

Appendix B – Self-Assessment Form

This self-assessment form should be completed by the complaints officer and discussed at the landlord's governing body annually. Evidence should be included to support all statements with additional commentary as necessary.

Explanations must also be provided where a mandatory 'must' requirement is not met to set out the rationale for the alternative approach adopted and why this delivers a better outcome.

Section 1 - Definition of a complaint Mandatory 'must' requirements

| Code section | Code requirement | Comply: Yes/No | Evidence, commentary and any explanations |
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| 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 organisation, its own staff, or those acting on its behalf, affecting an individual resident or group of residents.'</i> | Yes | Exact definition included in current BCH Complaint Policy and Procedure (Page 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 | The resident does not have to use the word 'complaint' for it to be treated as such. A complaint that is submitted via a third party or representative must still be handled in line with the landlord's complaints policy. | Yes | This is stipulated in the BCH Complaint Policy and Procedure (Pages 5, 7 and 8), and the BCH Complaint Booklet Staff FAQ's have also been developed and cascaded to ensure staff understand the complaints process and that a customer does not need to use the word complaint for it to be treated as such and 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 Senior Management Team and the Involvement and Communications Team have attended Team Meetings. Complaint Officers within the Involvement & Communications Team have also undergone Housing Ombudsman Complaint Handling Code Training. |
| 1.6 | ... if further enquiries are needed to resolve the matter, or if the resident requests it, the issue must be logged as a complaint. | Yes | This is stipulated in the BCH Complaint Policy and Procedure and Procedure (Page 5) and Staff FAQ's. |
| 1.7 | A landlord must accept a complaint unless there is a valid reason not to do so. | Yes | This is stipulated in the BCH Complaint Policy and Procedure (Pages 5 and 6) |

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| 1.8 | A complaints policy must clearly set out the circumstances in which a matter will not be considered, and these circumstances should be fair and reasonable to residents. | Yes | This is stipulated in the BCH Complaint Policy and Procedure (Pages 5 and 6) and the complaint booklet |
| 1.9 | If a landlord decides not to accept a complaint, a detailed 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. | Yes | This is stipulated in the BCH Complaint Policy and Procedure (Page 6) |

Best practice 'should' requirements

| Code section | Code requirement | Comply: Yes/No | Evidence, commentary and any explanations |
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| 1.4 | Landlords should recognise the difference between a service request , where a resident may be unhappy with a situation that they wish to have rectified, and a complaint about the service they have/have not received. | Yes | <p>BCH Complaint Policy and Procedure (Page 6)</p> <p>Stipulated in Staff FAQ document: <i>1. What is the difference between a complaint and a request for service? A complaint is an expression of dissatisfaction about the standard of service, actions or lack of action by the organisation, its own staff or those acting on its behalf, affecting an individual resident or group of residents. A request for service is a call for action from a customer i.e. to report a repair or incident of anti-social behaviour for instance.</i></p> <p>Housing Ombudsman Complaint Flowcharts also cascaded to staff to support with the distinction between a service request and a complaint.</p> |

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| 1.5 | Survey feedback may not necessarily need to be treated as a complaint, though, where possible, the person completing the survey should be made aware of how they can pursue their dissatisfaction as a complaint if they wish to. | Yes | BCH Complaint Policy and Procedure (Page 6) <i>Also stipulated in Staff FAQ document: 3. Is dissatisfaction on a Survey a complaint? Survey feedback may not necessarily need to be treated as a complaint, though any issues raised should be discussed and addressed and where possible, the customer completing the survey should be made aware of how they can pursue their dissatisfaction as a complaint if they wish to.</i> |
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Section 2 - Accessibility and awareness Mandatory 'must' requirements

