

## Appendix A: Self-assessment form

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

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

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

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

## Section 1: Definition of a complaint

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
1.2	<p>A complaint must be defined as:</p> <p><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></p>	Yes	<p><a href="https://www.mearsgroup.co.uk/good-governance/mears-group-complaints-policy">https://www.mearsgroup.co.uk/good-governance/mears-group-complaints-policy</a></p> <p><a href="https://www.incommunities.co.uk/complaints-and-feedback/">https://www.incommunities.co.uk/complaints-and-feedback/</a></p> <p><a href="https://www.bradford.gov.uk/compliments-and-complaints/policies-and-procedures/complaint-handling-policy-and-procedure/">https://www.bradford.gov.uk/compliments-and-complaints/policies-and-procedures/complaint-handling-policy-and-procedure/</a></p> <p><a href="https://www.bradford.gov.uk/housing/council-housing/feedback-and-complaints-about-your-social-housing/">https://www.bradford.gov.uk/housing/council-housing/feedback-and-complaints-about-your-social-housing/</a></p>	<p>CBMDC manages a housing stock of 429 properties. We have formal contracted agreements with two well established registered providers of social housing to oversee property management, repairs and maintenance of these properties.</p> <p>Throughout these contracts, the Council retains ownership of the properties, whilst the commissioned contractors act as managing agents.</p> <p>Residents living in CBMDC-owned properties are advised to contact their respective management agents to provide for feedback submissions or service requests. As registered social housing providers, our management agents adhere the Housing Ombudsman guidance when handling, managing and reporting on complaint performance and service requests received from tenants of CBMDC owned homes.</p> <p>Residents are entitled to receive services delivered by our contracted Management Agents. Where necessary, the Council will signpost tenants to facilitate access the complaints process.</p>

				Our agents operate under the statutory Housing Ombudsman Code of Practice for handling of resident complaints in cases where the Council is the landlord.
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	<a href="https://www.mearsgroup.co.uk/good-governance/mears-group-complaints-policy">https://www.mearsgroup.co.uk/good-governance/mears-group-complaints-policy</a>  <a href="https://www.incommunities.co.uk/complaints-and-feedback/">https://www.incommunities.co.uk/complaints-and-feedback/</a>	Our contracted agents reflect this through their complaint handling guidance and policies.
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	<a href="https://www.mearsgroup.co.uk/good-governance/mears-group-complaints-policy">https://www.mearsgroup.co.uk/good-governance/mears-group-complaints-policy</a>  <a href="https://www.incommunities.co.uk/complaints-and-feedback/">https://www.incommunities.co.uk/complaints-and-feedback/</a>  <a href="https://www.bradford.gov.uk/housing/council-housing/feedback-and-complaints-about-your-social-housing/">https://www.bradford.gov.uk/housing/council-housing/feedback-and-complaints-about-your-social-housing/</a>	Our contracted agents follow complaint handling guidance as a part of their standard procedures. In line with the Council's complaints policy and the Local Government & Social Care Ombudsman guidance, CBMDC recognises the distinction between a service request and a complaint, ensuring that they are recorded, managed and addressed.

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	<a href="http://www.mearsgroup.co.uk">www.mearsgroup.co.uk</a> <a href="http://www.incommunities.co.uk">www.incommunities.co.uk</a>	Our Management Agents work to the requirements of the code.
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	<a href="http://www.mearsgroup.co.uk">www.mearsgroup.co.uk</a> <a href="http://www.incommunities.co.uk">www.incommunities.co.uk</a>	Our Management Agents are committed to resolving issues efficiently and will escalate matters to a formal complaint when required. Appropriate signposting is provided when concerns are raised when completing feedback surveys.

## Section 2: Exclusions

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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2.1	Landlords must accept a complaint unless there is a valid reason not to do so. If landlords decide not to accept a complaint, they must be able to evidence their reasoning. Each complaint must be considered on its own merits.	Yes	<a href="https://www.mearsgroup.co.uk/good-governance/mears-group-complaints-policy">https://www.mearsgroup.co.uk/good-governance/mears-group-complaints-policy</a> <a href="https://www.incommunities.co.uk/complaints-and-feedback/">https://www.incommunities.co.uk/complaints-and-feedback/</a>	Our contracted management agents are expected to provide clear reasons when declining to accept a complaint. Each complaint is assessed on its own merit and if a complaint cannot be accepted, our agents will transparently communicate the rationale in line with the respective complaint policies.
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"> <li>• The issue giving rise to the complaint occurred over twelve months ago.</li> <li>• 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.</li> <li>• Matters that have previously been considered under the complaints policy.</li> </ul>	Yes	<a href="https://www.mearsgroup.co.uk/good-governance/mears-group-complaints-policy">https://www.mearsgroup.co.uk/good-governance/mears-group-complaints-policy</a> <a href="https://www.incommunities.co.uk/complaints-and-feedback/">https://www.incommunities.co.uk/complaints-and-feedback/</a>	We expect our contracted management agents to clearly sets out when they will not consider a complaint.
2.3	Landlords must accept complaints referred to them within 12 months of	Yes		Our contracted management agents will accept complaints

