

Bromford.

Annual self-assessment against the complaint handling code: June 2024

The Housing Ombudsman Service is set up by law to look at complaints about housing organisations registered with them. It is mandatory for all registered social housing providers, including us, to comply with the Housing Ombudsman Complaint Handling Code 2024.

The service resolves disputes around complaints involving the tenants and leaseholders of social landlords (housing associations and local authorities) and their voluntary members.

Their service is free, independent and impartial. Residents and landlords can contact the Ombudsman at any time for support in helping to resolve a dispute. They provide information and guidance to support residents and landlords and they can be contacted via:

Email: info@housing-ombudsman.org.uk

Telephone: **0300 111 3000**

Mail: Housing Ombudsman Service, PO Box 1484, Unit D, Preston, PR2 0ET.

The Housing Ombudsman first published a Complaints Handling Code in July 2020, setting out good practice to help landlords respond to complaints effectively and fairly. This has since been revised and an updated code was published in March 2022 with a refresh in April 2024. This had been included in the new Social Housing (Regulation) Act passed by parliament in July 2023 which made compliance by social landlords a statutory requirement.

A key requirement of the code is for landlords to publish an annual self-assessment against the key complaint handling principles alongside an annual report, which brings to life the lessons learnt by landlords and their performance against the code requirements. Our report can be found on our website.

This is our fourth self-assessment. It has been reviewed by our internal Customer Forum, led by the chief officer for customer experience. It has been reviewed with our Customer and Community Influence Network and reviewed by our Board on 26 June 2024. The assessment refers to the period 1 April 2023 to 31 March 2024.

The Housing Ombudsman's revised Complaint Handling Code can be found on their website: www.housing-ombudsman.org.uk

The table below outlines our own critical assessment of our service against the requirements of the Complaint Handling Code.

Section 1 – Definition of a complaint

| Code provision | Code requirement | Comply: Yes/No | Evidence | Commentary, and any explanations |
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| 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 | Complaints policy 2023 Complaints policy 2024 | This is set out in our Complaints Policy, which is available on the website. |
| 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 | Complaints policy 2023 Customer Complaints section on our Website How to -Customer Complaints leaflet 2023 | All expressions of dissatisfaction with our services in line with the code are logged as a complaint. We will accept complaints from customers, advocates, neighbours, MPs, etc and we do not require the use of the word complaint to be treated as such. |
| 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 | Complaints policy 2023 Monthly complaints reports Customer Complaints section on our Website How to -Customer Complaints leaflet 2023 | All expressions of dissatisfaction with our services in line with the code are logged as a complaint. Our contact centre colleagues are trained in how to deal with service requests and identify those which are complaints. To ensure transparency we record and monitor customer’s non-complaints. |
| 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 | Complaints policy 2023 Complaints procedure 2022 | Exclusions to the complaints process are detailed in our Complaints Policy. |

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| 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 | Complaints Policy 2023 Complaints procedure 2022 Closing the loop process | Where a customer expresses dissatisfaction with a service in a survey, they are advised of the option to pursue as a formal complaint and the feedback is also sent to the service manager to enable them to identify issues with their service. |
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Section 2 – Exclusions

| Code provision | Code requirement | Comply: Yes/No | Evidence | Commentary, and any explanations |
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| 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 | Complaints policy 2023 | We will accept a complaint unless there is a valid reason not to do so. If we decide not to accept a complaint, we will provide an explanation setting out the reason and explaining the customers right to take the decision to the Housing Ombudsman. |
| 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: <ol style="list-style-type: none"> 1.The issue giving rise to the complaint occurred over twelve months ago. Legal proceedings have started. 2.This is defined as details of the claim, such as the Claim Form and Particulars of Claim, having been filed at court. 3.Matters that have previously been considered under the complaints policy. | Yes | Complaints policy 2023 Reasonable adjustments policy 2021 | Our Complaints Policy has the suggested exclusions included within it. The updated complaints policy that will be issued to our board for approval in July 2024 formerly sets out that a customer can raise a complaint with an issue that is over 12months old. In practice we have been applying this since April 24. |
| 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 | Yes | Complaints policy 2023 | Team leader oversight and accountability ensures that those complaints that are requested which are outside of this timeframe are given management |

