

Self-Assessment Form

April 2023

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: '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.	Yes	Tenant Complaint Policy includes this. https://www.bchg.co.uk/media/1876/tenant-complaint-policy-final-version-to-nov-2024.pdf
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	Complaints is defined as an 'expression' of dissatisfaction, regardless of whether the word complaint is used or not.
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	Complaints within the definition and regardless of whether the tenant uses the word 'complaint' are logged.
1.7	A landlord must accept a complaint unless there is a valid reason not to do so.	Yes	Our policy states what we treat as a complaint and what we don't.

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	 The exclusions are: The issue is, or has been, subject to legal proceedings. Liability issue that is subject to an insurance claim The complaint is being pursued in an unreasonable manner.
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	If a matter is not accepted as a complaint, it would be logged. We would give a detailed response and signpost to appropriate support including Ombudsman.

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
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	We have a clear definition in our Policy. Training of staff reinforces this. We have a Team – Customer Feedback Improvement Panel that discusses performance and takes learning to make improvements.
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	Staff are trained to log any dissatisfaction picked up through surveys either as a quick fix, or where it falls within the definition as a complaint. Staff can explain the complaint process. Please note that follow up calls requires residents giving us permission as part of the survey under MRS Code B11. https://www.mrs.org.uk/pdf/codeconduct.pdf

Section 2 - Accessibility and awareness Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
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	In writing, in person, online through website and Portal, by phone, IFF Satisfaction surveys, using social media. Our Customer Relation Managers undertake home visits and have direct numbers that are made available to residents. https://www.bchg.co.uk/customer-area/contact-your-customer-relations-manager/
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	Policy clear and accessible https://www.bchg.co.uk/media/1876/tenant- complaint-policy-final-version-to-nov-2024.pdf
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	On website https://www.bchg.co.uk/contact-us/comments-or-complaints/
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	All staff are trained to comply with the Equality Act as part of our Equality Diversity Inclusion Strategy https://www.bchg.co.uk/bchg-blog/2021/bchg- launches-its-new-equality-diversity-and-inclusion- strategy/ We carry out equality impact assessments to identify potential issues with changes to policies and practices. We are currently working to strengthen by putting in place a clear statement on how we approach reasonable adjustments.
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	Posters about complaints policy are on scheme notice and electronic boards. Included in face to face meetings with groups. Newsletters, online Website and standard letters where applicable. https://www.bchg.co.uk/customer-area/resident-broadcasts/

2.7	Landlords must provide residents with contact information for the Ombudsman as part of its regular correspondence with residents.	Yes	The information is available online with link to video, in newsletters and responses.
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	We have dedicated Customer Relations Managers, Operative Manager, Call Centre staff and Homeforce Operatives who are trained to be responsive to the needs of residents and to signpost to services. The initial sign up includes the right to access the Ombudsman. We have an ongoing survey to check in on accessibility of the process. We are strengthening our correspondence information from the initial stage.

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.		Complaints can be made through social media. Our Corporate Team acknowledges, collect, and ask for contact details which are sent to the appropriate Head of Service area. We do not post our response on social media. All staff are trained on GDPR.

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	We have a dedicated Customer Relation Managers Team that deal directly with residents to resolve issues. We have a Customer Feedback Improvement Panel that deal with complex, sticky cases. It facilitates reviews and can commission 'expert' independent advice. The Panel involves the Deputy Chief Executive, and reports to the Exec Team. For avoidance of doubt this Panel is the 'Complaint Officer'.
3.2	the complaint handler appointed must have appropriate complaint handling skills and no conflicts of interest.	Yes	All staff handling complaints attended one day training session delivered through TPAS. There are enough staff trained to deal with conflict of interest.

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
3.3	 Complaint handlers should: 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	We have carried out training and reviewed our 'values' with Teams. We empower our staff with decision making and spending power to make on the spot decisions. There are regular Team meetings to brief and update on the latest spotlights and cases reviews. We had 40 staff undertake customer service training based around resident feedback and learning from complaints.