	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.		<a href="https://www.mearsgroup.co.uk/good-governance/mears-group-complaints-policy">https://www.mearsgroup.co.uk/good-governance/mears-group-complaints-policy</a>  <a href="https://www.incommunities.co.uk/complaints-and-feedback/">https://www.incommunities.co.uk/complaints-and-feedback/</a>	outside the time limit when there are good reasons to do so, the case is considered on its own merits and reflected in their standard procedures
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	<a href="https://www.mearsgroup.co.uk/good-governance/mears-group-complaints-policy">https://www.mearsgroup.co.uk/good-governance/mears-group-complaints-policy</a>  <a href="https://www.incommunities.co.uk/complaints-and-feedback/">https://www.incommunities.co.uk/complaints-and-feedback/</a>	The contracted management agents clearly define the scope & limitations in their complaint policies, including the reasons why a complaint may not be accepted. The management agents operate fairly and reasonably, making allowances where appropriate. As Registered Providers, our agents collaborate closely with the Ombudsman and adhere to its decisions and guidance.
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Yes	<a href="https://www.mearsgroup.co.uk/good-governance/mears-group-complaints-policy">https://www.mearsgroup.co.uk/good-governance/mears-group-complaints-policy</a>  <a href="https://www.incommunities.co.uk/complaints-and-feedback/">https://www.incommunities.co.uk/complaints-and-feedback/</a>	Our agents will assess each tenant's complaint based on individual and will not apply a blanket approach to exclusions. Where appropriate, CBMDC will collaborate on complaints falling under the council's jurisdiction, ensuring alignment with the Local Government & Social Care Ombudsman

### 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	<a href="http://www.mearsgroup.co.uk">www.mearsgroup.co.uk</a> <a href="http://www.incommunities.co.uk">www.incommunities.co.uk</a>	Both Mears & Incommunities have a duty under the Equality Act 2010 to ensure access to reasonable adjustments are provided. Our managing agents' annual Housing Ombudsman self-assessment form will reflect how they adhere to the Equality Act 2010 when handling complaints from tenants who live in CBMDC properties.
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.		<a href="https://www.mearsgroup.co.uk/good-governance/mears-group-complaints-policy">https://www.mearsgroup.co.uk/good-governance/mears-group-complaints-policy</a> <a href="https://www.incommunities.co.uk/complaints-and-feedback/">https://www.incommunities.co.uk/complaints-and-feedback/</a>	Our agents accept complaints made to any member of their staff. We expect them to provide training to their teams to ensure they fully understand and follow the correct procedures when handling complaints.
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	Yes	We expect our property management agents to ensure they have a) an understanding of the Housing Ombudsman's complaints code and guidance and b) to reflect this in their annual Housing Ombudsman self-assessment form	As part of our ongoing efforts to enhance complaint handling, CBMDC will continue to collaborate closely with our management agents to ensure compliance with the respective

	potentially a sign that residents are unable to complain.			Ombudsman requirements and alignment with best practices.
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	<a href="https://www.mearsgroup.co.uk/good-governance/mears-group-complaints-policy">https://www.mearsgroup.co.uk/good-governance/mears-group-complaints-policy</a> <a href="https://www.incommunities.co.uk/complaints-and-feedback/">https://www.incommunities.co.uk/complaints-and-feedback/</a>	We expect our management agents to ensure their complaints policies are accessible for all residents. As Registered Providers this should be reflected in their annual Housing Ombudsman self-assessment form.
3.5	The policy must explain how the landlord will publicise details of the complaints policy, including information about the Ombudsman and this Code.	Yes	<p>We expect our property management agents to:</p> <ul style="list-style-type: none"> <li>a) possess an understanding of the Housing Ombudsman's complaints code and guidance.</li> <li>b) accurately reflect this understanding in their annual Housing Ombudsman self-assessment form.</li> </ul>	<p>We expect our contracted management agents' complaints policies to:</p> <ul style="list-style-type: none"> <li>a) outline the complaints process and specify where it will be published.</li> <li>b) to include details about the Ombudsman Service and its complaint handling code.</li> <li>c) Be subject to ongoing review, with continued liaison to ensure necessary amendments are made as required.</li> </ul>
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	<a href="https://www.mearsgroup.co.uk/good-governance/mears-group-complaints-policy">https://www.mearsgroup.co.uk/good-governance/mears-group-complaints-policy</a> <a href="https://www.incommunities.co.uk/complaints-and-feedback/">https://www.incommunities.co.uk/complaints-and-feedback/</a>	Our property management agents provide information inline with the Ombudsman's guidance about representation when a tenant makes a complaint. This is reflected in our management agents' annual Housing



