Appendix 1 – Self Assessment

Housing Ombudsman Service
Complaint Handling Code - Self-Assessment (July 2026)

Author: Square Building Trust

Section 1: Definition of a complaint

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
1.2	A complaint must be defined as: *'An expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the landlord, its own staff, or those acting on its behalf, affecting a resident or group of residents.'*	Yes	• Complaints & Compliments Policy • Complaints Procedure • Complaints Leaflet • Bernicia Website Customer Excellence E Learning	Communicated to colleagues via mandatory read of policies and Customer Excellence E Learning. Also included in our Complaints & Compliments Policy under Standard 1.
1.3	A resident does not have to use the word 'complaint' for it to be treated as such. Whenever a resident expresses dissatisfaction landlords must give them the choice to make complaint. A complaint that is submitted via a third party or representative must be handled in line with the landlord's complaints policy.	Yes	• Complaints & Compliments Policy	Included in our Complaints & Compliments Policy under Standard 1.

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
1.4	Landlords must recognise the difference between a service request and a complaint. This must be set out in their complaints policy. A service request is a request from a resident to the landlord requiring action to be taken to put something right. Service requests are not complaints, but must be recorded, monitored and reviewed regularly.	Yes	• Complaints & Compliments Policy • Customer Excellence E Learning	There is a clear demarcation between a service request where the recipient is seeking a remedy and making a complaint about a service failure. This is recorded and reported within the Salesforce system. Included in our Complaints & Compliments Policy under Standard 1.
1.5	A complaint must be raised when the resident expresses dissatisfaction with the response to their service request, even if the handling of the service request remains ongoing. Landlords must not stop their efforts to address the service request if the resident complains.	Yes	• Complaints & Compliments Policy	Included in our Complaints & Compliments Policy under Standard 1.
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	Yes	• Complaints & Compliments Policy Survey process owned and defined by the customer insight team.	Included in our Complaints & Compliments Policy under Standard 1. TSM Perception surveys are conducted by a third party and customers are offered the option of contact with Bernicia to pursue any issues, by requesting a follow up. On our website,

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	provide details of how residents can complain.			information is also provided on how to make a complaint. Transactional surveys are completed in-house by the insight team and the opening survey outlines the need to raise complaints separately to the survey.

Section 2: Exclusions

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
2.1	Landlords must accept a complaint unless there is a valid reason not to do so. If landlords decide not to accept a complaint, they must be able to evidence their reasoning. Each complaint must be considered on its own merits	Yes	• Complaints & Compliments policy • Complaints Procedure • Complaint templates	Included in our Complaints & Compliments Policy under Standard 7. If we are unable to accept a complaint, a written response is provided to the customer with reason why and Ombudsman details included in the response. Salesforce system contains standard communication templates to support with the response.
2.2	A complaints policy must set out the circumstances in which a matter will not be considered as a complaint or	Yes	• Complaints & Compliments policy	Included in our Complaints & Compliments Policy under Standard 7.

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	escalated, and these circumstances must be fair and reasonable to residents. Acceptable exclusions include: The issue giving rise to the complaint occurred over twelve months ago. Legal proceedings have started. This is defined as details of the claim, such as the Claim Form and Particulars of Claim, having been filed at court. Matters that have previously been considered under the complaints policy.		• Complaints Procedure	
2.3	Landlords must accept complaints referred to them within 12 months of the issue occurring or the resident becoming aware of the issue, unless they are excluded on other grounds. Landlords must consider whether to apply discretion to accept complaints made outside this time limit where there are good reasons to do so.	Yes	• Complaints & Compliments Policy • Complaints Procedure	Included in our Complaints & Compliments Policy under Standard 7.
2.4	If a landlord decides not to accept a complaint, an explanation must be provided to the resident setting out the reasons why the matter is not suitable for the complaints process and the right to take that decision to the	Yes	• Complaints & Compliments Policy • Complaints procedure • Complaint templates	Included in our Complaints & Compliments Policy under Standard 7.

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	Ombudsman. If the Ombudsman does not agree that the exclusion has been fairly applied, the Ombudsman may tell the landlord to take on the complaint.			
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Yes	• Complaints & Compliments Policy • Complaints procedure	Included in our Complaints & Compliments Policy under Standard 7.

