Appendix 1: 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 complaint’s performance and service improvement report on their website. The governing body’s response to the report must be published alongside this.

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

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

**Section 1: Definition of a complaint**

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| **Code provision** | **Code requirement** | **Comply:**  **Yes / No** | **Evidence** | **Commentary / explanation** |
| 1.2 | A complaint must be defined as:  *‘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.’* | Yes | The definition is stated in our Complaints Policy and customer leaflet – How to make a complaint.  [Complaints system for our customers • Broadacres Housing Association](https://www.broadacres.org.uk/about-us/how-are-we-performing/feedback/complaints/) | This policy is reviewed every three years (last review April 2024) or with every change in the Complaints Handling Code  to make sure that it’s compliant. |
| 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 | We reiterate this in our colleague complaints training, explaining customers may not express or use the word “complaint” but it’s important we support the customer and give them the choice to make a complaint. We  explain in our policy that we accept complaints submitted via a third party or representative.  [Complaints system for our customers • Broadacres Housing Association](https://www.broadacres.org.uk/about-us/how-are-we-performing/feedback/complaints/) | There is additional support from the Customer Engagement and Insight Team in terms of giving advice and support to help identify whether a ‘query’ raised could in fact be a complaint. The policy explains we accept complaints from a ‘third party’ to further facilitate submitting a complaint. |
| 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 | Within our Complaints Policy and customer leaflet – How to Make a Complaint we explain the difference. We also reiterate this in the colleague training.  [Complaints system for our customers • Broadacres Housing Association](https://www.broadacres.org.uk/about-us/how-are-we-performing/feedback/complaints/) | Any contact made by a customer is logged on our main Customer Relations Management System (CRM) all service requests are recorded, passed through as work tray actions to teams / individual officers, who monitor this service request through to completion. |
| 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 | Within our Complaints Policy we explain that a customer can make a complaint in response to their service request. In the Colleague Complaints Procedure, we explain colleagues must not stop their efforts to address the service request if the resident complains. This is reiterated in colleague training.  [Complaints system for our customers • Broadacres Housing Association](https://www.broadacres.org.uk/about-us/how-are-we-performing/feedback/complaints/) |  |
| 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 | We provide details of how to make a complaint when we are asking customers for wider feedback on our services. We also now provide details of how to make a complaint during our annual surveys which we deliver twice a year, through email and telephone. | During our transactional email or SMS surveys we always follow up a low score of 3 or below with a phone call from a colleague to give us the opportunity to “put it right” or if not, they will raise a complaint if the customer expresses dissatisfaction and wishes to. |

**Section 2: Exclusions**

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| **Code provision** | **Code requirement** | **Comply:**  **Yes / No** | **Evidence** | **Commentary / explanation** |
| 2.1 | Landlords must accept a complaint unless there is a valid reason not to do so. If landlords decide not to accept a complaint they must be able to evidence their reasoning. Each complaint must be considered on its own merits. | Yes | Within our Complaints Policy we clarify our position.  [Complaints system for our customers • Broadacres Housing Association](https://www.broadacres.org.uk/about-us/how-are-we-performing/feedback/complaints/) | If we are unable to accept a complaint, we will let the customer know in writing stating the reason and also how to contact 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:   * 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 | Within our Complaints Policy we clearly set out the circumstances, including those stated in 2.2 in which a matter will not be considered as a complaint. We also state that every circumstance will be considered on its own merits.  [Complaints system for our customers • Broadacres Housing Association](https://www.broadacres.org.uk/about-us/how-are-we-performing/feedback/complaints/) |  |
| 2.3 | Landlords must accept complaints referred to them within 12 months of the issue occurring or the resident becoming aware of the issue, unless they are excluded on other grounds. Landlords must consider whether to apply discretion to accept complaints made outside this time limit where there are good reasons to do so. | Yes | Our Complaints Policy sets this out. Within the policy we also explain that each complaint will be considered on its own merits and the circumstances in which we exclude will be fair and reasonable.  [Complaints system for our customers • Broadacres Housing Association](https://www.broadacres.org.uk/about-us/how-are-we-performing/feedback/complaints/) |  |
| 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 | Within our complaints policy we set this out. If we are unable to accept a complaint, a written response is provided to the customer with the Ombudsman details included in the response.  [Complaints system for our customers • Broadacres Housing Association](https://www.broadacres.org.uk/about-us/how-are-we-performing/feedback/complaints/) | In 2024/25 we excluded no complaints. |
| 2.5 | Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint. | Yes | Within our complaints policy we set this out.  [Complaints system for our customers • Broadacres Housing Association](https://www.broadacres.org.uk/about-us/how-are-we-performing/feedback/complaints/) | In 2024/25 we excluded no complaints. |