| Code section | Code requirement | Comply: Yes/No | Evidence, commentary and any explanations |
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| 2.1 | Landlords must make it easy for residents to complain by providing different channels through which residents can make a complaint such as in person, over the telephone, in writing, by email and digitally. While the Ombudsman recognises that it may not be feasible for a landlord to use all of the potential channels, there must be more than one route of access into the complaints system. | Yes | BCH Complaint Policy and Procedure (Page 7) In writing By email Website MyBCH Self-service portal By telephone By private message on Social Media In person |
| 2.3 | Landlords must make their complaint policy available in a clear and accessible format for all residents. This will detail the number of stages involved, what will happen at each stage and the timeframes for responding. | Yes | BCH Complaint Policy and Procedure (Pages 7 and 9-14) Reasonable Adjustment Policy Complaint Booklet Interpretation Services |
| 2.4 | Landlord websites, if they exist, must include information on how to raise a complaint. The complaints policy and process must be easy to find on the website. | Yes | (Complaints) and Customer Feedback is a quick button on the main website page: https://www.bch.co.uk/ Links to: https://www.bch.co.uk/complaints-compliments-and-customer-feedback |
| 2.5 | Landlords must comply with the Equality Act 2010 and may need to adapt normal policies, procedures, or processes to accommodate an individual's needs. Landlords must satisfy themselves that their policy sets out how they will respond to reasonable adjustments requests in line with the Equality Act and that complaints handlers have had appropriate training to deal with such requests. | Yes | BCH Complaint Policy and Procedure (Page 8) Reasonable Adjustments Policy |

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| <p>2.6</p> | <p>Landlords must publicise the complaints policy and process, the Complaint Handling Code and the Housing Ombudsman Scheme in leaflets, posters, newsletters, online and as part of regular correspondence with residents.</p> | <p>Yes</p> | <p>The BCH Complaint Policy and Procedure, complaint booklet, Complaint Handling Code and information about the Housing Ombudsman Scheme are published on our website. https://www.bch.co.uk/complaints-compliments-and-customer-feedback/how-to-make-a-complaint.</p> <p>We do regular social media campaigns via Social media: Facebook and Twitter search @bchblackpool. This includes supporting the government 'Make it Right' campaign and the 4 Million Homes campaign.</p> <p>Regular mail shots are also sent to customers who have email contact details.</p> <p>An all customer printed newsletter is produced at least bi-annually and contains information about the Complaint Process.</p> <p>The Repairs Handbook contains information about the Complaints Process and this booklet is provided to all new customers in their welcome pack, along with a follow up email.</p> <p>Our Complaints Booklet and the Housing Ombudsman Information Guide are displayed and made available at all community roadshow events.</p> <p>Complaints booklets, posters and details of the Housing Ombudsman Scheme are available and on display at Coastal House Reception and our satellite office @the Grange. The Housing Ombudsman Scheme Information Guide is displayed in the notice boards of all 15 Community Centres.</p> |
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| 2.7 | Landlords must provide residents with contact information for the Ombudsman as part of its regular correspondence with residents. | Yes | The Housing Ombudsman logo and contact details are included in the footer of all complaint correspondence. A link to the Housing Ombudsman Website is also on our Complaints Webpage. |
| 2.8 | Landlords must provide early advice to residents regarding their right to access the Housing Ombudsman Service throughout their complaint, not only when the landlord's complaints process is exhausted. | Yes | BCH Complaint Policy and Procedure (Page 13) The BCH Complaint Policy and Procedure is enclosed with all Stage 1 complaint acknowledgment letters. This provides information on a customer's right to access the Housing Ombudsman at any point throughout their complaint. |

Best practice 'should' requirements

| Code section | Code requirement | Comply: Yes/No | Evidence, commentary and any explanations |
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| 2.2 | Where a landlord has set up channels to communicate with its residents via social media, then it should expect to receive complaints via those channels. Policies should contain details of the steps that will be taken when a complaint is received via social media and how confidentiality and privacy will be maintained. | Yes | This is stipulated in the BCH Complaint Policy and Procedure (Page 7) <i>Where a customer posts on social media pages, we will ensure privacy at all times by directing the complaint to private message to ensure privacy and confidentiality. If a customer posts personal details on a public post, this will be removed to protect their privacy and confidentiality.</i> |

