

Appendix 1 – Annual self-assessment against the complaint handling code

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	This is stated on the BCP Homes website and within the BCP Homes Complaints Policy	BCP Council (BCP) bases its definition on the Local Government and Social Care Ombudsman’s (LGSCO) definition of a complaint. This states that a complaint is: “A complaint is an expression of dissatisfaction about a council service (whether that service is provided directly by the council or by a contractor or partner) that requires a response.” BCP uses the following definition of a complaint which expands on the LGSCO definition: A complaint is an expression of dissatisfaction about a council service (whether that service is provided directly by the council or by a contractor or partner). There is no difference between a ‘formal’ and an ‘informal’ complaint. Both are expressions of dissatisfaction that require a response. To ensure consistency and avoid confusion BCP Council will only use the expanded LGSCO definition of a complaint.

				An expression of dissatisfaction will be treated as a complaint, and will be forwarded onto the correct team. If the matter cannot be resolved as a service request within 24 hours of receipt then it will be logged as a stage 1 complaint within 5 However there have been instances where tenants continue to complain after receiving a complaint response; eg that BCP Homes will not install rods on a roof to prevent seagulls nesting. Seagulls are protected and BCP Homes cannot install such measures, however the tenant is not happy with the response.
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	This is stated within the BCP Homes Complaints Policy and Procedure and has been made clear in the residents' magazine.	
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	Yes	This is set out in our Complaints Policy.	Service Requests are logged.

	something right. Service requests are not complaints, but must be recorded, monitored and reviewed regularly.			
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	If the issue cannot be resolved within 24 hours of receipt, then a stage 1 complaint will be logged within 5 working days of receipt.	
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	Information about how to make a complaint is available on your webpage, and has been mentioned in previous editions of the residents' magazine.	

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	This is set out in the Complaints Policy.	Complaints can be made via phone, email, post, in person to a member of staff or by filling in an online form.
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. • Matters that have previously been considered under the complaints policy.	Yes	This is set out in 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	Yes	This is set out in the Complaints Policy.	

	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.			
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	BCP Homes will not accept complaints that have already been through our stage 2 complaints process.	The Council has guidance on 'Unreasonable and unreasonably persistent complainants'
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Yes	Each complaint is considered on a case-by-case basis.	

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	All complaints for BCP Homes are directed one inbox – bcphomes.complaints@bcpcouncil.gov.uk	There is a Complaints Officer within BCP Homes and complaints co-ordinators in key areas. Complaints co-ordinators acknowledge complaints if they cannot be resolved quickly and confirm to the resident which member of staff will be dealing with the complaint. This will be based on the expertise in the area relating to the complaint.
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	This is set out in the Complaints Procedure. Training was given in May 2024 to all staff involved in the complaints process. This recording has been saved and is available to new staff.	Complaints can be made via phone, email, post, in person to a member of staff or by filling in an online form.
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	Yes	The different ways to contact BCP Homes are advertised on our webpage as well as in previous editions of the residents' magazine.	

	complaint volumes are potentially a sign that residents are unable to complain.			
3.4	Landlords must make their complaint policy available in a clear and accessible format for all residents. This will detail the two stage process, what will happen at each stage, and the timeframes for responding. The policy must also be published on the landlord's website.	Yes	The complaints policy is available on the council's webpage. Should a resident request a hard copy, then we can send this by post. The complaints process sets out the two stage complaints process and timescales. This is also available on the BCP Homes webpage.	
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	Contact details for the Housing Ombudsman are available in section 8 of the Complaints Policy. Reference is made in section 9 about adhering to the Housing Ombudsman's Code.	The full policy is available on the Council website
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	We would require permission for a third party to speak on a complainant's behalf.	
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	This is available in the Complaints Policy, on the BCP Homes webpage, and in stage 1 and 2 acknowledgement letters, and the stage 2 response letter.	

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	Evidenced on our website	There is a Complaints Officer within BCP Homes and complaints co-ordinators in key areas. Complaints co-ordinators acknowledge complaints if they cannot be resolved quickly and confirm to the resident which member of staff will be dealing with the complaint. This will be based on the expertise in the area relating to the complaint. The details of complaints co-ordinators are available on the intranet only. This ensures that there is effective administration of complaints and that they are dealt with in a timely manner. It would not be clear to residents who to contact for complaint handling e.g., chasing a response. Actions –

				1. Provide a point of contact on the website for residents regarding complaint handling.
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	The Complaints Officer reports into the Service Manager for Regulation and Resident Involvement. They have authority and autonomy to resolve disputes.	
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	BCP Homes has a complaints team and all staff especially front facing staff are aware of the process should they receive an email or phone call expressing dissatisfaction.	

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	BCP Homes Complaints Policy.	
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	We do not have additional stages. Upon receipt of a complaint, we will endeavour to resolve the concern within 24 hours where possible. If this is not possible then a stage 1 complaint will be logged within 5 working days of receipt.	
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	We do not have more than two stages to our complaints process.	
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	Yes procedure is the same for these	
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Yes	Yes in our processes	

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	This is set out in our stage 1 and stage 2 acknowledgement template letters. We ask complainants to clarify if we have recorded anything incorrectly.	
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	This is set out clearly in the acknowledgement letters.	
5.8	At each stage of the complaints process, complaint handlers must: a. deal with complaints on their merits, act independently, and have an open mind; b. give the resident a fair chance to set out their position; c. take measures to address any actual or perceived conflict of interest; and d. consider all relevant information and evidence carefully.	Yes	This is all done. The template response letters give prompts to ensure all points are addressed.	
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	If the deadline for a complaint needs to be extended up to 10 working days, then the responding officer will contact the complainant to advise what the new deadline date is.	

