

Black Country Housing Group

2025 -2026 Self-Assessment Form

This self-assessment sets out BCHG's compliance with the Housing Ombudsman Complaint Handling Code. Policy references are provided as the primary evidence of compliance, with brief commentary included only where necessary to illustrate how the policy operates in practice.

Operational assurance, performance monitoring and improvement actions are reported separately through the Complaint Handling Service Improvement Report.

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	Section 6.1 Customer Complaint Policy	Colleague guidance and case review support consistent recognition of complaints.
1.3	A resident does not have to use the word ‘complaint’ for it to be treated as such. Whenever a resident expresses dissatisfaction landlords must give them the choice to make complaint. A complaint that is submitted via a third party or representative must be handled in line with the landlord’s complaints policy.	Yes	Sections 6.4 and 6.7 Customer Complaint Policy	Complaints can be raised through any channel and via third-party representation.
1.4	Landlords must recognise the difference between a service request and a complaint. This must be set out in their complaints policy. A service request is a request from a resident to the landlord requiring action to be taken to put something right. Service requests are not complaints, but must be recorded, monitored and reviewed regularly.	Yes	Section 6.2 Customer Complaint Policy	Service requests are monitored through Repairs and CX system and reviewed operationally.

1.5	A complaint must be raised when the resident expresses dissatisfaction with the response to their service request, even if the handling of the service request remains ongoing. Landlords must not stop their efforts to address the service request if the resident complains.	Yes	Sections 6.2 and 6.3 Customer Complaint Policy	Operational teams continue resolving the issue while the complaint is investigated.
1.6	An expression of dissatisfaction with services made through a survey is not defined as a complaint, though wherever possible, the person completing the survey should be made aware of how they can pursue a complaint if they wish to. Where landlords ask for wider feedback about their services, they also must provide details of how residents can complain.	Yes	Section 6.5 Customer Complaint Policy	Survey feedback indicating dissatisfaction is reviewed and residents are informed how they can pursue a complaint if they wish. Where negative feedback meets an agreed threshold with the TSM survey provider, it is flagged for follow-up to make sure residents are offered the opportunity to raise a complaint.

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	Section 6.11 Customer Complaint Policy	Complaints are accepted unless they fall within the limited exclusions set out in the policy. Each case is considered on its individual merits and any decision not to accept a complaint would be evidenced in line with the policy.
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	Section 6.11 Customer Complaint Policy	Examples of this are clearly expressed to guide colleagues.

	• 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	Section 6.11 Customer Complaint Policy	The policy applies the 12-month time limit while allowing discretion to consider complaints outside this period where there is a reasonable justification, for example where safeguarding or health and safety concerns arise. Each case is considered on its individual merits.
2.4	If a landlord decides not to accept a complaint, an explanation must be provided to the resident setting out the reasons why the matter is not suitable for the complaints process and the right to take that decision to the Ombudsman. If the Ombudsman does not agree that the exclusion has been fairly applied, the Ombudsman may tell the landlord to take on the complaint.	Yes	Section 6.11 Customer Complaint Policy	Where a complaint is not accepted, the resident is provided with an explanation and advised of their right to refer the decision to the Housing Ombudsman. Where appropriate, residents may also be signposted to other support services.
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Yes	Section 6.11 Customer Complaint Policy Reasonable Adjustment Policy	Complaints are considered individually and no blanket exclusions are applied. Reasonable adjustments are considered where appropriate.

Section 3: Accessibility and Awareness

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
3.1	Landlords must make it easy for residents to complain by providing different channels through which they can make a complaint. Landlords must consider their duties under the Equality Act 2010 and anticipate the needs and reasonable adjustments of residents who may need to access the complaints process.	Yes	Sections 6.4,6.6 Customer Complaint Policy	Complaints can be raised through a range of channels including in person, telephone, email, online and through representatives. BCHG anticipates accessibility needs through reasonable adjustments and by recording changing resident needs during annual visits, with colleagues supported to recognise and respond to these.
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	Sections 6.4 Customer Complaint Policy	Residents can raise complaints with any member of staff. Colleagues are trained to recognise dissatisfaction and pass details to the appropriate team in line with the complaints process.
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	Section 6.2 Customer Complaint Policy	Complaint volumes are monitored and not viewed negatively. BCHG promotes residents' right to complain and signposts the Housing Ombudsman Service. We monitor alongside other feedback channels to make sure the complaints process remains visible and accessible.
3.4	Landlords must make their complaint policy available in a clear and accessible format for all residents. This	Yes	www.bchg.co.uk	Policy available at www.bchg.co.uk/information-and-publications/transparency-policy-and-other-

