

Housing Ombudsman Complaint Handling Code –Self-assessment Bancroft Tenant Management Co-operative (BTMC)

Section 1: Definition of a complaint

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
1.2	A complaint must be defined as: <i>‘an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the landlord, its own staff, or those acting on its behalf, affecting a resident or group of residents.’</i>	Yes	Complaints Policy and Procedure (Section 3) and website	We have adopted this definition in our Complaints Policy and staff induction/training.
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 and Procedure (Section 3)	Any enquiry fitting the definition of a complaint will be raised and dealt with as such. We also accept complaints via authorised third party requests as outlined in our Complaints 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	Complaints Policy and Procedure (Section 5)	We deal with service requests as a query. This is outlined in our Complaints 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	Complaints Policy and Procedure (Section 5)	This has been set out in section 5 of our Complaints Policy.

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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	<p>Some of our transactional surveys are carried out by an independent provider and over the telephone. As part of that process, any resident that expresses dissatisfaction is signposted to the Council's website or the housing Service Centre to register a complaint should they choose to.</p> <p>Staff also advise residents in their interaction the option to make a formal complaint if they are not satisfied with a service provided by BTMC. Information on how to complain is prominently available on the BTMC website.</p>	

Section 2: Exclusions

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
2.1	Landlords must accept a complaint unless there is a valid reason not to do so. If landlords decide not to accept a complaint, they must be able to evidence their reasoning. Each complaint must be considered on its own merits.	Yes	Complaints Policy and Procedure (Section 5)	Each case is considered on its own merit and exclusions are clearly defined in our Complaints Policy. If we decide not to accept a complaint, we will provide a detailed explanation to the service user setting out the reasons why the matter is not suitable for the complaints process. Complainants have the right to challenge this decision by bringing their complaint to the Housing Ombudsman.
2.2	<p>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:</p> <ul style="list-style-type: none"> • The issue giving rise to the complaint occurred over twelve months ago. • Legal proceedings have started. This is defined as details of the claim, such as the Claim Form and Particulars of Claim, having been filed at court. • Matters that have previously been considered under the complaints policy. 	Yes	Complaints Policy and Procedure (Section 5)	Exclusions set out are consistent with policies of other social landlords. We have also consulted with Resident in agreeing these exemptions.
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	Complaints Policy and Procedure (Section 5)	We accept complaints within 12 months of the issue occurring and exercise discretion on accepting complaints which go beyond the 12-month period. We also accept complaints within 12 months of a resident being aware of an issue unless there are other grounds for exemption.

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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 and Procedure (Section 5)	<p>If a complaint is not accepted, then a letter is sent providing an explanation.</p> <p>The following information is also included in all our rejection letters: 'If you are dissatisfied with this decision, you may wish to take your complaint to the Housing Ombudsman Service: https://www.housing-ombudsman.org.uk/residents/make-a-complaint/# or Telephone: 0300 111 3000'.</p>
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Yes	Complaints Policy and Procedure (Section 5)	<p>If we decide not to accept a complaint, we will provide a detailed explanation to the service user setting out the reasons why the matter is not suitable for the complaints process. Complainants have the right to challenge this decision by taking their complaint to the Housing Ombudsman.</p>

Section 3: Accessibility and Awareness

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
3.1	Landlords must make it easy for residents to complain by providing different channels through which they can make a complaint. Landlords must consider their duties under the Equality Act 2010 and anticipate the needs and reasonable adjustments of residents who may need to access the complaints process.	Yes	Complaints Policy and Procedure (Section 6), Reasonable Adjustment Policy, and website	We accept complaints from multiple channels and have a Reasonable Adjustment Policy, ensuring that we support the differing needs of our residents. We offer different channels to make a complaint: <ul style="list-style-type: none"> • Via an e-form on our website • In writing • By phone • In person
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		Staff responsible for complaints have completed training. As part of performance review the need for refresher training is reviewed and this includes training on equality, diversity, and inclusion.
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 Policy and Procedure (Section 13)	Whilst we do monitor the volume of complaints, we recognise that volumes in themselves are not an indicator of the service levels we are providing. We therefore ensure our focus is on learning from complaints and identifying areas for improvement.
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 and Procedure, Website	We provide a detailed and summary version of the Complaints Policy and Procedure on our website, We also provide a link to LBTH's website as all our formal complaints are recorded on their system.

