

Appendix A: Self-assessment form

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

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

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

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

For the purpose of this self-assessment where it states Feedback Policy this is our Feedback Policy: complaints, comments and compliments.

Section 1: Definition of a complaint

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation / Action
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	We have adopted the definition of a complaint in line with the Complaint Handling Code. We use this definition in our internal communications with staff and in our complaint handling awareness training. Our Feedback Policy defines this. <u>Evidenced:</u> Section 6 - Definitions	None: N/A Lead: N/A Completion date: N/A
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	Our Feedback Policy states 'a tenant does not have to use the word 'complaint' for us to treat their concerns as a complaint under this policy' and 'a complaint submitted via a third party or representative will still be handled in line with our complaints policy'. <u>Evidenced:</u> Section 6 - Definitions <u>Evidenced:</u> Section 12 - How to submit complaints, compliments and feedback.	None: N/A Lead: N/A Completion date: N/A
1.4	Landlords must recognise the difference	Yes	Our Feedback Policy details the	None: N/A

	<p>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.</p>		<p>difference between a complaint and a service request. Staff understand that where a customer is telling us about a problem for the first time, this should be treated as a service request.</p> <p>This is covered in our complaint awareness training session.</p> <p><u>Evidenced:</u> Section 6 - Definitions</p>	<p>Lead: N/A Completion date: N/A</p>
1.5	<p>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.</p>	Yes	<p>If a tenant raised a complaint about how our response to their service request we would not stop our efforts to address the service request.</p>	<p>None: N/A Lead: N/A Completion date: N/A</p>
1.6	<p>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.</p>	Yes	<p>Customer Engagement & Volunteer Manager collates the annual tenant satisfaction measures survey responses. An action plan is drawn up and any expressions of dissatisfaction identified are followed up with the relevant service/scheme. Where a tenant has given permission to be contacted regarding their expression of dissatisfaction this will be followed up.</p> <p><u>Evidenced:</u> Section 20 - Feedback</p>	<p>None: N/A Lead: N/A Completion date: N/A</p>

Section 2: Exclusions

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation / Action
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	We will accept complaints unless there is a valid reason not to do so as detailed in our Feedback Policy. <u>Evidenced:</u> Section 14 - Exemptions	None: N/A Lead: N/A Completion date: N/A
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: <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	Our Feedback Policy set's out where a matter will not be accepted as a complaint. Customers will be provided with the reasons why a complaint has not been accepted and provided on how the complaint can be escalated to outside organisations including the Housing Ombudsman. <u>Evidenced:</u> Section 13 - Other options available to tenants and customers <u>Evidenced:</u> Section 14 - Exemptions	None: N/A Lead: N/A Completion date: N/A
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	Yes	Our Feedback Policy states any complaints/appeals that are more 12 months old will not normally be investigated unless the complainant is able to demonstrate that there are ongoing/unresolved issues.	None: N/A Lead: N/A Completion date: N/A

	good reasons to do so.		<u>Evidenced:</u> Section 14 - Exemptions	
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	Refusal letter template contains a prompt to provide an explanation of why the matter is not suitable for the complaints process. It provides details of the Housing Ombudsman should the customer wish to refer the case to them and informs the customer that if the Housing Ombudsman does not agree the exclusion has been fairly applied then they may instruct us to take on the complaint. Our Feedback Policy lists some situations, and circumstances, where we will deal with a customer's complaint differently. <u>Evidenced:</u> Section 14 - Exemptions	None: N/A Lead: N/A Completion date: N/A
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Yes	Our Feedback Policy lists some situations, and circumstances, where we will deal with a customer's complaint differently. <u>Evidenced:</u> Section 14 – Exemptions	None: N/A Lead: N/A Completion date: N/A

