

Agenda No	
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Meeting:	BCHA Board	Date:	10.08.2026		
Title of Report:	Complaints Self-Assessment				
Report / topic previously discussed at:	Board				
Author & contact details:	Lauren Harvey – Customer Service Manager Laurenharvey@bcha.org.uk				
Reviewed by:	Chris George – Director of Homes Chrisgeorge@bcha.org.uk				
Appendices & Supporting Papers:	Complaints Handling Code Self-Assessment				
FINANCIAL RISK FLAG	No	CUSTOMER FLAG	Yes	VFM FLAG	No
WORKFORCE FLAG	No	ED&I FLAG	No	SAFETY FLAG	No

Type of Report	Analysis
Purpose of Report	For Discussion
Business Plan Linkage	All

RECOMMENDATIONS:

To note the annual self-assessment against the Ombudsman's Complaints Handling Code and that we are fully compliant.

1.0 EXECUTIVE SUMMARY

Following the Social Housing (Regulation) Act, the Housing Ombudsman's Code became statutory from 1st April 2024, providing a single, robust set of standards for complaints procedures to be accessible, fair and efficient. Landlords are obliged by law to follow the requirements set out in the Code. The Social Housing (Regulation) Act 2023 places a duty on the Housing Ombudsman to monitor compliance with the statutory Complaint Handling Code.

This critical function also is a requirement under the Tenancy Influence and Accountability consumer standard, that BCHA will be measured against.

BCHA has carried its annual self-assessment against the Housing Ombudsman's Complaints Handling Code and submitted to the Regulator. This will now be reviewed at board and Asa the complaints champion for board will need to complete the board response to BCHA complaint self-assessment. Once this has been completed both will be uploaded onto the BCHA website before the deadline of the 1st of October 2025. Minor amendments to BCHA policy and procedures continue to be made as and when required to accommodate changes to the 2024 Complaints Handling Code and to be compliant with the Transparency, Influence and Accountability Consumer Standard.

BCHA is fully compliant with the Housing Ombudsman Code of Conduct for complaints.

The self-assessment will now need to be reviewed and responded to by the complaints champion at board.

The self-assessment process along with regular reviews of performance against our own policy has led to:

- Improved tracking of complaints which is delivering improved response times
- Company-wide training on complaints recognition and complaints handling
- Provision of improved flow-charts and template letters for managers handling complaints
- Improved and swifter recognition and action relating to service requests, ASB and complaints that are not articulated as such by customers

Overall, the company has a clear focus on improving complaints handling, has robust and improving scrutiny of its performance and a willingness to identify and learn when things could be done better.

The self-assessment shows compliance with all areas of the code but identifies improvements are possible, especially in the response times for complaints. There are processes and reports in place which identify how this will be done and how BCHA will assess its performance against the targets in the Code and in its policy.

2.0 INTRODUCTION / PURPOSE OF REPORT

To inform the board of BCHA's self-assessment against the 2023 Housing Ombudsman's Complaints Handling Code and report on actions that have taken place since the last assessment which ensure compliance with the guidelines, and to confirm that we are fully compliant.

3.0 MAIN COMMENTARY

3.1 Background

The Housing Ombudsman Revised Complaints Handling Code came into effect from 1st April 2024.

The Key areas of the Code are

- Universal definition of a complaint
- Providing easy access to the complaints procedure and ensuring residents are aware of it, including their right to access the Housing Ombudsman Service
- The structure of the complaint's procedure - only two stages necessary and clear timeframes set out for responses

- Ensuring fairness in complaint-handling with a resident-focused process
- Taking action to put things right and appropriate remedies
- Creating a positive complaint-handling culture through continuous learning and improvement
- Demonstrating learning in annual reports
- A mandatory annual self-assessment against the Code

3.2 The Code is divided in different elements and the summary of each area of compliance is highlighted below – the full assessment is Appendix 1 of this report

