

Self-assessment against the Housing Ombudsman's Complaint Handling Code

Code Section	Code Requirement	Mandatory (M) or Best Practice (BP)	Comply: Yes/No	Evidence, Commentary and Any Explanations
Section 1 - Definition of a complaint				
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 organisation, its own staff, or those acting on its behalf, affecting an individual resident or group of residents.</i>	M	Yes	Brunelcare has adopted the Housing Ombudsman's definition of a complaint. The policy defines a complaint as: <i>an expression of dissatisfaction (written or verbal), about the standard of service, actions or lack of action by Brunelcare, its employees, or those acting on its behalf, affecting an individual customer or group of customers.</i> (see para 4.6).
1.3	The resident does not have to use the word 'complaint' for it to be treated as such. A complaint that is submitted via a third party or representative must still be handled in line with the landlord's complaints policy.	M	Yes	<p>Paragraph 4.10 of the Policy covers complaints made by a third party. It states: <i>A complaint may be made by a person (representative) acting on behalf of another person in any cases where that individual:</i></p> <ul style="list-style-type: none"> ● <i>Has died.</i> ● <i>Is unable to by reason of physical or mental incapacity to make a complaint themselves.</i> ● <i>Has requested the representative to act on their behalf.</i> <p>The following wording has been included in the September 2022 update of the Policy to make the Ombudsman's requirement clearer: (paragraphs 4.7 and 4.10):</p> <p><i>A customer does not need to use the word complaint for a concern they have raised to be treated as such.</i></p>

				<p><i>We will accept a complaint made on a customer's behalf through an advocate, for example, from a friend, support worker, relative or MP. Where complaints are made through an advocate we will, where appropriate need to confirm this with the customer</i></p>
1.4	<p>Landlords should recognise the difference between a service request, where a resident may be unhappy with a situation that they wish to have rectified, and a complaint about the service they have/have not received.</p>	BP	Yes	<p>Paragraph 6.15 of the Policy (<i>paragraph 7.6 of the September 2022 updated Policy</i>) provides: <i>examples of the type of concern that can be resolved at the local resolution stage are:</i></p> <ul style="list-style-type: none"> • <i>an appointment was made for a boiler to be fixed and the tenant raises a concern that no-one turned up on the appointed day;</i> • <i>someone raises a concern that their bin hasn't been emptied by the refuse collection service when it should have been;</i> • <i>a client is unhappy about the menu choices.</i> <p><i>However, an example of the type of concern that should not be resolved at the informal stage is when:</i></p> <ul style="list-style-type: none"> • <i>the concern involves issues where it appears a service failure has occurred due to an obvious systemic problem</i> <p>The following wording has been included in the September 2022 update of the Policy to make the Ombudsman's best practice recommendation clearer: (see paragraphs 3.5 and 3.6)</p> <p><i>Excluded from the complaints policy are "service requests" – A service request is defined as a request from a customer that requires action to be taken to put something right. It will usually be the first time we have been contacted about an issue and have not previously had the opportunity to investigate the concerns and agree</i></p>

				<p><i>what action we will take to resolve the issue.</i></p> <p><i>A complaint will be raised if a customer remains dissatisfied with the response to their service request. This will include matters where customers are not happy with a situation and are asking us to confirm the actions we will take to resolve the situation. If a customer remains dissatisfied after receiving our response, a complaint will be raised. We recognise that some customers will immediately ask for a complaint to be raised even though we have not had an opportunity to set out our position.</i></p>
1.5	Survey feedback may not necessarily need to be treated as a complaint, though, where possible, the person completing the survey should be made aware of how they can pursue their dissatisfaction as a complaint if they wish to.	BP	Yes	<p>The results of the Customer Survey completed in October 2021 were reviewed by the Strategy and Development Team for issues raised that may constitute a complaint and where necessary escalated for further review/investigation.</p> <p>The Policy also includes the following wording:</p> <p><i>6.18 (paragraph 7.9 of the September 2022 updated Policy) Comments and concerns may also be received via a number of mechanisms including satisfaction surveys, customer workshops and discussion groups. Brunelcare will ensure that feedback on the action taken to address issues raised via such mechanisms is publicised.</i></p>
1.6	... if further enquiries are needed to resolve the matter, or if the resident requests it, the issue must be logged as a complaint.	M	Yes	<p>See the following paragraphs of the Policy:</p> <p><i>6.11 (paragraph 7.1 of the September 2022 updated Policy) All employees who receive a comment or concern should make every attempt to try to resolve the matter raised as they arise. In most cases we will quickly be able to resolve customer concerns. This stage should be part of front line service delivery and not viewed as separate from it. This first step will normally be addressed by an explanation or other appropriate remedial action by frontline colleagues.</i></p>

				<p>6.14 (paragraph 7.5 of the September 2022 updated Policy) The informal resolution stage should be completed as quickly as possible and certainly should take no longer than two working days. If it is not possible to resolve the concern within the relevant timescale or without an investigation of the circumstances that led to the concern, then the matter should be escalated to the formal complaint investigation stage.</p> <p>6.17 (paragraph 7.8 of the September 2022 updated Policy) Employees must advise individuals on how to progress their comments/concerns to the formal complaints process (stage 1), if they are not satisfied with the outcome at the end of the informal stage.</p>
1.7	A landlord must accept a complaint unless there is a valid reason not to do so.	M	Yes	Paragraph 3.4 of the Policy sets out exceptions. This section sets out a list of when an issue will not be considered under the complaints policy.
1.8	A complaints policy must clearly set out the circumstances in which a matter will not be considered, and these circumstances should be fair and reasonable to residents.	M	Yes	Paragraph 3.4 of the Policy sets out exceptions. This section sets out a list of when an issue will not be considered under the complaints policy.
1.9	If a landlord decides not to accept a complaint, a detailed 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.	M	Yes	<p>Para 6.37 of the Policy (paragraph 9.12 of the September 2022 updated Policy) states:</p> <p><i>The Complaints Officer will provide support to individuals to ensure that they have all the information they need to contact the most appropriate organisation or Ombudsman. Further details are set out in the Comment, Concerns, Complaints and Compliments Procedure.</i></p> <p>The following wording has been included in the 2022-23 update of the Policy to make the Ombudsman's</p>