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
3.5	The policy must explain how the landlord will publicise details of the complaints policy, including information about the Ombudsman and this Code.	Partly	Complaints Policy and Procedure (Section 6.1), Website	<p>The complaints policy and procedure along with the self-assessment are online on BTMC website.</p> <p>All the acknowledgement emails sent by LBTH include a link to the complaints page where residents can access user friendly material on the complaints process.</p>
3.6	Landlords must give residents the opportunity to have a representative deal with their complaint on their behalf, and to be represented or accompanied at any meeting with the landlord.	Yes	Complaints Policy and Procedure (Section 4.1)	We will always accept and progress complaints via authorised third parties. This is covered in the Complaints Policy and Procedure.
3.7	Landlords must provide residents with information on their right to access the Ombudsman service and how the individual can engage with the Ombudsman about their complaint.	Yes	<p>Website</p> <p>We also provide this information in our response letters</p>	This is provided in the summary documentation and in the complaint response.

Section 4: Complaint Handling Staff

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
4.1	Landlords must have a person or team assigned to take responsibility for complaint handling, including liaison with the Ombudsman and ensuring complaints are reported to the governing body (or equivalent). This Code will refer to that person or team as the 'complaints officer'. This role may be in addition to other duties.	Yes	LBTH have a dedicated Customer Relations Team (CRT) and case handlers assigned to take responsibility for complaints. The team is the primary point of contact for the Ombudsman service and is responsible for ensuring compliance with the Complaints Handling Code.	
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	LBTH Customer Relations Team has access to BTMC staff and the Director which ensures prompt resolution for complaints.	
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	Performance and learning from complaints are reported to the our Board/Management Committee. We promote the Housing Ombudsman's principles of dispute resolution. Compliant awareness training is available to all staff. The responses to complaints are either completed by or overseen by the Director to ensure they are empathetic and easy to understand.	

Section 5: The Complaint Handling Process

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
5.1	Landlords must have a single policy in place for dealing with complaints covered by this Code. Residents must not be treated differently if they complain.	Yes	Complaints Policy & Procedure	We have adopted the Council's single policy, which sits alongside its Corporate Complaints Policy.
5.2	The early and local resolution of issues between landlords and residents is key to effective complaint handling. It is not appropriate to have extra named stages (such as 'stage 0' or 'informal complaint') as this causes unnecessary confusion.	Yes	Complaints Policy & Procedure	We operate a two stage complaints policy in line with the Complaints Handling Code.
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 & Procedure (Section 8)	<p>All complaints are recorded on the Council's complaint management system.</p> <p>Stage one complaints are acknowledged within two working days of receiving them and no later than five working days after receipt.</p> <p>The Stage 2 escalation protocol acts on the request for an escalation but advises the service area to work with the resident to get any outstanding issues resolved.</p>
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 & Procedure (Section 9)	BTMC Director is responsible for signing off responses to all complaints to ensure compliance whilst staff/external contractors may have a role in providing supporting information.
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Yes	Complaints Policy & Procedure (Section 9)	All third-party contractors that may have role in supporting complaints handling are bound by the Complaints Policy & Procedure.

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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	Complaints Policy & Procedure (Section 9)	LBTH send a generic acknowledgement is sent setting out that the case investigator will contact the complainant within 2 working days. It is at this phone call stage, that the case owner sets out their understanding of the complaint and the outcome the resident is seeking. This is then confirmed within the Stage 1 response.
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 & Procedure (Section 9)	As part of our call-back to residents, staff are expected to have conversations on what outcomes may be realistic.
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	All responses are quality checked or prepared by BTMC Director to ensure information and evidence used to decide upon the outcome in an impartial way.	
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	Complaints Policy & Procedure (Section 9)	Timescales are provided in the acknowledgement and any changes are communicated in a timely manner.
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	Yes	Reasonable Adjustments Policy	The Council monitors any agreements or remedial actions agreed with residents through their complaints management system which allows monitoring progress against timelines.