- Section 1 - Definition of a Complaint – fully compliant with all principles
- Section 2 – Exclusions – fully compliant with all principles
- Section 3 – Accessibility and awareness – fully compliant with all principles
- Section 4 – Complaint handling staff – fully compliant with all principles
- Section 5 – The complaint handling process - fully compliant with all principles. There are some areas where our return show N/A and this is regarding complaints from 3rd parties. BCHA does not have any 3rd party complaints process and would respond to complainant on behalf of any of our 3rd parties. This does not make us non-compliant in this area as its not applicable. All Complaints goes via our process.
- Section 6 – Complaint stages - fully compliant with all principles
- Section 7 – Putting things right - fully compliant with all principles
- Section 8 – Self assessment reporting and compliance - fully compliant with all principles. There are some areas showing N/A but that's not because there is a risk but the situation is not relevant to BCHA
- Section 9 – Scrutiny and oversight and continuous learning and improvement - fully compliant with all principles

4.0 CONCLUSION & NEXT STEPS

BCHA is fully compliant on all requirements.

The policy has been modified throughout the year as opportunities to improve practice have been identified

Next Steps

A complaint action Improvement plan has been created and is on the “Complaint Service Improvement Report” which has also been submitted to board for review and will be posted on the BCHA website. This plan will be implemented over the course of the year.

APPENDICES & SUPPORTING INFORMATION

Appendix 1

BCHA Complaints Handling Code Self- Assessment

Appendix A: Self-assessment form

This self-assessment form should be completed by the complaints officer, and it must be reviewed and approved by the landlord's governing body at least annually.

Once approved, landlords must publish the self-assessment as part of the annual complaints' performance and service improvement report on their website. The governing body's response to the report must be published alongside this.

Landlords are required to complete the self-assessment in full and support all statements with evidence, with additional commentary as necessary.

We recognise that there may be a small number of circumstances where landlords are unable to meet the requirements, for example, if they do not have a website. In these circumstances, we expect landlords to deliver the intentions of the Code in an alternative way, for example by publishing information in a public area so that it is easily accessible.

Section 1: Definition of a complaint

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
1.2	A complaint must be defined as: <i>'an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the landlord, its own staff, or those acting on its behalf, affecting a resident or group of residents.'</i>	Yes	BCHA 303 Compliments and Complaints policy – Available at Compliments & Complaints BCHA	Available under Section 6 – Definitions, section 6.1, Complaint (second bullet point)
1.3	A resident does not have to use the word 'complaint' for it to be treated	Yes	BCHA 303 Compliments and Complaints Policy,	Available under Section 6 -Definitions, Section 6.1, Complaints (second bullet point)

	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.		available at Compliments & Complaints BCHA	
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. 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	BCHA 303 Compliments and Complaints Policy, available at Compliments & Complaints BCHA	Available under Section 6 – Definitions, Section 6.1, Service Request (first bullet point) We can run a report on Rubixx for service request. This is also recorded through the complaint report for exec each month which summarises any emails that have come through to complaints which were not logged as a complaint for example they are Service Request, and it will detail who this was sent to or what action was taken.
1.5	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	Yes	BCHA 303 Compliments and Complaints Policy, available at Compliments & Complaints BCHA	Available under Section 6 – Definitions, Section 6.1, Service Request (first bullet point), the next sentence states “A complaint should be initiated when the customer raises dissatisfaction with the response to their service request.” It goes on to say, “If a customer does move forward with a complaint this should not stop your efforts to address the Service Request”.
1.6		Yes	BCHA 303 Compliments and Complaints Policy, available at Compliments & Complaints BCHA	Available under Section 6 – Definitions, Section 6.2 – Feedback of any type, where we state: “Customer Survey Feedback flagging potential complaints will be automatically sent through to Customer Services as they are received”. Our customer Services team would then either forward onto the relevant department to contact the customer or we will call the customer to discuss the issue and log a complaint if required.

