

Black Country Housing Group Annual Self-assessment form 2024/2025

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 | Section 6.1 Complaint Policy | Our policy uses this definition and expands on what it means. |
| 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 | Section 6.4 Complaint Policy and Reasonable Adjustment Policy, which welcomes third party representation. | Our Complaint Policy in April 2024 was revised and updated in line with the statutory Code 2024. If a customer expresses dissatisfaction to their service request, they can make a complaint, or we will call it out as a complaint. We will continue to put things right quickly. All complaints received by a third party or representative are treated in line with our complaints policy. |
| 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 Complaint Policy | Our Policy recognises the difference, but we are seeking to improve this with an 'ask once' is a service request, ask twice on the same issue becomes a complaint. This is to simplify and expand what the definition means. Where a complaint is made this is recorded as Stage 1. Using our CRM Module within housing system, all service requests are monitored through this and learning from trends. |

| | | | | |
|-----|--|-----|---------------------------------|--|
| 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 | Section 6.2 Complaint Policy | <i>If a customer expresses dissatisfaction with the response to their service request, or they ask twice on the same issue, we will continue to try to put things right quickly.</i> |
| 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 Complaint Policy | <i>Where dissatisfaction is expressed through survey feedback this will not immediately be defined as a complaint, we will follow this up and be led by the customer if they wish to complain. Our colleagues are trained to identify and champion complaints. All feedback is logged and tracked through the CRM module</i> |

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 6.3, 6.11 Complaint Policy | <i>We have not excluded any complaint and would only do so on reasons specified, we allow the process to fairly decide.</i> |
| 2.2 | <p>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:</p> <ul style="list-style-type: none"> • 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. • Matters that have previously been considered under the complaints policy. | Yes | Section 6.11 complaint Policy | <i>Exclusions are included within the policy; to date we have not excluded a customer. Should the circumstance arise we are clear that we will support and signpost the customer, this includes to the Housing Ombudsman Service.</i> |

| | | | | |
|-----|--|-----|--|---|
| 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 Complaint Policy | <i>We will accept complaints and have applied discretion on complaints after 12 months on safeguarding and health and safety. We will consider each case on its own merit.</i> |
| 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 Complaint Policy | <i>If we decide not to take a complaint an explanation is given with signpost to the Ombudsman. Our Customer Relation Manager offer includes a specific point of contact in a geographical locality with face-to-face contact that gives appropriate support and signposting to any customer.</i> |
| 2.5 | Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint. | Yes | Section 6.6 Complaint Policy. The BCHG Way values-based service standards. | <i>We apply discretion, and colleagues are empowered to make decisions. Key objective in our training is to be person centred.</i> |

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 | Section 6.4, 6.6 Complaint Policy | <i>We support this through our annual visit programme to record changing needs. Raising awareness internally through our Equality Diversity Inclusion Sounding Board on recognising and responding to needs.</i> |
| 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 | Section 6.4 Complaint Policy | <i>We have strengthened this area through providing technical focussed colleagues with more customer centric approach. The aim is to achieve a no wrong door approach. We are improving this through our brand ambassador programme.</i> |
| 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 Complaint Policy. The BCHG Way values-based service standard Customer Transparency Strategy | <i>As a value driven organisation, we promote complaint as invaluable feedback for learning and improving. We have compared volume with House mark, and trends emerging from TSM survey. We are encouraging complaints through ask once, ask twice. We will take learning from this and further evolve our process.</i> |
| 3.4 | Landlords must make their complaint policy available in a clear and accessible format for all residents. This | Yes | www.bchg.co.uk | <i>We operate a two-stage process, which is published on our website. Fast Track is a Stage 1 complaint but where a risk is identified and</i> |

| | | | | |
|-----|--|-----|--|---|
| | 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. | | | <i>requires mitigation within 24-48 hours. We also have accompanying leaflet. To further improve this area, we are working on an easy read version.</i> |
| 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 | <i>Section 11 Complaint Policy</i> | <i>We support this through the Make things Right campaign. The Code is available on our website. In the year we wrote to all customers about their rights and included complaints and the detail of the Housing Ombudsman Service. We had representative from the service attend the annual customer scrutiny conference.</i> |
| 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 | <i>Section 6.7 Complaint Policy. Reasonable Adjustment Policy</i> | <i>We take a person-centred approach; advocates and third parties are welcomed with the verbal or written permission of the customer</i> |
| 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 | <i>Complaint Procedure includes letter template That gives access detail to the Ombudsman Service.</i> | <i>Standard paragraph inserted in letters to signpost to the Ombudsman Service.</i> |