				<p>requirement clearer: (see paragraph 3.7) <i>“Where we cannot consider a complaint within our policy, we will explain why and offer advice or support to customers to try and help them resolve the issue”</i></p>
<p>Section 2 - Accessibility and awareness</p>				
2.1	<p>Landlords must make it easy for residents to complain by providing different channels through which residents can make a complaint such as in person, over the telephone, in writing, by email and digitally. While the Ombudsman recognises that it may not be feasible for a landlord to use all of the potential channels, there must be more than one route of access into the complaints system.</p>	M	Yes	<p>A complaint may be clinical or non-clinical and can be made:</p> <ul style="list-style-type: none"> ● in person; ● by telephone; ● Video call; or ● in writing (by letter or e-mail). (see paragraph 4.6 of the Policy) <p>Complaints may also be made using a form on the website. <i>This has been added to paragraph 4.6 of the Policy in the 2022-23 update.</i></p>
2.2	<p>Where a landlord has set up channels to communicate with its residents via social media, then it should expect to receive complaints via those channels. Policies should contain details of the steps that will be taken when a complaint is received via social media and how confidentiality and privacy will be maintained.</p>	BP	<p>Yes - but only after the Policy was updated following the self-assessment</p>	<p>The following wording has been included in the 2022-23 update of the Policy to make the Ombudsman’s best practice recommendation clear: (see paragraph 4.6)</p> <p><i>Complaints received via social media platforms will be directed via private messaging to enable us to maintain our customers confidentiality and privacy.</i></p> <p>Paragraphs 7.3 and 7.4 of the Policy (<i>now paragraphs 16.3 and 16.4 of the September 2022 updated Policy</i>) state:</p> <p><i>7.3 Brunelcare is dedicated to protecting any personal data processed by the Charity and in maintaining a system that goes above and beyond our obligations under the General Data Protection Regulation</i></p>

				<p><i>(GDPR). Our Practice is set out in our Data Protection Policy.</i></p> <p>7.4 <i>In relation to the complaints procedure it is the responsibility of the recipient to either redact the Person Identifiable element, and then request the Complaints Officer to coordinate the complaint process, or if this is not possible, they should redact the Person Identifiable information that is not needed to enable a thorough investigation.</i></p>
2.3	Landlords must make their complaint policy available in a clear and accessible format for all residents. This will detail the number of stages involved, what will happen at each stage and the timeframes for responding.	M	Yes	<p>The Policy is available on the website and the Complaints page sets out the process in a simple, easy to follow format.</p> <p>Posters and leaflets have been made available to customers and there is an easy to follow form on the website.</p> <p>For customers who are unable to access digital channels, a printed version of the Complaints policy will be provided.</p> <p><i>One of the first objectives of the new Complaints Officer is to review all information available to customers and further develop this in consultation with customers.</i></p> <p><i>A link/copy of the policy is included with the complaint acknowledgement letter.</i></p>
2.4	Landlord websites, if they exist, must include information on how to raise a complaint. The complaints policy and process must be easy to find on the website.	M	Yes	<p>A quick link to 'Make a Complaint' and 'Giving Feedback' can be accessed from the 'Contact Us' tab on the home page:</p> <p>https://www.brunelcare.org.uk/contact-us/</p> <p>The policy is accessible from the Make a Complaint page and can be located via the Search functionality.</p>
2.5	Landlords must comply with the	M	Yes	Paragraph 6.6 of the Policy states that:

	<p>Equality Act 2010 and may need to adapt normal policies, procedures, or processes to accommodate an individual's needs.</p> <p>Landlords must satisfy themselves that their policy sets out how they will respond to reasonable adjustments requests in line with the Equality Act and that complaints handlers have had appropriate training to deal with such requests.</p>		<p><i>No complainant will be discriminated against for any reason and the Charity is committed to its obligations under the Equality Act 2010.</i></p> <p>Further paragraphs 7.1 and 7.2 (now paragraph 16.1 and 16.2 of the September 2022 updated Policy) state:</p> <p><i>7.1 Making a complaint does not mean that a client/tenant/complainant will receive less help or that things will be made difficult for them. Brunelcare seeks to embed an environment where all clients, visitors and employees are treated as individuals, fairly and in a consistent way. We work within the spirit and the practice of the Equality Act 2010 by promoting a culture of respect and dignity and actively challenging discrimination, should it ever arise. This Policy will be applied in a way that is consistent with these principles.</i></p> <p><i>7.2 Employees must also ensure that customers and their relatives/carers are not discriminated against when a complaint is made and that their ongoing care will be unaffected. To help achieve this aim, all staff are made aware when in receipt of a complaint that complaint records must be kept separate from care records. Line Managers are responsible for ensuring that this is monitored when reviewing the investigation responses to complaints and for considering whether it may be more appropriate in the circumstances for their care to be transferred to another team.</i></p> <p>The following wording has been included in the 2022-23 update of the Policy to make the Ombudsman's requirement clearer: (see paragraph 6.9)</p> <p><i>We will offer advice and support on submitting a complaint</i></p>
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				<p>where required by:</p> <ul style="list-style-type: none"> • considering all requests for reasonable adjustments under the Equality Act 2010 and will implement adjustments where it is practicable to do so. • sharing information in a way that meets the customers' individual need
2.6	Landlords must publicise the complaints policy and process, the Complaint Handling Code and the Housing Ombudsman Scheme in leaflets, posters, newsletters, online and as part of regular correspondence with residents.	M	Yes	<p>Information regarding how to raise a complaint, the Complaint Handling Code and self-assessments against this is provided on the website and in the customer newsletter. Posters, leaflets and newsletters are available.</p> <p><i>A new Complaints Officer took up post on 31 October 2022 and the opportunity will be taken to re-launch the Complaints Policy and related procedure. As part of this regular updates and information on the complaints policy will be issued together with quarterly complaints performance information.</i></p> <p><i>Housing Ombudsman determinations and general Housing Ombudsman updates will also be provided to customers, on the website, and in other correspondence sent to customers.</i></p>
2.7	Landlords must provide residents with contact information for the Ombudsman as part of its regular correspondence with residents.	M	Yes	<p>Signposting to the various Ombudsman is contained in complaint acknowledgement and closure template letters. This provides contact information to the customer of how they can contact the Ombudsman Service at any time during their complaint.</p> <p>Ombudsman contact information is provided to customers on the website</p> <p><i>As part of the further enhancement of the complaints process the information on the Ombudsman contained in letters will be reviewed by the new Complaints Officer to see if it can be improved upon. Further, an article on</i></p>