Section 3: Accessibility and Awareness

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation / Action
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	<p>Our Feedback Policy provides a list of the different ways in which we are able to receive a complaint and sets out that we are committed to making reasonable adjustments in line with the Equality Act 2010.</p> <p>Evidenced: Section 12- How To Submit Complaints, Comments and Feedback</p> <p>Evidenced: Section 23 - Reasonable Adjustments</p>	<p>None: N/A Lead: N/A Completion date: N/A</p>
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	<p>A company update on the new complaint handling code was produced and circulated to staff across the organisation which included this information.</p> <p>Our complaints handling awareness training session also covers this.</p>	<p>None: N/A Lead: N/A Completion date: N/A</p>
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	<p>We monitor the volume of complaints through our annual complaints and service improvement report.</p> <p>We also provide Board with quarterly performance reports enabling trends</p>	<p>None: N/A Lead: N/A Completion date: N/A</p>

			to be identified.	
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	<p>The 'contact us' section of our website Contact Brighter Futures Brighter Futures, Stoke-on-Trent (brighter-futures.org.uk) provides details on how to make a complaint and our Feedback Policy can be found here https://www.brighter-futures.org.uk/wp-content/uploads/2024/03/Feedback-Policy-Complaints-Compliments-and-Comments.pdf</p> <p>A 'How to Complain Guide' and an accessible version can be found on our website: How to Complain Guide How to Complain Guide – Accessible</p>	<p>None: N/A Lead: N/A Completion date: N/A</p>
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	<p>Our website publicises our Feedback Policy, the Housing Ombudsman Service contact details and our self-assessment against the code https://www.brighter-futures.org.uk/contact/</p> <p>Our website also provides a link to the Housing Ombudsman Service.</p> <p>The Housing Ombudsman leaflet and poster are displayed on scheme/service notice boards and in our reception and are included in tenants welcome packs.</p>	<p>1. Add How to Complain guide as a standard item in tenants welcome packs Lead: Complaints Officer Completion date: July 2024</p>

			<p>Our complaint letter templates include information about the Housing Ombudsman</p> <p>Our How to Complain guides contain information about the Housing Ombudsman.</p>	
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	<p>Our Feedback Policy enables complainants are able to use representatives.</p> <p><u>Evidenced:</u> Section 8 - The Complaints Process</p> <p><u>Evidenced:</u> Section 12 - How To Submit Complaints, Comments, Comments and Feedback</p>	<p>None: N/A Lead: N/A Completion date: N/A</p>
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	<p>Customers are made aware that they can access the Housing Ombudsman Service:</p> <ol style="list-style-type: none"> 1. In our Stage 1 and Stage 2 formal complaint response letters. 2. Our Feedback Policy is sent with all complaint correspondence which provides details of the Housing Ombudsman Service. <p><u>Evidenced:</u> Section 8 - The Complaints Process</p> <p><u>Evidenced:</u> Section 13 - Other Options Available to Tenants and Customers</p>	<p>None: N/A Lead: N/A Completion date: N/A</p>

Section 4: Complaint Handling Staff

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation / Action
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	<p>Formal complaints are logged by the Complaints Officer who is the Governance, Procurement and Contracts Coordinator. Additional staff members have been trained to log complaints in the absence of the Governance, Procurement and Contracts Coordinator. The responsibility for investigating and responding to formal complaints falls to the management team.</p> <p><u>Evidenced:</u> Section 8 - The Complaints Process</p> <p><u>Evidenced:</u> Section 12 - How to Submit Complaints, Comments and Feedback</p>	<p>None: N/A Lead: N/A Completion date: N/A</p>
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	<p>Compliant handlers:</p> <ol style="list-style-type: none"> 1. Act with sensitivity and treat complainants fairly. 2. Have access to members of staff at all levels to resolve complaints. 	<p>None: N/A Lead: N/A Completion date: N/A</p>
4.3	Landlords are expected to prioritise complaint handling and a culture of learning from complaints. All relevant staff must be	Yes	Complaint themes and lessons learnt are a standard agenda item on team, Senior Leadership Team and	<p>None: N/A Lead: N/A Completion date: N/A</p>

	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		Executive Leadership Team meetings. Complaints and lessons learnt will also be included in the staff bulletin in the future.	
--	---	--	--	--

