

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 / Line 2 validation
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	Section 3 of our policy states “an expression of dissatisfaction, however made, about the standard of service, actions or lack of actions by bpha (including our subsidiary Bushmead Homes), our own staff or those acting on our behalf affecting an individual resident or group of residents.”	Correct and seen evidence.
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 use the Housing Ombudsman’s definition of a complaint which in section 3 of our policy states “Customers do not have to use the word ‘complaint’ for their dissatisfaction to be considered as a complaint.” It also states in section 6 of our policy that “Complainants may also ask a friend, relative or an advocacy service to make a complaint on their behalf. We will ask for the complainant’s written permission, before we engage with a third party. All complaints received via third parties on behalf of a customer will be handled fully in line with the process set out in this policy.”	Correct and seen evidence.

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	Section 9 of our policy details what a service request is and states "A service request is a request from a customer requiring action to be taken to put something right. Service requests are not complaints but will be recorded, monitored and reviewed." It also gives examples of service requests to assist customer understanding	Correct and seen evidence.
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	This is covered in section 9 of our policy which states "If you are dissatisfied with the progress of your service request and you tell us this, we will log this as a complaint. We will continue to work with you on your initial service request as well as responding to your complaint to ensure we can resolve your issues as quickly as possible."	Correct and seen evidence.
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	Yes	This can be evidenced through our use of causes for concern raised when collecting our TSM feedback; which will result in the customer being contacted by a member of bpha; and also in our transactional surveys following a repair visit. If these come back negative a	Correct and seen evidence.

	their services, they also must provide details of how residents can complain.		colleague will contact the customer, at which point the offer of a complaint will be made.	
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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	Reasons why a complaint will not be considered are details in section 8 of our policy. Within this section we state that “We do not take a blanket approach, and each case will be considered individually.” and “We will always notify you if your complaint or escalation to Stage Two is not accepted, setting out clearly the reasons why.”	Correct and seen evidence.
2.2	A complaints policy must set out the circumstances in which a matter will not be considered as a complaint or escalated, and these circumstances must be fair and reasonable to residents. Acceptable exclusions include: - The issue giving rise to the complaint occurred over twelve months ago. - Legal proceedings have started. This is defined as details of the claim, such as	Yes	Our policy clearly sets out the reasons we would not consider a complaint in section 8 and cover the areas specified.	Correct and seen evidence.

	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	This is referred to in section 8 which refers to exclusions and details that if complaints or the customer becoming aware of the issue occurred over 12 months ago will be excluded but states that “bpha may still accept a complaint after this time if there are good reasons to do so.”	Correct and seen evidence.
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	Section 8 of our policy states “We will always notify you if your complaint or escalation to Stage Two is not accepted, setting out clearly the reasons why.”	Correct and seen evidence.
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Yes	Section 8 of our policy states “We do not take a blanket approach, and each case will be considered individually.”	Correct and seen evidence.

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	We provide a range of channels for customer to raise complaints. The following are detailed in Section 6 of our policy: - Customer Portal - Telephone - Letter - e-mail - WhatsApp - Face to face to a bpha employee - Using a complaint form via our website - Posting on social media. We offer support for customers to access our complaints process through our Customer Reasonable Adjustments and our Vulnerability Policy that is referred to in our Complaints and Compliments Policy.	Correct and seen evidence.

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	All colleagues are made aware of our Complaints and Compliment Policy. This topic is included in our induction programme. Customer facing colleagues training and briefings about the complaints process.	Correct and seen evidence.
3.3	High volumes of complaints must not be seen as a negative, as they can be indicative of a well-publicised and accessible complaints process. Low complaint volumes are potentially a sign that residents are unable to complain.	Yes	We actively publicise our complaint process to customers through a variety of channels including our website and customer newsletter. Levels of complaints are monitored at formal meetings operationally and by the Board and Customer Experience Committee as part of their oversight and scrutiny role in ensuring that our complaints process is accessible and that complaints are welcomed. This includes volumes and themes. The organisation actively learns from complaints using the insight from these and other customer feedback to make service improvements.	Correct and evidence seen.
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	Yes	Our policy is available on our website where the process is also explained and includes the	Correct and evidence seen.

	each stage, and the timeframes for responding. The policy must also be published on the landlord's website.		timeframes for responding. There is also a complaint leaflet available.	
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	Section 17 of our policy explains we will publicise our approach to complaints and the findings from complaints through You Said, We Have Listened page and in Talk magazine and our annual report and self-assessment.	Correct and seen evidence.
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	We want it to be as accessible for customers to make complaints as possible. Section 6 of the policy states "Complainants may also ask a friend, relative or an advocacy service to make a complaint on their behalf or to represent or accompany them to any meetings they may join or attend."	Correct and seen evidence.
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	Details of the Ombudsman are included in letters, the website and the complaints leaflet.	Correct and seen evidence.