				Ombudsman self-assessment form and their complaints 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	<a href="https://www.mearsgroup.co.uk/good-governance/mears-group-complaints-policy">https://www.mearsgroup.co.uk/good-governance/mears-group-complaints-policy</a> <a href="https://www.incommunities.co.uk/complaints-and-feedback/">https://www.incommunities.co.uk/complaints-and-feedback/</a> <a href="http://www.bradford.gov.uk/housing/council-housing/feedback-and-complaints-about-your-social-housing/">www.bradford.gov.uk/housing/council-housing/feedback-and-complaints-about-your-social-housing/</a> <a href="https://www.bradford.gov.uk/compliments-and-complaints/policies-and-procedures/complaint-handling-policy-and-procedure/">https://www.bradford.gov.uk/compliments-and-complaints/policies-and-procedures/complaint-handling-policy-and-procedure/</a>	We expect our management agents to provide information about a tenant's right to access the Housing Ombudsman even if they have an open complaint with our agents. CBMDC provided tenant right to access the Housing Ombudsman Service on its website.

## 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	Our commissioned management agents are established Registered Providers with their own complaint teams. CBMDC has contracted the agents to lead on housing complaints on behalf of the Council	CBMDC has a dedicated Corporate Complaints Team and will signpost housing complaints where appropriate to our contacted social housing agents. The Council will collaborate with our agents in complaint handling where required.
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	As a part of expected procedures, the contracted agents ensure their complaints officers have access to staff throughout their organisations so that a prompt complaint resolution can be reached	Complaints that fall within the remit of the Housing Ombudsman Service will be appropriately signposted when brought to the attention of the Council.
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	Incommunities & Mears submit annual self-assessment forms which cover the handling of complaints including Council owned properties. The information in their submissions also reflects information on properties they manage on behalf of the Council	We expect our agents to ensure they have ongoing complaint handling training in place for all staff (including new starters) and provide bespoke training for staff where needed. CBMDC will work closely with our contracted agents to discuss any issues that arise when handling complaints about Council own properties

## 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	<a href="https://www.mearsgroup.co.uk/good-governance/mears-group-complaints-policy">https://www.mearsgroup.co.uk/good-governance/mears-group-complaints-policy</a> <a href="https://www.incommunities.co.uk/complaints-and-feedback/">https://www.incommunities.co.uk/complaints-and-feedback/</a> <a href="https://www.bradford.gov.uk/compliments-and-complaints/policies-and-procedures/complaint-handling-policy-and-procedure/">https://www.bradford.gov.uk/compliments-and-complaints/policies-and-procedures/complaint-handling-policy-and-procedure/</a> <a href="https://www.bradford.gov.uk/housing/council-housing/feedback-and-complaints-about-your-social-housing/">https://www.bradford.gov.uk/housing/council-housing/feedback-and-complaints-about-your-social-housing/</a>	All complaints covered by this code fall under our agents' Housing Complaint Policy. The Council's complaints policy & guidance advises tenants with regards to making a landlord complaint.
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 href="https://www.mearsgroup.co.uk/good-governance/mears-group-complaints-policy">https://www.mearsgroup.co.uk/good-governance/mears-group-complaints-policy</a> <a href="https://www.incommunities.co.uk/complaints-and-feedback/">https://www.incommunities.co.uk/complaints-and-feedback/</a> <a href="https://www.bradford.gov.uk/compliments-and-complaints/policies-and-procedures/complaint-handling-policy-and-procedure/">https://www.bradford.gov.uk/compliments-and-complaints/policies-and-procedures/complaint-handling-policy-and-procedure/</a> <a href="https://www.bradford.gov.uk/housing/council-housing/feedback-and-complaints-about-your-social-housing/">https://www.bradford.gov.uk/housing/council-housing/feedback-and-complaints-about-your-social-housing/</a>	We expect our agents to follow the code of guidance on complaints without introducing additional and unnecessary stages. Complaints handled by the Council that fall under the Local Government & Social Care Ombudsman follow the appropriate Code and reflected in its guidance and 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	<a href="https://www.mearsgroup.co.uk/good-governance/mears-group-complaints-policy">https://www.mearsgroup.co.uk/good-governance/mears-group-complaints-policy</a> <a href="https://www.incommunities.co.uk/complaints-and-feedback/">https://www.incommunities.co.uk/complaints-and-feedback/</a>	As with the Council's corporate complaints process, our contracted agents operate a two stage complaints process with no additional named stages.
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	<a href="https://www.mearsgroup.co.uk/good-governance/mears-group-complaints-policy">https://www.mearsgroup.co.uk/good-governance/mears-group-complaints-policy</a> <a href="https://www.incommunities.co.uk/complaints-and-feedback/">https://www.incommunities.co.uk/complaints-and-feedback/</a>	We will continue to work with our agents to ensure a two stage complaints process is followed,
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Yes	<a href="https://www.mearsgroup.co.uk/good-governance/mears-group-complaints-policy">https://www.mearsgroup.co.uk/good-governance/mears-group-complaints-policy</a> <a href="https://www.incommunities.co.uk/complaints-and-feedback/">https://www.incommunities.co.uk/complaints-and-feedback/</a>	Any complaint responses managed through our agents' complaints policy are aligned with the Housing Ombudsman Code of Practice. Regular meetings with our agents and ongoing communication regarding housing complaints are standard procedures to ensure effective oversight of complaints where the Council is the landlord.
5.6	When a complaint is logged at Stage 1 or escalated to Stage 2, landlords must set out their understanding of	Yes	<a href="https://www.mearsgroup.co.uk/good-governance/mears-group-complaints-policy">https://www.mearsgroup.co.uk/good-governance/mears-group-complaints-policy</a>	Our agents provide formal complaint acknowledgement letters that include details of the