				<i>complaints and the role of the various Ombudsman will be run in the next edition of the Grapevine due to be published in early December 2022.</i>
2.8	Landlords must provide early advice to residents regarding their right to access the Housing Ombudsman Service throughout their complaint, not only when the landlord's complaints process is exhausted.	M	Yes	<p>Signposting to the Housing Ombudsman is contained in complaint acknowledgement and closure template letters. This provides contact information to the customer of how they can contact the Ombudsman Service at any time during their complaint.</p> <p><i>As part of the further enhancement of the complaints process the information on the Ombudsman contained in letters will be reviewed by the new Complaints Officer to see if it can be improved upon. Further, an article on complaints and the role of the various Ombudsman will be run in the next edition of the Grapevine due to be published in early December 2022.</i></p>
Section 3 - Complaint handling personnel				
3.1	Landlords must have a person or team assigned to take responsibility for complaint handling to ensure complaints receive the necessary attention, and that these are reported to the governing body. This Code will refer to that person or team as the "complaints officer".	M	Yes	<p>The role of 'Complaints Officer' was introduced in September 2021.</p> <p>The Complaints Officer is part of the Corporate Governance Team.</p>
3.2	...the complaint handler appointed must have appropriate complaint handling skills and no conflicts of interest.	M	Yes	<p>To ensure no conflicts of interest the Complaints Officer is part of the Corporate Governance Team.</p> <p>A new Complaints Officer joined Brunelcare on 31 October 2022 who has a wealth of experience and who has worked at a senior level in the corporate governance and quality assurance fields.</p>

3.3	<p>Complaint handlers should:</p> <ul style="list-style-type: none"> • Be able to act sensitively and fairly • Be trained to handle complaints and deal with distressed and upset residents • Have access to staff at all levels to facilitate quick resolution of complaints • Have the authority and autonomy to act to resolve disputes quickly 	BP	Yes	<p>To ensure no conflicts of interest the Complaints Officer is part of the Corporate Governance Team. The Complaints Officer has unfettered access to staff working across the organisation and at all grades.</p> <p>Paragraph 6.25 (<i>paragraph 9.1 of the September 2022 updated Policy</i>) of the policy states that:</p> <p><i>6.25 A complaint investigation will be a fact-finding exercise which is impartial, open and transparent and proportionate to the seriousness of the complaint</i></p> <p>A new Complaints Officer joined Brunelcare on 31 October 2022 who has a wealth of experience and who has worked at a senior level in the corporate governance and quality assurance fields.</p>
Section 4 - Complaint handling principles				
4.1	<p>Any decision to try and resolve a concern must be taken in agreement with the resident and a landlord's audit trail/records should be able to demonstrate this. Landlords must ensure that efforts to resolve a resident's concerns do not obstruct access to the complaints procedure or result in any unreasonable delay. It is not appropriate to have extra named stages (such as 'stage 0' or 'pre-complaint stage') as this causes unnecessary confusion for residents. When a complaint is made, it must be acknowledged and logged at stage one of the</p>	M	Yes	<p>All complaints are logged and progressed through the Google sheets log - each site has its own log and the information is fed through to the central log that only the Complaints Officer, Performance and Governance Manager and Company Secretary & Head of Corporate Governance have access to.</p> <p><i>Once the Housing software system, Cx is implemented the complaint module will be used to record and monitor complaints.</i></p> <p>Progress and case notes are added to the complaint to create an audit trail of decisions and actions taken.</p> <p>Customers are made aware of their right to ask for a complaint to be raised if they remain dissatisfied with our response and actions taken to resolve their concern.</p>

	complaints procedure within five days of receipt.			<p>The Policy Documents our two-stage complaints process which includes: resolve complaints at the first point of contact where possible, formally record all complaints, steps taken to resolve complaints and the customer's right to ask for their complaint to be escalated to stage two if they remain dissatisfied with our response.</p> <p>The Policy states <i>all Stage 1 complaints will be formally acknowledged in writing by the Complaints Officer as soon as is possible, but within a maximum of three working days.</i></p> <p>The Complaints Officer monitors all complaints received irrespective of channel and ensures that all complaints are logged and assigned to a Complaint Lead.</p>
4.2	Within the complaint acknowledgement, landlords must set out their understanding of the complaint and the outcomes the resident is seeking. If any aspect of the complaint is unclear, the resident must be asked for clarification and the full definition agreed between both parties.	M	Yes	<p>Paragraph 6.20 (<i>paragraph 8.2 of the September 2022 updated Policy</i>) of the Policy states that:</p> <p><i>The Complaints Officer will offer to discuss the matter with the complainant, and will:</i></p> <ul style="list-style-type: none"> - <i>help the person who is complaining to understand the process;</i> - <i>confirm with them their preferred method of communication and what they want as an outcome;</i> - <i>provide advice of relevant advocacy and support services, for example Shelter and the Citizens Advice Bureau if they need help in making their complaint.</i> <p><i>The wording of the Stage 1 acknowledgement letter template has been further strengthened to address this requirement. It now clearly details:</i></p> <ul style="list-style-type: none"> - <i>the scope of the complaint using bullet points where appropriate.</i>

				- details the outcome the customer is seeking.
4.3	Landlords should manage residents' expectations from the outset, being clear where a desired outcome is unreasonable or unrealistic	BP	Yes	<p>All complaints are initially triaged by the Complaints Officer who is fully aware of the Complaints policy, the exclusions and how to manage expectations.</p> <p>Paragraph 6.20 (now paragraph 8.2 of the September 2022 updated Policy) of the Policy states that:</p> <p><i>The Complaints Officer will offer to discuss the matter with the complainant, and will:</i></p> <ul style="list-style-type: none"> - help the person who is complaining to understand the process; - confirm with them their preferred method of communication and what they want as an outcome; - provide advice of relevant advocacy and support services, for example Shelter and the Citizens Advice Bureau if they need help in making their complaint. <p><i>The wording of the Stage 1 acknowledgement letter template has been further strengthened to address this requirement. It now clearly details</i></p> <ul style="list-style-type: none"> - the scope of the complaint using bullet points where appropriate. - details the outcome the customer is seeking.
4.4	A complaint should be resolved at the earliest possible opportunity, having assessed what evidence is needed to fully consider the issue, what outcome would resolve the matter for the resident and whether there are any urgent actions required.	BP	Yes	<p>Paragraph 6.20 (now paragraph 8.2 of the September 2022 updated Policy) of the Policy states that:</p> <p><i>The Complaints Officer will keep track of (and record) progress and take responsibility for monitoring the smooth running of the investigation, ensuring that timescales are met.</i></p>

				The Complaints Officer is responsible for monitoring compliance with the deadlines set out in the Policy which are in line with those set by the Ombudsman.
4.5	Landlords should 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 where this is reasonable.	BP	Yes	<p>Paragraphs 4,10 of the Policy cover complaints made by a third party. It states:</p> <p><i>A complaint may be made by a person (representative) acting on behalf of another person in any cases where that individual:</i></p> <ul style="list-style-type: none"> ● <i>has died.</i> ● <i>Is unable to by reason of physical or</i> ● <i>mental incapacity to make a complaint themselves.</i> ● <i>Has requested the representative to act on their behalf.</i> <p>The following wording has been included in the 2022-23 update of the Policy to make the Ombudsman's best practice recommendation clear: (see paragraph 4.10)</p> <p><i>We will accept a complaint made on a customer's behalf through an advocate, for example, from a friend, support worker, relative or MP. Where complaints are made through an advocate we will, where appropriate need to confirm this with the customer</i></p>
4.6	A complaint investigation must be conducted in an impartial manner.	M	Yes	<p>Paragraph 6.20 (now paragraph 8.2 of the September 2022 updated Policy) of the Policy states:</p> <p><i>having satisfied themselves that they sufficiently understand the details of the complaint, the Complaints Officer will:</i></p> <ul style="list-style-type: none"> - <i>grade the seriousness of the complaint to decide the appropriate level of investigation;</i>