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| | 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. | | Reasonable adjustments policy 2021 | oversight and scrutiny. A customer's individual circumstance will be assessed in line with our Reasonable Adjustment Policy when required, so that we can make any appropriate adjustments. |
| 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 | Complaints policy 2023 Reasonable adjustments policy 2021 | The case handler, in discussions with leaders if needed, formerly sets this out in writing to the customer, this includes the right of appeal. |
| 2.5 | Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint. | Yes | Complaints policy 2023 Reasonable adjustments policy 2021 Complaints procedure 2022 | In making any decision to exclude a complaint the case handler will apply the 'Reasonable adjustments policy', taking into account individual circumstances. Commonly the case handler will seek the view of their leader in making this decision. |

3 – Accessibility and Awareness

| Code provision | Code requirement | Comply: Yes/No | Evidence | Commentary, and any explanations |
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| 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 | Complaints policy 2023 How to -Customer Complaints leaflet 2023 Customer Complaints section on our Website | Our Complaints Policy and Make a Complaint Leaflet are published on our website. These are also available for our Neighbourhood Coaches to use in hard copy for our customers. Both set out the different ways a customer can make a complaint. We have a dedicated make a complaint page on our website that includes our policy and how to raise a complaint. Following feedback from our |

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| | | | <p><u>Reasonable adjustments policy 2021</u></p> <p>Neighbourhood and communities' model</p> <p>Customer Solutions Training package 2023-24</p> | <p>involved customers we have made this aspect easier to access for our customers.</p> <p>The Complaints Policy includes reference to our obligations under the Equality Act 2010.</p> <p>Our reasonable adjustment policy outlines how we may consider how to modify our services.</p> <p>A training package for complaint handlers has been developed and delivered to include reference to the necessary skills. In total 18 colleagues have been trained in a range of evidence-based methodologies.</p> <p>The introduction of a quality assurance framework for the complaints team supports improved complaint handling.</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 | Complaints training plan 2023 | <p>Our leadership programme has a face-to-face Voice of the Customer full day awareness training and there is a complaint handling e-learning package for all colleagues across the business to complete.</p> <p>In the past 12 months over 180 leaders have completed this training.</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 | Complaints report – Monthly, received by Board and Customer Forum. | <p>Our governance arrangements include a formal 'Customer Forum' (led by the chief customer officer) which receives a monthly complaint report highlighting, volumes, root causes and potential lessons to be learnt. It provides scrutiny and decision making.</p> <p>Action and activity are monitored through minutes and actions.</p> <p>Our approach is to welcome feedback and in line with the code we promote the Housing</p> |

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| | | | | Ombudsman in our customer communications, our feedback programme, newsletters, annual reviews, annual report and through our Neighbourhood Coaches. |
| 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 | Complaints policy 2023 How to -Customer Complaints leaflet 2023 | The feedback programme from involved customers recommended a leaflet to explain the Housing Ombudsman's code more simply. This was introduced. Our community-based neighbourhood coaches are trained in the complaints procedure and can provide direct and bespoke support for customers. |
| 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 | Complaints policy 2023 | The Policy does this. Additionally, a suite of materials is available for colleagues to download and print for customers or to share electronically. |
| 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 | Complaints policy 2023 | We have an inclusive approach and where representatives are requested; we accommodate this. Complaints can be made by customer advocates, which the Policy sets out. |
| 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 | Complaints policy 2023 Complaints procedure 2022 Acknowledgement email | This information is included in complaint communications. It is integral to our acknowledgement communication and in our stage one and stage two responses. Our feedback programme asks if customers were made aware of their rights to access the Housing Ombudsman throughout their complaint journey – during the year customer awareness has increased from 35% in April 2023 to 58% at the end of year. |

