Self-Assessment Form 1st April 2025

This self-assessment form should be completed by the complaints officer and discussed at the landlord's governing body annually.

Evidence should be included to support all statements with additional commentary as necessary.

Explanations must also be provided where a mandatory 'must' requirement is not met to set out the rationale for the alternative approach adopted and why this delivers a better outcome.

Section 1 - Definition of a complaint

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
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 organisation, its own staff, or those acting on its behalf,* *affecting an individual resident or group of residents*.	Yes	See paras 3.1 and 5.5.1 Complaints and Compensation Policy as agreed by Board March 2024
1.3	The 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 a choice to make a complaint. A complaint that is submitted via a third party or representative must still be handled in line with the landlord's complaints policy.	Yes	See paras 5.5.1 and 5.5.2 Complaints and Compensation Policy
1.4	Landlords must recognise the difference between a service request and a complaint. This must be set out in their complaints policy. A service request is a request from a resident to the landlord requiring action to be taken to put something right. Service requests are not complaints, but must be recorded, monitored and reviewed regularly.	Yes	See para 5.7.1, 5.7.2, 5.7.3 Complaints and Compensation Policy

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	5.7.3 Complaints and Compensation Policy
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	Survey feedback is collated externally by MEL and in accordance with GDPR reported back anonymously, unless the respondent provides explicit permission for their responses to be shared with bdht. Where respondents do so any expressions of dissatisfaction are sent by email to the service manager and Head of Governance. When such notifications are received contact is logged on the QL management system for the service manager to contact the customer. Managers are instructed to advise the customer of their option to escalate as a complaint if they wish. Mel scripts and questionnaires have been updated to include a strap line to advise customers of how to access the complaints process if they are dissatisfied.

Section 2: Exclusions

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
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	See Policy Exclusions 5.6 Complaints and Compensation Policy

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. 19 • Matters that have previously been considered under the complaints policy.	Yes	5.6 complaints and compensation policy
2.3	Landlords must accept complaints referred to them within 12 months of the issue occurring or the resident becoming aware of the issue, unless they are excluded on 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	5.6.8, 5.6.9 complaint and compensation policy
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	5.6.2 complaints and compensation policy
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Yes	5.6.3 complaints and compensation policy

Section 3 - Accessibility and awareness

Code section	Code requirement	Comply : Yes/No	Evidence, commentary and any explanations
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	See para 5.3 Complaints & Compensation Policy. Detail included on bdht website. See Complaint Service Standard. Promotion of complaints is also promoted via our social media channels on a rolling monthly basis. See paras 4.1.8 and 4.1.9 of the Complaints and Compensation Policy. Detailed EIA undertaken as part of policy review 2020. See customer care and access to services policy
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	All staff aware of complaints process. Process set out in our housing management script. Complaints training completed for staff and managers on a 3 yearly basis
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 are promoted on our website, service standards, in our annual report, reception, via our surveys and social media

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 and compensation policy is available on website. Policy can be formatted in any way the customer requests.
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	Section 4.1.4, 4.1.5. Section 6.0. Section 10.4 of complaints and compensation policy
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	5.3.1 complaints and compensation Policy
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	Promoted within all complaint correspondence, service standard and Annual Report and Annual Report Summary (summary being sent to all residents). Contact details and the Complaint Handling Code are also included on our website.

Section 4 - Complaint handling staff

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
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	The Customer Insight Team are responsible for complaint handling. 5.7.6 complaints and compensation policy

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	All managers and Heads of Service are trained in undertaking complaint investigation Managers have the autonomy to resolve complaints. In addition a weekly complaints meeting is held with the Directors and Heads of Service from the operational teams alongside the Customer Insight Manger and Head of Customer Experience. 5.7.6 complaints and compensation policy
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	10.1.1 complaint and compensation policy. All managers and Heads of Service are trained in undertaking complaint investigation, training is refreshed on a triannual baisis. Weekly meetings with Heads of Service and Directors to keep a focus on resolving and learning from complaints

Section 5 - Complaint handling principles

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
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 and Compensation Policy.
5.2	The early and local resolution of issues between landlords and residents is key to effective complaint handling. It is not appropriate to have extra named stages (such as 'stage 0' or 'informal complaint') as this causes unnecessary confusion.	Yes	A two stage process is clearly laid out in the policy, along with an explanation of the difference between a complaint and a service request in the complaints and compensation policy
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	The two stage process is clearly laid out in the complaints and compensation policy.
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	bdht are responsible to investigate all complaints internally regardless if they are about a third party.
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Yes	bdht are responsible for investigating all complaint internally regardless of if they are about a third party.

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	Clearly set out in the complaint acknowledgement letters for both stages. Section 2.1 complaint procedure
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	Clearly set out in the complaint acknowledgement letters for both stages In addition Investigating manager will clarify before completing the investigation they have understood the complaint in full.
5.8	At each stage of the complaints process, complaint handlers must: a. deal with complaints on their merits, act independently, and have an open mind; b. give the resident a fair chance to set out their position; c. take measures to address any actual or perceived conflict of interest; and d. consider all relevant information and evidence carefully.	Yes	Investigating mangers investigations reviewed by their manager, the Customer Insight Manager or a Head of Service to ensure compliance.
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	5.8.5 complaints and compensation policy

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	Set out in service standards, measured via KPIs and monitored by Resident's Scrutiny Panel (reporting 6 monthly to Board by exception) Customer care and access to services policy sets out how to manage reasonable adjustments Housing management system shows any adjustments needed to services
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	Policy amended so that reasons for declining to escalate align with exclusions at para 5.6 Complaints and compensation Policy 5.8.8 and 5.7.6
5.12	A full record must be kept of the complaint, and the outcomes at each stage. This must include the original complaint and the date received, all correspondence with the resident, correspondence with other parties, and any relevant supporting documentation such as reports or surveys.	Yes	All complaint records are managed via the QL Housing Management System