Section 5: The Complaint Handling Process

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation / Action
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	Single Feedback Policy is in place.	None: N/A Lead: N/A Completion date: N/A
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	Brighter Futures Housing Association Ltd does not operate a third stage. Our Feedback Policy confirms that we have 2 stages of the complaints process. <u>Evidenced:</u> Section 8 - The Complaints Process	None: N/A Lead: N/A Completion date: N/A
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	Brighter Futures Housing Association Ltd does not operate a third stage. Our Feedback Policy confirms that we have 2 stages of the complaints process. <u>Evidenced:</u> Section 8 - The Complaints Process	None: N/A Lead: N/A Completion date: N/A
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	Yes	Section 8 of our Feedback Policy confirms that we have 2 stages of the complaints process.	None: N/A Lead: N/A Completion date: N/A

	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		All complaints are over seen by Brighter Futures. Evidenced: Section 8 - The Complaints Process	
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Yes	We would look at this by a case-by-case basis to understand the nature of the complaint and endeavour that third parties such as contractors comply with the timescales set out in our Feedback Policy.	None: N/A Lead: N/A Completion date: N/A
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	Our Stage 1 and Stage 2 complaint letter templates have been developed to ensure that all information pertinent to a complaint is considered and any written correspondence is structured in a consistent manner. Evidenced: Section 8 - The Complaints Process	None: N/A Lead: N/A Completion date: N/A
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	Providing clarity on responsibility for all complaint issues is the role of the complaints officer when issuing stage 1 and stage 2 acknowledgement letters.	None: N/A Lead: N/A Completion date: N/A
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	Yes	1. Complaint files are only accessible to senior members of staff. 2. Access can be restricted on an adhoc basis, if required. 3. Stage 1 and stage 2 response	None: N/A Lead: N/A Completion date: N/A

	<p>set out their position;</p> <p>c. take measures to address any actual or perceived conflict of interest; and</p> <p>1. consider all relevant information and evidence carefully.</p>		<p>letters are signed off by the investigating officers line manager prior to dispatch.</p> <p>4. The Complaints Officer acts in an independent manner.</p> <p>5. Complaint investigations are conducted in an independent and fair manner.</p> <p>Evidenced: Section 1 - Purpose</p>	
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	Where there is an extension the customer is kept informed about the progress. We have introduced an extension letter template which has prompts to provide the reason for the extension and the date when a response will be issued.	<p>None: N/A</p> <p>Lead: N/A</p> <p>Completion date: N/A</p>
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	<p>We have a central coordinated system on SharePoint for complaints. At the onset of the complaint the customer is asked about reasonable adjustments / vulnerabilities and this now includes disabilities. This information is recorded on the reasonable adjustments /vulnerabilities / disabilities spreadsheet and is transposed onto the case notes investigation sheet and forwarded to the appropriate investigation officer.</p> <p>Our Complaint/Feedback form has been updated to include all this</p>	<p>None: N/A</p> <p>Lead: N/A</p> <p>Completion date: N/A</p>

			information.	
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	<p>We will only escalate a complaint once it has been through our stage 1 complaint process and at the request of the complainant.</p> <p><u>Evidenced:</u> Section 8 - The Complaints Process</p> <p>Our Feedback Policy lists some situations, and circumstances, where we will deal with a customer's complaint differently.</p> <p><u>Evidenced:</u> Section 14 - Exemptions</p>	<p>None: N/A Lead: N/A Completion date: N/A</p>

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	<ol style="list-style-type: none"> 1. We have a central coordinated system on SharePoint for complaints where correspondence (including emails/letters) are stored electronically. 2. Complaints are given a case reference number and a case folder is set up. 3. Complaint progress is tracked using the complaint progress tracker. 4. Investigating officer complete a case notes investigation sheet which details their actions taken to reach their decision. <p>Evidenced: Section 10 - Recording Complaints</p>	<p>None: N/A Lead: N/A Completion date: N/A</p>
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	Providing remedies at all complaint stages is the role of the investigating officers.	<p>None: N/A Lead: N/A Completion date: N/A</p>
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.	No	<p>An Anti-Social behaviour policy is in place but not a specific unacceptable behaviour policy.</p> <p>Examples of situations, and circumstances, where complaints will be dealt with differently is addressed in the Feedback policy.</p>	<p>Create an Unacceptable Behaviour Policy Lead: Housing Lead and Complaints Officer Completion date: December 2024</p>

