

Self-assessment form for Bromford Flagship and its trading names of Newtide Homes, Samphire Homes and Victory Homes

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	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>	Y	Complaints Policy	The definition of a complaint is set out in our Complaints Policy
1.3	A resident does not have to use the word 'complaint' for it to be treated as such.	Y	Complaints Policy	Our complaints policy confirms that we define a complaint as "an

	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.			expression of dissatisfaction, however made" and this is reinforced in colleague training and guidance. Customers do not have to use the word 'complaint' for it to be treated as such. Whenever customers express dissatisfaction, we will give them the choice to make a formal complaint. Our complaints policy also confirms our customers can have a representative deal with the complaint on their behalf.
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.	Y	Complaints Policy Complaints training documents	Our team is trained and equipped with clear guidance to distinguish between service requests and complaints. This guidance is regularly updated to ensure continued effectiveness. To ensure transparency we record and monitor service requests.
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.	Y	Complaints Policy	We understand the importance of addressing customers' concerns promptly and effectively. In accordance with this requirement, we ensure that a complaint is raised whenever a customer expresses dissatisfaction with the response to

				their service request, regardless of whether the service request is still being processed. Furthermore, we will not halt our efforts to address the service request even if a customer files a complaint.
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.	Y	Complaints Policy Complaint performance and improvement report Feedback Programme reports	Where a customer expresses dissatisfaction with a service in a survey, they are advised of the option to pursue as a formal complaint. When customers do have cause to complain, we use this valuable insight as part of our complaint's performance and improvement report. Additionally, feedback is reviewed by service area managers to help identify any service-related issues and drive improvements.

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	Y	Complaints Policy Complaint case records and written response examples	Our complaints policy details the circumstances that a matter will not be considered a complaint. We will accept a complaint unless there is a valid reason not to do so. If we decide not to accept a complaint, we will provide an explanation in writing setting out the reason and explaining the customers right to take the decision to the Housing Ombudsman
2.2	A complaints policy must set out the circumstances in which a matter will not be considered as a complaint or escalated, and these circumstances must be fair and reasonable to residents. Acceptable exclusions include:	Y	Complaints Policy	Our complaints policy sets out circumstances in which a matter will not be considered a complaint.

	<p>1.1 The issue giving rise to the complaint occurred over twelve months ago.</p> <p>1.2 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.</p> <p>1.3 Matters that have previously been considered under the complaints policy.</p>			
2.3	<p>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.</p>	Y	<p>Complaints Policy</p> <p>Complaints training documents</p>	<p>Our complaints policy reflects this.</p> <p>Our complaints handlers are encouraged to apply discretion and seek team leader oversight if needed. A customer's individual circumstance will be assessed in line with our policy and where appropriate we will make any appropriate adjustments</p>
2.4	<p>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</p>	Y	<p>Complaints Policy</p> <p>Complaint case records and written response examples</p>	<p>If we do not accept a complaint, the case handler will set this out in writing, providing a clear explanation and the reasons why we have not accepted the complaint. We will inform the customer of the right to take the</p>

	fairly applied, the Ombudsman may tell the landlord to take on the complaint.			decision to the Housing Ombudsman.
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Y	Complaints Policy Complaints training documents Reasonable Adjustments Policy Reasonable adjustment Policy	In making any decision to exclude a complaint the case handlers are trained as a matter of course to consider the customers individual circumstances. We are dedicated to adjusting our services where reasonably practicable and this is taken into account by complaint handlers.

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.	Y	<p>Complaints Policy</p> <p>Complaint training documents BI reporting illustrating source of complaints</p> <p>https://www.bromford.co.uk/help-and-advice/complaints/</p> <p>https://www.newtide-homes.co.uk/my-community/complaints/make-a-complaint/</p> <p>https://www.samphire-homes.co.uk/my-community/complaints/make-a-complaint/</p> <p>https://www.victory-homes.co.uk/my-community/complaints/make-a-complaint/</p>	<p>We have dedicated complaint pages on our websites that includes our policy and how to raise a complaint.</p> <p>Multiple channels are available for customers to make complaints, including our website complaint form, live chat, telephone, email, by post and in person.</p> <p>The Complaints Policy includes reference to our obligations under the Equality Act 2010, and we will adjust services to meet individual needs.</p> <p>Complaints handlers are given training and guidance to make reasonable adjustments for customers who may need us to modify our service.</p>