				<ul style="list-style-type: none"> - identify an officer within the Charity with sufficient seniority, credibility and independence from the source of the complaint to undertake the investigation (depending on the nature of the complaint, this may still be someone within the service directorate but it may require someone independent from the service/directorate); - when deciding on an “investigator”, the Complaints Officer will take account of whether the investigation will need to span across more than one service; - for social care complaints, consideration will be given as to whether the investigation could benefit from the involvement of an independent expert.
4.7	<p>The complaint handler must:</p> <ul style="list-style-type: none"> ● deal with complaints on their merits ● act independently and have an open mind ● take measures to address any actual or perceived conflict of interest ● consider all information and evidence carefully ● keep the complaint confidential as far as possible, with information only disclosed if necessary to properly investigate the matter. 	M	Yes	<p>Paragraph 6.20 (now paragraph 8.2 of the September 2022 updated Policy) of the Policy states:</p> <p>having satisfied themselves that they sufficiently understand the details of the complaint, the Complaints Officer will:</p> <ul style="list-style-type: none"> - grade the seriousness of the complaint to decide the appropriate level of investigation; - identify an officer within the Charity with sufficient seniority, credibility and independence from the source of the complaint to undertake the investigation (depending on the nature of the complaint, this may still be someone within the service directorate but it may require someone independent from the service/directorate); - when deciding on an “investigator”, the Complaints Officer will take account of whether the investigation will need to span across more than one service;

				- for social care complaints, consideration will be given as to whether the investigation could benefit from the involvement of an independent expert
4.8	Where a key issue of a complaint relates to the parties' legal obligations landlords should clearly set out their understanding of the obligations of both parties	BP	Yes	Where appropriate we will provide appropriate advice and guidance to the customer regarding any legal obligations and this guidance will be clearly set out to the customer. We may confirm that the complaints process is not the right channel to investigate the customers' concerns, or we may confirm that a complaint will be raised.
4.9	Communication with the resident should not generally identify individual members of staff or contractors.	BP	Yes	Paragraphs 7.3 and 7.4 (<i>paragraph 16.3 and 16.4 of the September 2022 updated Policy</i>) of the Policy state: 7.3 <i>Brunelcare is dedicated to protecting any personal data processed by the Charity and in maintaining a system that goes above and beyond our obligations under the General Data Protection Regulation (GDPR). Our Practice is set out in our Data Protection Policy.</i> 7.4 <i>In relation to the complaints procedure it is the responsibility of the recipient to either redact the Person Identifiable element, and then request the Complaints Officer to coordinate the complaint process, or if this is not possible, they should redact the Person Identifiable information that is not needed to enable a thorough investigation</i>
4.10	Landlords should keep residents regularly updated about the progress of the investigation.	BP	Yes	Paragraph 6.21 (<i>paragraph 8.3 of the September 2022 updated Policy</i>) of the Policy states that: 6.21 <i>... In any event, there will be regular contact with the complainant, updating them on progress on the case</i>

4.11	Landlords must adhere to any reasonable arrangements agreed with residents in terms of frequency and method of communication.	M	Yes	<p>Paragraph 6.20 of the Policy (<i>paragraph 8.2 of the September 2022 updated Policy</i>) states that:</p> <p><i>The Complaints Officer will offer to discuss the matter with the complainant, and will:</i></p> <ul style="list-style-type: none"> - <i>help the person who is complaining to understand the process;</i> - <i>confirm with them their preferred method of communication and what they want as an outcome;</i> - <i>provide advice of relevant advocacy and support services, for example Shelter and the Citizens Advice Bureau if they need help in making their complaint.</i> <p>The following wording has been included in the 2022-23 update of the Policy to make the Ombudsman's requirement clearer:</p> <p>The bullet highlighted above has been amended to:</p> <p style="text-align: center;"><i>confirm with them their preferred method of communication, the frequency of communication and the outcome they are seeking.</i></p>
4.12	<p>The resident, and if applicable any staff member who is the subject of the complaint, must also be given a fair chance to:</p> <ul style="list-style-type: none"> · set out their position · comment on any adverse findings before a final decision is made. 	M	Yes	<p>As part of the complaint investigation, the individual undertaking the investigation is required to liaise with colleagues regarding the concerns raised. The colleague will have the opportunity to set out their position and comment on any observations made.</p> <p>Where permissible to do so and having due regard to date protection and confidentiality, we will contact customers to understand all points of view before issuing a final complaint decision.</p>
4.13	A landlord must include in its complaints policy its timescales for a	M	Yes - but only after the Policy	The following wording has been included in the 2022-23 update of the Policy to make the Ombudsman's

	resident to request escalation of a complaint		was updated following the self-assessment	<p>requirement clearer: (see paragraph 10.1)</p> <p><i>If the complainant is dissatisfied with the outcome of the formal complaint they can progress to Stage 2 by contacting the Complaints Office and requesting a review of their complaint. A request to progress the complaint to stage 2 must be submitted within 10 working days of receiving the stage 1 outcome letter.</i></p>
4.14	A landlord must not unreasonably refuse to escalate a complaint through all stages of the complaints	M	Yes	Brunelcare will ensure that a complaint will be escalated through all stages of the complaints process as appropriate. The Complaints Officer will ensure that the complainant is supported to do this.
4.15	A full record must be kept of the complaint, any review 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 reports or surveys prepared.	M	Yes	<p>A shared complaints mailbox is in place and managed by the Complaints Officer and key members of the Corporate Governance Team, for customers to send in evidence, communications and updates on complaints.</p> <p>A complaints log is maintained which details all relevant information and references key documentation. All emails, telephone conversations, and complaint correspondence are held together</p> <p>When Cx is in place the complaints module will be used as the record centre.</p>
4.16	Landlords should seek feedback from residents in relation to the landlord's complaint handling as part of the drive to encourage a positive complaint and learning culture,	BP	Yes	The Customer Survey issued in October 2021 included questions on complaints handling. The timing of the Survey meant that the new process had not had time to bed in. However, further feedback from residents will be sought as part of the Together with Customers Charter follow-up work
4.17	Landlords should recognise the impact that being complained about can have on future service delivery. Landlords should ensure that staff	BP	Yes	Paragraph 6.38 of the Policy (<i>paragraph 13.1 of the September 2022 updated Policy</i>) states:

	are supported and engaged in the complaints process, including the learning that can be gained,			6.38 <i>If a member of staff is cited in a complaint they must be informed by their manager and advised where help and support can be found. Staff who are involved in a complaint are entitled to be supported both professionally and personally</i>
4.18	Landlords must have policies and procedures in place for managing unacceptable behaviour from residents and/or their representatives when pursuing a complaint.	M	Yes	See paras 6.47 to 6.52 of the Policy (<i>section 14 of the September 2022 updated Policy</i>) which cover the policy and related procedures in detail
4.19	Any restrictions placed on a resident's contact due to unacceptable behaviour should be appropriate to their needs and should demonstrate regard for the provisions of the Equality Act 2010	BP	Yes	See Para 6.52 (<i>paragraph 14.6 in the September 2022 updated Policy</i>) – the Company Secretary & Head of Corporate governance needs to be involved in decisions of this nature
Section 5 - Complaint stages				
Stage 1				
5.1	Landlords must respond to the complaint within 10 working days of the complaint being logged. Exceptionally, landlords may provide an explanation to the resident containing a clear timeframe for when the response will be received. This should not exceed a further 10 days without good reason.	M	Yes	The Complaints Procedure states that 4.12 <i>The date of expected formal conclusion will be given at this time. The target is to try and resolve the complaint within 10 working days of it being received. If this is not possible an explanation needs to be given as to why and a reasonable time frame provided.</i> This is also reinforced in the Complaints log and on our website.
5.2	If an extension beyond 20 working days is required to enable the	BP	Yes	The Complaints Procedure currently states that:

	landlord to respond to the complaint fully, this should be agreed by both parties.			<p>4.16 <i>If it takes longer than 10 working days, the complainant must be kept informed of any change to the agreed response date</i></p> <p>The Policy, procedure and information on the website has updated to include the following statement: (see paragraph 8.3)</p> <p><i>If an extension beyond 20 working days is required in order to respond to the complaint fully, this should be agreed with the complainant. Where agreement over an extension period cannot be reached, the relevant Ombudsman's contact details will be provided so the complainant can challenge the plan for responding and/or the proposed timeliness of the response.</i></p>
5.3	Where agreement over an extension period cannot be reached, landlords should provide the relevant Ombudsman' contact details so that the resident can challenge the landlord's plan for responding and/or the proposed timeliness of the landlord's response	BP	Yes - but only after the Policy was updated following the self-assessment	The Policy and procedures has been updated to make this requirement clearer (see paragraph 8.3)
5.4	Where the problem is a recurring issue, the landlord should consider any older reports as part of the background to the complaint if this will resolve the issue for the resident.	BP	Yes	<p>Paragraph 6.27 of the Policy (<i>paragraph 9.3 in the September 2022 updated Policy</i>) states that:</p> <p>6.27 <i>Evidence gathering as part of the investigation can include interviews (including detailed note taking) and the review of:</i></p> <ul style="list-style-type: none"> • <i>correspondence (letters and emails)</i> • <i>notes of telephone conversations</i> • <i>organisational policies and procedures</i> • <i>good practice guidance</i>

				<ul style="list-style-type: none"> • records (including those specifically in relating to complaint under consideration and training records of staff involved in the complaint) • legislation • site plans and visits • photographic evidence • recordings in various formats (e.g. phone, video, CCTV) • obtaining professional/expert advice <p>The Policy and procedure has been updated to make this requirement clearer.</p>
5.5	<p>A complaint response must be sent to the resident when the answer to the complaint is known, not when the outstanding actions required to address the issue, are completed.</p> <p>Outstanding actions must still be tracked and actioned expeditiously with regular updates provided to the resident.</p>	M	Yes	<p>Complaint template letters are available for the complaint lead to use which will communicate the response to the complaint and actions we are proposing to take to resolve. If the customer chooses to leave the complaint open while works are being carried out,</p> <p>A final complaint outcome letter will be issued when the complaint is closed.</p> <p><i>Going forward outstanding actions will be entered onto a tracker by the Complaints Officer and these will be continuously monitored to ensure that the actions progress to agreed timescales. At the time of completion of the self-assessment actions were being tracked locally.</i></p>
5.6	<p>Landlords must address all points raised in the complaint and provide clear reasons for any decisions, referencing the relevant policy, law and good practice where</p>	M	Yes	<p>Paragraph 6.29 of the policy (<i>paragraph 9.5 in the September 2022 updated Policy</i>) states:</p> <p><i>6.29 At the end of an investigation a written outcome should be set out in a formal letter and in more</i></p>

	appropriate.			<p><i>serious cases a report. Where a report is produced this should include where appropriate:</i></p> <ul style="list-style-type: none"> ● <i>the scope of the investigation</i> ● <i>a summary of the investigation, including:</i> <ul style="list-style-type: none"> - <i>details of key issues, setting out a brief chronology of events leading to the complaint)</i> - <i>those who were interviewed (including setting out to what degree the complainant, and if appropriate, any affected relatives, advocates, etc. were involved in the investigation)</i> ● <i>conclusion - if the complaint is found to be justified/upheld this should include details of:</i> <ul style="list-style-type: none"> - <i>what happened - i.e. what went wrong</i> - <i>why it happened – i.e. the root cause of the problem (e.g. human error, a systemic failure)</i> - <i>what impact did it have on the complainant if a systemic failure has been identified, an explanation of actions taken to put things right, with a view to ensuring the same problem does not occur again</i> - <i>if appropriate, an apology</i> - <i>if appropriate, an offer of redress</i> ● <i>if the complaint has not been upheld, there should be an explanation of why this conclusion has been reached,</i>
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				<p><i>demonstrating that it has been arrived at based on the evidence gathered.</i></p> <p><i>Overall, the report should demonstrate throughout that the complaint has been taken seriously, that the investigation undertaken has been fair and, in accord with the seriousness of the complaint, proportionately thorough.</i></p>
5.7	Where residents raise additional complaints during the investigation, these should be incorporated into the stage one response if they are relevant and the stage one response has not been issued. Where the stage one response has been issued, or it would unreasonably delay the response, the complaint should be logged as a new complaint.	BP	Yes	<p>We are clear with the customer about the best way to address any additional concerns that are raised during the complaint conversations. This may be to incorporate the additional points into the complaint response, or in discussion with the customer we may raise a separate stage one complaint</p> <p>Complaints procedure – section 5.8. In some cases the customer may raise other issues not directly in connection to the complaint during an investigation. These can be included in the complaint response but you should identify them separately</p>
5.8	<p>Landlords must confirm the following in writing to the resident at the completion of stage one in clear, plain language:</p> <ul style="list-style-type: none"> · the complaint stage · the decision on the complaint · the reasons for any decisions made · the details of any remedy offered to put things right · details of any outstanding actions · details of how to escalate the 	M	Yes	<p>Paragraph 6.29 of the policy (<i>paragraph 9.5 in the September 2022 updated Policy</i>) states:</p> <p><i>6.29 At the end of an investigation a written outcome should be set out in a formal letter and in more serious cases a report. Where a report is produced this should include where appropriate:</i></p> <ul style="list-style-type: none"> ● <i>the scope of the investigation</i> ● <i>a summary of the investigation, including:</i> <ul style="list-style-type: none"> - <i>details of key issues, setting out a brief chronology of events leading to the complaint)</i>