	will detail the two stage process, what will happen at each stage, and the timeframes for responding. The policy must also be published on the landlord's website.			key-policies/ We operate two stage process.
3.5	The policy must explain how the landlord will publicise details of the complaints policy, including information about the Ombudsman and this Code.	Yes	Section 11 Customer Complaint Policy	The complaints policy is publicised through BCHG communications and scheme notice boards. Residents are informed during tenancy induction and colleagues during staff induction.
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	Section 6.7 Customer Complaint Policy Reasonable Adjustment Policy	Residents may appoint a representative to act on their behalf or accompany them in meetings. Third-party representation is supported through the complaints and reasonable adjustments policies.
3.7	Landlords must provide residents with information on their right to access the Ombudsman service and how the individual can engage with the Ombudsman about their complaint.	Yes	Section 7 Customer Complaint Policy	Complaint responses include information on residents' right to refer their complaint to the Housing Ombudsman Service.

Section 4: Complaint Handling Staff

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
4.1	Landlords must have a person or team assigned to take responsibility for complaint handling, including liaison with the Ombudsman and ensuring complaints are reported to the governing body (or equivalent). This Code will refer to that person or team as the 'complaints officer'. This role may be in addition to other duties.	Yes	Section 5 Customer Complaint Policy	The Head of Customer Voice is the complaint officer. The internal Customer Feedback Improvement Panel operated during 2025/26. REAP started in April 2026 and is being developed as a future co-regulatory resident and colleague group.
4.2	The complaints officer must have access to staff at all levels to facilitate the prompt resolution of complaints. They must also have the authority and autonomy to act to resolve disputes promptly and fairly.	Yes	Section 5 Customer Complaint Policy	The Head of Customer Voice has access to colleagues across the organisation and oversight through senior leadership arrangements to support prompt and fair resolution of complaints.
4.3	Landlords are expected to prioritise complaint handling and a culture of learning from complaints. All relevant staff must be suitably trained in the importance of complaint handling. It is important that complaints are seen as a core service and must be resourced to handle complaints effectively	Yes	Housing Ombudsman Learning Centre Course completion certificates	Relevant colleagues complete training on the Complaint Handling Code through the Housing Ombudsman Learning Centre to support awareness and consistent complaint handling practice. Completion rates are monitored centrally by the People and Culture Team. This is backed up with specific learning identified from complaint handling.

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	Sections 1, 2 and 6 Customer Complaint Policy	A single complaints policy applies to all residents and tenures. Fairness is supported through resident involvement in Stage 2 complaint review.
5.2	The early and local resolution of issues between landlords and residents is key to effective complaint handling. It is not appropriate to have extra named stages (such as 'stage 0' or 'informal complaint') as this causes unnecessary confusion.	Yes	Customer Complaint Policy	The complaints process does not include a Stage 0 or informal stage. Colleagues are empowered to resolve issues at the earliest opportunity while ensuring residents retain access to the formal complaints process.
5.3	A process with more than two stages is not acceptable under any circumstances as this will make the complaint process unduly long and delay access to the Ombudsman.	Yes	Section 7 Customer Complaint Policy	BCHG operates a two-stage complaints process in line with the Code.
5.4	Where a landlord's complaint response is handled by a third party (e.g. a contractor or independent adjudicator) at any stage, it must form part of the two stage complaints process set out in this Code. Residents must not be expected to go through two complaints processes.	Yes	Section 6.4 Customer Complaint Policy	Complaints relating to third-party services are managed through BCHG's complaints process, so residents are not required to follow separate procedures.

5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Yes	Section 6.4 Customer Complaint Policy	Complaints relating to third-party services are received and managed by BCHG, with contractors expected to follow BCHG's two-stage complaints process. This arrangement is being reviewed through the Service Improvement Plan to strengthen oversight.
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	Section 6.6, and 7 Customer Complaint Policy	The complaint definition and the outcomes sought are confirmed with the resident at acknowledgement to support triage and risk assessment. Stage 2 complaints are acknowledged and the complaint definition reconfirmed. This approach is being reviewed through the Service Improvement Plan to strengthen its use within Stage 1 investigation.
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	Complaint Procedure	Where it is clear from the complaint definition that the matter is not within BCHG's responsibility, residents are signposted appropriately. Where responsibility is unclear, this is clarified through the investigation.
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;	Yes	Section 7 Customer Complaint Policy	Complaints are allocated to an independent colleague at each stage. Stage 2 complaints are reviewed by a two-person panel. Templates support colleagues to be consistent and achieve evidence-based investigation.