Section 3 Complaint handling personnel Mandatory 'Must' requirements.

| Code section | Code requirement | Comply: Yes/No | Evidence, commentary and any explanations |
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| 3.1 | Landlords must have a person or team assigned to take responsibility for complaint handling to ensure complaints receive the necessary attention, and that these are reported to the governing body. This Code will refer to that person or team as the "complaint's officer" | Yes | The Involvement and Communications Team are assigned to take responsibility for complaints. The Team consists of a Manager, 3 officers and an assistant. The Manager and Officers take the role of 'Complaint Officers'. The Manager produces quarterly complaint performance information that is shared with the Senior Management Team and the Board. The Officers and Manager have all undergone Complaint Handling Training, attended the Housing Ombudsman Revised Complaint Handling Code Workshops in April 2022 and have completed the online Dispute Resolution training and attend regular Housing Ombudsman, TPAS and NFA workshops and webinars. |
| 3.2 | ...the complaint handler appointed must have appropriate complaint handling skills and no conflicts of interest. | | <p>Appointed complaint handlers are the Managers or Team Leaders responsible for the service. The Directors hear the Stage 2 Appeal Panel.</p> <p>Managers, Heads of Service and Directors have attended briefing sessions where complaints and complaint handling have been the focus.</p> <p>Stage 1 Complaint Handler guidance is issued to complaint handlers each time a complaint is allocated to them. Stage 2 Complaint Handler guidance is issued to the Complaint Handler.</p> <p>Any conflict of interest would be identified by the Complaint Officer and the investigation would be allocated to a different Complaint Handler.</p> <p>Customer Care and Complaint Handling Training is currently being planned and will be mandatory for all staff.</p> |

Best practice 'should' requirements

| Code section | Code requirement | Comply: Yes/No | Evidence, commentary and any explanations |
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| 3.3 | <p>Complaint handlers should:</p> <ul style="list-style-type: none"> • be able to act sensitively and fairly • be trained to handle complaints and deal with distressed and upset residents • have access to staff at all levels to facilitate quick resolution of complaints • have the authority and autonomy to act to resolve disputes quickly and fairly. | Yes | <p>Stage 1 Complaint Handler Guidance is issued to Complaint Handlers each time a complaint is allocated to them. Stage 2 Complaint Handler Guidance is issued to the Director Complaint Handler if escalated.</p> <p>As Complaint Handlers are Managers, Team Leaders or Directors they are able to facilitate quick responses and have the authority to act.</p> <p>Bespoke Customer Care and Complaint Handling Training is currently being planned and will be mandatory for all staff.</p> |

Section 4 - Complaint handling principles Mandatory 'must' requirements

| Code section | Code requirement | Comply: Yes/No | Evidence, commentary and any explanations |
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| 4.1 | Any decision to try and resolve a concern must be taken in agreement with the resident and a landlord's audit trail/records should be able to demonstrate this. Landlords must ensure that efforts to resolve a resident's concerns do not obstruct access to the complaints procedure or result in any unreasonable delay. It is not appropriate to have extra named stages (such as 'stage 0' or 'pre-complaint stage') as this causes unnecessary confusion for residents. When a complaint is made, it must be acknowledged and logged at stage one of the complaints procedure within five days of receipt . | Yes | BCH Complaint Policy and Procedure (Page 10). |
| 4.2 | Within the complaint acknowledgement, landlords must set out their understanding of the complaint and the outcomes the resident is seeking. If any aspect of the complaint is unclear, the resident must be asked for clarification and the full definition agreed between both parties. | Yes | Template Stage 1 acknowledgement letters are produced via the Feedback section of our Housing Management system so they are consistent. Within the template there is a clear section to include the understanding of the complaint and the outcome the resident is seeking. If this is unclear upon receipt of the complaint, the Complaint Officer will make contact with the customer to discuss and clarify. |
| 4.6 | A complaint investigation must be conducted in an impartial manner. | Yes | <p>The Manager or Team Leader of the service are allocated complaints to investigate as the Complaint Handler and review the evidence.</p> <p>Stage 1 and Stage 2 guidance notes, which confirm complaint investigations are to be conducted in an impartial manner, are also issued to all Complaint Handlers by the Complaint Officers when complaints are allocated to them,.</p> |