Section 4 - Complaint handling principles Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
4.1	Any decision to try and resolve a concern must be taken in agreement with the resident and a landlord's audit trail/records should be able to demonstrate this. Landlords must ensure that efforts to resolve a resident's concerns do not obstruct access to the complaints procedure or result in any unreasonable delay. It is not appropriate to have extra named stages (such as 'stage 0' or 'pre-complaint stage') as this causes unnecessary confusion for residents. When a complaint is made, it must be acknowledged and logged at stage one of the complaints procedure within five days of receipt.	Yes	This is covered by our Complaints procedure We do record quick fix, as part of our learning and development. We have set a 3-day target for acknowledgement

4.2	Within the complaint acknowledgement, landlords must set out their understanding of the complaint and the outcomes the resident is seeking. If any aspect of the complaint is unclear, the resident must be asked for clarification and the full definition agreed between both parties.	Yes	We have used the Ombudsman template for guidance to set our letters. This is reinforced through coaching delivered by the Head of Customer Voice.
4.6	A complaint investigation must be conducted in an impartial manner.	Yes	An investigation (not quick fix) is carried out by a person not involved in the initial stages for objectivity, usually a manager and above level.
4.7	The complaint handler must: 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	This is reinforced through training and living our values and is stated within our Policy
4.11	Landlords must adhere to any reasonable arrangements agreed with residents in terms of frequency and method of communication	Yes	This is set out in our Complaints Procedure (Policy)
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: • set out their position • comment on any adverse findings before a final decision is made.	Yes	This is set out in our Complaints Procedure (Policy)
4.13	A landlord must include in its complaints policy its timescales for a resident to request escalation of a complaint	Yes	We have timescales included in our Complaints Policy and Procedure
4.14	A landlord must not unreasonably refuse to escalate a complaint through all stages of the complaints	Yes	Exclusions are clearly stated in Policy

	procedure and must have clear and valid reasons for taking that course of action. Reasons for declining to escalate a complaint must be clearly set out in a landlord's complaints policy and must be the same as the reasons for not accepting a complaint.		
4.15	A full record must be kept of the complaint, any review and the outcomes at each stage. This must include the original complaint and the date received, all correspondence with the resident, correspondence with other parties and any reports or surveys prepared.	Yes	We have a Complaints log which links correspondence to a complaint
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 our Policy

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	Staff are trained and coached to manage expectations. We have co-produced values based service standards as part of this.
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	We have empowered staff to be responsive and to do the right thing. We have embedded a culture of Health &Safety, creating a risk first approach, and can be fast tracked to Senior Managers. We have timescales as a secondary check in.
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	We allow this as part of reasonable adjustments.
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	We comply with our legal and regulatory obligations. The Tenancy Agreement and Policies set out the core requirements.

4.9	Communication with the resident should not generally identify individual members of staff or contractors.	Yes	Staff training involves this. We take guidance from the Ombudsman templates.
4.10	Landlords should keep residents regularly updated about the progress of the investigation.	Yes	This is agreed with the resident.
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	We have done this direct and through an independent organisation, to learn and make improvements.
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	We have a Customer Learning Improvement Panel to support and promote learning.
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	Our policy is to comply with law and regulation. We undertake risk assessment should any restriction be applied. To date we have not applied this.

Section 5 - Complaint stages

Mandatory 'must' requirements

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	This is included in our Complaint Policy
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	Whilst response is sent, we have regular meetings to track cases and actions.

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	This is reinforced in training, providing templates that are based on Ombudsman guidance.
5.8	Landlords must confirm the following in writing to the resident at the completion of stage one in clear, plain language: • 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 information is set out in our template response.