Section 3: Accessibility and Awareness

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
3.1	Landlords must make it easy for residents to complain by providing different channels through which they can make a complaint. Landlords must consider their duties under the Equality Act 2010 and anticipate the needs and reasonable adjustments of residents who may need to access the complaints process.	Yes	• Complaints & Compliments Policy • Website • Complaints leaflet	Included in our Complaints & Compliments Policy under Standard 2. This is promoted in Complaints leaflet and website which include: in person, telephone, website, social, online, in writing (Letter or email). Translation and interpretation services are available with website being enabled with accessibility software
3.2	Residents must be able to raise their complaints in any way and with any member of staff. All staff must be aware of the complaints process and be able to pass details of the complaint to the appropriate person within the landlord.	Yes	• Complaints & Compliments Policy • Customer Excellence E Learning	Included in our Complaints & Compliments Policy under Standard 2. Our Complaints Policy is mandatory read for colleagues and this is monitored. Complaints training via our Customer Excellence E Learning ensures staff are aware of how to raise a complaint and our complaints process. This is monitored through completion

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
				records and is mandatory for all colleagues.
3.3	High volumes of complaints must not be seen as a negative, as they can be indicative of a well-publicised and accessible complaints process. Low complaint volumes are potentially a sign that residents are unable to complain.	Yes	• Complaints & Compliments Policy • Website	Included in our Complaints & Compliments Policy under Standard 2. We promote our Complaints & Compliments Policy on our website.
3.4	Landlords must make their complaint policy available in a clear and accessible format for all residents. This will detail the two stage process, what will happen at each stage, and the timeframes for responding. The policy must also be published on the landlord's website.	Yes	• Complaints & Compliments Policy • Complaints procedure • Website • Complaints leaflet	Included in our Complaints & Compliments Policy under Standard 1. Complaints leaflet to explain the policy in simpler terms is also available online and in hardcopy. All definitions, the stages and how they work, how customers transition between stages and all timeframes are included.
3.5	The policy must explain how the landlord will publicise details of the complaints policy, including information about the Ombudsman and this Code.	Yes	• Complaints & Compliments Policy	Included in our Complaints & Compliments Policy under Standard 2.
3.6	Landlords must give residents the opportunity to have a representative deal with their complaint on their behalf, and to be represented or	Yes	• Complaints & Compliments Policy	Included in our Complaints & Compliments Policy under Standard 2.

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	accompanied at any meeting with the landlord.			
3.7	Landlords must provide residents with information on their right to access the Ombudsman service and how the individual can engage with the Ombudsman about their complaint.	Yes	• Complaints & Compliments Policy • Complaint leaflet • Letter templates	Included in our Complaints & Compliments Policy under Standard 1. Information about the ombudsman service is included within the policy. It is also referenced in our response letters within the complaint process.

Section 4: Complaint Handling Staff

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
4.1	Landlords must have a person or team assigned to take responsibility for complaint handling, including liaison with the Ombudsman and ensuring complaints are reported to the governing body (or equivalent). This Code will refer to that person or team as the 'complaints officer'. This role may be in addition to other duties.	Yes	• Complaints & Compliments Policy & Procedure • Complaints procedure Flowchart • Role profiles	We have a dedicated Complaints team who handle and manage all complaints which included complaint handler and complaints officer. We also have a Customer Relationship Manager who oversees complaints and provides support to the Team. Complaint handlers are assigned according to the nature and stage of the complaint. Included in our Complaints & Compliments Policy under Standard 1.
4.2	The complaints officer must have access to staff at all levels to facilitate the prompt resolution of complaints. They must also have the authority and autonomy to act to resolve disputes promptly and fairly.	Yes	• Complaints & Compliments Policy • Complaints Procedure	Included in our Complaints & Compliments Policy under Standard 1. Our Complaint Team have access to designated colleagues within service areas, they have access to quick resolution and are empowered to exercise autonomy and authority.