**Section 3: Accessibility and Awareness**

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| **Code provision** | **Code requirement** | **Comply:**  **Yes / No** | **Evidence** | **Commentary / explanation** |
| 3.1 | Landlords must make it easy for residents to complain by providing different channels through which they can make a complaint.  Landlords must consider their duties under the Equality Act 2010 and anticipate the needs and reasonable adjustments of residents who may need to access the complaints process. | Yes | Our Complaints Policy plus customer leaflet illustrate the various channels open to the customers to make a complaint. This does include in person, telephone, in writing, through social media/website and by email.  Within the policy is a section on how we support residents who require reasonable adjustments.  During the summer of 2024 we consulted our customers as part of the development of a Vulnerability, Reasonable Adjustment and Protected Characteristics Policy. Over 900 customers responded to the survey and customers also took part in workshops around vulnerability. The policy was developed with customers and colleagues and approved by Committee in Jan 2025. The policy is available for customers on our website.  [Vulnerability-Protected-Characteristics-and-Reasonable-Adjustment-Policy\_Customer-Version.docx](https://view.officeapps.live.com/op/view.aspx?src=https%3A%2F%2Fwww.broadacres.org.uk%2Fwp-content%2Fuploads%2F2025%2F02%2FVulnerability-Protected-Characteristics-and-Reasonable-Adjustment-Policy_Customer-Version.docx&wdOrigin=BROWSELINK)  [Complaints system for our customers • Broadacres Housing Association](https://www.broadacres.org.uk/about-us/how-are-we-performing/feedback/complaints/)  In May 2024 an internal audit of our complaints management found “good practice areas throughout the complaints handling process. Notably, Broadacres’ website details information on how to file a complaint, the Housing Ombudsman service and the complaints policy”.  In July 2024 the Customer Scrutiny Panel (CSP) carried out a scrutiny review on our complaint handling. They found that there were some discrepancies around how complaints are reported through the extra care schemes. They recommended that further training be provided to support colleagues and a practice guide be developed to also assist the third-party carers on site. These actions are being monitored by the CSP. | Our complaints policy is available to download from our website as an accessible document and can be translated in their language of choice. We are able to print and send the policy to any customer who does not have online access. If a customer approaches any Broadacres colleague face to face with an expression of dissatisfaction or complaint, they will know who to pass the complaint to. We now track what channel the complaint came in through. |
| 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 | Colleagues are made aware of the complaints process and who to pass the complaint to through internal communications and team meetings. Our EDI & Vulnerability policy review consultation during the summer of 2024 included the review on how easy it is to make a complaint. | We continue to reach out and inform those more outlying teams such as Catering, Cleaning and the Operatives across the year. By attending team meetings, this will ensure they are aware of the process and can help our customers to make a complaint. These teams are out working in our customers’ homes and schemes and are often the only contact they have with Broadacres. |
| 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 | We have seen an increase in our complaint volumes in 2024/25. We dealt with more stage 1 complaints than in 2023/24.  [Broadacres\_Annual\_Complaints\_Website-Version.pdf](https://www.broadacres.org.uk/wp-content/uploads/2025/05/Broadacres_Annual_Complaints_Website-Version.pdf)  [Broadacres Magazine • Broadacres](https://www.broadacres.org.uk/broadacres-magazine/) | We will continue to use every opportunity to encourage our customers to let us know if they are dissatisfied or want to make a complaint. Talking about complaints at our Community Action Days, Social Media Campaigns and through our Customer Magazine. |
| 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 | Our Complaints Policy is available online or in print on request. We also have a customer complaints leaflet to explain the policy in simpler terms and this is available in a plain text version. All definitions, the stages and all timeframes are included.  [Complaints system for our customers • Broadacres Housing Association](https://www.broadacres.org.uk/about-us/how-are-we-performing/feedback/complaints/) | We have a dedicated section which sits on the Home page for complaints and feedback. This includes compliments, complaints and suggestions. We regularly share a link to this page through our social media posts and through our customer magazine. |
| 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 | This is set out in the Complaint Policy.  [Complaints system for our customers • Broadacres Housing Association](https://www.broadacres.org.uk/about-us/how-are-we-performing/feedback/complaints/) | There are links to the Ombudsman website and the Complaint Handling Code on our website, we include information in our customer magazine and across social media. |
| 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 | This is set out in the Complaints Policy.    [Complaints system for our customers • Broadacres Housing Association](https://www.broadacres.org.uk/about-us/how-are-we-performing/feedback/complaints/) | The policy includes a section on reasonable adjustments that explains how any resident, with their permission, can nominate a representative to deal with their complaint on their behalf. |
| 3.7 | Landlords must provide residents with information on their right to access the Ombudsman service and how the individual can engage with the Ombudsman about their complaint. | Yes | Our Complaints Policy clearly lays this out, as does the Customer Complaints Leaflet. We also provide Housing Ombudsman details in the stage 1 and 2 response letters and the customers right to access the Ombudsman service throughout the complaint.  [Complaints system for our customers • Broadacres Housing Association](https://www.broadacres.org.uk/about-us/how-are-we-performing/feedback/complaints/) | Details of how to access the Housing Ombudsman is also available on our website. |