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 Roles and Responsibility. Schedule of delegation | <i>The Head of Customer Voice is the nominated Complaint Officer. This role is supported by an internal Customer Feedback Improvement Panel that consists of Heads of Service and complaint handlers. The Ombudsman Service has a dedicated BCHG mailbox that includes senior managers. The CEO is a member of the governing panel and our Member Responsible for Complaints.</i> |
| 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 | Customer Feedback Improvement Panel | <i>Heads of Service and Deputy Chief Executive involved in Stage 2 Review. Head of Customer Voice has oversight with other Heads of Service and meet bi-monthly in a Customer Feedback Improvement Panel to take learning to improve resolution and remedy.</i> |
| 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 | Tpas Membership Brand Ambassador Training HOS Learning Centre | <i>Colleagues and Tenant panel Members reviewing complaints are encouraged to access courses through the centre for learning and Four Million Homes. There is continued learning promoted from complaints through the Customer Feedback Improvement Panel. Complaint Handling training took place 23.01.2025 and 05.03.2025</i> |

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 | <i>Sections 1, 2 and 6 Complaint Policy.</i> | <i>Single policy which is supported by a procedure, reasonable adjustment policy and resolution and remedy policy. To make sure we achieve fairness we have neutral people not involved in the complaint to investigate. Members of the Tenant Panel are involved in stage 2 reviews.</i> |
| 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 | <i>Informal stage is not included in the policy.</i> | <i>We have structured our services to achieve early and local resolution. We empower colleagues to make decisions backed with delegated budgets. We do not have extra stages in our complaint process.</i> |
| 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 | <i>Section 7 Complaint Policy</i> | <i>We operate a two-stage process in line with the Code.</i> |
| 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 | <i>Section 6.4 Complaint Policy</i> | <i>Within this section we previously stated that our Gas Contractor might handle a response to complaint. From 1 April 2025 the gas contract is insourced, so complaints are handled directly by BCHG.</i> |

| | | | | |
|-----|--|-----|---|--|
| 5.5 | Landlords are responsible for ensuring that any third parties handle complaints in line with the Code. | Yes | Section 6.4 Complaint Policy | <i>Third party issues will be received by BCHG, contractors are asked to follow our two-stage policy.</i> |
| 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; 7 Complaint Policy Complaint Procedure | <i>The Stage 1 acknowledgement sets out issues and remedy as the complaint definition. Stage 2 is acknowledged. This is supported by template letters.</i> |
| 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 | <i>We accept everything on face value that is within the control of BCHG and then let the process clarify.</i> |
| 5.8 | At each stage of the complaints process, complaint handlers must: <ul style="list-style-type: none"> 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 | Section 7 Complaint Policy | <i>Neutral person is assigned to investigate Stage 1 and Stage 2. The Head of Customer Voice oversees this process to make sure there is no conflict of interest. We seek feedback following the close of a complaint. We take learning to continuously improve.</i> |

| | | | | |
|------|--|-----|--|--|
| | | | | |
| 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 Complaint Policy | <i>We agree extensions with the customer and case manage this. We have developed letter templates to confirm where an extension is agreed and specify the date agreed.</i> |
| 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 | Section 6.7 Complaint Policy Internal Safeguarding Panel | <i>We previously mentioned a new system. This has now been implemented in October 2024. This gives the platform to make better use of data and insights, which will be improved as the system is embedded.</i> |
| 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 Complaint Policy Complaint Procedure | <i>All cases escalated where requested. Fast Track, that are cases that identify risk will include a member of the Executive Team. All other cases are escalated to a Head of Service.</i> |
| 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 | Complaint record on SharePoint | <i>The Complaint Record enables attachment of all appropriate correspondence to colleagues with permission to access. This will be further improved as we transition to the new housing system.</i> |

| | | | | |
|------|---|-----|---|---|
| | | | | |
| 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 | <i>Resolution and Remedies Policy BCHG Way values-based service standards</i> | <i>This is supported by empowering colleagues with decision making and spending power given to customer facing officers. Customer Feedback Improvement Panel takes learning in this area.</i> |
| 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 | <i>Unacceptable Behaviour Policy Reasonable Adjustment Policy</i> | <i>We use risk-based, person-centred approach and consider any special requirement. We have a Member of a Tenant panel to test proportionality.</i> |
| 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 | <i>Unacceptable Behaviour Policy. Reasonable Adjustment Policy</i> | <i>This is considered at the outset.</i> |