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	Residents can request a review of a decision. They are required to set out reasons why they are not satisfied and the remedies they are seeking. We will communicate in writing if an exclusion applies.
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	As per our acknowledgement letter we aim to seek clarity and outcome required.
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	This is in our complaint policy

5.12	The person considering the complaint at stage two, must not be the same person that considered the complaint at stage one.	Yes	We assign different staff to allow objectivity.
5.13	Landlords must respond to the stage two complaint <u>within 20</u> <u>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.	Yes	We have set the target to respond within 20 working days in our Policy.
5.16	Landlords must confirm the following in writing to the resident at the completion of stage two in clear, plain language: the complaint stage the complaint definition the decision on the complaint the reasons for any decisions made the details of any remedy offered to put things right details of any outstanding actions and if the landlord has a third stage, details of how to escalate the matter to stage three if this was the final stage, details of how to escalate the matter to the Housing Ombudsman Service if the resident remains dissatisfied.	Yes	This information is included in our template to respond. We do not operate a third stage of the complaints process.

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	We do not use a third stage approach

	Landlords must confirm the following in writing to the resident at the completion of stage three in clear, plain language:	Yes	Not in use at BCHG
	the complaint stage		
	the complaint definition		
5.20	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		

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	Included within our Policy
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	We have not had this issue but note the requirement.
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 is part of the investigation officer's standard practice
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	Standard practice, further clarification of this point will be noted in the procedure.

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	This is included in our Policy
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	We have had this issue but note the requirement.

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.		Not applicable
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.		Not applicable

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	This is set out in our Policy
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	This is set out in our Policy, we have revised Good Will and Compensation Policy that accompanies our complaint policy. We have accessible version on the website.
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	This is set out in our Policy
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	Our Customer Feedback Improvement Panel oversee compensation. We use a legal sounding board to discuss any statutory payments.

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.		This is picked up during complaint review meetings and lessons learnt
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.		We have a legal sounding board in place to support us. Those subject to legal proceedings are not dealt with as complaints.

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	Resident Annual Report https://www.bchg.co.uk/media/1813/residents- annual-report-2021-2022-v4.pdf Complaints section on website https://www.bchg.co.uk/contact-us/comments-or- complaints/you-said-what-we-did/ Performance is reported quarterly to Board and Exec Team. We have a monthly KPI set up on this area. We have Board to Resident Feedback https://www.bchg.co.uk/about-us/information- publications/transparency-policy-and-other-key- policies/ Complaints Panel made up from our Resident Scrutiny Voice Panel.

Code section	Code requirement	Comply	
		:	explanations
		Yes/No	
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	The Chief Executive and Chair are the lead on complaints. The whole of our Board take responsibility to hear the voice, which is central to decision making, we operate 'No Voice, No Approval' on customer facing policies, decisions.
7.4	As a minimum, governing bodies should receive: 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	Yes	Our Executive Team and Board receive quarterly performance report and annual complaint learning report.

tracked to ensure they are delivered to agreed timescales.		
The annual self-assessment against the Complaint Handling		
Code for scrutiny and challenge.		

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	Quarterly reports and complaint review meetings aim to do this.
7.6	 Landlords should have a standard objective in relation to complaint handling for all employees 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 act within the Professional Standards for engaging with complaints as set by the Chartered Institute of Housing. 	Yes	Our Customer Feedback Improvement Panel includes different Teams and aims to enhance collaborative working and standards.

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	Scheduled for April each year
8.2	Landlords must also carry out a self-assessment following a significant restructure and/or change in procedures.	Yes	This is considered when making changes
8.3	 Following each self-assessment, a landlord must: report the outcome of their self-assessment to their governing body. In the case of local authorities, self-assessment outcomes should be reported to elected members publish the outcome of their assessment on their website if they have one, or otherwise make accessible to residents include the self-assessment in their annual report section on complaints handling performance 	Yes	A copy of the assessment is published on our website. It has been noted to add the assessment to the 2022-23 annual report as the new requirement was not published in time for the current annual report.