4.3	Landlords are expected to prioritise complaint handling and a culture of learning from complaints. All relevant staff must be suitably trained in the importance of complaint handling. It is important that complaints are seen as a core service and must be resourced to handle complaints effectively	Yes	• Complaints & Compliments Policy • Customer Excellence E Learning • Bernicia Way Values and behaviours	Included in our Complaints & Compliments Policy under Standard 6. Complaint handlers along with all colleagues have received Customer Service Excellence training focusing on complaint handling. This is mandatory for all colleagues and monitored via learning records. The Bernicia Way details values and behaviours and is available through our learning management system. Bernicia Way, values and behaviours promote a customer centric culture.

Section 5: The Complaint Handling Process

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
5.1	Landlords must have a single policy in place for dealing with complaints covered by this Code. Residents must not be treated differently if they complain.	Yes	• Complaints & Compliments Policy	Policy applies to all complaints and complainants. Included in our Complaints & Compliments Policy under Standard 1.
5.2	The early and local resolution of issues between landlords and residents is key to effective complaint	Yes	• Complaints & Compliments Policy	Included in our Complaints & Compliments Policy under Standard 1.

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	handling. It is not appropriate to have extra named stages (such as 'stage 0' or 'informal complaint') as this causes unnecessary confusion.		• Complaints Procedure	
5.3	A process with more than two stages is not acceptable under any circumstances as this will make the complaint process unduly long and delay access to the Ombudsman.	Yes	• Complaints & Compliments Policy • Complaints Procedure	We currently only have two formal complaint stages – stage 1 and stage 2. Included in our Complaints & Compliments Policy under Standard 1.
5.4	Where a landlord's complaint response is handled by a third party (e.g., a contractor or independent adjudicator) at any stage, it must form part of the two stage complaints process set out in this Code. Residents must not be expected to go through two complaints processes.	Yes	• Complaints & Compliments Policy • Complaints Procedure	The Complaint Team co-ordinate a response to customers and would liaise with any third party to provide one response in accordance with our complaints process. Included in our Complaints & Compliments Policy under Standard 1.
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Yes	• Complaints & Compliments Policy • Complaints Procedure	The Complaint Team co-ordinate a response to customers and would liaise with any third party to provide one response in accordance with our complaints process.

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
				Included in our Complaints & Compliments Policy under Standard 1.
5.6	When a complaint is logged at Stage 1 or escalated to Stage 2, landlords must set out their understanding of the complaint and the outcomes the resident is seeking. The Code will refer to this as "the complaint definition". If any aspect of the complaint is unclear, the resident must be asked for clarification.	Yes	• Complaints & Compliments Policy • Complaints Procedure • Letter templates	Included in our Complaints & Compliments Policy under Standard 1.
5.7	When a complaint is acknowledged at either stage, landlords must be clear which aspects of the complaint they are, and are not, responsible for and clarify any areas where this is not clear.	Yes	• Complaints & Compliments Policy • Complaints Procedure • Letter templates	Included in our Complaints & Compliments Policy under Standard 1.
5.8	At each stage of the complaints process, complaint handlers must: a. deal with complaints on their merits, act independently, and have an open mind; b. give the resident a fair chance to set out their position; c. take measures to address any actual or perceived conflict of interest; and	Yes	• Complaints & Compliments Policy • Complaint procedure • Customer Excellence E Learning	Included in our Complaints & Compliments Policy under Standard 1. The Customer Excellence E Learning also supports colleagues on what they must do when handling complaints.

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	d. consider all relevant information and evidence carefully.			
5.9	Where a response to a complaint will fall outside the timescales set out in this Code, the landlord must agree with the resident suitable intervals for keeping them informed about their complaint.	Yes	• Complaints & Compliments Policy • Complaints Procedure • Letter templates	Within our Complaints & Compliments Policy, procedure and customer leaflet we express our aim to respond within the timescales stated. If we need more time, we will agree this with the customer and confirm the extension in writing. We use a complainant's preferred method of communication during the investigation of their complaint. We share when and how we will communicate with them and, when asked, we will adapt. Included in our Complaints & Compliments Policy under Standard 1.
5.10	Landlords must make reasonable adjustments for residents where appropriate under the Equality Act 2010. Landlords must keep a record of	Yes	• Complaints & Compliments Policy • Equality, Diversity & Inclusion policy	Our Complaints & Compliments Policy and procedure has a dedicated section on Equality and Diversity.