Section 4 – Complaint handling staff

| Code provision | Code requirement | Comply: Yes/No | Evidence | Commentary, and any explanations |
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| 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 | Staffing structure | Our chief customer officer is the accountable executive team member with a dedicated team that handles complaints. Our customer complaints officer is in post and has full access across the business to share complaint learning and root causes. This role also has responsibility for Housing Ombudsman liaison. |
| 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 | Governance structure | The complaints officer is integrated across all key meetings and forums. Attendance and activity are welcomed across all aspects of governance with minutes and actions. |
| 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 | Quality Assurance Framework 2023 Quality Assurance Guidance 2023 | Our training package for complaint handlers has been delivered over the year to include the necessary skills. The introduction of a quality assurance framework for complaint handlers also supports quality complaint handling. Training is mandatory for all complaint handlers. The training is reviewed annually and includes reference to the required skills and expectations as laid out in the code. |

Section 5 – The Complaint Handling Process

| Code provision | Code requirement | Comply: Yes/No | Evidence | Commentary, and any explanations |
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| 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 | Complaints policy 2023 Complaints procedure 2022 | Complaints policy amended and approved in line with Complaint Handling Code changes of April 2023. The Policy is reviewed annually and will be next issued to board for approval in July 2024. |

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| 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 | Complaints policy 2023 Complaints procedure 2022 | There are only two stages to our policy and practice. We triage complaints upon receiving the initial contact from customers and assess if there is an early resolution to the issue to try and give as swift a response as possible |
| 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 | Complaints policy 2023 Complaints procedure 2022 | Our complaint policy follows a two-stage process. The complaints policy has been reviewed, amended and approved in line with the Complaint Handling Code changes set out. |
| 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 | Complaints policy 2023 | This is not a process we use. We internally manage all complaints. |
| 5.5 | Landlords are responsible for ensuring that any third parties handle complaints in line with the Code. | Yes | Complaints policy 2023 | We do not use third parties to handle complaints. |
| 5.6 | When a complaint is logged at stage one or escalated to stage two, 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 | Complaints policy 2023 Complaints procedure 2022 Acknowledgement form 2023 | At the first point of contact with the customer, the complaint handler explores exactly what the complaint and outcome the customer is seeking is. This is then communicated to the customer as a record of the conversation. |
| 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 | Complaints policy 2023 Complaints procedure 2022 Acknowledgement form 2023 | As 5.6, plus we also include any clarifications which confirm what Bromford are / aren't responsible for. |

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| <p>5.8</p> | <p>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.</p> | <p>Yes</p> | <p><u>Complaints policy 2023</u></p> <p><u>Complaints procedure 2022</u></p> <p>Acknowledgement form 2023</p> <p>Training Plan 2023</p> <p>Quality Assurance framework 2023</p> | <p>This requirement is set out within our procedures and reinforced through training and the quality assurance framework.</p> <p>Additionally, complaint leaders review cases, including any reasons why a customer may choose to escalate their complaint to Stage 2 or the HO. This helps the team ensure standards are being maintained and corrective action is taken where this isn't the case.</p> |
| <p>5.9</p> | <p>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.</p> | <p>Yes</p> | <p><u>Complaints policy 2023</u></p> <p><u>Complaints procedure 2022</u></p> <p>Acknowledgement form 2023</p> | <p>The Acknowledgement form directs the complaint team to explore communication methods and timings with the customer and how best to support their needs.</p> <p>Colleagues will agree timescales with customers and document this.</p> |
| <p>5.10</p> | <p>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.</p> | <p>Yes</p> | <p><u>Complaints policy 2023</u></p> <p><u>Reasonable adjustments policy 2021</u></p> <p>Training plan 2023</p> <p>Acknowledgement form 2023</p> | <p>At the first point of contact the complaints team will ask the customer if there are any circumstances we need to be aware of when dealing with their complaint alongside existing information held on the system.</p> <p>A key role for our neighbourhood and communities team, specifically neighbourhood coaches, is to understand their customers' needs well. Importantly this information is recorded in our electronic system D365 for other customer facing colleagues to access when required.</p> |