			https://flagship-homes.co.uk/existing-customers/your-feedback/make-a-complaint/	
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.	Y	Complaints training documents BI reporting illustrating source of complaints	We are committed to ensuring that customers can raise complaints through any preferred method and with any member of staff. All staff are fully trained in the complaints process and are equipped to promptly pass details of any complaint to the complaint handling team, ensuring efficient handling and resolution.
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.	Y	Annual Complaints Performance and Service Improvement Report 23/24 (Flagship) Annual Complaints Performance and Service Improvement Report 2024 (Bromford) Monthly complaints reports Monthly dashboard	Our approach is to welcome feedback and in line with the code we promote the Housing Ombudsman in our customer communications. Complaints reports emphasise volumes and key themes, offering opportunities for scrutiny and decision-making as valuable learning sources to drive improvements. Complaints reporting is part of our governance structure

				including senior leaders, our Customer Influence Groups and Board.
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.	Y	Complaints Policy Reasonable Adjustments Policy Reasonable adjustment Policy Bromford Standards https://www.samphire-homes.co.uk/my-home-tenancy/our-commitment/	Our complaints policy is fully accessible on our websites and is also signposted to customers at commencement of their tenancy. Our customer facing colleagues can provide direct support for customers wishing to raise a complaint. We're happy to make reasonable adjustments to our process if customers need them. This is verified with the customer at the acknowledgement stage of the complaint handling process. Service Standards on complaints have been co-created with our involved customers.
3.5	The policy must explain how the landlord will publicise details of the complaints policy, including information about the Ombudsman and this Code.	Y	Complaints Policy	Our policy outlines our commitment to ensuring our Complaints Policy is accessible to customers on our website. It can be shared with customers electronically and/or in printed format to

				meet customer needs and preferences.
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.	Y	Complaints Policy Bromford Standards https://www.samphire-homes.co.uk/my-home-tenancy/our-commitment/	Our Policy outlines our inclusive approach to complaint handling. Where a customer requires a representative and/or advocate we accommodate this.
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.	Y	Complaints Policy Complaint case records	Our Complaints Policy signposts customers to The Ombudsman, and details of this are included in our complaint's communications at stage 1 and stage 2 and is detailed on our 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.	Y	Complaints Policy	Our dedicated complaint handling teams ensure complaints receive the necessary attention. Our Chief Customer Officer is the accountable executive team member.
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.	Y	Complaints Policy Monthly complaints reports Monthly dashboard	The complaints teams have access to colleagues at all levels across the business to ensure prompt resolution of complaints. They are integrated across all key meetings and forums, and this ensures regular reporting and compliance with the Code.
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	Y	Complaints Policy Complaints training documents Annual complaints and Improvement Report	Our complaint handling teams have the requisite skills and training set out by the code to handle complaints. They have access to all departments and

	complaints are seen as a core service and must be resourced to handle complaints effectively			support of the senior leadership team to access the people they need to quickly resolve complaints. We use complaints insight such as volumes & key themes as a source of learning to drive improvements. This can be evidenced in our annual complaints and improvement report.
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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.	Y	Complaints Policy	We have one Complaints policy which is published on our website and reviewed annually
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.	Y	Complaints Policy	Our Complaints Policy outlines our stage 1, and 2 complaints resolution process. There are no additional named stages.

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.	Y		As 5.2
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.	Y	Complaints Policy	Our complaints are only dealt with by our internal colleagues, even if the actual complaint is regarding a third party who delivers services on our behalf.
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Y		As 5.4
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.	Y	Complaints Policy Case examples	At the first point of contact with the customer, the complaint handler explores exactly what the complaint and outcome the customer is seeking is. Our online complaint forms also ask customers of their desired outcome. If any aspect of the complaint is unclear our complaint handling team will clarify this with the customer at the outset. Our understanding of the complaint and the outcome

				the customer is seeking is included in our written 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.	y	Complaints Policy	If any aspect of complaint responsibilities is unclear our complaint-handling team will clarify this with the customer at the outset. Our understanding of the complaint and the outcome the customer is seeking is included in our written response. If aspects of the complaint include areas outside our responsibility, we will include an explanation in our response
5.8	At each stage of the complaints process, complaint handlers must: <ul style="list-style-type: none"> 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. 	y	Complaints Policy Complaints training documents Conflict of interest of colleague's annual process	Our complaint handling colleagues are a dedicated and independent team who are impartial and have the autonomy to resolve complaints fairly at any stage throughout our complaints process.

