

## Self-assessment form – Complaints Handling Code

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:<br><i>‘an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the landlord, its own staff, or those acting on its behalf, affecting a resident or group of residents.’</i>  | Yes              | The wording is included in our Complaint Procedure.<br><br><b>Evidence: Section 1 –</b> What is 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              | We advise the tenants or their representative that where there is a service failure, they have a right to make a complaint.<br><br><b>Evidence: Section 1 -</b> What is a complaint? |                          |
| 1.4            | Landlords must recognise the difference between a service request and a complaint. This must be set out in their complaints policy. A service request is a request from a resident to the landlord requiring action to be taken to put something right. Service requests are not complaints, but must be                 | Yes              | Our Complaints Procedure defines what is a service request and what is a complaint.<br><br><b>Evidence: Section 2 &amp; 4</b>  |                          |

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|     | recorded, monitored and reviewed regularly.  |     |  |  |
| 1.5 | A complaint must be raised when the resident expresses dissatisfaction with the response to their service request, even if the handling of the service request remains ongoing. Landlords must not stop their efforts to address the service request if the resident complains.  | Yes | <b>Evidence: Section 2</b> - What is a complaint?  |  |
| 1.6 | An expression of dissatisfaction with services made through a survey is not defined as a complaint, though wherever possible, the person completing the survey should be made aware of how they can pursue a complaint if they wish to. Where landlords ask for wider feedback about their services, they also must provide details of how residents can complain. | Yes | <b>Evidence:</b><br>During our repair's satisfaction surveys, officers inform tenants that they have the option to pursue a complaint if they wish to do so. |  |

## 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              | <p>Our Complaints Procedure includes a comment, the complainant will be advised of the reason(s) (why their complaint was rejected)</p> <p><b>Evidence: Section 4 - What can't I complain about?</b></p> |                          |
| 2.2            | <p>A complaints policy must set out the circumstances in which a matter will not be considered as a complaint or escalated, and these circumstances must be fair and reasonable to residents. Acceptable exclusions include:</p> <ul style="list-style-type: none"> <li>• The issue giving rise to the complaint occurred over twelve months ago.</li> <li>• 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.</li> </ul> | Yes              | <p>Our Complaints Procedure includes a section on what a complainant can't complain about</p> <p><b>Evidence: Section 4 - What can't I complain about?</b></p>   |                          |

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|     | <ul style="list-style-type: none"> <li>• Matters that have previously been considered under the complaints policy.</li> </ul>   |     |  |  |
| 2.3 | <p>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.</p>   | Yes | <p>Our Complaints Procedure states that complaints should be made within 12 months of the complainant knowing of a Service Failure</p> <p><b>Evidence: Section 6 – How long do I have to make a complaint?</b></p> |  |
| 2.4 | <p>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.</p> | Yes | <p>Complaints Procedure included a comment that for each rejected complaint, the complainant will be advised of the reason why their complaint was rejected.</p> <p><b>Evidence: Section 4</b></p>                 |  |
| 2.5 | <p>Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.</p>   | Yes | <p>We will consider each complaint on its merit.</p>   |  |

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### Section 3: Accessibility and Awareness

| Code provision | Code requirement  | Comply: Yes / No | Evidence  | Commentary / explanation |
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| 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>We accept complaints by email, in writing, by telephone, in person, website or via a representative.</p> <p>Our Complaints Procedure includes a section on reasonable adjustment.</p> <p><b>Evidence:</b> Section 9 – Reasonable adjustments</p> |                          |
| 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              | <p>Any member of staff can accept a complaint and they are aware of our complaint procedure.</p> <p><b>Evidence:</b> Section 5 – How do I complain.</p>   |                          |
| 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  | Yes              | <p>We widely advertise our complaint procedure via our newsletter, website and the time of sign-up/new lettings.</p>  |                          |

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|     | sign that residents are unable to complain.  |     |  |  |
| 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 | Complaint Procedure is publicised on our website, including 'a quick guide on complaints'<br><br><b>Evidence:</b> Section 11 – complaints stages |  |
| 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 | Complaint Procedure include information and a link to HOS website.<br><br><b>Evidence:</b> Section 11.4  |  |
| 3.6 | Landlords must give residents the opportunity to have a representative deal with their complaint on their behalf, and to be represented or   | Yes | This is explained in our Complaints Procedure.   |  |
|     | accompanied at any meeting with the landlord.  |     | <b>Evidence:</b> Section 3 – Who can complain?   |  |