	provide details of how residents can complain.			We also complete quarterly TSM surveys through Acuity. All comments from this are read and reviewed and we have a green/red flag system in place to alert any comments which are of concern/ a customer has raised an issue for us to follow up on. There is a tracker dashboard of flags in the Acuity Platform, and this can be downloaded and shared as and when required.
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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	BCHA 303 Complaint and Complaints Policy, available at: Complaints & Complaints I BCHA	Available under Section 3 – Scope, Sub sections 3.3,3.4,3.8 and 3.9. If a complaint is not considered for whatever reason this is communicated to the complainant, the reason why and if this is being escalated through a different process what this is.
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 the Claim Form and Particulars of Claim, having been filed at court.	Yes	BCHA 303 Complaints and Complaints Policy, available at: Complaints & Complaints I BCHA	Available under Section 8 – Complaints, sub section 8.3, There are some circumstances not covered under this policy: Bullet points 4 and 5. We do not have a clause that matters previously considered would not be considered again as this would depend on the situation/ information provided and will be judged on a case by case basis

	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	BCHA 303 Compliments and Complaints Policy, available at: Compliments & Complaints BCHA	Available under Section 8 Complaints, Sub-section 8.3, There are some circumstances not covered under this Policy, Bullet point 4: "Events that occurred over 12 months ago unless the issue has continued since the first occurrence". BCHA accesses each complaint on its own merit and have accepted complaints over 12 months old where there is good reason to do so.	
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	BCHA Complaints Template Letters	BCHA as part of its template letters for responses have a complaint rejection letter which details why the complaint has not been submitted and a graphic is at the end of the letter with all HO details. If the complaint is not classed as a complaint for example ASB or Service Request, we detail this in an email response to the customer, at the end of the email in the complaints signature will include the HO contact details.	
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Yes	BCHA Complaints Officer	The BCHA complaints officer will review all complaints coming into the business and will make a consideration on the complaint based on the individual circumstances of that complaint.	

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	BCHA 303 Compliments and Complaints Policy, available at Compliments & Complaints I BCCHA	Available under Section 2.0 – Equality, Diversity and Inclusion, there are 3 bullet points, which details how customers with limited numeracy/English/ Large print and Braille are listed.
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	BCHA Compliments and Complaints online LMS Module BCCHA internal Hub – Compliments and Complaints Page.	This is an online training completed by all BCCHA staff within probation period The online training is currently being reviewed to include additional information and when relaunched all staff will have to complete the training again and this will be an annual course moving forward. Refresher training will be completed with all existing and new investigating complaints staff in Q2 of 25/26 and will be offered every 6 months moving forward. BCCHA has internal internet available to all staff, the compliment and complaint policy, training materials, template letters and contact details for Complaints Officer are available on here.
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	BCCHA Internal Practises BCCHA Compliments Training	As part of the complaint handling training, it is advised that a high number of complaints is not a bad thing and shows a positive complaint culture. Complaints information has been made accessible in all services, to all residents and is provided via, website, QR code, Tenant Talk, staff, phone, complaints inbox and more.
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	Yes	BCCHA 303 Compliments and Complaints Policy can be found via the	The compliments and complaints Policy under section 2.0 – Equality, Diversity and Inclusion it details the different ways customers can receive the policy.

	stage, and the timeframes for responding. The policy must also be published on the landlord's website.		BCHA website below: Complaints & Complaints J BCHA Also on the BCHA website is a hyperlink to a leaflet Complaints-Leaflet-v1.6-Web-2024.pdf (bcha2023.s3.eu-west-1.amazonaws.com)	The leaflet summarises the Compliments and Complaints policy into plain, easier language summarising the 2-stage process, what happens at each stage and timeframes for responding.
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	BCHA 303 Compliments and Complaints Policy, available at Complaints & Complaints J BCHA	Under Section 9 – The Process, Subheading – Occupants/Former Occupants of and Applicants to BCHA accommodation we detail the contact information for the Ombudsman and their website details. Information relating to our complaints policy, self-assessment publication and the ombudsman code can be found in the same place.
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	BCHA – All Stage Template Letters sent to Customers	BCHA Stage 1 Acknowledgement letter, BCHA Stage 1 outcome letter, BCHA stage 2 acknowledgement letter, BCHA stage 2 outcome letter, all states the following: “You are welcome to be accompanied or assisted by a representative in this process wherever this is reasonable. You also have the opportunity to appoint a representative to deal with your complaint on your behalf and to be represented or accompanied at any meeting with the landlord”
3.7	Landlords must provide residents with information on their right to access the Ombudsman service and how the individual can engage with	Yes	BCHA All Stage Template Letters sent to Customers	Available at the bottom of all stage and acknowledgement letters for customers there is a HO contact details image.