**Section 4: Complaint Handling Staff**

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| **Code provision** | **Code requirement** | **Comply:**  **Yes / No** | **Evidence** | **Commentary / explanation** |
| 4.1 | Landlords must have a person or team assigned to take responsibility for complaint handling, including liaison with the Ombudsman and ensuring complaints are reported to the governing body (or equivalent). This Code will refer to that person or team as the ‘complaints officer’. This role may be in addition to other duties. | Yes |  | We have a Complaints Officer who supports the named investigating officers, who alongside the Customer Insight and Engagement Manager is responsible for liaison with the Housing Ombudsman.  The Head of Customer Engagement and Insight who oversees complaints and ensures complaints are reported quarterly to the governing body. The Investigating Officers are assigned according to the nature and stage of the complaint. |
| 4.2 | The complaints officer must have access to staff at all levels to facilitate the prompt resolution of complaints. They must also have the authority and autonomy to act to resolve disputes promptly and fairly. | Yes | The roles of the Complaint Lead and Investigating Officer are defined in the colleague procedure. | The Complaints Officer has access to colleagues at all levels, as do the Investigating Officers. The Investigating Officers have the autonomy to resolve complaints quickly, offering customer focused remedies, including goodwill gestures and compensation. |
| 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 | All colleagues who manage and investigate complaints attend a training session that covers the Code, complaint handling, why complaints are important and how we learn from them to make improvements to our services.  This training is refreshed with colleagues every 3 years or when a significant change is made to the Policy or the Code.  Following an internal audit of complaints management in May 2024 we reviewed the training to include why customer feedback is important and how we use it. They found “Broadacres invests in training for staff handling complaints, ensuring a professional, empathetic approach”.  Having a dedicated Complaints Officer coordinating all complaints ensures we handle complaints effectively. | We report monthly into our operational leadership meeting and Director’s meeting. We hold monthly account meetings with key colleagues across the business to ensure we prioritise complaint handling and learning. We report quarterly to our Customer Experience Committee details of lessons learnt. Complaints data is also shared with the Customer Scrutiny Panel, to help select topics of scrutiny. We share those lessons with customers and colleagues, through newsletters, social media and Annual Reports.  [Broadacres\_Annual\_Complaints\_Website-Version.pdf](https://www.broadacres.org.uk/wp-content/uploads/2025/05/Broadacres_Annual_Complaints_Website-Version.pdf) |