	<p>matter to stage two if the resident is not satisfied with the answer</p>			<ul style="list-style-type: none"> - <i>those who were interviewed (including setting out to what degree the complainant, and if appropriate, any affected relatives, advocates, etc. were involved in the investigation)</i> ● <i>conclusion - if the complaint is found to be justified/upheld this should include details of:</i> <ul style="list-style-type: none"> - <i>what happened - i.e. what went wrong</i> - <i>why it happened – i.e. the root cause of the problem (e.g. human error, a systemic failure)</i> - <i>what impact did it have on the complainant if a systemic failure has been identified, an explanation of actions taken to put things right, with a view to ensuring the same problem does not occur again</i> - <i>if appropriate, an apology</i> - <i>if appropriate, an offer of redress</i> ● <i>if the complaint has not been upheld, there should be an explanation of why this conclusion has been reached, demonstrating that it has been arrived at based on the evidence gathered.</i> <p><i>Overall, the report should demonstrate throughout that the complaint has been taken seriously, that the investigation undertaken has been fair and, in accord with the seriousness of the complaint, proportionately thorough.</i></p>
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Stage 2				
5.9	If all or part of the complaint is not resolved to the resident's satisfaction at stage one it must be progressed to stage two of the landlord's procedure, unless an exclusion ground now applies. In instances where a landlord declines to escalate a complaint it must clearly communicate in writing its reasons for not escalating as well as the resident's right to approach the Ombudsman about its decision.	M	Yes	<p>We will not decline a customer's request to escalate their complaint to stage two unless it meets one of the exception reasons set out in paragraph 3.3 of the Policy.</p> <p>The Policy states: <i>(paragraph 9.10 to 9.12 in the September 2022 updated Policy)</i></p> <p>6.35 <i>Even in cases where an investigation upholds the complaint and offers remedy/redress, it may be that the complainant remains dissatisfied for some reason. Therefore, in all cases, the final complaint letter/report should provide guidance on the options thereafter if the complainant remains dissatisfied with the Charity's response.</i></p> <p>6.36 <i>A complainant may write to either the:</i></p> <ul style="list-style-type: none"> ● <i>Local Government and Social Care Ombudsman;</i> ● <i>Housing Ombudsman; or the</i> ● <i>Parliamentary and Health Service Ombudsman.</i> <p>6.37 <i>The Complaints Officer will provide support to individuals to ensure that they have all the information they need to contact the most appropriate Ombudsman. Further details are set out in the Comment, Concerns, Complaints and Compliments Procedure.</i></p>
5.10	On receipt of the escalation request, landlords must set out their understanding of issues outstanding and the outcomes the resident is seeking. If any aspect of the complaint is unclear, the resident must be asked for	M	Yes	<p>The complaints procedure states: <i>(paragraphs 10.1 to 10.3 in the September 2022 updated Policy)</i></p> <p>4.19 <i>If the complainant is dissatisfied with the outcome of the formal complaint they can progress to Stage 2 by contacting the Complaints Officer as per Stage 1 in section 4.9.</i></p>

	clarification and the full definition agreed between both parties.			<p>4.20 <i>The Complaints Officer will ensure the same process for Stage 1 will be followed regarding Acknowledge, Investigate and Respond. The same timescales will apply.</i></p> <p>4.21 <i>The Complaints Officer will escalate the complaint to a more senior investigating officer.</i></p> <p>NB: <i>It may be necessary to arrange an interview with the complainant in order to discuss the matter further and understand the reasons why they were unhappy with the response from Stage 1.</i></p> <p>The Stage 2 process should follow the same approach as Stage 1 and this is confirmed in paragraph 10.2 in the September 2022-23 update.</p>
5.11	Landlords must only escalate a complaint to stage two once it has completed stage one and at the request of the resident.	M	Yes	Complaints that escalate to stage two will have been through the preceding processes or the complainant will have or the complainant will have specifically requested the escalation.
5.12	The person considering the complaint at stage two, must not be the same person that considered the complaint at stage one.	M	Yes	<p>The Complaints Officer will identify an individual who is suitably independent to undertake the Stage 2 complaint investigation.</p> <p>Paragraph 6.20 of the Policy (<i>paragraph 8.2 in the September 2022 updated Policy</i>) states:</p> <p><i>having satisfied themselves that they sufficiently understand the details of the complaint, the Complaints Officer will:</i></p> <p><i>grade the seriousness of the complaint to decide the appropriate level of investigation;</i></p>

				<p><i>identify an officer within the Charity with sufficient seniority, credibility and independence from the source of the complaint to undertake the investigation (depending on the nature of the complaint, this may still be someone within the service directorate but it may require someone independent from the service/directorate);</i></p> <p><i>when deciding on an “investigator”, the Complaints Officer will take account of whether the investigation will need to span across more than one service;</i></p>
5.13	Landlords must respond to the stage two complaint within 20 working days of the complaint being escalated. Exceptionally, landlords may provide an explanation to the resident containing a clear timeframe for when the response will be received. This should not exceed a further 10 days without good reason.	M	Yes	<p>Brunelcare has a timeline of 14 days for stage 2 complaints.</p> <p><i>The Policy has been revised to 20 days.</i></p>
5.14	If an extension beyond 10 working days is required to enable the landlord to respond to the complaint fully, this should be agreed by both parties.	BP	Yes - but only after the Policy was updated following the self-assessment	<p>Contact with the individual who made the complaint is maintained by the Complaints Officer</p> <p>The Policy has been updated to include the following wording: (see paragraph 8.3)</p> <p><i>Where the 10 day deadline cannot be met complainants will be informed of the reasons and the date by which the investigation will be concluded. In any event, there will be regular contact with the complainant, updating them on progress on the case.</i></p>
5.15	Where agreement over an extension period cannot be reached, landlords should provide the Housing	BP	Yes	<p>The Complaint Officer provides contact details.</p> <p>All template letters have been checked and updated to</p>