	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.		<a href="https://www.incommunities.co.uk/complaints-and-feedback/">https://www.incommunities.co.uk/complaints-and-feedback/</a> <a href="https://www.bradford.gov.uk/compliments-and-complaints/policies-and-procedures/complaint-handling-policy-and-procedure/">https://www.bradford.gov.uk/compliments-and-complaints/policies-and-procedures/complaint-handling-policy-and-procedure/</a> <a href="https://www.bradford.gov.uk/housing/council-housing/feedback-and-complaints-about-your-social-housing/">https://www.bradford.gov.uk/housing/council-housing/feedback-and-complaints-about-your-social-housing/</a>	complaint as well as the outcomes/remedies that the resident is seeking. In any cases where further clarity is required, staff are advised to contact the resident for further clarification.
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	<a href="https://www.mearsgroup.co.uk/good-governance/mears-group-complaints-policy">https://www.mearsgroup.co.uk/good-governance/mears-group-complaints-policy</a> <a href="https://www.incommunities.co.uk/complaints-and-feedback/">https://www.incommunities.co.uk/complaints-and-feedback/</a>	If an aspect of the formal complaint that cannot be investigated through our agents' Housing Complaints Policy, the complainant is expected to be informed. Wherever possible, residents will be signposted to the correct body.
5.8	At each stage of the complaints process, complaint handlers must: <ul style="list-style-type: none"> <li>a) deal with complaints on their merits, act independently, and have an open mind;</li> <li>b) give the resident a fair chance to set out their position;</li> <li>c) take measures to address any actual or perceived conflict of interest; and consider all relevant information and evidence carefully.</li> </ul>	Yes	<a href="https://www.mearsgroup.co.uk/good-governance/mears-group-complaints-policy">https://www.mearsgroup.co.uk/good-governance/mears-group-complaints-policy</a> <a href="https://www.incommunities.co.uk/complaints-and-feedback/">https://www.incommunities.co.uk/complaints-and-feedback/</a> <a href="https://www.bradford.gov.uk/housing/council-housing/feedback-and-complaints-about-your-social-housing/">https://www.bradford.gov.uk/housing/council-housing/feedback-and-complaints-about-your-social-housing/</a>	We expect our contracted agents to follow the Ombudsman code for handling complaints, to carry out complaints impartially, carry out an objective review of the complaint, should there be any conflict of interest we expect our contracted agents to ensure that an appropriate complaints person is allocated to the case. Our agents have a quality assurance process in place and are Registered Providers.

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	Incommunities & Mears submit annual self-assessment forms which cover the handling of complaints including Council owned properties. The information in their submissions also reflects information on properties they manage on behalf of the Council	We expect our agents to keep to complaint response timescales and provide an update at suitable intervals to the complainant.
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	Incommunities & Mears submit annual self-assessment forms which cover the handling of complaints including Council owned properties. The information in their submissions also reflects information on properties they manage on behalf of the Council	We will ensure any resident/complainant reasonable adjustments are considered through our agents' complaint handling process as standard practice.
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.		Incommunities & Mears submit annual self-assessment forms which cover the handling of complaints including Council owned properties. The information in their submissions also reflects information on properties they manage on behalf of the Council	..
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,	Yes	Incommunities & Mears submit annual self-assessment forms which cover the handling of complaints including Council owned properties. The information in their submissions also reflects information on	Our contracted agents use their own dedicated management information system for logging, monitoring and managing all social housing complaints received and responded to.

	correspondence with other parties, and any relevant supporting documentation such as reports or surveys.		properties they manage on behalf of the Council	
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	Incommunities & Mears submit annual self-assessment forms which cover the handling of complaints including Council owned properties. The information in their submissions also reflects information on properties they manage on behalf of the Council	..
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	If it becomes necessary to put restrictions in place, CBMDC expects our contracted agents to reference their own Managing Vexatious Complaints Policy and apply their process appropriately  <a href="https://www.bradford.gov.uk/compliments-and-complaints/policies-and-procedures/managing-vexatious-complainants-and-requests-policy/">https://www.bradford.gov.uk/compliments-and-complaints/policies-and-procedures/managing-vexatious-complainants-and-requests-policy/</a>	..
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	CBMDC expects our agents to take proportionate action and always be taken in line with the Equality Act 2010	.