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	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.		• Diverse needs policy • Training records	We have a published Equality, Diversity and Inclusion Policy which covers all relevant aspects to ensure we consider and provide accessible and inclusive services which meet diverse needs. These documents are referenced in our policy. All colleagues receive Equality, Diversity & Inclusion training as core e-learning at induction and refresher training. We also have a Diverse Needs policy to support in handling disabilities. Included in our Complaints & Compliments Policy under Standard 2.
5.11	Landlords must not refuse to escalate a complaint through all stages of the complaints procedure unless it has valid reasons to do so. Landlords must clearly set out these reasons, and they must comply with the provisions set out in section 2 of this Code.	Yes	• Complaints & Compliments Policy • Complaints Procedure • Letter templates	Included in our Complaints & Compliments Policy under Standard 7.
5.12	A full record must be kept of the complaint, and the outcomes at each stage. This must include the original	Yes		All notes and contacts in relation to the investigation of the

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	complaint and the date received, all correspondence with the resident, correspondence with other parties, and any relevant supporting documentation such as reports or surveys.		• CRM system (Salesforce)– Case records • MRI Document management system	complaint will be held in our complaints management system (Salesforce), supported by integrated document management system (MRI) where applicable.
5.13	Landlords must have processes in place to ensure a complaint can be remedied at any stage of its complaints process. Landlords must ensure appropriate remedies can be provided at any stage of the complaints process without the need for escalation.	Yes	• Complaints & Compliments Policy • Complaints procedure	Included in our Complaints & Compliments Policy under Standard 3.
5.14	Landlords must have policies and procedures in place for managing unacceptable behaviour from residents and/or their representatives. Landlords must be able to evidence reasons for putting any restrictions in place and must keep restrictions under regular review.	Yes	• Complaints & Compliments Policy • Managing Unacceptable Behaviour Policy	Included in our Complaints & Compliments Policy under Standard 1. Managing Unacceptable Behaviour Policy in place.
5.15	Any restrictions placed on contact due to unacceptable behaviour must be proportionate and demonstrate regard for the provisions of the Equality Act 2010.	Yes	• Complaints & Compliments Policy • Managing Unacceptable Behaviour Policy	Managing Unacceptable Behaviour policy has an Equality Impact Assessment to ensure consideration is given to all protected characteristics under

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
				the Equality Act 2010 to eliminate discrimination, advance equality of opportunity and foster good relations. Before restricting a customer's contact, consideration will be given to ensure the sanctions are proportionate considering the provisions of the Equality Act 2010. Included in our Complaints & Compliments Policy under Standard 1.

Section 6: Complaints Stages

Stage 1

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
6.1	Landlords must have processes in place to consider which complaints can be responded to as early as possible, and which require further investigation. Landlords must consider factors such as the complexity of the complaint and whether the resident is vulnerable or at risk. Most stage 1 complaints can be resolved promptly, and an explanation, apology or resolution provided to the resident.	Yes	• Complaints & Compliments Policy Customer Excellence E Learning	Included in our Complaints & Compliments Policy under Standard 1. Our Customer Excellence E Learning also supports colleagues in putting things right promptly for the resident.
6.2	Complaints must be acknowledged, defined and logged at stage 1 of the complaint's procedure **within five working days of the complaint being received**.	Yes	• Complaints & Compliments Policy • Complaints Procedure • Performance monitoring KPIs • Complaint Leaflet	Included in our Complaints & Compliments Policy under Standard 1. We monitor our performance in this area on a monthly basis and as part of our Tenant Satisfaction Measures.
6.3	Landlords must issue a full response to stage 1 complaints **within 10 working days** of the complaint being acknowledged.	Yes	• Complaints & Compliments Policy • Complaints Procedure • Performance monitoring KPI's • Complaint Leaflet	Included in our Complaints & Compliments Policy under Standard 1. We monitor our performance in this area on a monthly basis and