	the Ombudsman about their complaint.		BCHA Website Compliments and Complaints Poster onsite in all BCHA properties BCHA Plain English – How to make complaint guide	On the BCHA Website under Compliments and Complaints the ombudsman contact details are available. Onsite in all BCHA properties is a poster advising of how customers can complaint including a QR code which takes you to the website/ HO details. It is referenced in the plain English how to make a complaint guide available to all customers.
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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	BCHA 303 Compliments and Complaints Policy, available at: Compliments & Complaints BCHA	Available under Section 4 – Responsibilities, Sub-section – Customer Services Staff, bullet point 4.7
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	BCHA Customer Services Team	The complaints Officer Lauren Harvey has access to all staff within BCHA and oversees the Complaints within BCHA, as part of this role they have the authority and autonomy to act and resolve disputes promptly and fairly.

4.3	Landlords are expected to prioritise complaint handling and a culture of learning from complaints. All relevant staff must be suitably trained in the importance of complaint handling. It is important that complaints are seen as a core service and must be resourced to handle complaints effectively	Yes	BCHA Staff Training.	BCHA offers complaint training for complaint investigators specifically around complaints and complaint responses/expectations. There is an internal LMS Learning around Compliment and Complaints which all staff members have to complete, and we are in the process of changing this to an annual LMS Learning. Compliments and Complaints are covered within BCCHA Company Induction for all new staff members. Compliments and Complaints process/ training materials/ template letters are available to all staff via The Hub (BCCHA online portal) Including information on how to get hold off the Complaints Officer and book in additional training for staff.
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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	BCCHA 303 Compliments and Complaints Policy, available at: Compliments & Complaints BCCHA	This is the only policy BCCHA has around Compliments and Complaints.
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	Yes	BCCHA 303 Compliments and Complaints Policy, available at Compliments	BCCHA only has a 2-stage process around complaints. This is explained in the Policy under Section 9 – The Process, 9.1 subheading, BCCHA stages and Timescales

	complaint') as this causes unnecessary confusion.		& Complaints] BCHA	
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	BCHA 303 Compliments and Complaints Policy, available at Compliments & Complaints] BCHA	BCHA only has a 2-stage complaints process. This is explained under Section 9 – The Process, 9.1 subheading, BCHA stages and Timescales
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.	N/A	Not Applicable	BCHA does not have any third-party complaints/ process. We would respond to the complaint on behalf of our third parties. If the complaint is in reference to a service provider for instance the LA decision, then in the rejection letter we would make them aware of this and how to submit a complaint to them
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	N/A	Not Applicable	As 5.4
5.6	When a complaint is logged at Stage 1 or escalated to Stage 2, landlords must set out their understanding of the complaint and the outcomes the resident is seeking. The Code will refer to this as "the complaint definition". If any aspect of the complaint is unclear, the resident must be asked for clarification.	Yes	BCHA 303 Compliments and Complaints Policy, available at Compliments & Complaints] BCHA BCHA standard template response letters.	In all BCHA standard acknowledgment letters for Stage 1 and 2 we detail the reasons for the complaint and outcome they are seeking. In all stage 1 and 2 response letters each part of the complaint is responded to include the desired outcomes