**Section 5: The Complaint Handling Process**

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| **Code provision** | **Code requirement** | **Comply:**  **Yes / No** | **Evidence** | **Commentary / explanation** |
| 5.1 | Landlords must have a single policy in place for dealing with complaints covered by this Code. Residents must not be treated differently if they complain. | Yes | We have one Complaints Policy that covers complaints from customers who have a tenancy, lease, license to occupy, service agreement or arrangement to occupy premises managed by Broadacres.  [Complaints system for our customers • Broadacres Housing Association](https://www.broadacres.org.uk/about-us/how-are-we-performing/feedback/complaints/) | Complaints from non Broadacres Customers such as private residents or owners are still recorded, acknowledged and responded to within 10 working days. |
| 5.2 | The early and local resolution of issues between landlords and residents is key to effective complaint handling. It is not appropriate to have extra named stages (such as ‘stage 0’ or ‘informal complaint’) as this causes unnecessary confusion. | Yes | We operate a 2 stage process that covers stage 1 and stage 2.  This is covered in our Complaints Policy and the Customer Complaints Leaflet.  [Complaints system for our customers • Broadacres Housing Association](https://www.broadacres.org.uk/about-us/how-are-we-performing/feedback/complaints/) |  |
| 5.3 | A process with more than two stages is not acceptable under any circumstances as this will make the complaint process unduly long and delay access to the Ombudsman. | Yes | We operate a 2 stage process that covers stage 1 and stage 2.  This is covered in our Complaints Policy and the Customer Complaints Leaflet.  [Complaints system for our customers • Broadacres Housing Association](https://www.broadacres.org.uk/about-us/how-are-we-performing/feedback/complaints/) |  |
| 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 |  | Our Complaints Process will not be handled by a third party, customer complaints are always handled by a Broadacres colleagues. Even if a complaint relates to a contractor or third party, a Broadacres colleague will handle the complaint. |
| 5.5 | Landlords are responsible for ensuring that any third parties handle complaints in line with the Code. | Yes |  | Our Complaints Process will not be handled by a third party, customer complaints are always handled by Broadacres colleagues. |
| 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 | The Complaints Officer will acknowledge the complaint at stage 1 and stage 2. As part of that process the Officer will set out their understanding of the complaint with the customer and the outcomes they are seeking, before it is passed to the Investigating Officer. This is included in the definition of the Complaints Officer responsibilities in the Colleague Complaints Procedure. | As part of the acknowledgement the Complaints Officer will respond to the customer in writing, setting out the “complaint definition” and advising if the customer believes anything is not clear or not included to let them know. |
| 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 |  | The Complaints Officer will acknowledge the complaint at stage 1 and stage 2. As part of that process the Officer will set out their understanding of the customer’s complaint, what we are and are not responsible for and the outcomes they are seeking, before it is passed. This is outlined in the Colleague Complaints Procedure. |
| 5.8 | At each stage of the complaints process, complaint handlers must:   1. deal with complaints on their merits, act independently, and have an open mind; 2. give the resident a fair chance to set out their position; 3. take measures to address any actual or perceived conflict of interest; and 4. consider all relevant information and evidence carefully. | Yes | As part of the Complaints training, we use Broadacres values as the foundations for how to effectively manage a complaint. They ensure our colleagues behave with respect, show empathy and are passionate in their role.  [Broadacres](https://careers.broadacres.org.uk/)  Following an internal audit of complaints management in May 2024 we reviewed the training to include why customer feedback is important and how we use it. They found “Broadacres invests in training for staff handling complaints, ensuring a professional, empathetic approach”. | We provide complaint handling training to all colleagues who investigate or manage complaints.  No Investigating Officer will investigate a complaint about themselves.  Investigating Officers do not investigate both stages.  Only a Head of Service of Director investigate a stage, If the customer felt the officer that had been assigned was not independent we would change the IO. |
| 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 | This is outlined in the Complaints Policy.  [Complaints system for our customers • Broadacres Housing Association](https://www.broadacres.org.uk/about-us/how-are-we-performing/feedback/complaints/) | When we issue the interim letter to confirm the new agreed timescales with the customer we will also advise how and when we have agreed to keep them informed. |
| 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 | This is outlined in the Complaints Policy. We record any agreed reasonable adjustments as well as any disabilities the resident discloses on our new Complaints Case Management system. These are kept under active review.  [Complaints system for our customers • Broadacres Housing Association](https://www.broadacres.org.uk/about-us/how-are-we-performing/feedback/complaints/) | We record any agreed reasonable adjustments, as well as any disabilities the resident discloses for the customer during the period of the complaint on our Complaints Case Management system. This allows us to keep the adjustments under review. |
| 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 | We would not refuse to escalate any complaint from a stage 1 to a stage 2. We articulate in our policy where we are unable to accept a complaint, however we will always consider each complaint on its own merits and will be fair and reasonable in our response.  [Complaints system for our customers • Broadacres Housing Association](https://www.broadacres.org.uk/about-us/how-are-we-performing/feedback/complaints/) |  |
| 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 |  | Our Complaint Case Management System enables us to log the complaint, record reasonable adjustments, keep a full record of the complaint, all correspondence with the customer, attach relevant supporting documentation. |
| 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 |  | One aspect of the Complaints Officer role is to support the customer and ensure at any stage of the process a complaint can be remedied. The introduction of a mid-way check in with the customers throughout the investigation period ensures the complaint officer is able to track and gain insight into the customer journey. |
| 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 | We have the following policy in place for managing unacceptable customer behaviour.  [2024-09-02-Unacceptable-Customer-Behaviour-Policy-Accessible.docx](https://view.officeapps.live.com/op/view.aspx?src=https%3A%2F%2Fwww.broadacres.org.uk%2Fwp-content%2Fuploads%2F2024%2F09%2F2024-09-02-Unacceptable-Customer-Behaviour-Policy-Accessible.docx&wdOrigin=BROWSELINK) | As part of the policy any restrictions and the reasons for them will be recorded on the customer’s account and kept under regular review. |
| 5.15 | Any restrictions placed on contact due to unacceptable behaviour must be proportionate and demonstrate regard for the provisions of the Equality Act 2010. | Yes | We have the following policy in place for managing unacceptable customer behaviour.    [2024-09-02-Unacceptable-Customer-Behaviour-Policy-Accessible.docx](https://view.officeapps.live.com/op/view.aspx?src=https%3A%2F%2Fwww.broadacres.org.uk%2Fwp-content%2Fuploads%2F2024%2F09%2F2024-09-02-Unacceptable-Customer-Behaviour-Policy-Accessible.docx&wdOrigin=BROWSELINK) | As above. This is outlined in the unacceptable behaviour policy. |