	c. take measures to address any actual or perceived conflict of interest; and d. consider all relevant information and evidence carefully.			
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	Section 7 Customer Complaint Policy	Where responses fall outside Code timescales, extensions are agreed with the resident and updates provided. Standard templates support this communication. This approach is being reviewed through the Service Improvement Plan.
5.10	Landlords must make reasonable adjustments for residents where appropriate under the Equality Act 2010. Landlords must keep a record of any reasonable adjustments agreed, as well as a record of any disabilities a resident has disclosed. Any agreed reasonable adjustments must be kept under active review.	Yes	6.7 Customer Complaint Policy 6.2 Reasonable Adjustment Policy	Reasonable adjustments are recorded and managed in line with the Reasonable Adjustment Policy. Customer Relations Managers update resident records through annual visits and adjustments are considered at the outset of complaints through risk screening.
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	Section 7 Customer Complaint Policy	Complaints are escalated to Stage 2 where requested by the resident unless valid exclusion criteria apply in line with Section 2 of the Code.
5.12	A full record must be kept of the complaint, and the outcomes at each stage. This must include the original	Yes	3.1 Customer Complaint Procedure	Complaint records, correspondence and supporting documentation are maintained within the CX Housing System.

	complaint and the date received, all correspondence with the resident, correspondence with other parties, and any relevant supporting documentation such as reports or surveys.		CX Feedback Housing System	
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	Resolution and Remedies Policy BCHG Way Values based Service Standards	Remedies can be applied at any stage of the complaints process in line with the Resolution and Remedies Policy.
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 any restrictions in place and must keep restrictions under regular review.	Yes	Unacceptable Behaviour Policy	Unacceptable behaviour is managed in line with the Unacceptable Behaviour Policy, with decisions evidenced and kept under review.
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	Unacceptable Behaviour Policy Reasonable Adjustment Policy	Any restrictions on contact are applied proportionately and in line with the Equality Act 2010 and the Reasonable Adjustment Policy.

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	Section 7 Customer Complaint Policy Customer Complaint Procedure	Complaints are risk screened to consider complexity, vulnerability and potential safeguarding issues, informing whether early resolution is appropriate or further investigation is required. This approach is being reviewed through the Service Improvement Plan to strengthen consistency.
6.2	Complaints must be acknowledged, defined and logged at stage 1 of the complaints procedure <u>within five working days of the complaint being received</u> .	Yes	Section 7 Customer Complaint Procedure	Complaints are acknowledged, defined and logged within the required five working day timescale.
6.3	Landlords must issue a full response to stage 1 complaints <u>within 10 working days</u> of the complaint being acknowledged.	Yes	Section 7 Customer Complaint Procedure	Stage 1 responses follow the Code's 10 working day timescale. Performance is monitored and improvement actions are captured through the Service Improvement Plan.
6.4	Landlords must decide whether an extension to this timescale is needed when considering the complexity of the	Yes	Section 7 Customer Complaint Policy	Where required, extensions are agreed with the resident and the revised timescale confirmed. Consistency in the use and

	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.			recording of extensions is being strengthened through the Service Improvement Plan.
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	Section 7 Customer Complaint Policy	Standard extension templates include information on the resident's right to contact the Housing Ombudsman Service.
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	Section 7 Customer Complaint Policy	Complaint responses are issued when the outcome is known. Any outstanding actions are recorded and monitored through the CX Feedback system with updates provided to the resident. Improvements to strengthen oversight of follow-up actions are being progressed through the Service Improvement Plan.
6.7	Landlords must address all points raised in the complaint definition and provide clear reasons for any decisions, referencing the relevant policy, law and good practice where appropriate.	Yes	Complaint Procedure has templates to support this.	Response templates support clear decision making and reference relevant policy where appropriate. Complaint responses are signed off by a Head of Service.
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	Yes	Complaint Procedure	The complaints procedure provides guidance on managing additional issues raised during investigation, making sure related matters are incorporated where appropriate or logged as a new complaint.

	unrelated to the issues already being investigated or it would unreasonably delay the response, the new issues must be logged as a new complaint.			
6.9	Landlords must confirm the following in writing to the resident at the completion of stage 1 in clear, plain language: 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	Complaint procedure	Stage 1 response templates make sure the complaint definition, decision, reasons, remedies, outstanding actions and escalation rights are clearly communicated.

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	Section 7 Customer Complaint Policy	Residents may escalate complaints to Stage 2 where they remain dissatisfied. Stage 1 response templates include clear information on how to request escalation.