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.	Y	Complaints Policy Case examples	<p>If we need an extension beyond the timescales set out in the Code, we will agree this with the customer.</p> <p>Our complaint handling team manage the expectations of our customers from the outset, clearly communicating next steps including any agreed extensions. Preferred method and frequency of communication is captured at the beginning of the complaints process and the next contact dates are communicated with the customer.</p>
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.	Y	Complaints Policy Reasonable Adjustments Policy Reasonable adjustment Policy Equality and Diversity Policy Equity, Diversity and Inclusion Policy	<p>At the first point of contact the complaints team will ask the customer if there are any circumstances, we need to be aware of when dealing with their complaint alongside existing information held on the system. We understand the importance of understanding our customer's needs and have systems in place to capture this information which can be</p>

				accessed by customer facing colleagues when required. We can adjust the service should a customer require it.
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.	Y	Complaints Policy Case examples	Our Complaints Policy outlines our escalation process; customers can escalate their complaint where they feel it has not been resolved. at the preceding stage. Where an escalation is refused this will be done so in accordance with our policy, and we will explain the reasons why to the customer in writing.
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.	Y	Complaint case records	Our systems capture a full record of the complaint and accommodate and support the Housing Ombudsman's complaint handling code. It includes date received, all stages of managing the complaint, all correspondence and where appropriate, technical reports.
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	Y	Complaints Policy Complaints training documents Compensation procedure Discretionary payment procedure	Our complaint handling team are impartial and have been given guidance and training in offering appropriate remedies to resolve complaints fairly at

	provided at any stage of the complaints process without the need for escalation.			any stage throughout our complaints process.
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.	Y	Equality and Diversity Policy Equity, Diversity and Inclusion Policy Restricting Customer Access Policy Unacceptable Behaviour Policy	Restrictions are only applied in exceptional circumstances. They are recorded and reviewed in line with our policies on restricting access.
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.	Y	As 5.15	Decisions to restrict contact will have regard for any protected characteristics and will be proportionate in relation to this and the risk of unacceptable behaviour towards colleagues. This process is in accordance with the Equalities Act 2010

Section 6: Complaints Stages

Stage 1

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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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.	Y	Complaints Policy Complaints training documents	Our Complaint Handling Team triage incoming complaints with regard to factors such as customer vulnerability, risk and complexity to ensure appropriate prioritisation and allocation of resource is applied.
6.2	Complaints must be acknowledged, defined and logged at stage 1 of the complaint's procedure <u>within five working days of the complaint being received.</u>	Y	2025 Annual Complaints Performance and Improvement report Complaint reports BI reports	Our complaints policy and procedures set out the requirement for our teams to acknowledge and log complaints within five working days of receipt. We record and regularly review this measure by reporting to our governance structure.
6.3	Landlords must issue a full response to stage 1 complaints <u>within 10 working days</u> of the complaint being acknowledged.	Y	2025 Annual Complaints Performance and Improvement report Complaint reports BI reports	Our complaints policy and procedures set out the requirement for our teams to issue a full response to stage 1 complaints within 10 working days of the complaint being acknowledged. We record and regularly review this measure.

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.	Y	2025 Annual Complaints Performance and Improvement report BI reports	Extensions are set out in our complaints policy; any extensions are documented and communicated to the customer. We clearly explain our reasoning to the customer and notify them of the timescale.
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.	Y	Complaints Policy Complaint case records	Our complaint handling team include signposting to the Ombudsman in communication as standard.
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.	Y	Complaints Policy BI reports	Our written response outlines the actions and timescales required to fully resolve the complaint. Those actions are recorded on our systems and tracked through to completion. We have a dedicated group of complaint handling colleagues who check and drive the completion of these actions alongside increased levels of communication with the customer.
6.7	Landlords must address all points raised in the complaint definition and provide clear	Y	Complaints Policy Complaint case records	This requirement is set out in our complaints policy and the

	reasons for any decisions, referencing the relevant policy, law and good practice where appropriate.			required information is set out in our complaint response.
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.	Y	Complaints Policy Complaint case records	Where a customer raises new complaints during the stage 1 process this will form part of the current complaint if they precede the full response date and are relevant, otherwise a new complaint will be raised. We will communicate this to the customer.
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. 	Y	Complaints Policy Complaint case records	We ensure customers receive clear information as part of the completion of the stage 1 process, using plain language. To support the quality of our responses and to ensure consistency we have produced a template letter that colleagues use to ensure all of the required information is included in their response.