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| | | | Annual Customer review form 2023 | Neighbourhood coaches carry out regular customer visits and a dedicated annual customer review to collect customer information, including vulnerabilities. |
| 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 | Complaints policy 2023 | The policy outlines how we comply with the provisions of the code. Leaders monitor adherence to this area of the code through case reviews with handlers and training. |
| 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 | Customer Relationship Management System | Our CRM system D365 has been specifically designed to accommodate and support the Housing Ombudsman’s complaint handling code. The system is undergoing upgrades to accommodate improved code alignment and improved processes for colleagues. This will in turn enhance our reporting capabilities going forward. |
| 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 | Complaints policy 2023 Compensation policy 2022 Compensation calculator 2023 | Our compensation policy – which is supported by the Housing Ombudsman’s remedies document – has been distributed to the team alongside training for greater awareness and consistency, as well as a compensation calculator to support the utilities and loss of room usage. |
| 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 | Reasonable adjustments policy 2021 Complaints policy 2023 | Restrictions are only applied in exceptional circumstances and a single point of contact is always appointed to support the customer. This is a time framed restriction and is subject to periodic review. Any restrictions would need approval from a director. |

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| 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 | Reasonable adjustments policy 2021 Complaints policy 2023 | As 5.14. Plus, this process is cognisant of the Equalities Act 2010 and is proportionate. Details are set out in the two policies cited as evidence. |
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Section 6. Complaint Stages: Stage 1

| Code provision | Code requirement | Comply: Yes/No | Evidence | Commentary, and any explanations |
|----------------|---|----------------|--|---|
| 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 one complaints can be resolved promptly, and an explanation, apology or resolution provided to the resident. | Yes | Complaints policy 2023 Complaints procedure 2022 Acknowledgement form 2023 | We introduced a triage process to decide which complaints can be resolved early and this is corroborated with the customer via the acknowledgement process and in line with the code requirements. |
| 6.2 | Complaints must be acknowledged, defined and logged at stage one of the complaint's procedure within five working days of the complaint being received. | Yes | Complaints policy 2023 | Our complaints policy is in line with code requirements. 100% of complaints are logged within the five working days. |
| 6.3 | Landlords must issue a full response to stage one complaints within 10 working days of the complaint being acknowledged. | Yes | Complaints policy 2023 | 74.9% of responses were provided within 10 working days for 2023-24. Performance is reported to our board monthly. We recognise that our performance has not been where we would have wanted it to be this year. This is due to several factors: volume, complexity of customer complaints, and ability to complete works in SLA timescales. |

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| | | | | Improvement work and plans are now in place, which resulted in performance returning to target levels in May 2024. |
| 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 be no more than 10 working days without good reason, and the reason(s) must be clearly explained to the resident. | Yes | Complaints policy 2023 Complaints procedure 2022 Quality assurance framework | This requirement is set out in our complaints policy and quality framework. We undertake quality checks in line with our quality assurance framework which is overseen by our leaders. |
| 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 | Complaints policy 2023 Complaints procedure 2022 Quality assurance framework | This requirement is set out in our complaints policy and quality framework. We undertake quality checks in line with our quality assurance framework. |
| 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 | Complaints policy 2023 Complaints procedure 2022 Acknowledgement form 2023 | We record actions in our system and track them through to completion. We have a dedicated group of complaint handling colleagues who check and drive the completion of these actions alongside increased levels of communication with the customer. |
| 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 | Complaints policy 2023 Complaints procedure 2022 Quality assurance framework | This requirement is set out in our complaints policy and quality assurance framework with our sampling and audits clearly stated. We undertake quality checks, and these are shared with colleagues at 1-1s and used to shape team meetings as areas for celebration and improvement. |