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	BCHA standard complaint template response letters	At acknowledgement stage if a part of the complaint does not sit under BCHA responsibility this would be outlined under the complaint definition and would detail if this was not our responsibility, why and who's this would be, this will also be clarified in the outcome letter, including if we are not responsible who is
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; 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.	Yes	BCHA 303 Compliments and Complaints Policy, available at: Compliments & Complaints J BCHA BCHA Best Practise BCHA Quality Assurance Complaints Group and Review	All BCHA Complaint handlers are Service or Business managers, as such they attend all training in BCHA covering Equality and Diversity and Professional Boundaries which reflects these behaviours. This is imbedded within our complaints process and the handling of the complaint
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	BCHA 303 Compliments and Complaints Policy, available at: Compliments & Complaints J BCHA	Available under Section 9 – The process, Subsection 9.1 under the table in bold. This is also referenced under Section 8, Sub section 8.3
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.	Yes	BCHA 303 Compliments and Complaints Policy, available at: Compliments & Complaints J	Available under Section 2 – Equality, Diversity, and Inclusion 2.1 this is referenced. Any reasonable adjustment or record of disability will be recorded on our internal database, under the relevant customer, in our Risk, Alerts and Vulnerabilities. If any adjustment is raised on the system a period for review is

	Any agreed reasonable adjustments must be kept under active review.		Complaints J BCHA BCHA Rubixx System	requested. BCHA also reviews customer data periodically to ensure any adjustments made or recorded are still correct and relevant.
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	BCHA 303 Compliments and Complaints Policy, available at: Compliments J & Complaints J BCHA	BCHA has no reason not to escalate a complaint through all stages of the complaints process, if a complaint is not accepted for whatever reason this will be reflected at the beginning of the complaints process. We have never had a reason where we have accepted a complaint and not escalated through all stages of the process if requested.
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	BCHA Rubixx (internal operating system) BCHA Complaints inbox	A case is raised for each complaint on BCHA internal system Rubixx. There is a filing cabinet within each case where all complaint information, correspondence and supporting documents are stored. All complaints are received through the complaints inbox and each complaint has a sub-folder within the complaints inbox where all correspondence and information are also collated
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	BCHA Complaints Handling Best practise, Policy, and Training	All BCHA complaint investigators receive training, as a part of this we cover best practise around complaint handling which encourages complaint handlers to remedy the complaint. All Complaints handlers have the relevant authority and autonomy to put remedies/actions in place to resolve complaints.
5.14	Landlords must have policies and procedures in place for managing unacceptable behaviour from residents and/or their representatives. Landlords must be able to evidence reasons for putting	Yes	BCHA Persistent and Vexatious Complaints Policy.	The ASB policy and Persistent/Vexatious complaints policy will detail any procedures in place for managing unacceptable behaviour. Within the Rubixx system we record these restrictions, when you add these onto the system it gives the option to input a review date. When this is due the system will populate a tasks to check if these restriction need to remain.

	any restrictions in place and must keep restrictions under regular review.		BCHA ASB Policy BCHA Rubixx 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	BCHA Persistent and Vexatious Complaints Policy. Rubixx System	Any process regarding restriction put in place around customers and the process for this is detailed within the Persistent and Vexatious complaints policy. Any restriction to customers regarding contact is recorded on Rubixx our internal system

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	BCHA 303 Compliments and Complaints Policy, available at: Compliments & Complaints I BCHA	Available under Section 9 – The process, Subsection 9.3. This is also referenced within the Policy, under Section 4 – General Principles, subsection 4.6
6.2	Complaints must be acknowledged, defined, and logged at stage 1 of the complaint's procedure <u>within five</u>	Yes	BCHA 303 Compliments and Complaints Policy, available	Available under Section 9 – The Process, Subsection 9.1 BCHA stages and Timelines this is documented within the table underneath this heading, we acknowledge at stage 1 within 2 working days of the complaint being received.