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.	Y	Complaints Policy Complaint case records	In our stage 1 complaint response we inform customers how they can escalate their complaint to stage 2 if they are not satisfied.
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.	Y	2025 Annual Complaints Performance and Improvement report Complaints Reports	Our policy and procedures set out the requirement for our teams to acknowledge and log requests for complaints to be escalated to stage 2 within five working days of receipt. We record and regularly review this measure by reporting to our governance structure
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.	Y	Complaints Policy Complaint case records	Communications with customers is a key component of the complaint process and we work with customers to understand why they remain unhappy Our stage 2 review will look at the handling of the complaint to date, decisions made, the resolution offered and will draw upon the views of subject matter experts where required to reach a fair resolution wherever possible.

6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Y	Complaints Policy Complaint case records	Stage 1 and stage 2 complaints are managed by different colleagues, as specified in our Complaints Policy
6.14	Landlords must issue a final response to the stage 2 within 20 working days of the complaint being acknowledged.	Y	2025 Annual Complaints Performance and Improvement report Complaints Reports	Our policy and procedures set out the requirement for our teams to issue a full response to stage 2 complaints within 20 working days of the complaint being acknowledged. We record and regularly review this measure by reporting to our governance structure
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.	Y	Complaints Policy Complaint case records	In accordance with our Complaints Policy, If the complaint is complex, to ensure a thorough response, we may need more time to respond. If this is the case, we will provide the customer with a clear explanation and timescale for response. We aim not to extend this by more than a further 20 working days.
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.	Y	Complaints Policy Complaint case records	Our complaint handling team include signposting to the Ombudsman in communication as standard.

				The contact details of the Ombudsman are also included in our complaints policy which is accessible on our website.
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.	Y	Complaints Policy Complaint case records	Our written response outlines the actions and timescales required to fully resolve the complaint. Those actions are recorded on our systems and tracked through to completion. We have a dedicated group of complaint handling colleagues who check and drive the completion of these actions alongside increased levels of communication with the customer.
6.18	Landlords must address all points raised in the complaint definition and provide clear reasons for any decisions, referencing the relevant policy, law and good practice where appropriate.	Y	Complaints Policy Complaint training documents	Our complaint handling team have been trained to ensure all points raised are addressed and will provide clear reasons for any decisions. They will seek subject matter expert advice to ensure relevant policy and law referencing is included where appropriate.
6.19	Landlords must confirm the following in writing to the resident at the completion of stage 2 in clear, plain language:	Y	Complaints Policy Complaint case records	To support the quality of responses and to ensure consistency we have produced

	<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. 			a template letter that colleagues use to ensure all the required information is included in their response.
6.20	Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.	Y	Complaints Policy Complaint case records	The complaint handling team have access to all departments across the business and support of the senior leadership team to access the people they need to resolve and respond to complaints quickly. In some key service areas such as repairs and maintenance, a business partnering role is in place to ensure complaints have the right levels of accountability, priority and progress. When completing stage 2 of the process the complaints

				handling team have engaged with all relevant colleagues to issue the response.
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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. 	Y	<p>Complaints Policy</p> <p>Complaint case records</p> <p>Letter templates</p>	<p>In line with our policy, our complaint response will include an acknowledgement where things have gone wrong and where appropriate, and details of any remedy offered to put things right.</p> <p>We ensure customers receive an apology if appropriate, providing an appropriate remedy and clear outcomes from our investigation. To support the quality of our responses and to ensure consistency we have produced a template letter that colleagues use to ensure all of the required information is included in their response.</p>

7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Y	Complaints Policy Complaint case records	Remedies/compensation guidance is in line with the Housing Ombudsman remedies document. Compensation awards consider the customers costs associated with the complaint and other relevant factors.
7.3	The remedy offer must clearly set out what will happen and by when, in agreement with the resident where appropriate. Any remedy proposed must be followed through to completion.	Y	Complaints Policy Complaint case records Compensation procedure Discretionary payment procedure	Remedial action is agreed with the customer where appropriate and is included in our complaint response. Our complaint handling team record and regularly review remedial actions and track them through to completion
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Y	Complaints Policy Complaint case records Compensation procedure Discretionary payment procedure	Our remedies/compensation guidance is in line with the Housing Ombudsman remedies document. Key themes and total amounts paid are tracked monthly and included in monthly complaints reporting for scrutiny and oversight.