6.11	Requests for stage 2 must be acknowledged, defined and logged at stage 2 of the complaint's procedure within five working days of the escalation request being received.	Yes	Section 7 Customer Complaint Policy	Stage 2 complaints are acknowledged, defined and logged within five working days. Acknowledgement templates confirm the complaint definition and outstanding issues.
6.12	Residents must not be required to explain their reasons for requesting a stage 2 consideration. Landlords are expected to make reasonable efforts to understand why a resident remains unhappy as part of its stage 2 response.	Yes	Section 7 Customer Complaint Policy	Residents are not required to provide reasons for escalation. Stage 2 investigation seeks to understand the remaining concerns and how these may be resolved.
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Yes	Section 7 Customer Complaint Policy	Stage 2 reviews are undertaken by a person not previously involved in the complaint, with a member from the tenant panel.
6.14	Landlords must issue a final response to the stage 2 <u>within 20 working days</u> of the complaint being acknowledged.	Yes	Section 7 Customer Complaint Policy	Stage 2 responses are issued within the 20-working day timescale.
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	Complaint Procedure	Where required, extensions are agreed with the resident and the revised timescale and reasons confirmed.
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	Complaint Procedure	Extension templates include the resident's right to contact the Housing Ombudsman Service.

6.17	A complaint response must be provided to the resident when the answer to the complaint is known, not when the outstanding actions required to address the issue are completed. Outstanding actions must still be tracked and actioned promptly with appropriate updates provided to the resident.	Yes	Complaint Procedure	Complaint responses are issued when the outcome is known. Any outstanding actions are monitored and 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	Complaint Procedure	Response templates support clear reasoning and ensure all elements of the complaint definition are addressed.
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	Complaint Procedure Has letters appended	Stage 2 response templates ensure the complaint definition, decision, reasons, remedies, outstanding actions and Ombudsman escalation rights are clearly communicated.
6.20	Stage 2 is the landlord's final response and must involve all suitable staff	Yes	Section 5 Customer Complaint Policy	Stage 2 responses involve senior staff with the appropriate authority to determine the

	members needed to issue such a response.			outcome and provide remedies where required.
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Section 7: Putting things right

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
7.1	Where something has gone wrong a landlord must acknowledge this and set out the actions it has already taken, or intends to take, to put things right. These can include: • Apologising. • Acknowledging where things have gone wrong; • Providing an explanation, assistance or reasons; • Taking action if there has been delay; • Reconsidering or changing a decision; • Amending a record or adding a correction or addendum; • Providing a financial remedy; • Changing policies, procedures or practices.	Yes	Resolution and Remedy Policy	Remedies are applied in line with the Resolution and Remedies Policy. Response templates support acknowledgement, explanation, corrective action and compensation where appropriate. This approach is being reviewed following the Housing Ombudsman's recent compensation guidance.
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Yes	Section 1- Resolution and Remedy Policy	Remedies are assessed in line with the Resolution and Remedies Policy, taking account of the impact on the resident, including health conditions, disability and vulnerability where relevant.

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	Remedy and Resolution Policy	Response templates set out the agreed remedy, actions and timescales. Delivery of remedies is monitored to make sure of completion.
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes	Remedy and Resolution Policy	Remedies are considered in line with the Resolution and Remedies Policy, which reflects guidance issued by the Housing Ombudsman Service and sector good practice.

Section 8: Self-assessment, reporting and compliance

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
8.1	Landlords must produce an annual complaints performance and service improvement report for scrutiny and challenge, which must include: a. the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements. b. a qualitative and quantitative analysis of the landlord's complaint handling performance. This must also include a summary of the types of complaints the landlord has refused to accept; c. any findings of non-compliance with this Code by the Ombudsman; d. the service improvements made as a result of the learning from complaints; e. any annual report about the landlord's performance from the Ombudsman; and f. any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord.	Yes	Service Improvement Report and Self Assessment On BCHG website www.bchg.co.uk	An annual complaints performance and service improvement report, including the Code self-assessment, is produced and published on the BCHG website: https://www.bchg.co.uk/transparency-and-publications/
8.2	The annual complaints performance and service improvement report must	Yes	www.bchg.co.uk	The annual complaints performance and service improvement report is presented to

	be reported to the landlord's governing body (or equivalent) and published on the on the section of its website relating to complaints. The governing body's response to the report must be published alongside this.			the governing body and published on the BCHG website alongside the governing body's response.
8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	Yes	Section 8.3 Customer Complaint Policy	BCHG undertakes a further self-assessment where required following significant organisational change, in line with the complaints policy.
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	Yes	Section 8.3 Customer Complaint Policy	BCHG undertakes a self-assessment where required following an Ombudsman investigation, in line with the complaints policy.
8.5	If a landlord is unable to comply with the Code due to exceptional circumstances, such as a cyber incident, they must inform the Ombudsman, provide information to residents who may be affected, and publish this on their website Landlords must provide a timescale for returning to compliance with the Code.	Yes		In the event BCHG is unable to comply with the Code due to exceptional circumstances, the Housing Ombudsman and residents would be informed and updates published on the BCHG website, including the timescale for returning to compliance.