			Evidenced: Section 14 - Exemptions	
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	All current judgements are taken in line with the proportionality expectations of the Equality Act 2010.	Will be included in the Unacceptable Behaviour Policy Lead: Housing Lead and Complaints Officer Completion date: December 2024

Section 6: Complaints Stages

Stage 1

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation / Action
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	Our Feedback Policy confirms we will work in line with this criteria identified in 6.1. <u>Evidenced:</u> Section 1 – Purpose <u>Evidenced:</u> Section 8 - The Complaints Process	None: N/A Lead: N/A Completion date: N/A
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	Our Feedback Policy details the timeframes we respond to complaints. <u>Evidenced:</u> Section 8 - The Complaints Process	None: N/A Lead: N/A Completion date: N/A
6.3	Landlords must issue a full response to stage 1 complaints <u>within 10 working days</u> of the complaint being acknowledged.	Yes	Our Feedback Policy details the timeframes we respond to complaints. <u>Evidenced:</u> Section 8 - The Complaints Process	None: N/A Lead: N/A Completion date: N/A
6.4	Landlords must decide whether an extension to this timescale is needed when considering the complexity of the complaint and then inform the resident of the expected timescale for response. Any extension must	Yes	Our Feedback Policy states 'there may be exceptional circumstances where we cannot meet the timeframe of ten working days, for example, where further evidence is	Amend wording in policy to carefully reflect the wording used in 6.4. Lead: Complaints Officer Completion date: August

	be no more than 10 working days without good reason, and the reason(s) must be clearly explained to the resident.		<p>required. If this is the case, we may need to extend this timeframe by a further ten working days. When this happens, we will contact the complainant to obtain their agreement. Where an agreement over an extension cannot be agreed we will provide the complainant with the Housing Ombudsman's details so they can challenge our plans for responding and/or the proposed timeliness of our response.</p> <p><u>Evidenced:</u> Section 8 - The Complaints Process</p> <p>The wording used in 6.4 is used in our complaint awareness training and our how to complain guide.</p>	2024.
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	Our stage 1 and stage 2 extension response letter templates provide contact details of the Housing Ombudsman.	<p>None: N/A Lead: N/A Completion date: N/A</p>
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	<p>A response is sent to the customer when the answer to the complaint is known and if there are any outstanding actions follow up letters are sent. Outstanding actions are recorded on the outstanding works and repairs tracker.</p> <p><u>Evidenced:</u> Section 8 – The Complaints Process <u>Evidenced:</u> Section 10 - Recording Complaints</p>	<p>None: N/A Lead: N/A Completion date: N/A</p>

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.		<p>Our Stage 1 complaint response letter template includes prompts for the investigating officer to include the information detailed in 6.7</p> <p>Standard letter templates ensure that all information pertinent to a complaint is considered and any written correspondence is structured in a consistent manner.</p> <p>Evidenced: Section 8 - The Complaints Process</p>	<p>None: N/A Lead: N/A Completion date: N/A</p>
6.8	Where residents raise additional complaints during the investigation, these must be incorporated into the stage 1 response if they are related and the stage 1 response has not been issued. Where the stage 1 response has been issued, the new issues are unrelated to the issues already being investigated or it would unreasonably delay the response, the new issues must be logged as a new complaint.	Yes	<p>Our Policy states that ‘cases will only be escalated where the substance of the case remains the same as stage 1. If new elements are raised, which would result in a different resolution that would have been offered in stage 1, a new complaint will be opened’.</p> <p>Evidenced: Section 8 - The Complaints Process</p>	<p>Review Feedback Policy to clarify and include all of the requirement. Lead: Complaints Officer Completion date: August 2024</p>
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 	Yes	<p>Our Stage 1 complaint response letter template includes a prompts for the investigating officer to include the information detailed in 6.9.</p> <p>Standard template letters ensures all written correspondence is structured in a consistent manner.</p>	<p>None: N/A Lead: N/A Completion date: N/A</p>