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 Complaint Policy, Complaint Procedure | <i>We support this in the policy by adopting a health and safety filter to establish Fast Track to prioritise any risk. We aim to further improve this by clarifying customer facing roles and responsibilities to deal with a complaint as early as possible and creating an award for best problem solver of the month.</i> |
| 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 | Complaint Procedure | <i>We have a complaint recording platform which colleagues that deal with complaints have access to. 100% of complaints are responded to within timescale.</i> |
| 6.3 | Landlords must issue a full response to stage 1 complaints <u>within 10 working days</u> of the complaint being acknowledged. | Yes | Complaint Procedure | <i>Our policy follows the process in the code. 93% were responded to within timescale. We continue to take learning to improve this.</i> |
| 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 | Yes | Complaint Procedure | <i>An extension is agreed with the customer and the reasons explained and date agreed.</i> |

| | | | | |
|-----|--|-----|---|---|
| | 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. | | | |
| 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 | <i>Section 7 Complaints Policy. Complaint Procedure</i> | <i>There is a standard letter that includes the contact detail of the housing ombudsman.</i> |
| 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 | <i>Complaint Procedure</i> | <i>Actions are monitored through the internal Customer Feedback Improvement Panel. We have introduced a new housing system in October 2024 that is being embedded and gives a better line of sight to monitor actions. This is an area we continue to strengthen.</i> |
| 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 | <i>Complaint Procedure has templates to support this.</i> | <i>Investigation report template includes this. We have a sign off process to stage 1 letter to make sure a clear response is made to the customer. We take learning from Stage 2 cases to understand how we can improve our Stage 1 response.</i> |
| 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 | Yes | <i>Complaint Procedure details this.</i> | <i>We have included guidance on this in our complaint procedure</i> |

| | | | | |
|-----|---|-----|----------------------------|---|
| | 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: <ul style="list-style-type: none"> 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 | <i>Complaint Procedure</i> | <i>Letter template has this included.</i> |

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 | <i>Section 7 Complaint Policy, Complaint Procedure</i> | <i>Stage 2 is our final response, and the letter states this and includes the customer right to the Ombudsman Service.</i> |
| 6.11 | Requests for stage 2 must be acknowledged, defined and logged at stage 2 of the complaint's procedure | Yes | <i>Complaint Procedure</i> | <i>Stage 2 acknowledgement letter includes this.</i> |

| | | | | |
|------|---|-----|-----------------------------------|---|
| | within five working days of the escalation request being received. | | | |
| 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 | <i>Complaint Procedure</i> | <i>We will not ask reasons why but do ask for how we can achieve to make things right.</i> |
| 6.13 | The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1. | Yes | <i>Section 7 Complaint Policy</i> | <i>Reviews are always carried out by a person not previously involved and includes a member of the Tenant Panel.</i> |
| 6.14 | Landlords must issue a final response to the stage 2 <u>within 20 working days</u> of the complaint being acknowledged. | Yes | <i>Section 7 Complaint Policy</i> | <i>There were 7 stage 2 reviews carried out and 84% responded within timescale. Each case is reviewed to understand the reason for the delay and whether an extension could have been agreed.</i> |
| 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 | <i>Complaint procedure</i> | <i>Complaint procedure includes this.</i> |
| 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 | <i>Complaint procedure</i> | <i>The standard letter template includes this.</i> |

| | | | | |
|------|--|-----|---|---|
| 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 | <i>Complaint procedure</i> | <i>Our internal Customer Feedback Improvement Panel monitor to make sure responses are being sent in a timely way and when the answer is known and emphasised in the procedure.</i> |
| 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 | <i>Complaint procedure</i> | <i>Letters are signed off before they are sent by another colleague to make sure this is achieved.</i> |
| 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 append all the template letters. | <i>Standards template letters outline this, but we expect a personalised and responsive approach in the style of letter writing. We obtain feedback from customers following the close of a complaint to take learning and improve.</i> |
| 6.20 | Stage 2 is the landlord's final response and must involve all suitable staff | Yes | <i>Section 5 Complaint Policy</i> | <i>Stage 2 involves senior staff with appropriate authorities to make things right.</i> |

| | | | | |
|--|--|--|--|--|
| | members needed to issue such a response. | | | |
|--|--|--|--|--|