**Section 6: Complaints Stages**

Stage 1

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| **Code**  **provision** | **Code requirement** | **Comply:**  **Yes / No** | **Evidence** | **Commentary / explanation** |
| 6.1 | Landlords must have processes in place to consider which complaints can be responded to as early as possible, and which require further investigation. Landlords must consider factors such as the complexity of the complaint and whether the resident is vulnerable or at risk. Most stage 1 complaints can be resolved promptly, and an explanation, apology or resolution provided to the resident. | Yes | This process is outlined in the Colleague Complaints Procedure. | During the acknowledgement stage the Complaints Officer will call the customer, this contact helps them to triage the complaint. They will establish the complexity of the complaint, the vulnerability of the customer, if any reasonable adjustments are required. If the complaint involves several service areas. If a case is identified as having complexities or requires multiple interventions from services, then a case conference is arranged within 48 hours of the case being noted as complex. Customer vulnerabilities, reasonable adjustments and desired resolutions are considered as part of review. |
| 6.2 | Complaints must be acknowledged, defined and logged at stage 1 of the complaints procedure **within five working days of the complaint being received**. | Yes | This is outlined in the Complaints Policy and the customer leaflet.  [Complaints system for our customers • Broadacres Housing Association](https://www.broadacres.org.uk/about-us/how-are-we-performing/feedback/complaints/)  In May 2024 an internal audit of complaints management found that “Daily automated reports on ongoing complaints also facilitate timely responses and resolution”. | During the colleague complaint handling training we talk about the HO timescales we work to.  Each month we report on whether we have achieved the timescales to Senior Leadership, the Customer Experience Committee and Customer Scrutiny Panel through their Quarterly Complaints Update. |
| 6.3 | Landlords must issue a full response to stage 1 complaints **within 10 working days** of the complaint being acknowledged. | Yes | This is outlined in the Complaints Policy and the customer leaflet.  [Complaints system for our customers • Broadacres Housing Association](https://www.broadacres.org.uk/about-us/how-are-we-performing/feedback/complaints/) | During the colleague complaint handling training we talk about the HO timescales we work to.  Each month we report on whether we have achieved  the timescales to Senior Leadership, the Customer Experience Committee and Customer Scrutiny Panel through their Quarterly Complaints Update. |
| 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 | This is outlined in the Complaints Policy.  [Complaints system for our customers • Broadacres Housing Association](https://www.broadacres.org.uk/about-us/how-are-we-performing/feedback/complaints/) | As part of the colleague training, we outline the timescales for extending a complaint and give examples of reasons why an extension may be required. All extensions are approved by the Complaints Officer. |
| 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 |  | The letter sent to the customer outlining the agreement around the extension and the reasons why, includes the Housing  Ombudsman details. |
| 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 | We follow the Housing Ombudsman Complaint Handling Code timescales, which are outlined in the policy and we do not extend timescales to when outstanding actions are completed if this falls outside the Handling Code.  [Complaints system for our customers • Broadacres Housing Association](https://www.broadacres.org.uk/about-us/how-are-we-performing/feedback/complaints/)  As part of the CSP scrutiny review of complaints handling in July 2024 they recommended that we undertook a review of our outstanding actions process. In November 2024 a new Customer management system was implemented across the organisation. This has improved visibility of all customer contacts enabling the management team to report on ongoing and outstanding action. Effective communication and completion of agreed actions is an organisation objective for 25/26. | The stage 1 response letter includes a clear update of all the outstanding actions, with completion dates or anticipated completion dates and a named contact for the customer should  they have any concerns. |
| 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 | The Complaints Officer will provide the Investigating Officer with a clear complaint definition after they have contacted the customer and acknowledged the complaint. This is outlined in the Colleague Complaints Procedure. | All points are addressed in the stage 1 letter and where a decision is made we will clearly set this out referencing the relevant policies, law and good practice where appropriate. |
| 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 | This is outlined in our Complaints Policy and is covered in our Complaints Training.  [Complaints system for our customers • Broadacres Housing Association](https://www.broadacres.org.uk/about-us/how-are-we-performing/feedback/complaints/) |  |
| 6.9 | Landlords must confirm the following in writing to the resident at the completion of stage 1 in clear, plain language:   1. the complaint stage; 2. the complaint definition; 3. the decision on the complaint; 4. the reasons for any decisions made; 5. the details of any remedy offered to put things right; 6. details of any outstanding actions; and 7. details of how to escalate the matter to stage 2 if the individual is not satisfied with the response. | Yes | All stage 1 complaint letters follow a template. The template follows the points in the code, which includes that letters are written in clear and plain language avoiding jargon. The Colleague Complaints procedure advises investigating officers on what is expected in the letter, all letters are checked by the Complaints Officer/Manager before being issued. |  |