	<p>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.</p>		<p><u>Evidenced:</u> Section 8 - The Complaints Process</p>	
--	---	--	--	--

Stage 2

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation / Action
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	<p>Our Feedback Policy states 'cases will only be escalated where the substance of the case remains the same as stage 1. If new elements are raised, which would result in a different resolution that would have been offered in stage 1, a new complaint will be opened' and 'if the complainant is still dissatisfied with the outcome at the end of our two stage complaints process, our stage 2 response provides contact details of the Housing Ombudsman Service contact so they can further escalate their complaint externally'.</p> <p>Evidenced: Section 8 - The Complaints Process</p> <p>Evidenced: Section 13 - Other Options Available to Tenants and Customers.</p>	<p>None: N/A Lead: N/A Completion date: N/A</p>
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	<p>Our Feedback Policy details the timeframes we respond to complaints.</p> <p>Evidenced: Section 8 - The Complaints Process</p>	<p>None: N/A Lead: N/A Completion date: N/A</p>
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	No	Our Feedback policy states 'We will only escalate a complaint once it has been through our stage 1 complaint process and at the request of the	<ol style="list-style-type: none"> 1. Amend wording in policy to carefully reflect the wording used in 6.12. 2. Incorporate in complaint

	a resident remains unhappy as part of its stage 2 response.		complainant and 'Complainants must inform Brighter Futures of their outstanding issues and what outcome they are looking for. Evidenced: Section 8 - The Complaints Process	Handling awareness training. Lead: Complaints Officer Completion date: August 2024
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Yes	Evidenced: Section 8 - The Complaints Process	None: N/A Lead: N/A Completion date: N/A
6.14	Landlords must issue a final response to the stage 2 <u>within 20 working days</u> of the complaint being acknowledged.	Yes	Evidenced: Section 8 - The Complaints Process	None: N/A Lead: N/A Completion date:
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	Our Feedback Policy states 'we will provide a written response within 20 working days of receipt of the stage 2 escalation request and this will include the same information as detailed in our Stage 1 response letter' and 'in exceptional circumstances, it may not be possible to provide a written response within 20 working days. In this case, we will write to the complainant providing them with an explanation and a clear timeframe for when a response will be provided. This will not exceed a further 20 working days without good reason'. Evidenced: Section 8 'The Complaints Process'	Amend wording in policy to carefully reflect the wording used in 6.4. Lead: Complaints Officer Completion date: August 2024

			The wording used in 6.15 is used in our complaint awareness training and our how to complain guide.	
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	Our stage 2 extension letter template provides contact details of the Housing Ombudsman.	None: N/A Lead: N/A Completion date: N/A
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	A response is sent to the customer when the answer to the complaint is known and if there are any outstanding actions follow up letters are sent. Outstanding actions are recorded on the outstanding works and repairs tracker. <u>Evidenced:</u> Section 8 – The Complaints Process <u>Evidenced:</u> Section 10 - Recording Complaints	None: N/A Lead: N/A Completion date: N/A
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	Our Stage 2 complaint response letter template includes prompts for the investigating officer to include the information detailed in 6.18 Standard letter templates ensure that all information pertinent to a complaint is considered and any written correspondence is structured in a consistent manner. <u>Evidenced:</u> Section 8 - The Complaints Process	None: N/A Lead: N/A Completion date: N/A