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	any disabilities a resident has disclosed. Any agreed reasonable adjustments must be kept under active 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	Complaints Policy & Procedure (Section 9)	<p>Stage 1 response includes information on the option to escalate to the next stage.</p> <p>A service user can ask for a complaint to be escalated within 12 months of a stage 1 response. It is the Council's Corporate Complaint team who determines whether a request is refused. Every case will be treated on its merits.</p> <p>Cases are typically refused where it relates to an insurance claim which is managed through a separate process.</p>
5.12	A full record must be kept of the complaint, and the outcomes at each stage. This must include the original complaint and the date received, all correspondence with the resident, correspondence with other parties, and any relevant supporting documentation such as reports or surveys.	Yes	Complaints Policy & Procedure	All records are kept by LBTH on their complaints 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	Complaints Policy and Procedure	Staff are encouraged to make recommendations i.e., offer of compensation or other remedial actions to resolve a dispute quickly.
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	Yes	Persistent and Unacceptable Behaviours Policy	BTMC has adopted the Council's persistent and unacceptable behaviours policy.

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	restrictions in place and must keep restrictions 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	Persistent and Unacceptable Behaviours Policy	Persistent and Unacceptable Behaviours Policy ensures that individual equality impact assessments are conducted prior to restrictions being put in place for residents.

Section 6: Complaints Stages

Stage 1

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
6.1	Landlords must have processes in place to consider which complaints can be responded to as early as possible, and which require further investigation. Landlords must consider factors such as the complexity of the complaint and whether the resident is vulnerable or at risk. Most stage 1 complaints can be resolved promptly, and an explanation, apology or resolution provided to the resident.	Yes	Complaints Policy and Procedure (Section 9)	Staff are encouraged to make recommendations i.e., offer of compensation or other remedial actions to resolve a dispute quickly. All Stage 1 complaints are signed off by BTMC Director.
6.2	Complaints must be acknowledged, defined and logged at stage 1 of the complaints procedure <u>within five working days</u> of the complaint being received.	Yes	Complaints Policy and Procedure (Section 8)	This timescale is included in the policy and procedure. Compliance and performance are monitored and reported to LBTH.
6.3	Landlords must issue a full response to stage 1 complaints <u>within 10 working days</u> of the complaint being acknowledged.	Yes	Complaints Policy and Procedure (Section 8)	We have a target to respond within 10 working days in line with the Housing Ombudsman's Code. This timescale is included in the policy and procedure.

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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 and Procedure (Section 9)	We will always explain why additional time is needed to resolve a complaint and aim to agree an extension with the resident. Requests for extensions and correspondence from residents is documented on the Council's complaint monitoring system.
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 and Procedure (Section 9)	If an extension cannot be agreed, we signpost the resident to the Housing Ombudsman Service for an independent review.
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 and Procedure (Section 9)	We respond to complaints in line with our 10-working day target and set out the commitments which are tracked by LBTH using the complaints management system (iCasework).
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 and Procedure (Section 9)	The responses include a standardised template to guide the complaint handlers. This helps to ensure that all the required information is provided as part of the Stage 1 response. Responses are reviewed and signed off by BTMC Director to ensure they are of the required standard.

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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	Complaints Policy and Procedure (Section 9)	Where appropriate to do so, new issues would be included in the original complaint investigation. If the addition of new issues could hinder or delay complaint resolution, a new complaint will be created.
6.9	Landlords must confirm the following in writing to the resident at the completion of stage 1 in clear, plain language: <ul style="list-style-type: none"> a. the complaint stage; b. the complaint definition; c. the decision on the complaint; d. the reasons for any decisions made; e. the details of any remedy offered to 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	Complaints Policy and Procedure (Section 9)	The standardised response template guides the complaint handlers and helps to ensure all the required information is provided as part of the Stage 1 response. Responses are reviewed and signed off by BTMC Director to ensure they are of the required standard.