Section 8: Putting things right

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"> 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. 	Y	2025 Annual Complaints Performance and Improvement report	<p>A self-assessment against the HO code and Complaint Handling and Service Improvement report is produced annually and published on our website. Our Complaint Handling and Service Improvement report is in line with the requirements of the code. Our annual Ombudsman landlord performance report is also published on our website detailing our performance and any non-compliance with 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.	Y	2025 Annual Complaints Performance and Improvement report	The annual complaints performance and service improvement report is provided to the Board as part of our governance structure. The report and the Boards response is published on our websites.
8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	Y	2025 Annual Complaints Performance and Improvement report	This self-assessment is being carried out following the formal merger of Bromford Housing Group Limited and Flagship Housing Group Limited to form Bromford Flagship which was completed on 28/02/2025.
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	Y		Requirement noted.
8.5	If a landlord is unable to comply with the Code due to exceptional circumstances, such as a cyber incident, they must inform the Ombudsman, provide information to residents who may be affected, and publish this on their website Landlords must provide a timescale for returning to compliance with the Code.	Y		Requirement noted. In the past 12 months there have been no exceptional incidents that have impacted our ability to meet the HO Code.

Section 9: Scrutiny & oversight: continuous learning and improvement

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / 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.	Y	Annual Complaints Performance and Service Improvement Report 23/24 (Flagship) Annual Complaints Performance and Service Improvement Report 2024 (Bromford) 2025 Annual Complaints Performance and Improvement report	<p>Each month, we compile a comprehensive complaints report detailing our complaint handling performance. This report is then reviewed through our governance structures, reaching the executive and board. Our customer influence panel also receive complaint handling reporting for awareness, accountability, scrutiny, and feedback.</p> <p>Additionally, we track and review emerging themes to drive continuous improvement and produce the annual Complaints and Service Improvement report, which provides detail on our learning, progress and next steps.</p>
9.2	A positive complaint handling culture is integral to the effectiveness with which landlords resolve disputes. Landlords must	Y	Annual Complaints Performance and Service Improvement Report 23/24 (Flagship)	We view complaints as important pieces of customer insight; we use it to identify

	use complaints as a source of intelligence to identify issues and introduce positive changes in service delivery.		Annual Complaints Performance and Service Improvement Report 2024 (Bromford) 2025 Annual Complaints Performance and Improvement report	issues and recurring themes to drive positive changes in service delivery. The Annual Complaints and Service Improvement report provides details of this. Our ongoing complaint reporting is part of our governance structure, ensuring all colleagues are engaged in the learning from complaints.
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.	Y	Complaints Policy Customer Influence Panel terms of reference	<p>We are developing a culture of root cause analysis and learning from complaints and broader insights, particularly in areas of underperformance. This approach ensures that improvement plans can be established to enhance services. Themes, lessons learned, and actions are documented in complaints reporting and wider customer insight materials.</p> <p>These are shared through various governance channels, including our board, executive, customer influence panel and monthly team meetings. Our member responsible for</p>

				<p>complaints sits on our Customer Influence Panel and Board.</p> <p>Any complaint handling failures (CHFO's) and HO determinations are reported monthly to Board via the Complaints Report and the Member Responsible for Complaints is briefed. All CHFO's and severe maladministration determinations will trigger a deep dive review, with findings and any recommendations included in the monthly complaints Board report and reported to the Customer Influence Panel.</p>
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.	Y	Link to Our Leadership page	Paul Coates the Chief Customer Officer has the accountability for complaints and is a member of our Executive Team.
9.5	In addition to this a member of the governing body (or equivalent) must be	Y	Link to Our Leadership page	Dame Sandra Horley is a non-executive board member

	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').			appointed as our MRC in June 2024. Sandra also chairs our CCIN (Customer and Community Influence Network), is a member of our Customer Influence Panel and Bromford Flagship Board.
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.	Y	Monthly complaints reporting	The MRC has access to the complaint handling team and complaint performance reporting. Additionally, they meet with a number of colleagues to discuss complaint performance and enable them to report their findings to board
9.7	As a minimum, the MRC and the governing body (or equivalent) must receive: <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 	Y	As 9.6	The MRC, Board and Executive receive a monthly report which sets out the requirements in 'a, b and c' monthly and is engaged in the drafting and reviewing of the documents set out in 'd'.

	d. annual complaints performance and service improvement report.			
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> <p>a. have a collaborative and co-operative approach towards resolving complaints, working with 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>	Y	<p>Complaint training documents</p> <p>Complaint case records</p>	<p>We continue to work hard on ensuring our culture and way of working aligns fully with HO code. We communicate with colleagues about the importance of effective complaint handling and share complaint performance reporting. Our strategy and annual plans establish clear expectations, while our values and DNA are woven into our communications and campaigns to encourage a customer-first mindset among colleagues.</p>