6.19	<p>Landlords must confirm the following in writing to the resident at the completion of stage 2 in clear, plain language:</p> <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 the Ombudsman Service if the individual remains dissatisfied. 		<p>Our Stage 2 complaint template letter includes all of the information as detailed in 6.19.</p> <p>Our stage response letter informs complainants that if they are dissatisfied with our response, they can escalate this to the Housing Ombudsman Service (details postal address, telephone number, email address and website).</p> <p><u>Evidenced:</u> Section 8 - The Complaints Process</p>	<p>None: N/A Lead: N/A Completion date: N/A</p>
6.20	<p>Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.</p>	Yes	<p>There is no third stage of the complaints process.</p> <p>Our Feedback Policy states 'if the complainant is still dissatisfied with the outcome at the end of our two stage complaints process, our stage 2 response provides contact details of the Housing Ombudsman Service contact so they can further escalate their complaint externally'.</p> <p><u>Evidenced:</u> Section 13 - Other Options Available to Tenants and Customers.</p>	<p>None: N/A Lead: N/A Completion date: N/A</p>

Section 7: Putting things right

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation / Action
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	We have a suite letter templates that enable core requirements to be compiled and followed by the investigating officers.	<p>None: N/A Lead: N/A Completion date: N/A</p>
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Yes	Our Compensation Policy sets out our approach to compensation. It details some circumstances when compensation will be considered and what the compensation may be. It should be noted that each case will be considered on its own merit.	<p>Review and update draft compensation policy and seek approval. Lead: Director of Finance and Business Support Completion date: December 2024</p>
7.3	The remedy offer must clearly set out what will happen and by when, in agreement with	Yes	Our Compensation Policy sets out our approach to compensation. It	Review and update draft compensation policy and seek

	the resident where appropriate. Any remedy proposed must be followed through to completion.		<p>details some circumstances when compensation will be considered and what the compensation may be. It should be noted that each case will be considered on its own merit.</p> <p><u>Evidenced:</u> Section 25 - Compensation</p>	<p>approval. Lead: Director of Finance and Business Support Completion date: December 2024</p>
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes	We would take into account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	<p>None: N/A Lead: N/A Completion date: N/A</p>

Section 8: Self-assessment, reporting and compliance

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation / Action
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	<p>The annual complaints performance and service improvement report 2024 has been produced which includes the self-assessment against the Complaint Handling Code https://www.brighter-futures.org.uk/contact/</p> <p>The report is broken down into different sections and covers point a-f as listed in 8.1.</p> <p>The annual complaints performance and service improvement report 2024 will be presented to the Board of Management in August 2024 for their response and this will then be published on our website.</p>	<p>Present annual complaints performance and service improvement report 2024 at August Board meeting for scrutiny and challenge.</p> <p>Lead: Director of Finance and Business Support.</p> <p>Completion date: August 2024</p>
8.2	<p>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</p>	No	<p>The annual complaints performance and service improvement report 2024 has been produced which includes the self-assessment against</p>	<p>Present annual complaints performance and service improvement report 2024 at August Board meeting for</p>

	section of its website relating to complaints. The governing body's response to the report must be published alongside this.		the Complaint Handling Code and will be published on the website by 30 th June 2024.	scrutiny and challenge. Lead: Director of Finance and Business Support. Completion date: August 2024 (Publish governing body's response on website).
8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	Yes	A new self-assessment would be completed following any significant restructure or change in procedures as outlined in the Housing Ombudsman Code.	None: N/A Lead: N/A Completion date: N/A
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	Yes	We have had no investigation by the Housing Ombudsman but would review and update the self-assessment if asked.	None: N/A Lead: N/A Completion date: N/A
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	If we were to experience exceptional circumstances we would notify the Housing Ombudsman and notify customers by for example, publishing this on our website until such time we were able to return to compliance as set out in the Housing Ombudsman Code.	None: N/A Lead: N/A Completion date: N/A