			If the deadline date needs to be extended by more than 10 working days, then the responding officer must contact the complainant to explain the reasons why the extension is required, and agree the extension date with the complainant.	
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.		Section 7.2 of the BCP Homes complaints policy states: BCP Homes aims to work with customers to provide an easy-to-use complaints process, focusing on their needs and satisfaction. BCP Homes will provide equal access to the complaints service by: 1. Accepting complaints in the format easiest for the complainant. 2. Supporting vulnerable customers who wish to make complaints via support workers, relatives or third parties 3. Translating and interpreting and providing information in large print or alternative formats	EIAs done for policies and procedures. Corporate Complaints Guidance advises: Is the person having difficulty in communicating their complaint to you? Do they need an interpreter or translation help or information in a different format like Braille or audio-tape? Do they need an advocate? Reasonable adjustments policy available for staff on intranet. If a copy of the policy, or response letters need to be in a different language, this can be arranged. Equally if a tenant cannot read, then the responding officer will ring the tenant to go through the response, and follow up with a

				written response if someone is available to read the letter to the tenant.
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	Yes this is in our policy.	
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	All information is saved on either EDRMS or Sharepoint.our document management systems.	
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	The responding officer will, where possible, remedy the situation where appropriate in either stage of the complaints process if inline with our policy or procedure. Financial remedies will be considered on a case by case basis.	
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		The Council has guidance on how to deal with 'Unreasonable and unreasonably persistent complainants'.	

	putting any restrictions in place and must keep restrictions under regular review.		On some occasions contact plans will be implemented against tenants whose contact with us becomes unmanageable.	
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 our process for this reflects the Equality Act	

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	Each complaint received is assessed on a case by case basis upon receipt. Some can be resolved as a service request, whereas others require a full investigation and are logged at stage 1.	
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	We follow this process.	
6.3	Landlords must issue a full response to stage 1 complaints <u>within 10 working days</u> of the complaint being acknowledged.	Yes	We follow this process. Sometimes an extension is required.	
6.4	Landlords must decide whether an extension to this timescale is needed when considering the complexity of the complaint and then inform the resident of the expected timescale for response. Any	Yes	This is followed	

	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.		Very often the resident will be contacted by phone. However, the complainant will have been made aware of how to contact the housing ombudsman in their acknowledgement letter.	
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	The complaint response will set out how the issues will be overcome.	
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	This is followed	
6.8	Where residents raise additional complaints during the investigation, these must be incorporated into the stage 1 response if they are related and the stage 1 response has not been issued. Where the stage 1 response has been issued, the new issues are unrelated to the issues already being investigated or it would	Yes	This is followed	

	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	Evidenced in our standard letters	

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	This is complied with.	
6.11	Requests for stage 2 must be acknowledged, defined and logged at stage 2 of the complaints procedure within five working days of the escalation request being received.	Yes	This is complied with.	

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	This is complied with	
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Yes	This is complied with. A Service Manager or Head of Service will be the allocated officer for a Stage 2 complaint.	
6.14	Landlords must issue a final response to the stage 2 <u>within 20 working days</u> of the complaint being acknowledged.	Yes	Unless the deadline date needs extending.	
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	This is complied with	
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.		The stage 2 acknowledgement letter gives information on how to contact the Housing Ombudsman.	
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	Yes	This is complied with	

	with appropriate updates provided to the resident.			
6.18	Landlords must address all points raised in the complaint definition and provide clear reasons for any decisions, referencing the relevant policy, law and good practice where appropriate.	Yes	This is complied with	
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	This is complied with	
6.20	Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.	Yes	This is complied with	

Section 7: Putting things right

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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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	This is complied with	
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Yes	This is complied with. Most often it will involving putting right what went wrong especially if this relates to repairs.	
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	We have a Compensation Policy which sets out levels and types of compensation.	
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes	The Compensation Policy takes into account Housing Ombudsman guidance.	

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.		a) This is included b) This is included c) This is included d) This is included e) This is included f) This is included	
8.2	The annual complaints performance and service improvement report must be reported to the landlord's governing body		This will be done once it has been signed off by our governing body in October.	

	(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.			
8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.		We will comply where necessary.	
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.		We will comply if necessary.	
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.		We will comply if necessary	

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	For all complaints that are upheld or partially upheld, the responding officer must fill in a 'Service Improvement form' that states lessons learned and actions required.	
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	See above.	
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	Lessons learned are shared to the Advisory Board, in the residents magazine, in the BCP Homes staff bi-monthly complaints newsletter etc.	
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	Service Manager for Regulation and Resident Involvement.	

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	Councillor Dower is the lead for complaints	
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	Councillor Dower is on the Advisory Board.	
9.7	As a minimum, the MRC and the governing body (or equivalent) must receive: a. regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance; b. regular reviews of issues and trends arising from complaint handling; c. regular updates on the outcomes of the Ombudsman's investigations and progress made in complying with orders related to severe maladministration findings; and d. annual complaints performance and service improvement report.	Yes	• Yes we hold regular scheduled meetings • Lessons learnt and trends picked up are covered. • Ombudsman outcomes are reported • Report provided.	
9.8	Landlords must have a standard objective in relation to complaint handling for all		All Staff have a set objective as follows:	

	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.		<i>'Ensure that you deal with complaints collaboratively, take collective responsibility for any shortcomings, act on any lessons learned and uphold professional standards in complaint handling.'</i>	
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