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| 4.7 | <p>The complaint handler must:</p> <ul style="list-style-type: none"> • deal with complaints on their merits • act independently and have an open mind • take measures to address any actual or perceived conflict of interest • consider all information and evidence carefully • keep the complaint confidential as far as possible, with information only disclosed if necessary to properly investigate the matter. | Yes | <p>This is outlined in the BCH complaint Policy and Procedure (Pages 10 &11)</p> <p>Stage 1 and Stage 2 guidance notes, which confirm what the complaint handler must do, this are also issued to all complaint handlers by the Complaint Officers when complaints are allocated to them,.</p> |
| 4.11 | Landlords must adhere to any reasonable arrangements agreed with residents in terms of frequency and method of communication | Yes | <p>Reasonable Adjustment Policy</p> <p>All complaints are logged centrally on the feedback section of our housing management system which enables Complaint Officers to note agreed frequency and methods of communication. The Housing Management System also has alert UDC's (User Defined Characteristics) which will highlight if a customer has made us aware of a specific communication need or vulnerability.</p> |
| 4.12 | <p>The resident, and if applicable any staff member who is the subject of the complaint, must also be given a fair chance to:</p> <ul style="list-style-type: none"> • set out their position • comment on any adverse findings before a final decision is made. | Yes | All complainants and/or their representatives are invited to attend the Stage 2 Appeal Panel Hearing. If a staff member is subject to the complaint, they are also interviewed by the Appeal Panel. |
| 4.13 | A landlord must include in its complaints policy its timescales for a resident to request escalation of a complaint | Yes | <p>This is outlined in the BCH Complaint Policy and Procedure (Page 12).</p> <p>The timescale of 25 working days to escalate to Stage 2 is also included as standard in the Stage 1 response letter, the template of which is produced using the feedback module of the housing management system.</p> |
| 4.14 | A landlord must not unreasonably refuse to escalate a complaint through all stages of the complaints | Yes | BCH Complaint Policy and Procedure (Page 12) |

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| | procedure and must have clear and valid reasons for taking that course of action. Reasons for declining to escalate a complaint must be clearly set out in a landlord's complaints policy and must be the same as the reasons for not accepting a complaint. | | |
| 4.15 | A full record must be kept of the complaint, any review 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 reports or surveys prepared. | Yes | All complaints are logged and managed by the Complaint Officers using the feedback module of the housing management system. The system generates a unique complaint reference number. All documentation, records and actions are logged on the case using this system. |
| 4.18 | Landlords must have policies and procedures in place for managing unacceptable behaviour from residents and/or their representatives when pursuing a complaint. | Yes | BCH Unreasonable Behaviour Policy |

Best practice 'should' requirements

| Code section | Code requirement | Comply: Yes/No | Evidence, commentary and any explanations |
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| 4.3 | Landlords should manage residents' expectations from the outset, being clear where a desired outcome is unreasonable or unrealistic | Yes | Complaint Officers have received Housing Ombudsman Complaint Handling Code Training and completed online dispute resolution modules. The Team are experienced front line staff members who are experienced in dealing with customers and managing expectations. The complaint form includes a section on the customer's desired outcome so that this is clear from the offset. If the outcome was clearly unreasonable or unrealistic then this would be discussed with the customer at the point of case opening. |

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| 4.4 | A complaint should be resolved at the earliest possible opportunity, having assessed what evidence is needed to fully consider the issues, what outcome would resolve the matter for the resident and whether there are any urgent actions required | Yes | BCH Complaint Policy and Procedure (Pages 10 & 11) |
| 4.5 | Landlords should 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 where this is reasonable. | Yes | BCH Complaint Policy and Procedure (Pages 7, 8 and 12) |
| 4.8 | Where a key issue of a complaint relates to the parties' legal obligations landlords should clearly set out their understanding of the obligations of both parties. | Yes | Stage 1 and Stage 2 Complaint Handler Guidance |