Stage 2

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| **Code provision** | **Code requirement** | **Comply:**  **Yes / No** | **Evidence** | **Commentary / explanation** |
| 6.10 | If all or part of the complaint is not resolved to the resident’s satisfaction at stage 1, it must be progressed to stage 2 of the landlord’s procedure. Stage 2 is the landlord’s final response. | Yes | Our Complaints Policy explains this. Our customer leaflet also explains the transition between stages and the right to approach the Ombudsman.  [Complaints system for our customers • Broadacres Housing Association](https://www.broadacres.org.uk/about-us/how-are-we-performing/feedback/complaints/) |  |
| 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 | The Complaints Officer will contact the customer and acknowledge, define and log the stage 2 within 5 working days of receiving it. This is set out in our Complaints Policy and Procedure.  [Complaints system for our customers • Broadacres Housing Association](https://www.broadacres.org.uk/about-us/how-are-we-performing/feedback/complaints/) |  |
| 6.12 | Residents must not be required to explain their reasons for requesting a stage 2 consideration. Landlords are expected to make reasonable efforts to understand why a resident remains unhappy as part of its stage 2 response. | Yes | During the acknowledgement contact the Complaints Officer will make every effort to understand why the resident remains unhappy. This is outlined in the Colleague Complaints Procedure. |  |
| 6.13 | The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1. | Yes | Our Complaints Policy and Colleague Procedure explains this. The same officer does not investigate a stage 2 complaint. All stage 2 complaints are investigated by a Head of Service or Director.  [Complaints system for our customers • Broadacres Housing Association](https://www.broadacres.org.uk/about-us/how-are-we-performing/feedback/complaints/) |  |
| 6.14 | Landlords must issue a final response to the stage 2 **within 20 working days** of the complaint being acknowledged. | Yes | Our Complaints Policy explains this.  [Complaints system for our customers • Broadacres Housing Association](https://www.broadacres.org.uk/about-us/how-are-we-performing/feedback/complaints/) |  |
| 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 | We always aim to respond within the 20 working days laid out by the Code. If we need more time, we will agree this with the customer and share this in writing and will always be no more than a further 20 working days. This is set out in our Complaints Policy.  [Complaints system for our customers • Broadacres Housing Association](https://www.broadacres.org.uk/about-us/how-are-we-performing/feedback/complaints/) |  |
| 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 |  | All correspondence with the customer includes information on how to contact the Housing Ombudsman. Including the interim letter, which informs a customer about an extension to the timescales. |
| 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 | We follow the Housing Ombudsman Complaint Handling Code timescales, which are outlined in the policy, and we do not extend timescales to when outstanding actions are completed if this falls outside the Handling Code times.  [Complaints system for our customers • Broadacres Housing Association](https://www.broadacres.org.uk/about-us/how-are-we-performing/feedback/complaints/) |  |
| 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 |  | The Complaints Officer will provide the Investigating Officer with a clear complaint definition after they have contacted the customer and acknowledged the complaint. All points are addressed in the Stage 2 letter and where a decision is made, we will clearly set this out referencing the relevant policies, law and good practice where appropriate. |
| 6.19 | Landlords must confirm the following in writing to the resident at the completion of stage 2 in clear, plain language:   1. the complaint stage; 2. the complaint definition; 3. the decision on the complaint; 4. the reasons for any decisions made; 5. the details of any remedy offered to put things right; 6. details of any outstanding actions; and 7. details of how to escalate the matter to the Ombudsman Service if the individual remains dissatisfied. | Yes | All stage 2 complaint letters follow a template that follows the points in 6.19. All letters are written in clear and plain language avoiding any jargon.  The Complaints procedure advises investigating officers on what is expected in the letter, all letters are checked by the Complaints Officer before being issue |  |
| 6.20 | Stage 2 is the landlord’s final response and must involve all suitable staff members needed to issue such a response. | Yes | Stage 2 Investigations are dealt with by Heads of Service or Directors. All suitable staff that are needed to resolve the issue are involved in trying to come to an agreeable resolution for the customer.  [Complaints system for our customers • Broadacres Housing Association](https://www.broadacres.org.uk/about-us/how-are-we-performing/feedback/complaints/) |  |