## 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	Incommunities & Mears submit annual self-assessment forms which cover the handling of complaints including Council owned properties. The information in their submissions also reflects information on properties they manage on behalf of the Council. Please refer to respective agent webpages.	<p>We expect our agents to aim to resolve all complaints at stage 1 without requesting an extension, having due regard to the complexity of the case and resident vulnerability or risk.</p> <p>We expect response dates tracked to ensure formal responses are completed in as timely a manner as possible. We expect the agents to actively encourage colleagues to respond to and resolve complaints as soon as practicably possible.</p> <p>We will continue to engage with our contracted agents to satisfy ourselves that the appropriate in complaints training is in place.</p>
6.2	Complaints must be acknowledged, defined and logged at stage 1 of the complaints procedure <b><u>within five working days of the complaint being received.</u></b>	Yes	<p><a href="https://www.mearsgroup.co.uk/good-governance/mears-group-complaints-policy">https://www.mearsgroup.co.uk/good-governance/mears-group-complaints-policy</a></p> <p><a href="https://www.incommunities.co.uk/complaints-and-feedback/">https://www.incommunities.co.uk/complaints-and-feedback/</a></p>	Timescales should be set out in the Managing agent's Housing Complaints Policy.



6.3	Landlords must issue a full response to stage 1 complaints <b><u>within 10 working days</u></b> of the complaint being acknowledged.	Yes	<a href="https://www.mearsgroup.co.uk/good-governance/mears-group-complaints-policy">https://www.mearsgroup.co.uk/good-governance/mears-group-complaints-policy</a>	CBMDC expects our agents to ensure they complaint to the timeframes that should be set out in their complaint policies
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	<a href="https://www.mearsgroup.co.uk/good-governance/mears-group-complaints-policy">https://www.mearsgroup.co.uk/good-governance/mears-group-complaints-policy</a> <a href="https://www.incommunities.co.uk/complaints-and-feedback/">https://www.incommunities.co.uk/complaints-and-feedback/</a>	Our agents comply with the Housing Ombudsman's guidance on timescales and extensions.
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	Incommunities & Mears submit annual self-assessment forms which cover the handling of complaints including Council owned properties. The information in their submissions also reflects information on properties they manage on behalf of the Council	If a complaint requires an extension, the Housing Ombudsman details will be provided at all stages. All response letters to complainants also include details with how a resident can contact the Housing Ombudsman.
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		Incommunities & Mears submit annual self-assessment forms which cover the handling of complaints including Council owned properties. The information in their submissions also reflects information on	We expect our contracted agents to send a complaint response to the resident when the answer to complaint is known. Agents have a process

	completed. Outstanding actions must still be tracked and actioned promptly with appropriate updates provided to the resident.		properties they manage on behalf of the Council	in place to track and monitor completion of promised actions
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	Incommunities & Mears submit annual self-assessment forms which cover the handling of complaints including Council owned properties. The information in their submissions also reflects information on properties they manage on behalf of the Council	Our contracted agents provide complaint responses at a good standard, including clear findings, outcomes and actions, referencing all relevant policies and regulations 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	Incommunities & Mears submit annual self-assessment forms which cover the handling of complaints including Council owned properties. The information in their submissions also reflects information on properties they manage on behalf of the Council	CBMDC expects our agents to have a process in place when additional complaints are raised by the complaints. We expect our agents to consider whether additional issues need to be added to the complaint or if a secondary complaint should be raised
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;	Yes	Incommunities & Mears submit annual self-assessment forms which cover the handling of complaints including Council owned properties. The information in their submissions also reflects information on properties they manage on behalf of the Council	We expect our agents to have standard template letters and stage 1 guidance to provide structure to complaint responses