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| 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 | <p>This is explained in our Complaints Policy and Procedure.</p> <p><b>Evidence:</b> Section 11 – formal complaints stages</p> <p>Section 11.4 – Housing Ombudsman service</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>We are a small RP. whilst we do not have a dedicated Complaints Officer, our Operations Manager has overall responsibility to monitor complaints and is the main point of contact for HOS and reports all complaints to the Board.</p> <p><b>Evidence: Section 12 – Monitoring and learning</b></p> |                          |



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| 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 | See comments in 4.1 which indicates that we have a senior member of staff monitoring all 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 | Yes | All staff receives regular internal training on complaint handling and regularly reviews the complaints procedure during team meetings. |  |
|     | core service and must be resourced to handle complaints effectively   |     |   |  |

### 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              | We have a single Complaints Procedure.<br><br><b>Evidence:</b> Complaint procedure. |                          |

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| 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 | Our Complaints Policy and Procedure only includes two stages process.<br><br><b>Evidence:</b> Complaint procedure.                            |  |
| 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 | Our Complaints Policy and Procedure only includes two stages process.<br><br><b>Evidence:</b> Complaint procedure.                            |  |
| 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   | Yes | Our Complaints Procedure explains that any complaints relating to a 3 <sup>rd</sup> party will be investigated using our Complaint Procedure. |  |

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|     | this Code. Residents must not be expected to go through two complaints processes.                      |     | <b>Evidence:</b> Section 11  |  |
| 5.5 | Landlords are responsible for ensuring that any third parties handle complaints in line with the Code. | Yes | All complaints are investigated by BHA.<br><br><b>Evidence:</b> Section 11.4 |  |

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| 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 | <p>When we log a complaint, we register</p> <ul style="list-style-type: none"> <li>- detailed explanation of the complaint</li> <li>- outcome the complainant is seeking</li> <li>- This is also outlined in our acknowledgment correspondence.</li> </ul> |  |
| 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 | <p>When responding to a complaint, we will include</p> <ul style="list-style-type: none"> <li>- detailed explanation of their complaint</li> <li>- the area(s) that we are dealing with.</li> </ul>  |  |

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| 5.8  | <p>At each stage of the complaints process, complaint handlers must:</p> <ul style="list-style-type: none"> <li>a. deal with complaints on their merits, act independently, and have an open mind;</li> <li>b. give the resident a fair chance to set out their position;</li> <li>c. take measures to address any actual or perceived conflict of interest; and</li> <li>d. consider all relevant information and evidence carefully.</li> </ul> | Yes | <p>All staff members receive regular training internally and where available attend webinars on complaint handling.</p>                    |  |
| 5.9  | <p>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.</p>   | Yes | <p>Our Complaints Procedure included information on agreeing on a complaint extension.</p> <p><b>Evidence:</b> Section 11.2</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>Our Complaints Procedure includes information on reasonable adjustments.</p> <p><b>Evidence:</b> Section 9 – Reasonable Adjustment.</p> |  |

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| 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 | <p>Where complainants have a valid reason to escalate a complaint, they can do so.</p> <p>Where we do not agree to escalate a complaint, we will provide the reasons why and advise the complainant of their right to approach the HOS.</p> <p><b>Evidence:</b> Section 10 – Complaint resolution process</p> |  |
| 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 | We will record all complaints on a spreadsheet with timeline of the stages of the complaint.  |  |
| 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 | We ensure that complaints are handled quickly and efficiently and provide remedies at any stage of the complaint process.   |  |
| 5.14 | Landlords must have policies and procedures in place for managing unacceptable behaviour from residents   | No  | Currently we inform what behaviour is unacceptable to us and what is accepted of them.  |  |

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|      |   |    | However, we are working on devising a written policy |  |
|      | and/or their representatives. Landlords must be able to evidence reasons for putting any restrictions in place and must keep restrictions under regular review. | No | <b>See 5.14</b>                                      |  |
| 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.      | No | <b>See 5.14</b>                                      |  |

## Section 6: Complaints Stages

### Stage 1

| Code provision | Code requirement  | Comply:<br>Yes /<br>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, | Yes                    | We review all complaints to determine if we have sufficient information to provide an immediate response or it needs further investigation. We also take into account through our Management system (Pyramid) of any known vulnerabilities of the claimant. |                          |