Section 9: Scrutiny & oversight: continuous learning and improvement

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation / Action
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	<p>We aim to proactively use learning from complaints to revise policies and procedures and to improve services.</p> <p>Following the complaints process this has led to:</p> <ul style="list-style-type: none"> • Staff reflecting on their working practice. • Where changes/improvements have been identified these have been implemented. • Case handlers complete a lessons learnt and outcomes tracker when closing down a complaint. 	<p>None: N/A Lead: N/A Completion date: N/A</p>
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	<p>In February 2024 we appointed the Vice Chair as the Member Responsible for Complaints (the 'MRC') who will be the lead responsibility for driving the positive complaints handling culture. They will be responsible for ensuring the governing body receives regular information on complaints that provides insight on the landlord's complaint handling performance.</p>	<p>Amend Feedback Policy from chair of the board to vice chair will be the lead responsibility for driving the positive complaints handling culture (section 19). Lead: Complaints Officer. Completion date: August 2024</p>
9.3	Accountability and transparency are also integral to a positive complaint handling culture. Landlords must report back on wider learning and improvements from	No	<p>All complaints including anonymously received complaints are logged in a systemic way for analysis and reporting.</p>	<p>Sharing the information and scrutiny by stakeholders, including our residents, staff, and relevant committees is an</p>

	<p>complaints to stakeholders, such as residents' panels, staff and relevant committees.</p>		<p>On closing a complaint, the lessons learnt and outcomes tracker is updated to record the underlying cause of the complaint and any remedial action(s) taken. By recording complaints in this way we can identify and address the cause of complaints and where appropriate identify any changes to working practices/service improvements and identify any training opportunities.</p> <p>We use this information to produce complaint and lessons learnt reports to SLT and have recently introduced a quarterly complaints, compliments and lessons learnt newsletter which is shared with staff across the organisation.</p> <p><u>Evidenced:</u> Section 10 - Recording Complaints</p>	<p>area for development. Lead: Director of Finance and Business Support Completion date: December 2024</p>
<p>9.4</p>	<p>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.</p>	<p>Yes</p>	<p>The Housing Lead is responsible for complaint handling and ensuring a positive complaint handling culture across Brighter Futures. They assess any themes or trends to identify any potential systemic issues, serious risks, or policies and procedures that require revision</p>	<p>Add role of Senior Lead to the Feedback Policy (section 19). Lead: Complaints Officer. Completion date: August 2024</p>

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	In February 2024 we appointed the Vice Chair as the Member Responsible for Complaints (the 'MRC') who will be the lead responsibility for driving the positive complaints handling culture. They will be responsible for ensuring the governing body receives regular information on complaints that provides insight on the landlord's complaint handling performance.	<p>1. Add role of MRC to Feedback Policy (section 19) Lead: Complaints Officer. Completion date: 1 - Amended Feedback August 2024 2. Write MRC job profile 3. The Board Terms of Reference will be reviewed and updated to confirm this requirement. Lead: Complaints Officer Completion date: December 2024</p>
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	In February 2024 we appointed the Vice Chair as the Member Responsible for Complaints (the 'MRC') who will be the lead responsibility for driving the positive complaints handling culture and be responsible for ensuring the governing body receives regular information on complaints that provides insight on the landlord's complaint handling performance.	<p>Amend Feedback Policy from chair of the board to Vice chair will be the lead responsibility for driving the positive complaints handling culture (section 19). Lead: Complaints Officer. Completion date: August 2024</p>
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,	Yes	The Board will receive the annual performance report on complaints including the Ombudsman's Self-Assessment in August 2024.	Present annual complaints performance and service improvement report 2024 at August Board meeting for

	<p>alongside complaint handling performance;</p> <p>b. regular reviews of issues and trends arising from complaint handling;</p> <p>c. regular updates on the outcomes of the Ombudsman's investigations and progress made in complying with orders related to severe maladministration findings; and</p> <p>d. annual complaints performance and service improvement report.</p>		<p>Quarterly performance reports are provided to the Board of management identifying issues and trends.</p>	<p>scrutiny and challenge. Lead: Director of Finance and Business Support. Completion date: August 2024</p>
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>	No	<p>This objective is not specifically set out in our Complaints Policy. Brighter Futures Housing Association Ltd has in place a code of conduct for all employees.</p>	<p>The specific wording of the Complaint Handling Code objective will be to be set out in policy and procedures. Lead: Director of Finance and Business Support. Completion date: August 2024</p>