	<p>c) the decision on the complaint;</p> <p>d) the reasons for any decisions made;</p> <p>e) the details of any remedy offered to put things right;</p> <p>f) details of any outstanding actions; and</p> <p>g) details of how to escalate the matter to stage 2 if the individual is not satisfied with the response.</p>			
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## 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	<a href="https://www.mearsgroup.co.uk/good-governance/mears-group-complaints-policy">https://www.mearsgroup.co.uk/good-governance/mears-group-complaints-policy</a>  <a href="https://www.incommunities.co.uk/complaints-and-feedback/">https://www.incommunities.co.uk/complaints-and-feedback/</a>	We expect our contracted agents to appropriately signpost in the Stage 1 letters, advise complainants on how to escalate their complaints to stage 2 complaint. Stage 2 complaints are handled in accordance with the respective Ombudsmen's Code of Practice
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	Incommunities & Mears submit annual self-assessment forms which cover the handling of complaints including Council owned properties. The information in their submissions also reflects information on properties they manage on behalf of the Council	Our agents comply with expected timescales for complaint acknowledgements at stage 2 and inline with the Housing Ombudsman's Code of Practice.

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	Incommunities & Mears submit annual self-assessment forms which cover the handling of complaints including Council owned properties. The information in their submissions also reflects information on properties they manage on behalf of the Council	CBMDC does not expect residents to provide reasoning for their request of an escalation to stage 2. If required, it is accepted that the agents will seek additional information as to why the resident was not satisfied with the stage 1 response. However, this is not a prerequisite of a stage 2 consideration.
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Yes	Incommunities & Mears submit annual self-assessment forms which cover the handling of complaints including Council owned properties. The information in their submissions also reflects information on properties they manage on behalf of the Council	Our Agents are expected to follow a process to ensure that the stage 2 complaint is responded to by a different person than at stage 1
6.14	Landlords must issue a final response to the stage 2 <b><u>within 20 working days</u></b> of the complaint being acknowledged.	Yes	Incommunities & Mears submit annual self-assessment forms which cover the handling of complaints including Council owned properties. The information in their submissions also reflects information on properties they manage on behalf of the Council	We expect our contracted agents to include response timeframes at stage 2 in their complaint policy.
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	Yes	Incommunities & Mears submit annual self-assessment forms which cover the handling of complaints including Council owned properties. The information in their submissions also reflects information on properties they manage on behalf of the Council	We expect our agents to update complainants at Stage 2 complaints if an extension is required, this should include reasoning for the extension.

	without good reason, and the reason(s) must be clearly explained to the resident.			
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	Incommunities & Mears submit annual self-assessment forms which cover the handling of complaints including Council owned properties. The information in their submissions also reflects information on properties they manage on behalf of the Council	CBMDC expects our contracted agents to ensure timescales are provided to the complainants when extensions are required and that they provide the Housing Ombudsman's details in their correspondence
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	Incommunities & Mears submit annual self-assessment forms which cover the handling of complaints including Council owned properties. The information in their submissions also reflects information on properties they manage on behalf of the Council	The complaint response is sent to the complainant when the answer to the complaint is known. If there should be any outstanding actions, CBMDC expect our agents to outline outstanding actions in the complaint response, so they are clearly communicated.
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	Incommunities & Mears submit annual self-assessment forms which cover the handling of complaints including Council owned properties. The information in their submissions also reflects information on properties they manage on behalf of the Council	Our agents are expected to address all points raised in their complaints responses and also provide clear reasons and outcomes for the decisions made.
6.19	Landlords must confirm the following in writing to the resident at the completion of stage 2 in clear, plain language:	Yes	Incommunities & Mears submit annual self-assessment forms which cover the handling of complaints including Council owned properties. The information in their submissions also reflects information on	As a part of handling complaints from tenants who reside in Council owned properties, our Agents use template letters which include the guidance

	<ul style="list-style-type: none"> <li>a) the complaint stage;</li> <li>b) the complaint definition;</li> <li>c) the decision on the complaint;</li> <li>d) the reasons for any decisions made;</li> <li>e) the details of any remedy offered to put things right;</li> <li>f) details of any outstanding actions; and</li> <li>g) details of how to escalate the matter to the Ombudsman Service if the individual remains dissatisfied.</li> </ul>		properties they manage on behalf of the Council	outlined in 6.19. We expect our agents to ensure that they comply with the Ombudsman's guidance when writing a stage 2 complaint response.
6.20	Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.	Yes	Incommunities & Mears submit annual self-assessment forms which cover the handling of complaints including Council owned properties. The information in their submissions also reflects information on properties they manage on behalf of the Council	Allocated Stage 2 investigation Officers will consult with all appropriate staff, this includes the involvement of designated Housing Services Manager/Officer in the Council

## Section 7: Putting things right

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	Yes	Incommunities & Mears submit annual self-assessment forms which cover the handling of complaints including Council owned properties. The information in their submissions also	Our contracted agents comply with Ombudsman's guidance in cases when errors or maladministration are identified. If a fault is found, it is