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	Section 14 of our policy explains that the Complaints Resolution Team is responsible for complaint handling and are the main liaison for the Housing Ombudsman.	Correct and seen evidence. It is known in the business we handle the HOS activity. A note will be added to the policy, the next time it gets reviewed.
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	Section 4 of our policy explains that the Complaints Resolution Team have access to work with whomever they need to resolve a complaint, at all levels. Complaints are reviewed on a monthly basis through the Operational Programme Board and any issues can be raised at this forum.	Correct and seen evidence.
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	Yes	Customer facing colleagues are regularly briefed on complaints and Senior Managers review complaints on a monthly basis through Operational Programme Board.	Correct and seen evidence.

	must be resourced to handle complaints effectively			
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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	There is one policy that covers complaints under the Housing Ombudsman Code. Compliments and Complaints Policy. This was reviewed in June 2026 in line with Housing Ombudsman feedback that we received	Correct and seen evidence.
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	The complaints process is a two-stage process. As explained in section 4 of our policy. We will operate a two-stage complaint process.	Correct and seen evidence.
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	Section 7 of our policy details that stage two is the final stage of our complaint process.	Correct and seen evidence
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	Section 3 of our policy states "We will consider complaints about our third-party contactors and agents under this policy. Customers are not expected to complain to third parties direct."	Correct and seen evidence.

5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Yes	Section 2 and 3 of our policy shows we work closely with our contractors, who understand the Code and support our complaints team to meet the timescales and all other aspects of the Code. Customers are encouraged to make their complaint to bpha, rather than a third party so we can ensure they receive a satisfactory response	Correct and seen evidence.
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	This is within our response letters for both stages of the complaints process.	Correct and seen evidence.
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	Section 8 of our policy states what we do and do not pick up as a part of complaints resolution, and this is confirmed in writing at the point of acknowledgement.	Correct and seen evidence.
5.8	At each stage of the complaints process, complaint handlers must: a. deal with complaints on their merits, act independently, and have an open mind;	Yes	The complaint resolution team deal with each complaint individually. Each complaint will be treated separately to any previous interactions, or other complaints	

	b. give the resident a fair chance to set out their position; c. take measures to address any actual or perceived conflict of interest; and d. consider all relevant information and evidence carefully.		and where possible complaints are dealt with by different officers. For each new complaint the whole process will be followed and each customer will be given the opportunity to talk with the complaints handler directly to ensure a full understanding of the points to be covered. The approach is set out in section 7 of our policy.	Correct and seen evidence.
5.9	Where a response to a complaint will fall outside the timescales set out in this Code, the landlord must agree with the resident suitable intervals for keeping them informed about their complaint.	Yes	Any extension to a complaint will be confirmed with the customer and the next communication date agreed. This is explained in section 7 of our policy.	Correct and seen evidence.
5.10	Landlords must make reasonable adjustments for residents where appropriate under the Equality Act 2010. Landlords must keep a record of any reasonable adjustments agreed, as well as a record of any disabilities a resident has disclosed. Any agreed reasonable adjustments must be kept under active review.	Yes	In line with our Customer Reasonable Adjustment Policy, customer data collection plan, and any service guidance; reasonable adjustments will always be considered to ensure making, and resolving a complaint is effective for the customer. This is explained in section 14.	Correct and seen evidence.
5.11	Landlords must not refuse to escalate a complaint through all stages of the	Yes	The reasons for refusing to escalate a complaint are set out in section 8	Correct and seen evidence.

	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.		of our policy and are in line with the Housing Ombudsman Code.	
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	All details, interaction and resolutions are kept up to date within our CRM Complaint system which was designed in line with the Housing Ombudsman Code requirements.	Correct and seen on CRM.
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	The Complaint Resolution Officer's are empowered to provide a resolution to a complaint at any point through the process. If they cannot offer the requested remedy they will work with a senior member of staff to understand and ensure the customer receives a full explanation. Remedies are clearly set out in the resolution letter.	Correct and seen an example of a complaint and the timeline.
5.14	Landlords must have policies and procedures in place for managing unacceptable behaviour from residents and/or their representatives. Landlords	Yes	In cases of unreasonable, persistent or aggressive complaints the issue will be dealt with in line with our Unacceptable Behaviour Policy	Correct and seen evidence.

	must be able to evidence reasons for putting any restrictions in place and must keep restrictions under regular review.		which can be found on the bpha website. Details of each case are held on our CRM system.	
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	Our Unacceptable Behaviour Policy is in place and takes due regard of the provisions of the Equality Act 2010.	Correct and seen evidence.