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
				as part of our Tenant Satisfaction Measures.
6.4	Landlords must decide whether an extension to this timescale is needed when considering the complexity of the complaint and then inform the resident of the expected timescale for response. Any extension must be no more than 10 working days without good reason, and the reason(s) must be clearly explained to the resident.	Yes	• Complaints & Compliments Policy • Complaints and Compliments Procedure • Letter templates	Included in our Complaints & Compliments Policy under Standard 1. If an extension is required, we will explain the reason(s) why we need more time, we will agree this with the customer and confirm the extension in writing.
6.5	When an organisation informs a resident about an extension to these timescales, they must be provided with the contact details of the Ombudsman.	Yes	• Complaints & Compliments Policy • Customer leaflet • Letter template	Included in our Complaints & Compliments Policy under Standard 1. Details of the Ombudsman are detailed on extension template
6.6	A complaint response must be provided to the resident when the answer to the complaint is known, not when the outstanding actions required to address the issue are completed. Outstanding actions must still be tracked and actioned promptly with appropriate updates provided to the resident.	Yes	• Complaints & Compliments Policy • Complaints and Compliments Procedure	Included in our Complaints & Compliments Policy under Standard 1. Contact will also be maintained with the customer until all outstanding actions are tracked and complete.

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
6.7	Landlords must address all points raised in the complaint definition and provide clear reasons for any decisions, referencing the relevant policy, law and good practice where appropriate.	Yes	• Complaints & Compliments Policy • Letter templates	Included in our Complaints & Compliments Policy under Standard 1. Response templates prompt and provide guidance to ensure all points raised are responded to and the rationale for all decisions are presented.
6.8	Where residents raise additional complaints during the investigation, these must be incorporated into the stage 1 response if they are related and the stage 1 response has not been issued. Where the stage 1 response has been issued, the new issues are unrelated to the issues already being investigated or it would unreasonably delay the response, the new issues must be logged as a new complaint.	Yes	• Complaints Procedure	Section 5.7 within complaints procedure refers to this point.
6.9	Landlords must confirm the following in writing to the resident at the completion of stage 1 in clear, plain language: a. the complaint stage; b. the complaint definition;	Yes	• Complaints Procedure • Letter templates	Section 5.7 within complaints procedure refers to this point. Letter templates provide all of these details and our policy and procedure guide complaint

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	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.			handlers on what is expected of them.

Stage 2

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
6.10	If all or part of the complaint is not resolved to the resident's satisfaction at stage 1, it must be progressed to stage 2 of the landlord's procedure. Stage 2 is the landlord's final response.	Yes	• Complaints & Compliments Policy • Compliment Procedure	Included in our Complaints & Compliments Policy under Standard 1. We operate a 2-stage process and our response at this stage will be final.
6.11	Requests for stage 2 must be acknowledged, defined and logged at stage 2 of the complaint's procedure within five working days of the escalation request being received.	Yes	• Complaints & Compliments Policy • Complaints and Compliments Procedure • Letter templates • Performance Information • Complaints leaflet	Included in our Complaints & Compliments Policy under Standard 1. If a customer requests escalation this is carried out in accordance with the procedure and timescales
6.12	Residents must not be required to explain their reasons for requesting a stage 2 consideration. Landlords are expected to make reasonable efforts to understand why a resident remains unhappy as part of its stage 2 response.	Yes	• Complaints Procedure	Section 5.9 of the procedure details we would try to establish this to reach a satisfactory resolution.

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Yes	• Complaints & Compliments Policy • Complaints Procedure	Included in our Complaints & Compliments Policy under Standard 1.
6.14	Landlords must issue a final response to the stage 2 **within 20 working days** of the complaint being acknowledged.	Yes	• Complaints & Compliments Policy • Complaints Procedure • Performance monitoring • Complaint Leaflet	Included in our Complaints & Compliments Policy under Standard 1. Performance in this area is monitored and reported monthly and through TSM's.
6.15	Landlords must decide whether an extension to this timescale is needed when considering the complexity of the complaint and then inform the resident of the expected timescale for response. Any extension must be no more than 20 working days without good reason, and the reason(s) must be clearly explained to the resident.	Yes	• Complaints & Compliments Policy • Complaints Procedure • Letter templates	Included in our Complaints & Compliments Policy under Standard 1. We also explain how if we need more time, we will agree this with the customer and confirm this in writing.
6.16	When an organisation informs a resident about an extension to these timescales, they must be provided with the contact details of the Ombudsman.	Yes	• Complaints & Compliments Policy • Complaints Procedure • Letter templates	Included in our Complaints & Compliments Policy under Standard 1. Our extension templates include the Housing Ombudsman contact details.
6.17	A complaint response must be provided to the resident when the answer to the complaint is known, not	Yes	• Complaints & Compliments Policy	Included in our Complaints & Compliments Policy under Standard 1.

