

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 |
|--------------|---|----------------|---|
| 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 | The definition of a complaint is included in the GC002 Compliments and Complaints Policy in Section 4. |
| 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 | Explanation included in the Compliments and Complaints policy (GC002) in paragraph 4.2.1 ‘who can complain’ and in the paragraph 4.2.2 ‘How to make a complaint’. |
| 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 | Logging complaints due to further enquiries is included in the Compliments and Complaints policy (GC002) paragraph 4.2.3 ‘complaint resolution’ |
| 1.7 | A landlord must accept a complaint unless there is a valid reason not to do so. | Yes | Acceptance of complaint is included in the Compliments and Complaints policy (GC002), Section 3 ‘How we deliver the compliments and complaints policy’. |

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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 | Circumstances for not deeming matters to constitute a complaint are included in the Compliments and Complaints Policy (GC002) in Section 3. 'How we deliver the Policy'. |
| 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 | The Complaint Resolution Team (CRT) will notify the customer i.e. by phone and explain why we won't consider their complaint. Complaint criteria is included in the Compliments and Complaints Policy (GC002) in Section 3 'How we deliver the policy'. Rejected complaints are recorded on the CRM system. |

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 | The definition of a complaint is included in the GC002 Compliments and Complaints Policy in Section 3. Training is provided to all new complaint handlers and the Complaints Resolution Team. |
| 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 | We operate an online portal -Viewpoint and Total Mobile and feedback is requested immediately after a job has been completed. |

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 | Different complaint channels are included in the Compliments and Complaints Policy (GC002) in paragraph 3.5. Full details can be found in the 'Contact us' drop-down menu, compliments and complaints. |
| 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 | Refer to bpha website- Full details can be found in the 'Contact us' drop-down menu, 'compliments and complaints' tab. Policy also available through the 'About us' drop-down menu too. |
| 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 | Refer to bpha website- Full details can be found in the 'Contact us' drop-down menu, 'compliments and complaints' tab 'how to make a complaint'. Policy also available on the bpha website too. |
| 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 | The Equality, Diversity, and Inclusion Policy (HR026) is published on our website. Paragraph 2.2. refers to our commitment. The Aids and Adaptations Policy (PS007) is published on our website. Paragraph 4.4. 'Completed Aids and Adaptations Work' includes details of circumstances whereby this policy will apply. |
| 2.6 | 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. | Yes | Published on the bpha website - Full details can be found in the 'contact us' drop-down menu ...compliments and complaints tab 'make a complaint' and 'where can I find your complaints policy' in the drop-down menu. |

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| | | | We also undertake regular social media campaigns. |
| 2.7 | Landlords must provide residents with contact information for the Ombudsman as part of its regular correspondence with residents. | Yes | The Stage 2 final letter template (pg.2) includes contact details for the Ombudsman. Full details can be found in the 'contact us' drop-down menu, 'compliments and complaints' tab, 'make a complaint', on the bpha website. |
| 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 | Published on the bpha website Full details can be found in the 'contact us' drop-down menu, 'compliments and complaints' tab, 'make a complaint'. |

Best practice 'should' requirements

| Code section | Code requirement | Comply: Yes/No | Evidence, commentary and any explanations |
|--------------|--|----------------|--|
| 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 | Ability to communicate with bpha via social media channels is included in the Compliments and Complaints Policy (GC002) in paragraph 4.2.2. Confidentiality is included in the Compliments and Complaints Policy (GC002) in paragraph 4.5. and in the Code of Conduct.. |

Section 3 - Complaint handling personnel

Mandatory 'must' requirements

| Code section | Code requirement | Comply: Yes/No | Evidence, commentary and any explanations |
|--------------|---|----------------|---|
| 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 "complaints officer". | Yes | Bpha has a Complaints Resolution Team |
| 3.2 | ...the complaint handler appointed must have appropriate complaint handling skills and no conflicts of interest. | Yes | The Complaints Resolution Team are specifically trained in complaints resolution and the Ombudsman Code. Conflicts of interest are reviewed annually (Or when changes happen in between) and should a conflict arise, a different advisor will deal with the complaint. Stage 2 complaints are always reviewed by Heads of Service Conflict of Interest declarations are submitted annually and independently reviewed. |

Best practice 'should' requirements

| Code section | Code requirement | Comply: Yes/No | Evidence, commentary and any explanations |
|--------------|--|----------------|--|
| 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 | Each complaint Resolution Officer has received appropriate training. |

Section 4 - Complaint handling principles

Mandatory 'must' requirements

| Code section | Code requirement | Comply: Yes/No | Evidence, commentary and any explanations |
|--------------|--|----------------|---|
| 4.1 | <p>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.</p> | Yes | <p>The complaints process includes an acknowledgement letter sent within 2 working days and initial contact (phone call) is made within 3 days by the complaint handler. Details are included within the Compliments and Complaints policy (GC002) in paragraph 4.2.4. 'complaint'</p> <p>Independent checks/audits on complaints are undertaken by the Complaints Resolution Manager or Head of Service Improvement and include reporting on any breaches of the code.</p> |