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	All complaints received at bpha are dealt with by the same priority. However, if there are actions that are having a larger impact on customers these will be resolved on a priority base, whilst the rest of the is complaint managed as usual	Correct and seen evidence of this by attending a CRM daily catch up meeting. Evidence of meeting saved.
6.2	Complaints must be acknowledged, defined and logged at stage 1 of the	Yes	Section 7 of our policy states "Once your Stage One complaint or a request for escalation to Stage Two	Correct and seen evidence.

	complaints procedure <u>within five working days of the complaint being received.</u>		is received, it will be logged and an acknowledgement sent to you within 5 working days.”	
6.3	Landlords must issue a full response to stage 1 complaints <u>within 10 working days</u> of the complaint being acknowledged.	Yes	Section 7 of our policy states “We will issue a full written response to Stage One complaints within 10 working days of the complaint being acknowledged.” This is monitored and reported monthly to the Operational Programme Board and quarterly to the Customer Experience Committee.	Correct and seen evidence.
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	Our approach is set out in section 7 of our policy which explains that the extension will be no more than 10 days without good reason.	Correct and seen evidence.
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	This is detailed in section 7 of our policy.	Correct and seen evidence.
6.6	A complaint response must be provided to the resident when the answer to the	Yes	As defined in the policy any outstanding actions following a	Correct and seen evidence. Spelling mistake?

	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.		complaint response is logged as a promise and monitored through to completion. This is then confirmed with the complainant.	
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	Where possible, when a complaint is raised the Complaints Resolution Team call the complainant to discuss the point raised in the complaint to ensure all elements are captured. All response letters contain details of all points raised and these are responded to in detail providing clear reasons for decisions referencing relevant policy, law and good practice, where appropriate. This is detailed in Section 7 of our policy.	Correct and seen evidence.
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	Yes	Section 7 of our policy states “If you raise additional complaints during our investigation, these will be incorporated into the Stage One response if they are related, and the Stage One response has not been issued. If the Stage One response has been issued and/or the new issues raised are unrelated to those	Correct and seen evidence.

	unreasonably delay the response, the new issues must be logged as a new complaint.		already being investigated or it would unreasonably delay our response to you, the new issues will 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: 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	Section 7 of our policy includes all the elements detailed in line with the Housing ombudsman Code.	Correct and seen evidence.

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	Yes	This is covered in section 7 of our policy, which states "If you are not satisfied with our response to your	Correct and seen evidence.

	the landlord's procedure. Stage 2 is the landlord's final response.		Stage One complaint and would like us to review our decision, please contact us within 20 working days of receiving your Stage One reply".	
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	This is set out in section 7 of our policy.	Correct and seen evidence.
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	Section 7 of the policy states" It would be helpful if you could explain why you remain dissatisfied and what resolution you are seeking, although it is not essential for you to provide this information".	Correct and seen evidence.
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Yes	Stage two complaints are handled by a relevant Senior Manager. This is detailed in Section 7 of our policy.	Correct and seen evidence.
6.14	Landlords must issue a final response to the stage 2 within 20 working days of the complaint being acknowledged.	Yes	This is detailed in section 7 of the policy, "We will issue our Stage Two response within 20 working days of the Stage Two acknowledgement.	Correct and seen evidence.
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	Yes	This is detailed in section 7 of the policy, "We will contact you if, due to the complexity of your complaint an extension of time is required and confirm the response date and the	Correct and seen evidence.

	working days without good reason, and the reason(s) must be clearly explained to the resident.		reason we have needed an extension of time.” Extensions of time have to be agreed with the Complaints Resolution Manager.	
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	Our approach is set out in section 7 of our policy, which explains that any extension will be no more than 10 additional working days for stage 1 complaints and no more than 20 additional working days for stage 2 complaints, unless there is a good reason to extend beyond these timescales.	Correct and seen evidence.
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	As defined in the policy any outstanding actions following a complaint response are logged as a promise and monitored through to completion. This is then confirmed with the complainant. This is detailed in Section 7 of our policy.	Correct and seen evidence.
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	The senior manager responding will make sure they cover all parts of the agreed complaint when writing their final response. They will work with other subject matter experts around the business,	Correct and seen evidence.

			if required, to ensure they are referencing relevant policy, law or good practice. Final response letters are checked by a member of the Complaints Resolution Team before they are sent.	
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	Section 7 of our policy includes all the elements detailed in line with the Housing Ombudsman Code.	Correct and seen evidence.
6.20	Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.	Yes	The Stage 2 letters are sent from a senior member of staff from the department the complaint is about. If the complaint is about multiple areas the Complaints Resolution	Correct and seen evidence.