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|     | apology or resolution provided to the resident.  |     |   |  |
| 6.2 | Complaints must be acknowledged, defined and logged at stage 1 of the complaints procedure <b><u>within five working days of the complaint being received.</u></b> | Yes | Our Complaints Procedure outlines that the complaint should be acknowledged and defined in five working days.<br><br><b>Evidence:</b> 'a quick guide to complaints procedure'   |  |
| 6.3 | Landlords must issue a full response to stage 1 <b><u>days</u></b> of the complaint being acknowledged. <b><u>within 10 working</u></b>                            | Yes | Our complaint procedure outlines that a full response to a Stage 1 complaint should be made within ten working days unless it requires an extension due to the complexity of the complaint.<br><br><b>Evidence:</b> Section 11 – How will the Complaint be handled? |  |

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| 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>Our Complaints Policy &amp; Procedure outlines that a full response to Stage 1 complaint should be made within ten working days.</p> <p>Where an extension is required, we will always the complainant of the reason for the extension and the length of the extension. Normally, we expect this to be no more than 10 working days.</p> |  |
| 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 | <p>This is included in the Complaints Policy and Procedure where extensions are made.</p> <p><b>Evidence:</b> Section 11 – How will the Complaint be handled?</p>   |  |
| 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   | Yes | Our response will have outlines headings/actions that is to be included in the response letter.   |  |



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|     | the issue are completed. Outstanding actions must still be tracked and actioned promptly with appropriate updates provided to the resident.   |     | <p>Our complaints are handled quickly and efficiently, making sure any changes to the service required are put in place.</p> <p>Any actions proposed or agreed upon will be monitored by the designated officer and with updates provided to the complainant.</p> <p><b>Evidence:</b> This information is included in Complaint response letters.</p> |  |
| 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 | It is standard practice to make reference to relevant policies and procedures. These policies and procedures are based on our legal obligations and relevant best practices.  |  |
| 6.8 | Where residents raise additional complaints during the investigation, these must be incorporated into the stage 1 response if they are related and the stage 1 response has not been issued. Where the stage 1 response has been issued, the new issues are unrelated to the issues already being investigated or it would unreasonably | Yes | Our Complaints Policy and Procedure highlights that any additional information relating to the initial complaint will be incorporated into the Stage 1 response. Unless the new reported are unrelated then they will be treated as a separate complaint.   |  |

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|     | 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"> <li>a. the complaint stage;</li> <li>b. the complaint definition;</li> <li>c. the decision on the complaint;</li> <li>d. the reasons for any decisions made;</li> <li>e. the details of any remedy offered to put things right;</li> <li>f. details of any outstanding actions; and</li> <li>g. details of how to escalate the matter to stage 2 if the individual is not satisfied with the response.</li> </ul> | Yes | These headings are included and followed in our response letters. |  |

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              | This process is followed through our Complaints Procedure.<br><br><b>Evidence:</b> Section 11 |                          |

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| 6.11 | Requests for stage 2 must be acknowledged, defined and logged at stage 2 of the complaints procedure  | Yes | This process is followed through our Complaints Procedure.  |  |
|      | within five working days of the escalation request being received.  |     |   |  |
| 6.12 | Residents must not be required to explain their reasons for requesting a stage 2 consideration. Landlords are expected to make reasonable efforts to understand why a resident remains unhappy as part of its stage 2 response. | Yes | This process is followed through our Complaints Procedure.  |  |
| 6.13 | The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.   | Yes | This is outlined in our Complaints Policy and Procedure.  |  |
| 6.14 | Landlords must issue a final response to the stage 2 <b><u>within 20 working days</u></b> of the complaint being acknowledged.  | Yes | Our Complaints Procedure outlines that a full response to a Stage 2 complaint should be made within 20 working days, unless it requires an extension due to the complexity of the complaint.<br><br><b>Evidence:</b> Section 11 |  |

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| 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 | <p>Our policy and procedure outlines this.</p> <p><b>Evidence:</b> Section 9</p> <p>Where an extension is required, we will always the complainant of the reason for the extension and the length of the extension. Normally, we expect this to be no more than 20 working days.</p> |  |
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| 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 | <p>This is included in the Complaints Policy and Procedure where extensions are made.</p> <p><b>Evidence:</b> Section 11</p> |  |
| 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 | <p>This is included in the Complaints Policy and Procedure where extensions are made.</p> <p><b>Evidence:</b> Section 11</p> |  |

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| 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 | It is standard practice to make reference to relevant policies and procedures. These policies and procedures are based on our legal obligations and relevant best practices. |  |
| 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;<br>b. the complaint definition;<br>c. the decision on the complaint;<br>d. the reasons for any decisions made;<br>e. the details of any remedy offered to put things right;<br>f. details of any outstanding actions; and<br>g. details of how to escalate the matter to the Ombudsman Service if the individual remains dissatisfied. | Yes | These headings are included in our response letters.   |  |