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	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.		• Complaints Procedure • Customer Excellence E Learning	Contact will also be maintained with the customer until all outstanding actions are complete.
6.18	Landlords must address all points raised in the complaint definition and provide clear reasons for any decisions, referencing the relevant policy, law and good practice where appropriate.	Yes	• Complaints & Compliments Policy • Letter templates	Included in our Complaints & Compliments Policy under Standard 1. Response templates prompt and provide guidance to ensure all points raised are responded to and the rationale for all decisions are presented.
6.19	Landlords must confirm the following in writing to the resident at the completion of stage 2 in clear, plain language: a. the complaint stage; b. the complaint definition; c. the decision on the complaint; d. the reasons for any decisions made; e. the details of any remedy offered to put things right; f. details of any outstanding actions; and	Yes	• Complaints Procedure • Letter templates	Letter templates provide all of these details and our policy and procedure guide complaint handlers on what is expected of them.

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	g. details of how to escalate the matter to the Ombudsman Service if the individual remains dissatisfied.			
6.20	Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.	Yes	• Complaints Procedure • Letter templates	Response at Stage 2 clearly states this is our final response and will involve all relevant staff to provide this.

Section 7: Putting things right

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
7.1	Where something has gone wrong a landlord must acknowledge this and set out the actions it has already taken, or intends to take, to put things right. These can include: • Apologising; • Acknowledging where things have gone wrong; • Providing an explanation, assistance or reasons; • Taking action if there has been delay; • Reconsidering or changing a decision; • Amending a record or adding a correction or addendum; • Providing a financial remedy; • Changing policies, procedures or practices.	Yes	• Complaints & Compliments Policy • Complaints Procedure	Included in our Complaints & Compliments Policy under Standard 3. Complaints procedure section 5.7 and 5.13.
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Yes	• Complaints Procedure	This will be considered at Stage 1 and Stage 2 response as appropriate
7.3	The remedy offer must clearly set out what will happen and by when, in agreement with the resident where appropriate. Any remedy proposed must be followed through to completion.	Yes	• Letter templates	Response will include a plan of action to enable these to be proactively managed to completion.

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes	• Complaints & Compliments Policy	Included in our Complaints & Compliments Policy under Standard 3.

Section 8: Self-assessment, reporting and compliance

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
8.1	Landlords must produce an annual complaints performance and service improvement report for scrutiny and challenge, which must include: a. the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements. b. a qualitative and quantitative analysis of the landlord's complaint handling performance. This must also include a summary of the types of complaints the landlord has refused to accept; c. any findings of non-compliance with this Code by the Ombudsman; d. the service improvements made as a result of the learning from complaints; e. any annual report about the landlord's performance from the Ombudsman; and f. any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord.	Yes	a) Ombudsman Self-Assessment – against the Complaint Handling Code b) Performance information – Qualitative & quantitative c) Determinations from Ombudsman where appropriate d) Service improvements from learnings e) Annual Report from Housing Ombudsman – if 5 or more determinations for 2023/24 f) Any reports / publications from Ombudsman about Bernicia as appropriate	We will comply with regulatory guidance within the required timeframes. This will be published and shared widely with customers.