	Ombudsman's contact details so the resident can challenge the landlord's plan for responding and/or the proposed timeliness of a landlord's response			ensure that the relevant Ombudsman's details are advised at each stage.
5.16	<p>Landlords must confirm the following in writing to the resident at the completion of stage two in clear, plain language:</p> <ul style="list-style-type: none"> · the complaint stage · the complaint definition · the decision on the complaint · the reasons for any decisions made · the details of any remedy offered to put things right · details of any outstanding actions <p>and</p> <ul style="list-style-type: none"> · if the landlord has a third stage, details of how to escalate the matter to stage three · if this was the final stage, details of how to escalate the matter to the Housing Ombudsman Service if the resident remains dissatisfied. 	M	Yes	<p>Paragraphs 6.29 to 6.31 of the policy (<i>paragraphs 9.5 to 9.6 in the September 2022 updated Policy</i>) state:</p> <p>6.29 <i>At the end of an investigation a written outcome should be set out in a formal letter and in more serious cases a report. Where a report is produced this should include where appropriate:</i></p> <ul style="list-style-type: none"> ● <i>the scope of the investigation</i> ● <i>a summary of the investigation, including:</i> <ul style="list-style-type: none"> - <i>details of key issues, setting out a brief chronology of events leading to the complaint)</i> - <i>those who were interviewed (including setting out to what degree the complainant, and if appropriate, any affected relatives, advocates, etc. were involved in the investigation)</i> ● <i>conclusion - if the complaint is found to be justified/upheld this should include details of:</i> <ul style="list-style-type: none"> - <i>what happened - i.e. what went wrong</i> - <i>why it happened – i.e. the root cause of the problem (e.g. human error, a systemic failure)</i>

				<ul style="list-style-type: none"> - <i>what impact did it have on the complainant if a systemic failure has been identified, an explanation of actions taken to put things right, with a view to ensuring the same problem does not occur again</i> - <i>if appropriate, an apology</i> - <i>if appropriate, an offer of redress</i> ● <i>if the complaint has not been upheld, there should be an explanation of why this conclusion has been reached, demonstrating that it has been arrived at based on the evidence gathered.</i> <p>6.30 <i>Overall, the report should demonstrate throughout that the complaint has been taken seriously, that the investigation undertaken has been fair and, in accord with the seriousness of the complaint, proportionately thorough.</i></p> <p>6.31 <i>In cases where a complaint has been upheld and there is a clear systemic issue, the appropriate Director should ensure that an action plan is devised setting out how the recommendations will be implemented and identify who will be responsible for ensuring their implementation. When it affects them, frontline colleagues should be involved in this process. The plan should also include arrangements for confirming to the complainant that changes have been implemented and make provision for the monitoring and evaluation of new arrangements introduced to assess their impact.</i></p>
<p>Stage 3</p>				

5.17	Two stage landlord complaint procedures are ideal. This ensures that the complaint process is not unduly long. If landlords strongly believe a third stage is necessary, they must set out their reasons for this as part of their self-assessment. A process with more than three stages is not acceptable under any circumstances.	M	Yes	Brunelcare's complaints policy is in line with recommendations made by the Housing Ombudsman, and we operate a two-stage complaints process.
5.18	Complaints should only go to a third stage if the resident has actively requested a third stage review of their complaint. Where a third stage is in place and has been requested, landlords must respond to the stage three complaint within 20 working days of the complaint being escalated. Additional time will only be justified if related to convening a panel. An explanation and a date for when the stage three response will be received should be provided to the resident.	BP	NA	Not applicable - Brunelcare's complaints policy is in line with recommendations made by the Housing Ombudsman, and we operate a two-stage complaints process.
5.19	Where agreement over an extension period cannot be reached, landlords should provide the Housing Ombudsman's contact details so the resident can challenge the landlord's plan for responding and/or the proposed timeliness of a landlord's response.	BP	NA	Not applicable - Brunelcare's complaints policy is in line with recommendations made by the Housing Ombudsman, and we operate a two-stage complaints process.

5.20	<p>Landlords must confirm the following in writing to the resident at the completion of stage three in clear, plain language:</p> <ul style="list-style-type: none"> ● the complaint stage ● the complaint definition ● the decision on the complaint ● the reasons for any decisions made ● the details of any remedy offered to put things right ● details of any outstanding actions ● details of how to escalate the matter to the Housing Ombudsman Service if the resident remains dissatisfied 	M	NA	Not applicable - Brunelcare's complaints policy is in line with recommendations made by the Housing Ombudsman, and we operate a two-stage complaints process.
Section 6 - Putting things right				
6.1	Effective dispute resolution requires a process designed to resolve complaints. 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.	M	Yes	See para. 6.29 of the Policy (<i>paragraph 9.7 in the September 2022 updated Policy</i>)
6.2	Any remedy offered must reflect the extent of any service failures and the level of detriment caused to the resident as a result. A landlord must carefully manage the expectations of residents and not promise anything that cannot	M	Yes	<p><i>While Brunelcare complies with these requirements the Policy has been strengthened to ensure that the requirements are clear to all – A new section headed redress and compensation has been included in the 2022-23 update of the Policy [see paragraph 9.9]</i></p> <p>A compensation policy and procedure is in place.</p>

	be delivered or would cause unfairness to other residents.			
6.3	Landlords should look beyond the circumstances of the individual complaint and consider whether anything needs to be 'put right' in terms of process or systems to the benefit of all residents.	BP	Yes	<p><i>Paragraph 5.1 of the Policy states that (Section 12 - Learning from Comment, Concerns, Complaints and Compliments in the September 2022-23 revised Policy):</i></p> <p><i>Seeking continuous improvement</i></p> <ul style="list-style-type: none"> • Using the feedback and the lessons learnt from complaints to improve service design and delivery. • Having systems in place to record, analyse and report on the learning from complaints. • Regularly reviewing the lessons learnt from complaints. • Telling the complainant about the lessons learnt and changes made to services, guidance or policy. <p>Further work to strengthen the embedding of lessons learnt will be taken forward over the coming months.</p>
6.5	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.	M	Yes	<p>Paragraph 6.29 of the Policy (<i>paragraph 9.6 in the September 2022 updated Policy</i>) states:</p> <p><i>6.29 At the end of an investigation a written outcome should be set out in a formal letter and in more serious cases a report. Where a report is produced this should include where appropriate:</i></p> <ul style="list-style-type: none"> • <i>the scope of the investigation</i> • <i>a summary of the investigation, including:</i> <ul style="list-style-type: none"> - <i>details of key issues, setting out a brief chronology of events leading to the complaint)</i>