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| 6.8 | Where residents raise additional complaints during the investigation, these must be incorporated into the stage one response if they are related, and the stage one response has not been issued. Where the stage one 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 | Complaints policy 2023 Complaints procedure 2022 Quality assurance framework Training plan 2023 | This requirement is set out in our complaints policy and quality framework. We undertake quality checks as stated above. |
| 6.9 | Landlords must confirm the following in writing to the resident at the completion of stage one 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 two if the individual is not satisfied with the response. | Yes | Complaints policy 2023 Complaints procedure 2022 Call coaching and sampling methodology 2023 Annual Complaints and Service Improvement report | To support the quality of responses and to ensure consistency we have produced an exemplar letter, or template, that colleagues use. This is further supported by the quality assurance framework and training, which additionally guides colleagues on responses. All communication is recorded via our customer D365 system or our IPFX telephony system which has a call recording and monitoring facility. We seek feedback from customers on the effectiveness of the process and action improvements – see Annual complaints and Service Improvement report. |

Section 6. Complaint Stages: Stage 2

| Code provision | Code requirement | Comply: Yes/No | Evidence | Commentary, and any explanations |
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| 6.10 | If all or part of the complaint is not resolved to the resident's satisfaction at stage one, it must be progressed to stage two of the landlord's procedure. Stage two is the landlord's final response. | Yes | Complaints policy 2023 Complaints procedure 2022 | Our customer system D365 has been specifically designed to accommodate and support the HO complaint handling code. In line with the April 2024 code we are making further improvements to the system, this will be delivered during 2024. |

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| 6.11 | Requests for stage two must be acknowledged, defined and logged at stage two of the complaint's procedure within five working days of the escalation request being received. | Yes | Complaints policy 2023 Complaints procedure 2022 Acknowledgement form 2023 | Our complaints policy is in line with code requirements. 100% of complaints are logged within the five working days. |
| 6.12 | Residents must not be required to explain their reasons for requesting a stage two consideration. Landlords are expected to make reasonable efforts to understand why a resident remains unhappy as part of its stage two response. | Yes | Complaints policy 2023 Complaints procedure 2022 Acknowledgment form 2023 Training plan 2023 | Communications with customers is a key component of the complaint process and is checked and quality assured. Recording communications is key in our customer experienced system. The Training Plan covers a range of issues, including dispute resolution; solution focussed approach; reflective practice; building stronger relationships with customers; communicating effectively to ensure the customer has clarity of what can be achieved and to manage expectations. |
| 6.13 | The person considering the complaint at stage two must not be the same person that considered the complaint at stage one | Yes | Complaints policy 2023 Complaints procedure 2022 | Different colleagues deal with stage 1 and stage 2 complaints – this is set out in our Policy. |
| 6.14 | Landlords must issue a final response to the stage two within 20 working days of the complaint being acknowledged. | Yes | Complaints policy 2023 Complaints procedure 2022 | 39% of stage two complaints were issued in timescale during 23/24. This is significantly lower than our expectations and we have added additional resource to deal with the volume of customers requesting to escalate their complaints to stage two of the process. Performance is reported and tracked at our board monthly. |

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| 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 | Complaints policy 2023 Complaints procedure 2022 | This requirement is set out in our complaints policy and quality framework. We undertake quality checks in line with our quality assurance framework which is overseen by team leaders. |
| 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 | Complaints policy 2023 Complaints procedure 2022 Quality assurance framework | This requirement is set out in our complaints policy and quality framework. We undertake quality checks in line with our quality assurance framework. |
| 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 | Complaints policy 2023 Complaints procedure 2022 | We record actions in our system and track them through to completion. We have a dedicated group of complaint handling colleagues who check and drive the completion of these actions alongside increased levels of communication with the customer. |
| 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 | Complaints policy 2023 Training plan 2023 Complaints procedure 2022 | This requirement is set out in our complaints policy and quality assurance framework with our sampling and audits clearly stated. We undertake quality checks, and these are shared with colleagues at 1-1s and used to shape team meetings as areas for celebration and improvement. |
| 6.19 | Landlords must confirm the following in writing to the resident at the completion of stage two in clear, plain language: a. the complaint stage; b. the complaint definition; c. the decision on the | Yes | Complaints policy 2023 | The exemplar letter or letter template and quality assurance framework require that all points listed are responded to. |