Section 7: Putting things right

| Code provision | Code requirement | Comply: Yes / No | Evidence | Commentary / explanation |
|----------------|--|------------------|-------------------------------------|---|
| 7.1 | <p>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:</p> <ul style="list-style-type: none"> • 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 | <i>Resolution and Remedy Policy</i> | <i>We include learning from resolution and remedies at the Customer Feedback Improvement Panel. We demonstrate this through 'you said, we did'.</i> |
| 7.2 | Any remedy offered must reflect the impact on the resident as a result of any fault identified. | Yes | <i>Resolution and Remedy Policy</i> | <i>Our policy takes a person-centred approach.</i> |

| | | | | |
|-----|---|-----|---|--|
| 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 | <i>Resolution and Remedy Policy Complaint Procedure</i> | <i>We monitor actions and contact the customer to make sure we have completed.</i> |
| 7.4 | Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies. | Yes | https://www.housing-ombudsman.org.uk/wp-content/uploads/2024/04/04.-Guidance-Remedies.pdf | <i>We have considered the guiding principles from the Ombudsman in our Policy.</i> |

Section 8: Putting things right

| Code provision | Code requirement | Comply: Yes / No | Evidence | Commentary / explanation |
|----------------|--|------------------|--|--|
| 8.1 | <p>Landlords must produce an annual complaints performance and service improvement report for scrutiny and challenge, which must include:</p> <ul style="list-style-type: none"> 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 | <i>Tenant Annual Report Service Improvement Report</i> | <i>We support this through the production of an annual complaint learning report. You Said, We Did include cases escalated to the Ombudsman.</i> |

| | | | | |
|-----|---|-----|--|---|
| 8.2 | The annual complaints performance and service improvement report must be reported to the landlord's governing body (or equivalent) and published on the on the section of its website relating to complaints. The governing body's response to the report must be published alongside this. | Yes | www.bchg.co.uk | <i>This is on our website.</i> |
| 8.3 | Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures. | Yes | Section 8.3 Complaint Policy www.bchg.co.uk | <i>For transparency the self-assessment is placed on the website.</i> |
| 8.4 | Landlords may be asked to review and update the self-assessment following an Ombudsman investigation. | Yes | Section 8.3 Complaint 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 | Customer Transparency Strategy | |

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 | <i>Section 8.2 Complaint Policy</i> | <i>We have an internal Customer Feedback Improvement Panel to consider the wider implications and trends from complaints.</i> |
| 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 | <i>Section 1 and 8.1 Complaint Policy</i> | <i>We include complaints in the quarterly customer voice report to the Board of Management. Bimonthly the Customer Feedback Improvement Panel discuss complaint insights.</i> |
| 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 | <i>Customer Transparency Strategy</i> | <i>Tenant Panel are involved in the review of stage 2 complaints. The annual customer scrutiny conference is co-designed, and the agenda is evidence based using complaints and TSM. Issues discussed with customer base for learning and improvement.</i> |
| 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 | <i>Customer Feedback Improvement Panel Complaint Procedure</i> | <i>The Head of Customer Voice with the Member Responsible for Complaints do this. The Customer Feedback Improvement Panel act as another defence line in this process, with matters reported to the Board of Management.</i> |

| | | | | |
|-----|---|-----|---|--|
| 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 | <i>Schedule of Delegation</i> | <i>We have an MRC that is a member of the governing body.</i> |
| 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 | <i>Customer Feedback Improvement Panel</i> | <i>The MRC is a member of the internal Customer Feedback Improvement Panel that receives regular reports to support this role.</i> |
| 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 | <i>Customer Feedback Improvement Panel Report</i> | <i>MRC is part of the internal Customer Feedback Improvement Panel where the report framework is based on the code. A quarterly customer voice report includes complaint learning and analysis. An annual complaint performance and learning report is received by the Board of Management. The first Customer Scrutiny Conference took place in September 2024 and an service improvement plan developed with customers with Board oversight.</i> |

| | | | | |
|-----|---|-----|---|--|
| | d. annual complaints performance and service improvement report. | | | |
| 9.8 | <p>Landlords must have a standard objective in relation to complaint handling for all relevant employees or third parties that reflects the need to:</p> <p>a. have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments;</p> <p>b. take collective responsibility for any shortfalls identified through complaints, rather than blaming others; and</p> <p>c. act within the professional standards for engaging with complaints as set by any relevant professional body.</p> | Yes | <i>The BCHG Way values-based service standards.</i> | <i>We have values-based behaviour framework the BCHG Way, which all colleagues are required to create a positive complaint culture. This is measured through performance reviews. BCHG has also invested in training brand ambassadors to make sure the BCHG way sticks, supporting induction.</i> |