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| 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. | No | <p>The standard template for stage 1 acknowledgement letter (pg.1) includes paragraph confirming reason for the complaint and the customer's expected outcome. These are discussed over the phone with the customer at the initial contact stage (day 3) and recorded on our CRM system – complaint description and desired outcome are mandatory fields.</p> <p>How we have fixed it Complaint acknowledgement letter template has been reviewed by the Head of Service Improvement to include understanding of the complaint and desired outcome. All letter templates are currently under review by the Head of Service and will be uploaded to the CRM system and used from January 2024.</p> |
| 4.6 | A complaint investigation must be conducted in an impartial manner. | Yes | <p>Complaint handlers are independent of any particular business area.</p> <p>Complaints are also reviewed annually by second line assurance and the results reported to the Executive Leadership Team and the Customer Committee. This includes an examination of the process and sampling of complaints and records.</p> |
| 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 included within the Compliments and Complaints Policy (GC002) paragraph 4.2.2 'How to Make a Complaint' and 4.2.3 'Complaint Resolution'.</p> <p>Confidentiality is included within the Compliments and Complaints Policy (GC002) in paragraph 4.5 and Code of conduct in paragraph 8.</p> |

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| 4.11 | Landlords must adhere to any reasonable arrangements agreed with residents in terms of frequency and method of communication | Yes | Details of communication and methods are included in the Compliments and Complaints Policy (GC002) – complaints process Section 4.2 CRM system has mandatory fields for recording information as to customer communication. |
| 4.12 | The resident, and if applicable any staff member who is the subject of the complaint, must also be given a fair chance to: <ul style="list-style-type: none"> • set out their position comment on any adverse findings before a final decision is made. | Yes | Investigation process and initial contact with customer is included, addresses these key points and is including in the Compliments and Complaints Policy (GC002) in Section 4.2 |
| 4.13 | A landlord must include in its complaints policy its timescales for a resident to request escalation of a complaint | Yes | Timescales for complaint escalation are included in the Compliments and Complaints Policy (GC002) paragraph 4.2.4 'Appeal'.. |
| 4.14 | A landlord must not unreasonably refuse to escalate a complaint through all stages of the complaints 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. | Yes | The reasons for the rejection of escalation are included in the Compliments and Complaints Policy (GC002) 4.2.4.2. |
| 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 | bpha uses a CRM bespoke complaints management system with mandatory fields designed as per Ombudsman code requirements. |
| 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 | This is included in the GC002 Compliments and Complaints Policy – paragraph 4.6 'unreasonable, persistent or vexatious complainants' |

Best practice 'should' requirements

| Code section | Code requirement | Comply: Yes/No | Evidence, commentary and any explanations |
|--------------|--|----------------|--|
| 4.3 | Landlords should manage residents' expectations from the outset, being clear where a desired outcome is unreasonable or unrealistic | Yes | Managing customer expectations is covered in the Customer Experience Organisational training. |
| 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 | This is included in the Compliments and Complaints Policy (GC002) in Section 4 'Receiving/logging compliments and complaints'. |
| 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 | This is included in the Compliments and Complaints Policy (GC002) 4.2.1.2 and 4.2.1.5. |
| 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 | |

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| 4.9 | Communication with the resident should not generally identify individual members of staff or contractors. | Yes | Communication does not include personal details as per Data Protection Policy (G&C001) and Code of Conduct. |
| 4.10 | Landlords should keep residents regularly updated about the progress of the investigation. | Yes | This is included in the Compliments and Complaints Policy (GC002) in the paragraph 4.2.3 'Complaint Resolution' |
| 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 | <p>Timed transactional surveys are carried out throughout the year, and after significant changes have been embedded, we may also run feedback session on The Place. Our Customer complaint panel, Resolve 'deep dive' into a sample of complaints responses and give feedback to the Team, the Executive team and Board members on their findings.</p> <p>Tenant Satisfaction Measures (TSM) results are reviewed monthly and reported quarterly to the Executive Team and Customer Committee.</p> |
| 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 | Training is provided with staff presentations on the complaints approach. |
| 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 | Approach to unacceptable behaviour is included in the HS027 Visiting and Service Guidance Procedure. |

Section 5 - Complaint stages

Mandatory 'must' requirements

Stage 1

| Code section | Code requirement | Comply: Yes/No | Evidence, commentary and any explanations |
|--------------|---|----------------|--|
| 5.1 | Landlords must respond to the complaint within 10 working days 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 | Timescales are included in the Compliments and Complaints Policy (GC002) in Section 4.2.3 Complaint Resolution Weekly checks/audits on complaints compliance with this timescale are undertaken by the Complaints Resolution Manager including reporting on breaches to Heads of Service. |
| 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 | This is included in the Compliments and Complaints Policy (GC002) in Section 4.2.3. - agreed actions in the final letter and send within 10 working days. |

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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 | Independent checks by the Complaints Resolution Manager on all letters. Manager feedback is provided to the complaint handlers, or a letter may be rejected if too many amendments are required. |
| 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 | The standard complaint stage 1 final letter template includes all of these key points. |