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
8.2	The annual complaints performance and service improvement report must be reported to the landlord's governing body (or equivalent) and published on the on the section of its website relating to complaints. The governing body's response to the report must be published alongside this.	Yes	• Ombudsman Self-Assessment • Website • Annual Complaints performance and service improvement report	The Ombudsman Self-assessment will be published to website within the Complaints and Compliments – Self Assessment section. Along with the Annual complaints performance and service improvement
8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	Yes	• A self-assessment will be undertaken should there be a significant restructure or change in procedure.	
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	Yes	• This will be documented should we be asked to carry out a review	
8.5	If a landlord is unable to comply with the Code due to exceptional circumstances, such as a cyber incident, they must inform the Ombudsman, provide information to residents who may be affected, and publish this on their website Landlords must provide a timescale for returning to compliance with the Code.	Yes	• Business Continuity Plans	We will comply with the code unless exceptional circumstances prevent us from doing so, where business continuity plans will be put into operation for a return to business as usual, as soon as possible. We will inform the ombudsman should this occur and provide a timescale for returning to compliance.

Section 9: Scrutiny & oversight: continuous learning and improvement

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
9.1	Landlords must look beyond the circumstances of the individual complaint and consider whether service improvements can be made as a result of any learning from the complaint.	Yes	• Complaints & Compliments Policy • Complaints Procedures Feedback report	We use complaints to identify themes and trends to provide a broader picture for service improvement learning and opportunities Included in our Complaints & Compliments Policy under Standard 4.
9.2	A positive complaint handling culture is integral to the effectiveness with which landlords resolve disputes. Landlords must use complaints as a source of intelligence to identify issues and introduce positive changes in service delivery.	Yes	• Complaints & Compliments Policy • Feedback Report • Customer Excellence E Learning	Included in our Complaints & Compliments Policy under Standard 4. We view complaints as an opportunity to learn and improve services for the wider customer base. We use complaints to identify themes and issues to create improvement opportunities within service delivery.
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	Yes	• Operational report.	Complaints data and learning is contained within operational report is provided to SBT Board.

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	stakeholders, such as residents' panels, staff and relevant committees.			
9.4	Landlords must appoint a suitably senior lead person as accountable for their complaint handling. This person must assess any themes or trends to identify potential systemic issues, serious risks, or policies and procedures that require revision.	Yes	• Head of Customer Contact Centre • Role Profiles	The complaints team sits with our Head of Customer Contact Centre with a Customer Relationship Manager who directly manages the complaint team. They provide regular oversight of complaints to the wider business.
9.5	In addition to this a member of the governing body (or equivalent) must be appointed to have lead responsibility for complaints to support a positive complaint handling culture. This person is referred to as the Member Responsible for Complaints ('the MRC').	Yes	• Ratified in the minutes	MRC appointed as Kristine Grey (Vice Chair)
9.6	The MRC will be responsible for ensuring the governing body receives regular information on complaints that provides insight on the landlord's complaint handling performance. This person must have access to suitable information and staff to perform this role and report on their findings.	Yes	• See below	MRC has access to staff at Director level, and Operational level. See below re: information

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
9.7	As a minimum, the MRC and the governing body (or equivalent) must receive: a. regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance; b. regular reviews of issues and trends arising from complaint handling; c. regular updates on the outcomes of the Ombudsman's investigations and progress made in complying with orders related to severe maladministration findings; and d. annual complaints performance and service improvement report.	Yes	• Complaints information at Board • Ombudsman determinations • Annual complaints performance and service improvement report – scheduled early August 2024	We provide a quarterly operational report to Board, which the MRC is a member, which includes: • Performance on case handling • Statistical data on complaints • Annual Self-assessment against the Complaint Handling Code
9.8	Landlords must have a standard objective in relation to complaint handling for all relevant employees or third parties that reflects the need to: a. have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments;	Yes	• Bernicia way – Values and Behaviours • Customer Excellence E Learning	Our vision, values and behaviours are well communicated to colleagues and embedded in our culture through effective leadership. Our behaviours include those specific to how we interact with our customers. Customer Excellence E Learning further supports colleagues' complaint handling

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	b. take collective responsibility for any shortfalls identified through complaints, rather than blaming others; and c. act within the professional standards for engaging with complaints as set by any relevant professional body.			and their role to work collaboratively across teams and departments, taking ownership and responsibility and delivering this in a professional way.