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| 6.20 | Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response. | Yes | Any investigation will involve relevant staff members. Before a final response is sent out it is normal practice to discuss with a Senior Officer will be involved in the investigation and the final response. |  |
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## 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"> <li>• Apologising;</li> <li>• Acknowledging where things have gone wrong;</li> <li>• Providing an explanation, assistance or reasons;</li> <li>• Taking action if there has been delay;</li> <li>• Reconsidering or changing a decision;</li> <li>• Amending a record or adding a correction or addendum;</li> <li>• Providing a financial remedy;</li> <li>• Changing policies, procedures or practices.</li> </ul> | Yes              | <p>These headings are included and followed in our response letters.</p> <p><b>Evidence:</b> Section 10 – Putting things right</p>                         |                          |
| 7.2            | Any remedy offered must reflect the impact on the resident as a result of any fault identified.  | Yes              | <p>Our Complaints Procedure refers to rectification, including making apology and compensation as goodwill gesture.</p> <p><b>Evidence:</b> Section 10</p> |                          |

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| 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 | These is included and in our response letters   |  |
| 7.4 | Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.  | Yes | We have a Compensation Policy<br><b>Evidence:</b> Compensation Policy will be located on our website. |  |



## 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"> <li>a. the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements.</li> <li>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;</li> <li>c. any findings of non-compliance with this Code by the Ombudsman;</li> <li>d. the service improvements made as a result of the learning from complaints;</li> <li>e. any annual report about the landlord's performance from the Ombudsman; and</li> <li>f. any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord.</li> </ul> | Yes              | <p>We provide complaints report to our board as part of KPI data. We will incorporate detailed data of our complaints including the handling of the complaint at various stages and, remedies and lesson learned.</p> <p>Going forward we will produce annual complaints performance and services improvement report for our board and publication on our website, newsletter and annual reports.</p> |                          |

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| 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 | It is our normal practice to publish our complaints performance in our annual report and newsletters.<br><br>Evidence: The Complaints performance report to be uploaded on HOS website annually in June. |  |
| 8.3 | Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.  | Yes | We will carry out an annual self-assessment. In the event of any significant changes, we will bring forward the self-assessment.   |  |
| 8.4 | Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.   | Yes | Noted  |  |
| 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 | This will be covered under our Disaster Recovery Procedure.  |  |

### 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              | This is included in our Complaints Procedures.  |                          |
| 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              | This is encouraged through internal and external training plus open discussion with the team and partnership and attendance with other RPs forums.          |                          |
| 9.3            | Accountability and transparency are also integral to a positive complaint handling culture. Landlords must report back on wider learning and improvements from complaints to stakeholders, such as residents' panels, staff and relevant committees. | Yes              | See comments above.<br><br>We have a tenant rep on the governing board. Complaints management and lessons learned are also discussed in our Resident Forum. |                          |
| 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,  | Yes              | The Operations Manager is responsible for this.   |                          |

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|     | serious risks, or policies and procedures that require revision.  |     |   |  |
| 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 | BHA's Vice Chair is responsible for this.                     |  |
| 9.6 | The MRC will be responsible for ensuring the governing body receives regular information on complaints that provides insight on the landlord's complaint handling performance. This person must have access to suitable information and staff to perform this role and report on their findings.  | Yes | The Vice Chair has access to both Operations Manager and CEO. |  |
| 9.7 | As a minimum, the MRC and the governing body (or equivalent) must receive: <ul style="list-style-type: none"> <li>a. regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance;</li> <li>b. regular reviews of issues and trends arising from complaint handling;</li> <li>c. regular updates on the outcomes of the Ombudsman's investigations and progress made in complying with</li> </ul> | Yes | See Comment in 8.1  |  |

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|     | orders related to severe maladministration findings; and<br>d. annual complaints performance and service improvement report.   |     |  |  |
| 9.8 | Landlords must have a standard objective in relation to complaint handling for all relevant employees or third parties that reflects the need to: a. have a collaborative and cooperative approach towards resolving complaints, working with colleagues across teams and departments;<br>b. take collective responsibility for any shortfalls identified through complaints, rather than blaming others; and<br>c. act within the professional standards for engaging with complaints as set by any relevant professional body. | Yes | This is included in our Complaints Procedure and this is further emphasised through team meetings and 1:1 supervision support sessions |  |