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| | 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. | | Complaints procedure 2022 | This is also reinforced through our complaint handler training. All communications recorded either via our customer D365 system or via our IPFX telephony system which has call recording and monitoring facility. It is integral to our acknowledgement communication; in our responses and is asked as part of our feedback programme. |
| 6.20 | Stage two is the landlord's final response and must involve all suitable staff members needed to issue such a response. | Yes | Complaints policy 2023 Complaints procedure 2022 | A business partnering role across key areas of the business is in place to ensure complaints have the right levels of accountability, priority and progress. |

Section 7 – Putting things right

| Code provision | Code requirement | Comply: Yes/No | Evidence | Commentary, and any explanations |
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| 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; | Yes | Complaints policy 2023 Complaints procedure 2022 Compensation policy 2022 Training plan 2022 Quality assurance framework Monthly complaint reports | <p>Monthly there is a comprehensive complaints report compiled which shows our performance against the code along with lessons learnt, progress against any actions and root cause analysis. This then tracks through our governance arrangements to our executive and board as well as to our Customer and Community Influence Network for awareness, accountability, scrutiny and comment.</p> <p>Additionally, themes emerging from the spotlight reports from the Housing Ombudsman are tracked and checked by key leaders across the business to drive improvement.</p> |

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| | <ul style="list-style-type: none"> Changing policies, procedures or practices. | | Annual complaint and service improvement report | |
| 7.2 | Any remedy offered must reflect the impact on the resident as a result of any fault identified. | Yes | Compensation policy 2022 | Our policy on compensation is in line with the Housing Ombudsman remedies document. Compensation awards consider fully the customers costs associated with the complaint and other relevant factors. |
| 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 | Compensation policy 2022 Quality assurance framework | Reviewed and checked by team leaders to ensure this has clarity and consistency for customers. |
| 7.4 | Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies. | Yes | Compensation policy 2022 Quality assurance framework | As above and the remedies document is a key part to the team training pack. Key themes and total amounts paid are tracked monthly and included in the monthly complaints report for scrutiny and oversight. |

Section 8 – Self-assessment, reporting and compliance

| Code provision | Code requirement | Comply: Yes/No | Evidence | Commentary, and any explanations |
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| <p>8.1</p> | <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. | <p>Yes</p> | <p>Self-assessment 2024</p> <p>Annual Complaint Handling and Service Improvement Report 2024</p> | <p>A self-assessment against the HO code and Annual Complaint Handling and Service Improvement report is produced annually. Both documents will be considered and approved by our board in June 2024 and will be considered in detail by CCIN (our involved customer group). Both documents will also be published on our website.</p> |
| <p>8.2</p> | <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 section of its website relating to complaints. The governing body’s response to the report must be published alongside this.</p> | <p>Yes</p> | <p>Self-assessment 2024</p> <p>Annual Complaint Handling and Service Improvement Report 2024</p> <p>Published on website</p> | <p>A self-assessment against the HO code and Annual Complaint Handling and Service Improvement report is produced annually. Both documents will be considered and approved by our board in June 2024 and will be considered in detail by CCIN (our involved customer group). Both documents will also be published on our website and include the board’s response.</p> |
| <p>8.3</p> | <p>Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.</p> | <p>Yes</p> | <p>Complaints policy 2023</p> <p>Complaints procedure 2022</p> | <p>The Complaints Policy is reviewed annually. In the last 12 months there has been no significant events, including restructure or merger.</p> |