	<u>working days of the complaint being received.</u>		at Compliments & Complaints J BCHA	
6.3	Landlords must issue a full response to stage 1 complaints <u>within 10 working days</u> of the complaint being acknowledged.	Yes	BCHA 303 Compliments and Complaints Policy, available at Compliments & Complaints J BCHA	Available under Section 9 – The Process, Subsection 9.1 BCHA stages and timelines. This is documented within the table underneath this heading, on the first row.
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	BCHA 303 Compliments and Complaints Policy, available at Compliments & Complaints J BCHA	Available under section 9 – The process, Subsection 9.1 under the table the first bullet point details this. If an extension is granted wherever possible this is confirmed in writing to the customer with clear reasons for the extension and the extended date for the outcome.
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	BCHA Complaint Template Letters	HO details are provided on the original acknowledgment letter, if it is necessary to confirm an extension and this is done by email or letter, the details will be provided at the bottom.
6.6	A complaint response must be provided to the resident when the answer to the complaint is known, not when the outstanding actions required to address the issue are completed. Outstanding actions must still be tracked and actioned promptly with appropriate updates provided to the resident.	Yes	BCHA 303 Compliments and Complaints Policy, which can be found at: Compliments & Complaints J BCHA	Available under Section 8.0 – Complaints, Subsection bullet point 8.10
6.7	Landlords must address all points raised in the complaint definition and	Yes	BCHA Complaint	As part of the BCHA Stage 1 and 2 outcome letters the letter will detail the complaint definition and under this for each point of the complaint will advise if

	provide clear reasons for any decisions, referencing the relevant policy, law and good practice where appropriate.		Stage 1 and 2 Outcome Letters	this has been upheld or not and the reason for this, policy, law and good practise are used as and when appropriate.
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 delay the response, the new issues must be logged as a new complaint.	Yes	BCHA 303 Compliments and Complaints Policy, which can be found at: Compliments & Complaints BCHA	Available under Section 9.0 – The Process, Subsection 9.1 – BCHA Timescales – there is a table under this is 4 bullet points. The 4 th bullet point covers this.
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	BCHA Complaint Template Letters	In BCHA Stage 1 outcome letter templates it details what stage the complaint is, each point of the complaint, an outcome to each point raised and if this has been upheld or not, if the complaint is upheld then an offer of remedy or action taken to resolve this is also documented, details of outstanding actions will be recorded and details of how to escalate to stage 2 and the timeframe for this is also included.

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	BCHA 303 Compliments and Complaints Policy, available at Compliments & Complaints J BCHA	As detailed in the Policy Under section 9 – The Process it details that this is a 2-stage complaint process. If any complainant is not happy with the outcome from the Stage 1 complaint, then we will escalate to Stage 2
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	BCHA 303 Compliments and Complaints Policy, available at: Compliments & Complaints J BCHA	Available under Section 9 – The Process, Sub section 9.1 BCCHA stages and timescales. The second row on the table acknowledges stage 2 acknowledgement within 2 working days.
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	BCHA 303 Compliments and Complaints Policy, available at: Compliments & Complaints J BCHA BCCHA Best Practise	Available under Section 9 – The Process, Subsection 9.4. This does say an appeal from stage 1 should detail reasons for escalation but not they have to provide. If no reason is provided BCCHA will make reasonable efforts to understand and detail the reason for escalation which will be reflected within the acknowledgement letter and in the letter, we advise if this is not the reason for your complaint or we have misunderstood to contact us and let us know.
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Yes	BCCHA 303 Compliments and Complaints Policy, available at Compliments & Complaints J BCHA	Available under Section 9 – The Process, Sub Section 9.3 and 9.4 details under 9.3 stage 1 that a complaint will be escalated to the relevant business manager. 9.4 details that if escalated to stage 2 this will be sent to a director to review and respond to. The escalation process details that a different level of management will deal with a stage 2 complaint to stage 1