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 | All complaints escalated from stage 1 are accepted unless compensation has been paid in full and final settlement – included in the Compliments and Complaints Policy (GC002) in paragraph 4.4 Compensation |
| 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 | The complaints procedure includes a stage 2 acknowledgement letter and an explanation of the Hearing Appeal process for each complaint. |
| 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 | The Stage 2 process included in the Compliments and Complaints Policy (GC002) in paragraph 4.2.4 'Appeal'. The CRM system is configured to only allow progression to a stage 2 complaint after stage 1 has been completed. |

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| 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 complaints are heard by a Head of Service who is supported by a member of the complaints team. |
| 5.13 | Landlords must respond to the stage two complaint <u>within 20 working days</u> 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. | No | <p>Process includes timescales for stage 2 in the Compliments and Complaints Policy (GC002) in paragraph 4.2.4. 'appeal'.</p> <p>Currently stage 2 complaints do not have formal extensions and customers are not being notified.</p> <p>How we are fixing it This is being built into our CRM computer system to make sure anyone managing a stage 2 knows about the timescales and any loner must have an explanation and be signed off by the complaints manager.</p> |
| 5.16 | <p>Landlords must confirm the following in writing to the resident at the completion of stage two in clear, plain language:</p> <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 <p>and</p> <ul style="list-style-type: none"> • 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 | The standard complaint stage 2 final letter template includes these key points. |

Stage 3

| Code section | Code requirement | Comply: Yes/No | Evidence, commentary and any explanations |
|--------------|---|----------------|---|
| 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 | n/a 2 stages only- GC002 Compliments and Complaints Policy. |
| 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 | n/a- only 2 stages |

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 | The complaints resolution team will contact customer via letter or email to confirm extensions required. Agreed extensions are recorded within the CRM system. |
| 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 | Refer to bpha website full details can be found under the 'contact us' drop-down menu, compliments and complaints tab, complaints. |
| 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 | This forms part of the initial investigation – details are recorded within our CRM system. |
| 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 | Once a complaint has been raised any further or unrelated issues to the original complaint must be logged as a new complaint- included in the Compliments and Complaints Policy (GC002) in paragraph 4.2.1.4 |

Stage 2

| Code section | Code requirement | Comply: Yes/No | Evidence, commentary and any explanations |
|--------------|---|----------------|---|
| 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 | Extensions are formally recorded on the CRM system and there is ongoing communication with the customer confirming the status of their complaint. |
| 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 | Details would be provided if no agreement could be met. Detailed within our Complaints Procedure. |

Stage 3

| Code section | Code requirement | Comply: Yes/No | Evidence, commentary and any explanations |
|--------------|---|----------------|---|
| 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 | Only 2 stages. |
| 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 | As above |

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 | Both the Stage 1 and stage 2 complaints final letter template include a paragraph acknowledging failures and how we will put things right. Both sections must be completed. |
| 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 | Compensation is offered by the Complaints Resolution Team in agreement with the service areas the complaint is regarding. The Payments and Incentives Policy (BP004), provides a guide to compensation to ensure fairness to all residents. |
| 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 | Included in the final letter template for stage 1 and 2 with details of remedial action. Complaints letter responses are checked independently by the Complaints Resolution Team. |
| 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 | All compensation is calculated on an individual basis as set out in the Payments and Incentives Policy (BP004). The guidance for calculating compensation is included in this 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 | As part of the complaint investigation and included in the Compliments and Complaints Policy (GC002) in paragraph 4.2.2 'how to make a complaint'. Learning Outcomes are logged on the system and monitored to implementation and effectiveness |
| 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 | The complaints resolution team will work alongside other departments e.g. legal or insurance where a legal entitlement is sought. |

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 | Learning outcomes are recorded within the Customer Annual Report 22/23 pg. 18 Complaints and Compliments section. Included on the bpha website – complaints page in the learning and actions stage. Outcomes learnings are shared with Heads of Service and larger improvements form part of our Service Improvement Plan. |

Best practice ‘should’ requirements

| Code section | Code requirement | Comply: Yes/No | Evidence, commentary and any explanations |
|--------------|--|----------------|---|
| 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 | Non-Executive Director and Chair of the Customer Committee. |
| 7.4 | <p>As a minimum, governing bodies should receive:</p> <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 | Quarterly report on Complaints and Compliments to the Customer Committee. |

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| 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 | Reporting on complaints includes analysis of trends and themes. This information is shared across the business and is fed into the learnings process |
| 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 | Complaint process is included in the Customer Experience Organisational training. |

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 | Completed each year and published on the bpha website. |
| 8.2 | Landlords must also carry out a self-assessment following a significant restructure and/or change in procedures. | Yes | Self -assessment would have been completed now regardless of time due to restructure of the way complaints are handled at start of financial year. |
| 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 | No | <p>Outcome of the self-assessment was presented to the Customer Committee in April 2023.</p> <p>Published on bpha website.</p> <p>bpha did not include the self-assessment in their latest edition of annual report, 2022/23.</p> <p>How have we fixed it? The annual report is available on the website, there is no reference made in the customer annual report. A link has been added to the page where to report is downloadable and this will be included in the next edition of the annual report.</p> |