	<p>intends to take, to put things right. These can include:</p> <ul style="list-style-type: none"> <li>• Apologising;</li> <li>• Acknowledging where things have gone wrong;</li> <li>• Providing an explanation, assistance or reasons;</li> <li>• Taking action if there has been delay;</li> <li>• Reconsidering or changing a decision;</li> <li>• Amending a record or adding a correction or addendum;</li> <li>• Providing a financial remedy;</li> <li>• Changing policies, procedures or practices.</li> </ul>		reflects information on properties they manage on behalf of the Council	<p>acknowledged, an apology is provided and corrective action is taken promptly as possible.</p> <p>Any financial remedy should be considered in accordance with the Ombudsman's guidance. CBMDC values the importance of learning from complaints.</p> <p>Therefore, any insight or outcomes derived from housing complaint responses should be shared with the Council</p>
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Yes	Incommunities & Mears submit annual self-assessment forms which cover the handling of complaints including Council owned properties. The information in their submissions also reflects information on properties they manage on behalf of the Council	We encourage our agents to ensure the remedies offered reflect the impact on the resident in line with H.O.S. guidance.
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.		Incommunities & Mears submit annual self-assessment forms which cover the handling of complaints including Council owned properties. The information in their submissions also reflects information on properties they manage on behalf of the Council	<p>We expect our agents to provide complaint response letters that clearly outline the actions to be taken as a party of the remedy,</p> <p>Where applicable, it is practice to specify the timescales for these actions. In cases where outstanding actions, appointments or repairs are</p>

				<p>required as a result of a complaint, our agents are expected to reach an agreement with the resident.</p> <p>All remedies should be fully implemented and documented in the case file.</p>
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes	Incommunities & Mears submit annual self-assessment forms which cover the handling of complaints including Council owned properties. The information in their submissions also reflects information on properties they manage on behalf of the Council	Contracted agents refer to the Ombudsman's guidance when deciding upon remedies for our complaint cases.



## Section 8: Self-assessment, reporting and compliance

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
8.1	<p>Landlords must produce an annual complaints performance and service improvement report for scrutiny and challenge, which must include:</p> <ul style="list-style-type: none"> <li>a) the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements.</li> <li>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;</li> <li>c) any findings of non-compliance with this Code by the Ombudsman;</li> <li>d) the service improvements made as a result of the learning from complaints;</li> <li>e) any annual report about the landlord's performance from the Ombudsman; and</li> <li>f) any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord.</li> </ul>	Yes	<p><a href="#">Complaint handling performance   Bradford Council</a></p> <p><a href="#">Feedback and complaints about your Social Housing   Bradford Council</a></p> <p>The following weblinks provide decisions and minutes following reporting and scrutiny by elected members</p> <p><a href="https://bradford.moderngov.co.uk/ieList/Documents.aspx?CId=144&amp;MId=8313">https://bradford.moderngov.co.uk/ieList/Documents.aspx?CId=144&amp;MId=8313</a></p> <p><a href="#">Decisions 21st-Nov-2024 10.30 Governance and Audit Committee.pdf</a></p> <p>See also:</p> <p><a href="#">Complaints Performance   Incommunities</a></p> <p><a href="#">Mears Group PLC Annual Report and Accounts 2023   Mears Group PLC</a></p>	<p>CBMDC produces the Complaint Handling Annual Performance &amp; Activity Report, which is presented to the Governance and Audit Committee.</p> <p>The contracted registered providers also produce their own annual complaints performance and improvement reports, detailing complaints related to Council owned properties.</p> <p>Following a recent review of the Council's Housing Services and the changes introduced by the Housing Ombudsman, the Council remains committed to working with its providers to ensure tenant complaints are reflected in our annual reporting.</p> <p>The Council will continue to ensure that contracted providers' Housing Complaints policies align with all relevant requirements and the Housing Ombudsman's Code of Practice.</p> <p>Whilst the contracted providers have their own reporting and governance processes, we acknowledge the importance of continuous improvements to</p>

				ensure robust mechanisms incorporate lessons learned from previous years as well as any findings from non-compliance and Housing Ombudsman Service investigations related to the Council's landlord responsibilities
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	<a href="https://bradford.moderngov.co.uk/ieListDocuments.aspx?CId=144&amp;MIId=8313">https://bradford.moderngov.co.uk/ieListDocuments.aspx?CId=144&amp;MIId=8313</a>  <a href="#">Decisions 21st-Nov-2024 10.30 Governance and Audit Committee.pdf</a>	
8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	Yes		<p>The Council has undergone a restructure of the Housing Management Team which will support the management and compliance of the Council's statutory responsibility as a social housing landlord.</p> <p>The Council will review the handling of future self-assessments with the introduction of a new Housing (HRA) Monitoring Officer.</p> <p>The Monitoring Officer will support the Housing (HRA) Contract Manager in overseeing the external contractors that manage the Council's housing</p>