			BCHA Complaints Process		
6.14	Landlords must issue a final response to the stage 2 <u>within 20 working days</u> of the complaint being acknowledged.	Yes	BCHA 303 Compliments and Complaints Policy, available at: Compliments & Complaints J BCHA	Available under Section 9 – The Process, Sub section 9.4 details that a final response under BCHA policy should be issued within 15 working days of the complaint being acknowledged	
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	BCHA 303 Compliments and Complaints Policy, available at: Compliments & Complaints J BCHA	Available under Section 9 – The Process, Sub Section 9.1 – BCHA stages and timelines, under the graphic table, the second bullet point details this information.	
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	BCHA 303 Compliments and Complaints Policy, available at: Compliments & Complaints J BCHA	Available under Section 9- The Process, Subsection 9.1 – BCHA stages and timelines, under the graphic table, the third bullet point details this information.	
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	Yes	BCHA 303 Compliments and Complaints Policy, available at Compliments & Complaints J BCHA	Available under Section 8.0 The last bullet points which would be 8.10	

	promptly with appropriate updates provided to the resident.				
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	BCHA Complaint outcome letters	Within the BCHA stage 1 and 2 outcome letters it summarises the complaint definition and underneath will reference the decision made and reason for this. Policy, local Laws and good practise are referenced as and when appropriate	
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	BCHA Complaint Template Letters BCHA Complaints Process	In the Stage 2 BCHA Complaint response letter, the letter details the stage of the complaint, details each point of the complaint, the decision made if each point has been upheld or not, the reasons for this decision, if the complaint is upheld then any remedial actions will be details within the letter, anything outstanding and at the end of all stage letters we have the HO contact details information and how to contact.	
6.20	Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.	Yes	BCHA 303 Compliments and Complaints Policy, available at: Compliments & Complaints J BCHA	The policy details under Section 9 – The Process that this is only a 2 stage complaints process.	

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	Complaints Stage 1 and 2 Outcome Letters to the customers. BCHA 303 Compliments and Complaints Policy, available at: Compliments & Complaints BCHA	Within the outcome letter at both stages we apologise for any inconvenience caused or if BCHA has fell below the standard expected. As part of the outcome, we will identify if/where we went wrong/ why if we have a reason for this and we would reconsider/change an outcome or amend a record if deemed appropriate. If an issue has been identified that calls for a change to policy/procedure or practise, service managers and business managers have authority to correct this at local level, if it identified this a policy (companywide action) this will be reflected. BCHA Compliments and Complaints Policy section 11 – Compensation details our process on financial remedy's
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Yes	BCHA Compliments and Complaints Policy, available at: Compliments	This is referenced in the Policy under Section 11 – Compensation. Subsection 11.1

			& Complaints J BCHA	
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	BCHA Complaint Outcome Letters BCHA Rubixx System	As part of each stage outcome letter, if the point has been upheld where a remedy is needed, what this will be and when by will be detailed within the letter. On BCHA Rubixx System outcomes are recorded along with learnings, if actions need to be raised or tasked off the back of this, this can be raised on the system as a Task to the relevant team person and all tasks can be monitored
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes		BCHA Compliment and Complaints Policy has been updated to reflect the current guidance within the Ombudsman code.

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: - the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements. - a qualitative and quantitative analysis of the landlord's complaint handling	Yes	BCHA website: Complaints & Complaints J BCHA	A – The annual self-assessment for this code is completed by the Complaints Officer and can be found on the BCHA website B – Provided quarterly within our board pack and ELT. Refused complaints are logged through our non-complaints process. Acuity data analysis and Tenant Talk C – This is not currently applicable but would follow scrutiny detailed in point B and would be reported to governance. D – Provided quarterly within our board pack and we have periodic Quality Assurance of complaint outcomes and process to identify this and the quarterly Acuity data. All complaint when closed are asked for Learning Outcomes which are reviewed, and this is prompted through our internal database E – Follows the process as described in point B

F – Follows the process as described in Point B				
	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.			
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 section of its website relating to complaints. The governing body's response to the report must be published alongside this.	Yes	BCHA Website: Compliments & Complaints BCHA	We do not have a governing body but a board at BCHA. The board receives a copy of the assessments and reports, and they can then be found published along with any response on the BCHA website.
8.3	Landlords must also carry out a self-assessment following a significant restructuring, merger and/or change in procedures.	NA	This will be done as/when relevant.	To date BCHA has not had a significant restructuring, merger or change in procedure for this to be relevant but will be done if this situation occurs.
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	NA	This will be done as/when relevant.	To date BCHA has not been asked to review/update the self-assessment following an Ombudsman investigation but this will be done as/when this situation occurs.

