
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	Yes	BCH Complaint Policy & Procedure BCH Complaint Booklet	This is stipulated in the Complaint Policy and Procedure (Page 11)

	actions must still be tracked and actioned promptly with appropriate updates provided to the resident.		BCH Website BCH Staff Complaint Guidance	Stage 1 and 2 Complaint Handler Guidance also outlines this
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	BCH Complaint Policy & Procedure BCH Complaint Booklet BCH Website BCH Staff Complaint Guidance	This is stipulated in the Complaint Policy and Procedure (Page 12) Stage 1 and 2 Complaint Handler Guidance also outlines this
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	BCH Complaint Policy & Procedure BCH Complaint Booklet BCH Website BCH Staff Complaint Guidance	This is stipulated in the Complaint Policy and Procedure (Page 12) Stage 1 and 2 Complaint Handler Guidance also outlines this
6.20	Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.	Yes	BCH Complaint Policy & Procedure BCH Complaint Booklet	This is stipulated in the Complaint Policy and Procedure (Page 12)

			BCH Website	
			BCH Staff Complaint Guidance	

Section 7: Putting things right

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
7.1	<p>Where something has gone wrong a landlord must acknowledge this and set out the actions it has already taken, or intends to take, to put things right. These can include:</p> <ul style="list-style-type: none"> • 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	<p>BCH Complaint Policy & Procedure</p> <p>BCH Compensation Policy</p> <p>BCH Staff Complaint Guidance</p> <p>Housing Ombudsman Guidance on Remedies</p> <p>Complaint Evaluation Forms</p>	<p>This is stipulated in the Complaint Policy and Procedure (Page 12)</p> <p>Stage 1 and 2 Complaint Handler Guidance also outlines this</p>
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Yes	BCH Complaint Policy & Procedure	This is stipulated in the Complaint Policy and Procedure (Page 12)

			<p>BCH Compensation Policy</p> <p>BCH Staff Complaint Guidance</p> <p>Housing Ombudsman Guidance on Remedies</p>	<p>Stage 1 and 2 Complaint Handler Guidance also outlines this</p>
7.3	<p>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.</p>	Yes	<p>BCH Complaint Policy & Procedure</p> <p>BCH Compensation Policy</p> <p>BCH Staff Complaint Guidance</p> <p>Housing Ombudsman Guidance on Remedies</p> <p>Complaint Action Tracker</p>	<p>This is stipulated in the Complaint Policy and Procedure (Page 12)</p> <p>Stage 1 and 2 Complaint Handler Guidance also outlines this</p> <p>All remedies offered are tracked on a complaint action tracker and monitored by the Service Manager</p>
7.4	<p>Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.</p>	Yes	<p>BCH Complaint Policy & Procedure</p> <p>BCH Staff Complaint Guidance</p> <p>BCH Staff Intranet</p>	<p>This is stipulated in the Complaint Policy and Procedure (Page 12)</p> <p>The BCH Staff Complaint Guidance refers to this and the link to the guidance is available on the BCH Staff</p>

				Intranet under the complaints quick link.
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Section 8: Putting things right

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
8.1	<p>Landlords must produce an annual complaints performance and service improvement report for scrutiny and challenge, which must include:</p> <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	<p>BCH Complaint Policy & Procedure</p> <p>BCH Complaint Report</p>	<p>This is stipulated in the Complaint Policy and Procedure (Page 13)</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	BCH Complaint Policy & Procedure BCH Complaint Report Board Response BCH Website	This is stipulated in the Complaint Policy and Procedure (Page 13)
8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	Yes	BCH Complaint Policy & Procedure	This is stipulated in the Complaint Policy and Procedure (Page 13)
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	Yes	BCH Complaint Policy & Procedure	This is stipulated in the Complaint Policy and Procedure (Page 13)
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	BCH Complaint Policy & Procedure BCH Business Continuity Plan	This is stipulated in the Complaint Policy and Procedure (Page 13)

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	<p>BCH Complaint Policy & Procedure</p> <p>Board Complaint Reports</p> <p>Board Meeting Minutes</p> <p>SMT meeting minutes</p> <p>Customer Complaint Panel meeting minutes</p> <p>Complaint Evaluations</p>	<p>This is stipulated in the Complaint Policy and Procedure (Page 14)</p> <p>Following the closure of a complaint, Heads of Service (Stage 1) or Directors (Stage 2) complete a complaint evaluation which covers the root cause of the complaint, what was done to resolve it and wider actions needed to improve services or prevent re-occurrence.</p> <p>Complaint data is reported quarterly to the Senior Management Team and the BCH Board, along with identified trends and areas that may need reviewing.</p> <p>Our Customer Complaint representatives meet quarterly to assess and review complaint</p>

				information and scrutinise performance, with a focus on lessons learnt and recommended actions.
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	<p>BCH Complaint Policy & Procedure</p> <p>Board Complaint Reports</p> <p>Board Meeting Minutes</p> <p>SMT meeting minutes</p> <p>Customer Complaint Panel meeting minutes</p> <p>Team Meeting Minutes</p> <p>Staff Briefings</p> <p>BCH Website (learning page in development)</p> <p>Annual Report</p>	As above in 9.1
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	Yes	<p>BCH Website (learning page to be developed)</p> <p>Annual Report</p> <p>Customer Newsletters</p>	<p>As above in 9.1</p> <p>Complaint information and lessons learnt are also shared with customers in the Annual Report,</p>

	stakeholders, such as residents' panels, staff and relevant committees.		<p>BCH Website</p> <p>BCH Complaint Policy & Procedure</p> <p>Board Complaint Reports</p> <p>Board Meeting Minutes</p> <p>SMT meeting minutes</p> <p>Customer Complaint Panel meeting minutes</p>	newsletters and on the BCH website.
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	<p>BCH Complaint Policy & Procedure</p> <p>SMT meeting minutes</p> <p>Board Complaint Reports</p> <p>Board Meeting Minutes</p>	This is stipulated in the Complaint Policy & Procedure (Page 14)
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	Yes	<p>BCH Complaint Policy & Procedure</p> <p>Board Complaint Reports</p> <p>Board Meeting Minutes</p>	This is stipulated in the Complaint Policy & Procedure (Page 14 and 15)

	Responsible for Complaints ('the MRC').		SMT meeting minutes	
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	Complaint Policy & Procedure Board Complaint Reports Board Minutes	This is stipulated in the Complaint Policy & Procedure (Page 14 and 15)
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 d. annual complaints performance and service improvement report.	Yes	Complaint Policy & Procedure Board Complaint Reports Board Minutes	This is stipulated in the Complaint Policy & Procedure (Page 14 and 15)
9.8	Landlords must have a standard objective in relation to complaint	Yes	Complaint Policy & Procedure	This is stipulated in the Complaint Policy &

	<p>handling for all relevant employees or third parties that reflects the need to:</p> <ul style="list-style-type: none"> 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. 		<p>Board Complaint Reports</p> <p>SMT Meeting Minutes</p> <p>JOMM Minutes</p> <p>Board Minutes</p>	<p>Procedure (Page 14 and 15)</p>
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