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| 4.9 | Communication with the resident should not generally identify individual members of staff or contractors. | Yes | Stage 1 and Stage 2 Complaint Handler Guidance |
| 4.10 | Landlords should keep residents regularly updated about the progress of the investigation. | Yes | Cases are allocated to specific Complaint Officers who act as a dedicated officer and monitor cases to ensure timescales are met. Should there be a delay or further information about progress then the Complaint Officer will update the resident. When appropriate, Complaint Handlers are encouraged to call the complainant to discuss the issue first hand, as per Stage 1 Complaint Handler guidance. |
| 4.16 | Landlords should seek feedback from residents in relation to the landlord's complaint handling as part of the drive to encourage a positive complaint and learning culture. | Yes | Telephone satisfaction surveys take place when complaints have closed. These surveys are conducted by customer Complaint Panel Representatives to be independent. |
| 4.17 | Landlords should recognise the impact that being complained about can have on future service delivery. Landlords should ensure that staff are supported and engaged in the complaints process, including the learning that can be gained | Yes | Regular supervisions take place with staff and complaints have now become a mandatory team meeting item so that complaints can be discussed positively and lessons learnt shared. Ongoing communication about complaints being an opportunity to learn is done with staff and covered at Staff Awareness Sessions. The Chief Exec and/or Directors are currently also attending all team meetings to engage with staff about complaints and support the policy and positive culture. |
| 4.19 | Any restrictions placed on a resident's contact due to unacceptable behaviour should be appropriate to their needs and should demonstrate regard for the provisions of the Equality Act 2010. | Yes | Reasonable Adjustments Policy. Unreasonable Behaviour Policy. |

Section 5 - Complaint stages Mandatory 'must' requirements Stage 1

| Code section | Code requirement | Comply: Yes/No | Evidence, commentary and any explanations |
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| 5.1 | Landlords must respond to the complaint <u>within 10 working days</u> of the complaint being logged. Exceptionally, landlords may provide an explanation to the resident containing a clear timeframe for when the response will be received. This should not exceed a further 10 days without good reason. | Yes | This is outlined in the BCH Complaint Policy and Procedure (Page 10), the complaint booklet and the Stage 1 complaint handler guidance notes. The Feedback system also enables actions to be set and notifications received by the Complaint Officer to ensure that timescales are met. Response timescales are monitored by the Involvement and Communications Manager and reported quarterly to the Senior Management Team. |

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| 5.5 | A complaint response must be sent 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 expeditiously with regular updates provided to the resident. | Yes | BCH Complaint Policy and Procedure (Page 11) and Stage 1 Guidance Outstanding actions are tracked and monitored by the Complaint Officer and Senior Management Team. The Complaint Handler will provide updates to the resident. Actions are monitored at the Joint Operational Managers meeting and any outstanding actions will be challenged at the meeting by the Director of the Service. |
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| 5.6 | Landlords must address all points raised in the complaint and provide clear reasons for any decisions, referencing the relevant policy, law and good practice where appropriate. | Yes | BCH Complaint Policy and Procedure (Page 11) and Stage 2 Complaint Handler Guidance. |
| 5.8 | Landlords must confirm the following in writing to the resident at the completion of stage one in clear, plain language: <ul style="list-style-type: none"> • the complaint stage • the decision on the complaint • the reasons for any decisions made • the details of any remedy offered to put things right • details of any outstanding actions • details of how to escalate the matter to stage two if the resident is not satisfied with the answer | Yes | BCH Complaint Policy and Procedure (Page 11) and Stage 1 Guidance. Stage 1 response letters are produced using the feedback module of the housing management system, the template of which includes details of how to escalate to Stage 2. |