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	5.9 complaints and compensation policy
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	Unacceptable Behaviour Policy in place
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	Unacceptable Behaviour Policy in place and refers to the Equality Act 2010

Section 6 - Complaint stages

Stage 1

Code section	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	Yes	Complaints and compensation policy and complaints procedure

	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.		
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	Complaint procedure and housing management process. Daily email updating of complaints and timescales
6.3	Landlords must issue a full response to stage 1 complaints within 10 working days of the complaint being acknowledged.	Yes	Complaint procedure and housing management process. Daily email updating of complaints and timescales
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	5.8.5 complaint and compensation policy. Complaints procedure
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	5.8.5 complaint and compensation policy. Complaints procedure Delay letter to customers
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	5.8.5 complaints and compensation policy Investigating manager issues Stage 1 letter on completion of investigation, note recommendations. Customer Insight Team maintain a register of agreed recommendations in order to monitor implementation
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	Complaint response letters set up to ensure this approach

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	2.16 complaints procedure Although on occasions new issues will be raised and incorporated at Stage 2. However in the majority of cases included in the stage 1 response.
6.9	Landlords must confirm the following in writing to the resident at the completion of stage 1 in clear, plain language: a. the complaint stage; b. the complaint definition; c. the decision on the complaint; d. the reasons for any decisions made; e. the details of any remedy offered to put things right; f. details of any outstanding actions; and g. details of how to escalate the matter to stage 2 if the individual is not satisfied with the response.	Yes	Complaint response letter template to ensure this approach

Stage 2

Code section	**Code requirement**	**Comply: Yes/No**	**Evidence, commentary and any explanations**
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	The complainant can escalate all or part of their complaint to stage 2.

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	Complaints procedure 5.2
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	Complaints procedure 5.1
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Yes	Directors investigate at Stage 2
6.14	Landlords must issue a final response to the stage 2 within 20 working days of the complaint being acknowledged.	Yes	Complaints and compensation policy and procedure
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 procedure 3.9-3.14
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 procedure 3.14 Delay letter to customers
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	5.8.5 complaints and compensation policy Investigating manager issues Stage 1 letter on completion of investigation, note recommendations. Customer Insight Team maintain a register of agreed recommendations in order to monitor implementation

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	Complaint response letter template to ensure this approach
6.19	Landlords must confirm the following in writing to the resident at the completion of stage 2 in clear, plain language: a. the complaint stage; b. the complaint definition; c. the decision on the complaint; d. the reasons for any decisions made; e. the details of any remedy offered to put things right; f. details of any outstanding actions; and g. details of how to escalate the matter to the Ombudsman Service if the individual remains dissatisfied.	Yes	Template letter ensures compliance
6.20	Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.	Yes	Complaints and compensation policy section 5.8

Section 7: Putting things right

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
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;	Yes	Set out in decision letter and monitoring mechanisms in place to track implementation

	• 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.		
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Yes	Staff guide to compensation to ensure consistency in any award. Customer Voice manager and HoS review of draft Stage 1 complaints investigation to challenge any conclusions and ensure any remedies offered are available to all customers
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	Set out in investigation letter and monitoring by Customer Insight Team to ensure actions are completed. Customer Insight Team works with managers to ensure prompt implementation of recommendations. This is a corporate priority
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes	Compensation guidance for staff guide

Section 8 - Putting things right

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
8.1	Landlords must produce an annual complaints performance and service improvement report for scrutiny and challenge, which must include: a. the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements. b. a qualitative and quantitative analysis of the landlord's complaint handling performance. This must also include a summary of the types of complaints the landlord has refused to accept; c. any findings of non-compliance with this Code by the Ombudsman; d. the service improvements made as a result of the learning from complaints; e. any annual report about the landlord's performance from the Ombudsman; and f. any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord.	Yes	Published on our website. Quarterly report to Executive Management Team and Scrutiny panel, 6 monthly report to Board Annual report to customer
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	Annual report to customers on website. Will be published following the annual review of complaints in June
8.3	Landlords must also carry out a self assessment following a significant restructure, merger and/or change in procedures.	Yes	Would do this where required

8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	Yes	Would do this where required
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	Would do this where required

Section 9 - Scrutiny & oversight: continuous learning and improvement

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
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	All elements and teams involved or linked to complaints are included in investigation and recommendations
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	Regular discussions at managers meeting to ensure positive complaints handing culture. Weekly meetings with heads of service and directors to look to learn from complaints in a constructive way
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	Annual report to Residents (website). Quarterly summary to RSP and raised at staff meetings. Quarterly report to executive management team and 6 monthly report to Board

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	Head of Customer Experience and Director of Housing and Communities are leads on 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 positive complaint handling culture. This person is referred to as the Member Responsible for Complaints ('the MRC').	Yes	Board (May 2022) have appointed Liz Nembhard to lead on complaints See para 10.2 in Complaint & Compensation Policy
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	6 monthly monitoring report to Board. 6 weekly meetings with Head of Customer Experience to look at themes and trends
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	6 monthly monitoring report to Board incorporates these elements 6 weekly meeting with MRC and Head of Customer Experience. # Board receive complaints information in the monthly strategic balance score card.
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. have a collaborative and cooperative approach towards resolving complaints, working with colleagues across teams	Yes	Included within Complaint Guidance to staff and the Complaints Policy. See para 10.1 in Complaint & Compensation Policy

	and departments; b. take collective responsibility for any shortfalls identified through complaints, rather than blaming others; and c. act within the professional standards for engaging with complaints as set by any relevant professional body.		Weekly complaints meeting with Heads of Service and Directors to discuss complaints and learning