			Manager will coordinate the response to the customer ensuring all suitable staff members are included.	
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Section 7: Putting things right

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
7.1	Where something has gone wrong a landlord must acknowledge this and set out the actions it has already taken, or intends to take, to put things right. These can include: • Apologising; • Acknowledging where things have gone wrong; • Providing an explanation, assistance or reasons; • Taking action if there has been delay; • Reconsidering or changing a decision; • Amending a record or adding a correction or addendum; • Providing a financial remedy; • Changing policies, procedures or practices.	Yes	This is evidenced in our complaint responses where complaints have partially or fully upheld.	Correct and seen evidence.

7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Yes	We offer a variety of remedies which are decided on an individual basis dependant on the complaint. Our Compensation and Goodwill Policy sets out how we calculate these and includes considering the impact on the customer and their family. This was revised in June 2026.	Correct and seen evidence.
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	Remedies are clearly set out in the resolution letter and where possible will meet the customer's expectations. The customer is then contacted once the remedy (promise) has been completed to ensure they are satisfied with the final outcome. This is detailed in Section 7 of our policy.	Correct and seen evidence.
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes	The updated Compensation and Goodwill Policy is in line with the Housing Ombudsman Code.	Correct and seen evidence.

Section 8: Self-assessment, reporting and compliance

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
8.1	Landlords must produce an annual complaints performance and service improvement report for scrutiny and challenge, which must include: 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	The annual report and self-assessment signed off by Board in July 2026.	Correct and seen evidence.

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	The annual report and self-assessment signed off by Board in July 2026 and published on the website by Sept 2026	Correct and seen annual report. The publication of the self-assessment on the website not yet available, as this will not be until the end of September.
8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	Yes	bpha completed a stock acquisition of approximately 1,200 units between March and May 2026. This self-assessment has been reviewed since then and reflects this change.	Whilst evidence of the approval for the recently completed stock acquisition was seen, this does not impact the complaints process.
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	NA	Not applicable	bpha has not been asked to review and update our self – assessment following an Ombudsman investigation.
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.	NA	Not applicable	bpha has not experienced any exceptional circumstances which have affected our compliance with the code.

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	We theme our lessons learned for each individual complaint which allows us to identify if larger service improvements need to be made. bpha is committed to monitoring, identifying trends through root cause analysis and learning from complaints. Complaints will be recorded and fed back to employees and the relevant service area with the intent of improving service delivery.	Correct and seen evidence.
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	bpha has a positive learning culture and views complaints as opportunities to understand the customer experience and enhance services, supporting continuous improvement.	Correct and seen evidence.
9.3	Accountability and transparency are also integral to a positive complaint handling culture. Landlords must report back on wider learning and improvements from	Yes	We report our learnings from complaints through our website on the You Said, We Listened page and The Complaints Performance and	Correct and seen evidence.

	complaints to stakeholders, such as residents' panels, staff and relevant committees.		Service Improvement Report. Complaint learnings are also published in Talk magazine. Complaints are reported to Resolve, our customer complaints group. The Customer Voice Annual Report, published on the organisation's website, demonstrates how feedback and complaints have been used to drive service improvements through the work of Resolve. Complaints and learnings are reported quarterly to the Customer Experience Committee.	
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	Section 17 of our policy states that the our Director of Strategy is the nominated Senior Lead accountable for complaint handling.	Correct and seen evidence.
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	Our MRC is the Chair of the Customer Experience Committee. This is detailed on the website under complaints.	Correct and seen evidence.

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 MRC is provided with complaint handling information and insights and may attend Stage 2 complaint reviews to gain closer insight.	Correct and seen evidence.
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	The MRC is Chair of our Customer Experience Committee (CEC), who receive complaints reporting each quarter, as well as an annual complaints performance report. The complaints reports provide regular updates on the volume received, outcomes of complaints and complaint handling performance. The reporting also details updates on HOS determinations, including progress made in relation to maladministration findings as well as key service improvements. In addition, independent validations on complaint performance and compliance are undertaken throughout the year by the Risk, Assurance and Sustainability team. These validations are provided to the Customer Experience Committee.	Correct and seen evidence

			The MRC has undertaken HOS training. They meet quarterly with the Complaint Resolution Manager and the Assistant Director of Risk, Assurance and Sustainability. They take part in shadowing to understand the complaints process, reporting and hear from customers first hand. They are also welcome to request other information they feel important to ensure we are dealing with complaints in line with the code.	
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 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.	Yes	The is set out in section 4 of our policy under Policy principles which explains our approach. The centralised complaints team provide a focus on complaints supported by key stakeholders for whom complaints are a standard objective.	Correct and seen evidence.