Stage 2

| Code section | Code requirement | Comply: Yes/No | Evidence, commentary and any explanations |
|--------------|--|----------------|--|
| 5.9 | If all or part of the complaint is not resolved to the resident's satisfaction at stage one it must be progressed to stage two of the landlord's procedure, unless an exclusion ground now applies. In instances where a landlord declines to escalate a complaint it must clearly communicate in writing its reasons for not escalating as well as the resident's right to approach the Ombudsman about its decision. | Yes | BCH Complaint Policy and Procedure (Page 12) |

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| 5.10 | On receipt of the escalation request, landlords must set out their understanding of issues outstanding and the outcomes the resident is seeking. If any aspect of the complaint is unclear, the resident must be asked for clarification and the full definition agreed between both parties. | Yes | Stage 2 Appeal Hearing Invite letters which are sent to the complainant at point of escalation request are produced using the feedback module of the housing management system, the template of which includes a section for our understanding of the outstanding issues and the desired outcome. |
| 5.11 | Landlords must only escalate a complaint to stage two once it has completed stage one and at the request of the resident. | Yes | BCH Complaint Policy and Procedure (Page 12) |
| 5.12 | The person considering the complaint at stage two, must not be the same person that considered the complaint at stage one. | Yes | Stage 2 Complaint Handler Guidance |
| 5.13 | Landlords must respond to the stage two complaint within 20 working days of the complaint being escalated. Exceptionally, landlords may provide an explanation to the resident containing a clear timeframe for when the response will be received. This should not exceed a further 10 days without good reason. | Yes | BCH Complaint Policy and Procedure (Page 13) and Stage 2 Complaint Handler Guidance. |
| 5.16 | Landlords must confirm the following in writing to the resident at the completion of stage two in clear, plain language: the complaint stage the complaint definition the decision on the complaint the reasons for any decisions made the details of any remedy offered to put things right details of any outstanding actions and if the landlord has a third stage, details of how to escalate the matter to stage three if this was the final stage, details of how to escalate the matter to the Housing Ombudsman Service if the resident remains dissatisfied. | Yes | BCH Complaint Policy and Procedure (Page 13) and Stage 2 Complaint Handler Guidance. |

Stage 3

| Code section | Code requirement | Comply: Yes/No | Evidence, commentary and any explanations |
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| 5.17 | Two stage landlord complaint procedures are ideal. This ensures that the complaint process is not unduly long. If landlords strongly believe a third stage is necessary, they must set out their reasons for this as part of their self-assessment. A process with more than three stages is not acceptable under any circumstances. | Yes | BCH Complaint process consists of Stage 1 and Stage 2. We do not have a Stage 3. BCH Policy and Procedure (Page 13) |
| 5.20 | Landlords must confirm the following in writing to the resident at the completion of stage three in clear, plain language: <ul style="list-style-type: none"> • the complaint stage • the complaint definition • the decision on the complaint • the reasons for any decisions made • the details of any remedy offered to put things right • details of any outstanding actions • details of how to escalate the matter to the Housing Ombudsman Service if the resident remains dissatisfied | N/A | There is no stage 3 in the complaint process. |

Best practice 'should' requirements Stage 1

| Code section | Code requirement | Comply: Yes/No | Evidence, commentary and any explanations |
|--------------|---|----------------|--|
| 5.2 | If an extension beyond 20 working days is required to enable the landlord to respond to the complaint fully, this should be agreed by both parties. | Yes | BCH Complaint Policy and Procedure (Page 11) |
| 5.3 | Where agreement over an extension period cannot be reached, landlords should provide the Housing Ombudsman's contact details so the resident can challenge the landlord's plan for responding and/or the proposed timeliness of a landlord's response. | Yes | BCH Complaint Policy and Procedure (Page 11) and Stage 2 Complaint Handler Guidance. |
| 5.4 | Where the problem is a recurring issue, the landlord should consider any older reports as part of the background to the complaint if this will help to resolve the issue for the resident. | Yes | Stage 1 and Stage 2 Complaint Handler Guidance |
| 5.7 | Where residents raise additional complaints during the investigation, these should be incorporated into the stage one response if they are relevant and the stage one response has not been issued. Where the stage one response has been issued, or it would unreasonably delay the response, the complaint should be logged as a new complaint. | Yes | BCH Complaint Policy and Procedure (Page 11) and Stage 1 Complaint Handler Guidance. |