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| | | | <u>Compensation policy 2022</u> | |
| 8.4 | Landlords may be asked to review and update the self-assessment following an Ombudsman investigation. | Yes | Self-assessment 2022 and 2023 Annual Complaints report's 2022 and 2023 | In the past 12 months we have not been asked by the Housing Ombudsman to do this. |
| 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 | compliant | In the past 12 months there have been no exceptional incidents that have impacted our ability to meet the HO Code. |

Section 9: Scrutiny & Oversight: continuous learning and improvement

| Code provision | Code requirement | Comply: Yes/No | Evidence | Commentary, and any explanations |
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| 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 | Complaints report - monthly Annual Complaints and Service Improvement report 2024 | Each month we produce a complaints report that is received by our board, the Executive, Customer Forum and two monthly by CCIN. This report includes performance, analysis and root cause issues that feed into our continuous learning and improvement agenda. Annually we produce an Annual Complaints and Service Improvement report, which provides detail on our learning, progress and next steps. This is further supported by a monthly Customer Insight report which provides customer feedback on service quality, which we also use to support our improvement agenda. |

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| 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 | Complaint report – monthly Annual Customer and Service Improvement report 2024 | Bromford view complaints as important pieces of feedback and intelligence, we use it to identify issues and introduce positive changes in service delivery. The Annual Complaints and Service Improvement report 2024 provides details. Additionally, we track HO documents and judgements and other benchmarking information to support our improvement agenda. |
| 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 | Complaint report – monthly Annual Customer and Service Improvement report 2024 | We are developing a culture of root cause analysis and learning from complaints and wider insight (where we may have underperformance). This is to ensure that improvement plans can then be put in place or feedback loops created to improve services. Themes, learning and actions are captured within complaints reporting and wider customer insight documentation that is shared through multiple governance channels, including our board, executive, customer forum, team meetings - monthly, and with customers every 2 months. Additionally we are sharing plans and progress with customer via numerous communication channels including the website, email and other social media. |
| 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 | | Paul Coates the Chief Customer officer has the accountability for complaints. |
| 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 | Yes | Board information pack. | Dame Sandra Horley is a non-executive board member and will be appointed as our MRC in June 2024. Sandra also chairs our CCIN (Customer and |

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| | positive complaint handling culture. This person is referred to as the Member Responsible for Complaints ('the MRC'). | | | Community Influence Network). The board information pack will be updated to reflect this, as will her biography on the website. |
| 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 | Monthly complaints reporting Regulatory performance report | A monthly complaint report is provided to our board and two monthly to CCIN. The MRC has access to suitable information and colleagues. Colleagues from the business, including complaints, regularly attend CCIN to present reports and findings. Additionally the MRC meets with a number of colleagues frequently to discuss customer matters, including improvement agendas |
| 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 | Monthly complaints reporting HO self-assessment 2024 Annual Complaint and Service Improvement report 2024 | The MRC receives the requirements set out in 'a, b and c' monthly and is engaged in the drafting and reviewing of the documents set out in 'd'. |
| 9.8 | Landlords must have a standard objective in relation to complaint handling for all relevant employees or third parties that reflects the need to: a. has a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments; | Yes | Leadership competencies Leadership goals | Bromford work hard on ensuring our culture and way of working aligns fully with HO code, we do this in a number of ways: <ul style="list-style-type: none">• Our Strategy, annual plans and annual targets sets clear expectations and is specific on key elements and attributes, including our DNA (values and culture). |

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| | <p>b. takes 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> | | | <ul style="list-style-type: none"> • Embedded through leadership competencies, leadership, team and colleague objectives. Also, general and tailored training programmes, some of which are mandatory for all colleagues • Embedded with third parties through contract management reviews, including complaints performance. • Various customer and colleague campaigns, including Think Customer, Act Customer. |
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