**Section 7: Putting things right**

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| **Code provision** | **Code requirement** | **Comply:**  **Yes / No** | **Evidence** | **Commentary / explanation** |
| 7.1 | Where something has gone wrong a landlord must acknowledge this and set out the actions it has already taken, or intends to take, to put things right.  These can include:   * Apologising; * Acknowledging where things have gone wrong; * Providing an explanation, assistance or reasons; * Taking action if there has been delay; * Reconsidering or changing a decision; * Amending a record or adding a correction or addendum; * Providing a financial remedy; * Changing policies, procedures or practices. | Yes | This is set out in our Complaints Policy and forms part of the Complaints Training.  [Complaints system for our customers • Broadacres Housing Association](https://www.broadacres.org.uk/about-us/how-are-we-performing/feedback/complaints/) |  |
| 7.2 | Any remedy offered must reflect the impact on the resident as a result of any fault identified. | Yes | We refer to how we offer a remedy in both the Complaints and Compensation Policy. By following this policy, we ensure we have offered a remedy that reflects the impact. Both polices follow the Housing Ombudsman  guidance.  [Complaints system for our customers • Broadacres Housing Association](https://www.broadacres.org.uk/about-us/how-are-we-performing/feedback/complaints/) | The aim of the Compensation Policy is to ensure we provide redress to restore the position our customer would have been in had the service failure not occurred.  [Compensation Policy Web - Revised April 2024](https://www.broadacres.org.uk/wp-content/uploads/2024/04/Compensation-Policy-Web-Revised-April-2024-compressed.pdf) |
| 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 | This is set out in our Complaints Policy and is included in the Complaints Training and Procedure for colleagues.  [Complaints system for our customers • Broadacres Housing Association](https://www.broadacres.org.uk/about-us/how-are-we-performing/feedback/complaints/) |  |
| 7.4 | Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies. | Yes |  | We take note of all guidance issued by the Housing Ombudsman when deciding on appropriate remedies and our Compensation Policy reflects this.  [Compensation Policy Web - Revised April 2024](https://www.broadacres.org.uk/wp-content/uploads/2024/04/Compensation-Policy-Web-Revised-April-2024-compressed.pdf) |

**Section 8: Putting things right**

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| **Code provision** | **Code requirement** | **Comply:**  **Yes / No** | **Evidence** | **Commentary / explanation** |
| 8.1 | Landlords must produce an annual complaints performance and service improvement report for scrutiny and challenge, which must include:   1. the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements. 2. 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; 3. any findings of non-compliance with this Code by the Ombudsman; 4. the service improvements made as a result of the learning from complaints; 5. any annual report about the landlord’s performance from the Ombudsman; and 6. any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord. | Yes | We produce an annual complaints report and a self-assessment form annually for scrutiny and challenge that includes everything set out in 8.1 and made them available on our website.  [Broadacres\_Annual\_Complaints\_Website-Version.pdf](https://www.broadacres.org.uk/wp-content/uploads/2025/05/Broadacres_Annual_Complaints_Website-Version.pdf) |  |
| 8.2 | The annual complaints performance and service improvement report must be reported to the landlord’s governing body (or equivalent) and published on the on the section of its website relating to complaints. The governing body’s response to the report must be published alongside this. | Yes | The annual complaints performance and service improvement report has been reported to the Group Customer Experience Committee in April 2025. It has been published in the section of our website relating to complaints. And the Boards response to the report is published alongside it.  [MRC-Statement-Website.pdf](https://www.broadacres.org.uk/wp-content/uploads/2025/05/MRC-Statement-Website.pdf) |  |
| 8.3 | Landlords must also carry out a self- assessment following a significant restructure, merger and/or change in procedures. | Yes | Noted, we have not been through a merger, significant restructure or changed our procedures since completing this assessment. |  |
| 8.4 | Landlords may be asked to review and update the self-assessment following an Ombudsman investigation. | Yes | Noted. |  |
| 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 | Noted. |  |