Stage 2

| Code section | Code requirement | Comply: Yes/No | Evidence, commentary and any explanations |
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| 5.14 | If an extension beyond 10 working days is required to enable the landlord to respond to the complaint fully, this should be agreed by both parties. | Yes | BCH Complaint Policy and Procedure (Page 13) |
| 5.15 | Where agreement over an extension period cannot be reached, landlords should provide the Housing Ombudsman's contact details so the resident can challenge the landlord's plan for responding and/or the proposed timeliness of a landlord's response | Yes | BCH Complaint Policy and Procedure (Page 13) |

Stage 3

| Code section | Code requirement | Comply: Yes/No | Evidence, commentary and any explanations |
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| 5.18 | Complaints should only go to a third stage if the resident has actively requested a third stage review of their complaint. Where a third stage is in place and has been requested, landlords must respond to the stage three complaint within 20 working days of the complaint being escalated. Additional time will only be justified if related to convening a panel. An explanation and a date for when the stage three response will be received should be provided to the resident. | N/A | There is no third stage in the complaint process. |
| 5.19 | Where agreement over an extension period cannot be reached, landlords should provide the Housing Ombudsman's contact details so the resident can challenge the landlord's plan for responding and/or the proposed timeliness of a landlord's response. | N/A | There is no third stage in the complaint process. |

Section 6 - Putting things right Mandatory 'must' requirements

| Code section | Code requirement | Comply: Yes/No | Evidence, commentary and any explanations |
|---------------------|--|-----------------------|--|
| 6.1 | Effective dispute resolution requires a process designed to resolve complaints. 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. | Yes | BCH Complaint Policy and Procedure (Page 13) and Stage 1 and Stage 2 Complaint Handler Guidance. |

Stage 2

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| 6.2 | Any remedy offered must reflect the extent of any service failures and the level of detriment caused to the resident as a result. A landlord must carefully manage the expectations of residents and not promise anything that cannot be delivered or would cause unfairness to other residents. | Yes | BCH Complaint Policy and Procedure (Page 13) and Stage 1 and Stage 2 Complaint Handler Guidance. BCH Compensation Policy |
| 6.5 | 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 | BCH Complaint Policy and Procedure (Page 13) and Stage 1 and Stage 2 Complaint Handler Guidance. |
| 6.6 | In awarding compensation, a landlord must consider whether any statutory payments are due, if any quantifiable losses have been incurred, the time and trouble a resident has been put to as well as any distress and inconvenience caused. | Yes | BCH Complaint Policy and Procedure (Page 13) and Stage 1 and Stage 2 Complaint Handler Guidance. BCH Compensation Policy. |

Best practice 'should' requirements

| Code section | Code requirement | Comply: Yes/No | Evidence, commentary and any explanations |
|---------------------|--|-----------------------|---|
| 6.3 | Landlords should look beyond the circumstances of the individual complaint and consider whether anything needs to be 'put right' in terms of process or systems to the benefit of all residents. | Yes | BCH Complaint Policy and Procedure (Page 13) and Stage 1 and Stage 2 Complaint Handler Guidance. Following the closure of a complaint (either Stage 1 or Stage 2) the complaint handler will complete an evaluation which notes the root cause of the complaint, the action taken to resolve it and the outcome/lessons learned. Quarterly complaint data is provided to Senior Managers, including evaluation and root cause information. |
| 6.7 | In some cases, a resident may have a legal entitlement to redress. The landlord should still offer a resolution where possible, obtaining legal advice as to how any offer of resolution should be worded. | Yes | Stage 1 and Stage 2 Complaint Handler Guidance. |