Stage 2

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
6.10	If all or part of the complaint is not resolved to the resident's satisfaction at stage 1, it must be progressed to stage 2 of the landlord's procedure. Stage 2 is the landlord's final response.	Yes	Complaints Policy and Procedure (Section 9)	Complaints Policy and Procedure provides clear guidelines on how a complaint can be escalated 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 Policy and Procedure (Section 9)	All Stage 2 requests are acknowledged within five working days of receipt by LBTH.
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 Policy and Procedure (Section 9)	Resident is not required to provide an explanation.
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Yes	Complaints Policy and Procedure (Section 9)	A Stage 2 review will always be conducted by a different staff member. This prevents the possibility of the escalation being considered by the same person.
6.14	Landlords must issue a final response to the stage 2 within 20 working days of the complaint being acknowledged.	Yes	Complaints Policy and Procedure (Section 9)	This timeframe is set out in the 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 Policy and Procedure (Section 9)	Stage 2 investigation is undertaken within 20 working days in line with the Complaints Policy. An explanation will always be provided if additional time is needed to resolve a complaint and an extension agreed with the resident.

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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 and Procedure (Section 9)	Complaints Policy and Procedure states that residents will be signposted to the Housing Ombudsman Service if they wish to pursue and independent review.
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 and Procedure (Section 9)	Complaints Policy and Procedure makes it clear that responses should not be delayed unless additional time is required to investigate a complex matter.
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 and Procedure (Section 9)	A standardised response template is used to guide complaint handlers. This helps to ensure that all the required information is provided as part of the Stage 2 response. Responses are reviewed and signed off by BTMC Director to ensure they are of the required standard.
6.19	Landlords must confirm the following in writing to the resident at the completion of stage 2 in clear, plain language: <ul style="list-style-type: none"> a) the complaint stage; b) the complaint definition; c) the decision on the complaint; d) the reasons for any decisions made; e) the details of any remedy offered to 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	Complaints Policy and Procedure (Section 9)	A standardised response template is used to guide complaint handlers. This helps to ensure that all the required information is provided as part of the Stage 2 response. Responses are reviewed and signed off by BTMC Director to ensure they are of the required standard.

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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 Policy and Procedure (Section 9)	The internal process recognises Stage 2 as the final stage of the complaints process. All responses at this stage are signed off by the BTMC Director who ensures that the complaint has been appropriately considered and a suitable offer of redress has been made to prevent further escalation of the complaint.

Section 7: Putting things right

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
7.1	<p>Where something has gone wrong a landlord must acknowledge this and set out the actions it has already taken, or intends to take, to put things right. These can include:</p> <ul style="list-style-type: none"> • Apologising; • Acknowledging where things have gone wrong; • Providing an explanation, assistance or reasons; • Taking action if there has been delay • Reconsidering or changing a decision; • Amending a record or adding a correction or addendum; • Providing a financial remedy; • Changing policies, procedures or practices. 	Yes	Complaints Policy and Procedure (Section 10)	<p>Complaints handling procedure commits us to apologising, accepting responsibility, putting things right (by providing redress or a remedy) when they are in our control, and using feedback from complaints to improve services.</p> <p>The LBTH complaints management system ensures an effective audit trail of communication and tracks corrective actions agreed with residents throughout the complaints process.</p>

7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Yes	Complaints Policy and Procedure (Section 10)	Policies on complaints and redress acknowledge and respond to issues of service failures whilst taking into account individual circumstances.
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	Complaints Policy and Procedure (Section 10)	Action plans are set, with clear ownership assigned, along with expected completion dates. There is also a procedure for tracking remedies that have been offered via the complaints management system.
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes	Complaints Policy and Procedure (Section 10)	The LBTH redress policy (adopted by BTMC) reflects the guidance issued by the Ombudsman when deciding remedies.