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	8.2 Customer Complaint Policy	Learning from complaints is reviewed through the Customer Feedback Improvement Panel to identify wider service improvements.
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	Section 1 and 8.1 Customer Complaint Policy	Complaints and wider resident feedback are reported to the BCHG Board to inform oversight and service improvement.
9.3	Accountability and transparency are also integral to a positive complaint handling culture. Landlords must report back on wider learning and improvements from complaints to stakeholders, such as residents' panels, staff and relevant committees.	Yes	Terms of Reference	Learning from complaints is shared with residents and colleagues through tenant panel involvement, the annual customer conference and the Customer Feedback Improvement Panel.
9.4	Landlords must appoint a suitably senior lead person as accountable for their complaint handling. This person must assess any themes or trends to identify potential systemic issues, serious risks, or policies and procedures that require revision.	Yes	Section 5 Customer Complaint Policy	Senior oversight of complaint handling is provided through the Head of Customer Voice, with themes and trends reported to the BCHG Board. Governance arrangements are being strengthened for 2026/27 through REAP, which started in April 2026.

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	Schedule of Delegation	A Member Responsible for Complaints (MRC), who is a member of the governing body, is appointed in line with the Schedule of Delegation.
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	Customer Feedback Improvement Panel Terms of Reference	The MRC has access to relevant complaint performance information and colleagues to support oversight of complaint handling.
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	Yes	Customer Feedback Improvement Panel Customer Voice Report to BCHG Board	The governing body receives regular reports on complaint volumes, performance, themes and outcomes, including Ombudsman findings and the annual complaints performance and service improvement report.

	d. annual complaints performance and service improvement report.			
9.8	Landlords must have a standard objective in relation to complaint handling for all relevant employees or third parties that reflects the need to: a. have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments; b. take collective responsibility for any shortfalls identified through complaints, rather than blaming others; and c. act within the professional standards for engaging with complaints as set by any relevant professional body.	Yes	The BCHG Way Values Based Service Standards	The BCHG Way values-based service standards promote collaborative working and collective responsibility in resolving complaints. These behaviours are reinforced through performance reviews and measured through colleague pulse surveys.

Complaint Handling Service Improvement Plan 2025–2026

Ref	Related Code Provision(s)	Service Improvement Action	Lead Area	Target Timescale	Intended Outcome
1	4.1, 8.1, 8.2	Develop REAP, started in April 2026, as a co-regulatory resident and colleague group to oversee, challenge and learn from complaints.	Head of Customer Voice	Q2 2026/27	Stronger resident assurance, oversight and learning from 2026/27.
2	5.4, 5.5	Strengthen oversight of contractor and third-party complaints through clearer expectations and monitoring.	Head of Customer Voice	Q3 2026/27	Improved consistency and accountability for services delivered on BCHG's behalf.
3	5.6, 5.7, 6.7, 6.18	Strengthen Stage 1 complaint definitions to improve triage, investigation quality and clarity on outcomes sought.	Head of Housing	Q2 2026/27	Clearer expectations, stronger early resolution and improved complaint quality.
4	5.9, 6.4, 6.15	Review complaint extensions and recording to improve consistency, communication and Code compliance.	Head of Housing	Q3 2026/27	Improved monitoring, transparency and assurance on complaint extensions.
5	6.1	Strengthen risk assessment and early resolution to improve consistency on complexity, vulnerability, safeguarding and escalation.	Head of Housing	Q3 2026/27	More consistent, proportionate handling and improved resident support.
6	5.12, 6.6, 6.17, 7.3	Improve tracking of complaint actions and remedies in CX Feedback to support timely completion and resident updates.	Head of Housing	Q3 2026/27	Greater assurance that actions are completed and residents kept informed.
7	7.1, 7.2, 7.4	Review the Resolution and Remedies Policy against Ombudsman guidance and embed learning through training, assurance and strengthened brand ambassadors.	Head of Customer Voice	Q3 2026/27	More consistent, fair and transparent remedies and compensation.