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	This will be done as/when relevant but our Digital Transformation Team (IT) and Communications team have been made aware of this.	We have not had this issue occur but the relevant teams who would be aware of this, IT for the cyber incident and our communications team have been made aware so if an incident does occur, we will be able to take the relevant action.
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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	Rubixx – Internal System	Within our internal system Rubixx when you close down a complaint/case a pop-up box appears for learnings/outcomes, this has to be completed to close the case, and these learnings are forming part of the quarterly insights report.
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	BCHA 303 Compliments and Complaints Policy, available at: Compliments & Complaints BCHA	Referenced under the Policy – Section 4 – Responsibilities, Sub section 4.1 and referenced in 4.6. This is also referenced under Section 5 – General Principles, sub section 5.4 This is also referenced under Appendix 1- Role of the board champion, in the first 3 paragraphs
9.3	Accountability and transparency are also integral to a positive complaint handling culture. Landlords must	Yes	BCHA Tenant Talk Magazine	BCHA issues a Tenant Talk article now twice a year which details complaints information, this is available and sent to all BCHA residents, put on the BCHA website and published internally on our hub system.

	report back on wider learning and improvements from complaints to stakeholders, such as residents' panels, staff and relevant committees.		BCHA Quarterly Board Report BCHA Service Quarterly Complaint reports Introducing Compliments and Complaints quarterly overview for all staff.	Senior Managers for supported services receive quarterly complaint reports which they share with the commissioners for their service. They can request this from the Complaints Officer at any time. The quarterly board report provides this information to the board. BCHA staff so have access to all Tenant Talk editions
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	Quality Assurance Terms of Reference. Customer Service Team Leader Quarterly board report.	The Customer Service Team Leader is the dedicated Complaints Officer, they feed into a director who has regular meetings to review complaints. The quarterly report details any trends or themes identified.
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	BCHA Board Member has been appointed as the MRC BCHA 303 Compliments and Complaints Policy, available	BCHA has appointed a board member into this position- Asa, contact details can be provided for him. This is referenced in the Policy under Appendix 1 – Role of the Board Champion (From the Complaints Handling Code Section 7)

			at Compliments & Complaints J BCHA		
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	BCHA Board member has been appointed as MRC.	BCHA Board member Asa is aware of staff within BCHA who oversee complaints and their management and has been invited to collaborate. Board member has access or is provided with any information requested relating to complaints. The quarterly board report is provided to Asa who can then discuss with the board/governing body.	
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	BCHA Quarterly board report BCHA website: Compliments & Complaints J BCHA	A board member has been appointed to this role: A – This is provided within the quarterly board report B – This is provided within the quarterly board report C – This is provided within the quarterly board report D – This is completed by the Complaints officer and sent to ELT and the board before being published.	
9.8	Landlords must have a standard objective in relation to complaint	Yes	BCHA 303 Compliments	A – This is reflected within the Policy under Section 1 Introduction, bullet point 1.2 and 1.3.	

	handling for all relevant employees or third parties that reflects the need to: - 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; and - act within the professional standards for engaging with complaints as set by any relevant professional body.		and Complaints Policy, available at: Compliments & Complaints BCHA	B – This is reflected within the work BCHA does around complaints, learnings are taking and rolled out as a collaborative and when summarising in complaint outcomes we detail BCHA has not instead of mentioning certain teams/staff members/ sub-contractors etc. Information around Quality Assurance can be found under Section 10 Quality Assurance. C - As and when necessary
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