Section 8: Putting things right

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: <ul style="list-style-type: none"> a. the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements. b. a qualitative and quantitative analysis of the landlord's complaint handling performance. This must also include a summary of the types of complaints the landlord has refused to accept; c. any findings of non-compliance with this Code by the Ombudsman; d. the service improvements made as a result of the learning from complaints; e. any annual report about the landlord's performance from the Ombudsman; and f. any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord. 	Yes	Council /BTMC website Complaints Policy and Procedure (Section 14)	<p>An annual performance and service improvement report is presented to the governing body and published on the Councils website and BTMC performance is separately reported in the our Annual Report.</p> <p>Whilst we strive for full compliance with the code, we recognise there will be some delay in meeting requirements. We will ensure information is available, so we remain fully compliant with the requirements of the code.</p>
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		
8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	Yes	Complaints Policy and Procedure (Section 14)	This self-assessment is reported to the Council's elected members annually, or upon any significant changes.

8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	Yes	Complaints Policy and Procedure (Section 14)	If there are significant concerns over the complaint handling following a formal Ombudsman investigation, the self-assessment to comply with this condition will be reviewed.
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	Complaints Policy and Procedure (Section 14)	BTMC adhere to this requirement if and when affected by exceptional circumstances.

Section 9: Scrutiny & oversight: continuous learning and improvement

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
9.1	Landlords must look beyond the circumstances of the individual complaint and consider whether service improvements can be made as a result of any learning from the complaint.	Yes	Quarterly learning reports including thematic analysis to understand trends	LBTH case management system requires staff to clearly set out why a complaint has been upheld or not upheld and identify any learning or improvements that may need to arise. The quarterly reports to the governing body/LBTH capture learning and identifies service improvement priorities which are tracked and monitored.
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	Complaints are viewed as an opportunity to learn and drive service improvement. We take an approach that is not focused on the volumes of complaints that we receive. Staff are expected to engage positively with the complaints handling process and ensure all dissatisfaction is logged as a complaint.	
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	LBTH provides information on Complaints performance and key learning to our Tenants Voice forum on a quarterly basis. BTMC governing body will have the opportunity to provide challenge and maintain oversight of how the BTMC is engaging with the complaints process and driving service improvement based on learnings.	

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	Complaints Policy and Procedure (Section 14)	The Council employs a Head of Regulatory Assurance whose portfolio includes oversight for complaints. The Head of Regulatory Assurance is responsible for ensuring the Member Responsible for Complaints and the governing body have access to reports complaints performance, learning and service improvement priorities. The Head of Regulatory Assurance is also able to direct the formulation of policies and procedures as appropriate to address areas of weakness of non-compliance. BTMC adopts any changes/improvements made by LBTH.
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	Complaints Policy and Procedure (Section 14)	BTMC Director is the lead for complaints. In addition, as BTMC's complaints are managed and monitor by the LBTH there is another layer of Member Responsible for Complaints (MRC).
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	Complaints performance is reported to LBTH and BTMC governing body.	

9.7	<p>As a minimum, the MRC and the governing body (or equivalent) must receive:</p> <ul style="list-style-type: none"> 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 annual complaints performance and service improvement report. 	Yes	<p>At present we report quarterly to LBTH our performance which is also recorded on their monitoring system. Our governing body receive quarterly updates and members receive annual performance report.</p>
9.8	<p>Landlords must have a standard objective in relation to complaint handling for all relevant employees or third parties that reflects the need to:</p> <ul style="list-style-type: none"> a) have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments; b) take collective responsibility for any shortfalls identified through complaints, rather than blaming others; and c) act within the professional standards for engaging with complaints as set by any relevant professional body. 	Yes	<p>This objective is captured in our organisational aims and values. BTMC's <i>values</i> when engaging with customers and other stakeholders:</p> <ul style="list-style-type: none"> • Treating people as individuals, with respect and integrity; • Caring about people, being fair, honest and accountable in all our contacts; • Promoting and celebrating the diversity of our community and striving to ensure we represent and serve all of our members and residents; • Valuing the contribution of our members is key to our success; • Encouraging our people to have the confidence and imagination to create solutions to improve the area. <p>These values reinforce our expectations of staff, and our objectives are based on these values. We also expect the same behaviours from our contractors who are an extension of the organisation.</p>