				<ul style="list-style-type: none"> - <i>those who were interviewed (including setting out to what degree the complainant, and if appropriate, any affected relatives, advocates, etc. were involved in the investigation)</i> ● <i>conclusion - if the complaint is found to be justified/upheld this should include details of:</i> <ul style="list-style-type: none"> - <i>what happened - i.e. what went wrong</i> - <i>why it happened – i.e. the root cause of the problem (e.g. human error, a systemic failure)</i> - <i>what impact did it have on the complainant if a systemic failure has been identified, an explanation of actions taken to put things right, with a view to ensuring the same problem does not occur again</i> - <i>if appropriate, an apology</i> - <i>if appropriate, an offer of redress</i> ● <i>if the complaint has not been upheld, there should be an explanation of why this conclusion has been reached, demonstrating that it has been arrived at based on the evidence gathered.</i> <p><i>Overall, the report should demonstrate throughout that the complaint has been taken seriously, that the investigation undertaken has been fair and, in accord with the seriousness of the complaint, proportionately thorough.</i></p>
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6.6	In awarding compensation, a landlord must consider whether any statutory payments are due, if any quantifiable losses have been incurred, the time and trouble a resident has been put to as well as any distress and inconvenience caused	M	Yes	<p>While this requirement is followed in practice a need to reinforce this requirement in the Policy was identified. The following wording has now been included: (see paragraph 9.9 in the September 2022-23 revised Policy)</p> <p><i>Financial compensation will be considered where we are unable to take action to redress an adverse impact on the customer caused by a service failure, or where the customer has incurred financial loss, or where we are under a statutory or contractual obligation to compensate a customer. We may seek specialist advice regarding appropriate compensation levels from solicitors or the relevant Ombudsman service. In awarding compensation, we will consider whether any statutory payments are due, if any quantifiable losses have been incurred, the time and trouble a resident has been put to as well as any distress and inconvenience caused.</i></p>
6.7	In some cases, a resident may have a legal entitlement to redress. The landlord should still offer a resolution where possible, obtaining legal advice as to how any offer of resolution should be worded.	BP	Yes	Where relevant, the Complaints Officer and / or Complaint Lead will seek legal advice on matters regarding any legal entitlement to redress.
Section 7 - Continuous learning and improvement				
7.2	Accountability and transparency are integral to a positive complaint handling culture. Landlords must report back on wider learning and improvements from complaints in their annual report and more frequently to their residents, staff and scrutiny panels.	M	Yes	A Complaints Annual Report is produced and this addresses trends and learning. <i>From November 2022 quarterly complaints reports will be published on Brunelcare's website and a summary of complaints and learning will be included in Grapevine the resident's magazine (first set of information will be published in the Winter edition).</i>

7.3	A member of the governing body should be appointed to have lead responsibility for complaints to support a positive complaint handling culture. This role will be responsible for ensuring the governing body receives regular information on complaints that provides insight to the governing body on the landlord's complaint handling performance	BP	Yes	<p>A Trustee member of the Board has been designated the lead for Complaints. He reviews all quarterly reports before they go to the PQ&E Committee and the annual report, providing comments and support. Where a complainant is not happy with a complaint response following Stage 2 he reviews all documentary evidence to ensure that a full investigation has been completed and the response provided at Stage 2 reasonable.</p> <p>This role is now described in Section 15.4 of the September 2022-23 updated policy.</p>
7.4	<p>As a minimum, governing bodies should receive:</p> <ul style="list-style-type: none"> ● Regular updates on the volume, categories and outcome of complaints, alongside complaint handling performance including compliance with the Ombudsman's orders ● Regular reviews of issues and trends arising from complaint handling, ● The annual performance report produced by the Ombudsman, where applicable ● Individual complaint outcomes where necessary, including where the Ombudsman made findings of severe maladministration or referrals to regulatory bodies. The implementation of management responses should be tracked to ensure 	BP	Yes	<p>Quarterly reports are prepared for the PQ&E Committee. The Committee Chair reports on the Committee's review of these is reported to the Board as part of his Committee Chair's Assurance Report.</p> <p>Further work to strengthen reporting to the Committee and Board will be taken forward in 2022-23.</p>

	<p>they are delivered to agreed timescales.</p> <ul style="list-style-type: none"> • The annual self-assessment against the Complaint Handling Code for scrutiny and challenge. 			
7.5	<p>Any themes or trends should be assessed by senior management to identify potential systemic issues, serious risks or policies and procedures that require revision. They should also be used to inform staff and contractor training.</p>	BP	Yes	<p>Themes and trends are identified by the Complaints Officer and reported through to SLT and the PQ&E Committee.</p> <p><i>This is an area identified as part of the self-assessment and related audit of the process that requires further strengthening. This is referenced as an area of improvement in the Annual Complaints Report for 2021-22.</i></p>
7.6	<p>Landlords should have a standard objective in relation to complaint handling for all employees that reflects the need to:</p> <ul style="list-style-type: none"> • have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments • take collective responsibility for any shortfalls identified through complaints rather than blaming others • act within the Professional Standards for engaging with 	BP	Yes	<p>Section 5 of the Policy sets out key principles and requirements. The principles are set out under the headings:</p> <ul style="list-style-type: none"> • Betting it right • Being customer focused • Acting fairly and proportionately • Seeking continuous improvement

	complaints as set by the Chartered Institute of Housing.			
Section 8 - Self-assessment and compliance				
8.1	Landlords must carry out an annual self-assessment against the Code to ensure their complaint handling remains in line with its requirements	M	Yes	Self-assessment completed in September 2020 New procedure introduced in September 2021 Re-assessment completed in September/October 2022 in readiness for review at the November PQ&E Committee meeting. The self-assessment will be published after the 10 November PQ&E Committee meeting.
8.2	Landlords must also carry out a self-assessment following a significant restructure and/or change in procedures.	M	Yes	A self-assessment will be carried out following a significant restructure and / or change in procedure.
8.3	Following each self-assessment, a landlord must: <ul style="list-style-type: none"> report the outcome of their self-assessment to their governing body. In the case of local authorities, self-assessment outcomes should be reported to elected members publish the outcome of their assessment on their website if they have one, or otherwise make accessible to residents 	M	Yes	The self-assessment completed in 2020 was reported to the PQ&E Committee and to the Board. The self-assessment was subsequently published on Brunelcare's website. The 2022 self-assessment will be reported to the PQ&E Committee on 10 November 2022 and via the Chair's Assurance Report to the Board on 14 December 2022. The self-assessment will be published on Brunelcare's website. The self-assessment has been captured in the Complaints Annual Report.

	<ul style="list-style-type: none">• include the self-assessment in their annual report section on complaints handling performance			
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