Section 7 - Continuous learning and improvement Mandatory

'must' requirements

| Code section | Code requirement | Comply: Yes/No | Evidence, commentary and any explanations |
|--------------|--|----------------|---|
| 7.2 | Accountability and transparency are integral to a positive complaint handling culture. Landlords must report back on wider learning and improvements from complaints in their annual report and more frequently to their residents, staff and scrutiny panels. | Yes | BCH Complaint Policy and Procedure (Page 15) BCH Annual Report 21/22 BCH Annual Report 22/23 BCH Website |

Best practice 'should' requirements

| Code section | Code requirement | Comply: Yes/No | Evidence, commentary and any explanations |
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| 7.3 | A member of the governing body should be appointed to have lead responsibility for complaints to support a positive complaint handling culture. This role will be responsible for ensuring the governing body receives regular information on complaints that provides insight to the governing body on the landlord's complaint handling performance. | Yes | BCH Complaint Policy and Procedure (Page 15) BCH Board has an appointed Complaints Champion. |
| 7.4 | As a minimum, governing bodies should receive: <ul style="list-style-type: none"> Regular updates on the volume, categories and outcome of complaints, alongside complaint handling performance including compliance with the Ombudsman's orders Regular reviews of issues and trends arising from complaint handling, The annual performance report produced by the Ombudsman, where applicable Individual complaint outcomes where necessary, including where the Ombudsman made findings of severe maladministration or referrals to regulatory bodies. The implementation of management responses should be tracked to ensure they are delivered to agreed timescales. The annual self-assessment against the Complaint Handling Code for scrutiny and challenge. | Yes | BCH Complaint Policy and Procedure (Page 16) A standalone report is added to each board agenda detailing the numbers of complaints at each stage with detail as required to allow board oversight on all cases at stage 2 or likely to progress to the Ombudsman. A senior member of BCH management will join the Council's customer service group and regular reports on complaints handling will also go to the Council Shareholder Committee. |
| 7.5 | Any themes or trends should be assessed by senior management to identify potential systemic issues, serious risks or policies and procedures that require revision. They should also be used to inform staff and contractor training. | Yes | BCH Complaint Policy and Procedure (Page 15) |

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| | | | Complaints are a standard agenda item at the Senior Management Team Meetings. |
| 7.6 | <p>Landlords should have a standard objective in relation to complaint handling for all employees that reflects the need to:</p> <ul style="list-style-type: none"> • have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments • take collective responsibility for any shortfalls identified through complaints rather than blaming others • act within the Professional Standards for engaging with complaints as set by the Chartered Institute of Housing. | Yes | <p>BCH Complaint Policy and Procedure (Page 16)</p> <p>Complaints are a standard agenda item at Senior Management Meetings, Team Meeting and the Joint Operational Managers Meeting.</p> |

Section 8 - Self-assessment and compliance Mandatory 'must' requirements

| Code section | Code requirement | Comply: Yes/No | Evidence, commentary and any explanations |
|--------------|---|----------------|---|
| 8.1 | Landlords must carry out an annual self-assessment against the Code to ensure their complaint handling remains in line with its requirements. | Yes | <p>BCH Complaint Policy and Procedure (Page 16)</p> <p>Reviewed November 2023 alongside the complaint policy and procedure and guidance and published on website.</p> |
| 8.2 | Landlords must also carry out a self-assessment following a significant restructure and/or change in procedures. | Yes | BCH Complaint Policy and Procedure (Pages 16) |
| 8.3 | <p>Following each self-assessment, a landlord must:</p> <ul style="list-style-type: none"> • report the outcome of their self-assessment to their governing body. In the case of local authorities, self- assessment outcomes should be reported to elected members • publish the outcome of their assessment on their website if they have one, or otherwise make accessible to residents • include the self-assessment in their annual report section on complaints handling performance | Yes | BCH Complaint Policy and Procedure (Pages 16) |