**Section 9: Scrutiny & oversight: continuous learning and improvement**

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| **Code provision** | **Code requirement** | **Comply:**  **Yes / No** | **Evidence** | **Commentary / explanation** |
| 9.1 | Landlords must look beyond the circumstances of the individual complaint and consider whether service improvements can be made as a result of any learning from the complaint. | Yes | We gather all learning from complaints through our lessons learnt tracker and monthly action plans. Learning is discussed and shared with all Senior Leaders, and service improvements are recorded and tracked. This ensures we have looked beyond the individual complaint and used the learning to improve the wider services where possible.  [Complaints system for our customers • Broadacres Housing Association](https://www.broadacres.org.uk/about-us/how-are-we-performing/feedback/complaints/)  An internal audit in May 2024 found that “Monthly reviews of the lessons learned tracker ensure that insights are actioned and shared across the organisation”. |  |
| 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 | We talk to colleagues about our vision, values and behaviours through communications and leadership, our values encompass having a positive complaint handling culture. This is also set out in our Customer and Corporate Strategy.  [About our homes and services • Broadacres Housing Association](https://www.broadacres.org.uk/about-us/) |  |
| 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 | We publish complaint learnings and improvements made through our customer magazine and annual report. A quarterly report is provided to our Group Customer Experience Committee and Customer Scrutiny Panel.  [Broadacres\_Annual\_Complaints\_Website-Version.pdf](https://www.broadacres.org.uk/wp-content/uploads/2025/05/Broadacres_Annual_Complaints_Website-Version.pdf)  [Broadacres Magazine • Broadacres](https://www.broadacres.org.uk/broadacres-magazine/)  An internal audit of our complaint management in May 2024 found “The customer engagement team's commitment to continuous improvement is evident in their regular participation in Housing Quality Network (HQN) webinars and discussions of Housing Ombudsman articles during committee meetings. Quarterly performance reports (including analysis of complaint data and customer satisfaction) are reviewed internally and shared publicly, demonstrating transparency”. |  |
| 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 |  | The Head of Customer Engagement and Insight has been appointed as the lead person accountable for complaint handling, assessing themes, trends, potential systematic issues, serious risks, or policies and procedures that require revision. |
| 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 |  | Our Group Customer Experience Committee, which includes board members, independent members and customers. is delegated to oversee complaints performance.  The Chair of this committee, as a board member takes lead responsibility for overseeing our complaints approach, performance and culture. |
| 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 |  | The MRC is able to request any additional information about complaints at any time and has access to the chief executive, directors and Head of Customer Engagement and Insight so that they can report on their findings. |
| 9.7 | As a minimum, the MRC and the governing body (or equivalent) must receive:   1. regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance; 2. regular reviews of issues and trends arising from complaint handling; 3. regular updates on the outcomes of the Ombudsman’s investigations and progress made in complying with orders related to severe maladministration findings; and 4. annual complaints performance and service improvement report. | Yes | We provide quarterly reporting into the Group Customer Experience Committee, which includes board members who are delegated to focus on this activity. This includes:   * Statistical data on complaints. * Details on all cases heard by the Ombudsman. * Ombudsman activity including changes to the Code. * Complaint learning and findings. * Audit or risks relating to the complaints service. * An update on initiatives and progress. | We have a Key Risk Indicator on how many maladministration decisions have been made by the HO on our complaints. This is reported to leaders and the Group Customer Experience Committee quarterly.  The Annual self-assessment and the Annual Performance and service improvement report are shared with the Group Customer Experience Committee and the members of the Customer Scrutiny Panel for scrutiny and challenge before submitting. |
| 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:   1. have a collaborative and co- operative approach towards resolving complaints, working with colleagues across teams and departments; 2. take collective responsibility for any shortfalls identified through complaints, rather than blaming others; and 3. act within the professional standards for engaging with complaints as set by any relevant professional body. | Yes | We have a standard objective for all relevant colleagues that states   * To act within the professional standards set by the Charter Institute for Housing when managing customer complaints by working collaboratively with colleagues across Broadacres to resolve complaints effectively and take personal responsibility for continuous improvement opportunities. |  |