				<p>stock of 429 homes. The function of the Housing Contract Management includes</p> <ul style="list-style-type: none"> <li>- Producing performance reports and managing statistical returns to meet contractual and audit standards.</li> <li>- Compiling comprehensive performance reports, including statistical analysis, issue identification, benchmarking, and preparing presentations.</li> </ul>
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	Yes		<p>We commit to carrying out a review and update of our self-assessment should we be requested to do so by the Housing Ombudsman Service. There is an expectation that our managing agents comply with this also.</p>
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	Incommunities & Mears submit annual self-assessment forms which cover the handling of complaints including Council owned properties. The information in their submissions also reflects information on properties they manage on behalf of the Council	<p>If our contracted managing agents are unable to comply with the code due to exceptional circumstances, we expect them to inform the Housing Ombudsman Service and provide information to our customers/tenants with timescales for returning to compliance.</p>

## 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	Incommunities & Mears submit annual self-assessment forms which cover the handling of complaints including Council owned properties. The information in their submissions also reflects information on properties they manage on behalf of the Council	The Council is committed to learning from complaints and looking beyond the circumstances of the individual complaint. We hold regular reviews of the housing complaints we have received to identify service failures and use this learning to consider whether service improvements need to be made as a result. Going forward, CBMDC plans to engage with our contracted management agents to ensure lessons learned are fed into the Council's learnings.
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	Incommunities & Mears submit annual self-assessment forms which cover the handling of complaints including Council owned properties. The information in their submissions also reflects information on properties they manage on behalf of the Council	Recommendations and learning from individual complaints as well as trends are important to the Council and we recognise that further work is required with our contracted property management agents to ensure that their handling of housing complaints are fed back to the Council.
9.3	Accountability and transparency are also integral to a positive complaint handling culture. Landlords must	Yes	<a href="https://www.bradford.gov.uk/housing/council-housing/feedback-and-complaints-about-your-social-housing/">https://www.bradford.gov.uk/housing/council-housing/feedback-and-complaints-about-your-social-housing/</a>	Due to the low volume of housing stock owned by the Council, we do not currently report back on wider learning

	report back on wider learning and improvements from complaints to stakeholders, such as residents' panels, staff and relevant committees.			from housing complaints through panels, however our contacted registered housing providers do this on the Council's behalf. The Housing Service is open to review this aspect if required to do so,
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	Incommunities & Mears submit annual self-assessment forms which cover the handling of complaints including Council owned properties. The information in their submissions also reflects information on properties they manage on behalf of the Council	The Council's Housing Services Manager has accountability for Housing complaints & works alongside the Corporate Complaints Team. This process is currently under review as a part of a broader Housing Service review.
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	Incommunities & Mears submit annual self-assessment forms which cover the handling of complaints including Council owned properties. The information in their submissions also reflects information on properties they manage on behalf of the Council	Housing complaints performance is to be incorporated into the Council's annual Governance Audit Committee Report to ensure oversight and scrutiny.
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	Yes	Incommunities & Mears submit annual self-assessment forms which cover the handling of complaints including Council owned properties. The information in their submissions also reflects information on properties they manage on behalf of the Council	This aligns with the Council's existing reporting framework. The process for reporting insights from housing complaints is currently under review. insights from housing complaint is under review

	staff to perform this role and report on their findings.			
9.7	<p>As a minimum, the MRC and the governing body (or equivalent) must receive:</p> <ul style="list-style-type: none"> <li>a. regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance;</li> <li>b. regular reviews of issues and trends arising from complaint handling;</li> <li>c. regular updates on the outcomes of the Ombudsman's investigations and progress made in complying with orders related to severe maladministration findings; and</li> <li>d. annual complaints performance and service improvement report.</li> </ul>	Yes	Incommunities & Mears submit annual self-assessment forms which cover the handling of complaints including Council owned properties. The information in their submissions also reflects information on properties they manage on behalf of the Council	Process under review. Housing complaints will be incorporated into the Council's annual Governance Audit Committee,
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"> <li>a. have a collaborative and co-operative approach towards resolving complaints, working with</li> </ul>	Yes	Incommunities & Mears submit annual self-assessment forms which cover the handling of complaints including Council owned properties. The information in their submissions also reflects information on properties they manage on behalf of the Council	CDMDC collaborates with its contacted agents to ensure a unified and solution focused approach to complaint resolution. We emphasise shared accountability for service improvements, fostering a culture of learning and improvement rather than blame. Our contracted registered housing providers are expected

	<p>colleagues across teams and departments;</p> <p>b. take collective responsibility for any shortfalls identified through complaints, rather than blaming others; and</p> <p>c. act within the professional standards for engaging with complaints as set by any relevant professional body.</p>			<p>to uphold professional standards in complaint handling, ensuring fairness, transparency and consistency in service delivery.</p>
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