

CBMDC Housing Complaint Handling Code Self-Assessment 2024–25

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

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

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

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

Operating Context

City of Bradford Metropolitan District Council (CBMDC) transferred their stock in 2003. Since this time, we currently have under 500 units of affordable and social housing and reopened the Housing Revenue Account. We have entered into contracts with two Registered Providers of social housing who are providing property management, repairs maintenance of our properties in the District: Mears (Plexus) and Incommunities. Throughout the term of these contracts, the Council retain ownership of the properties and our commissioned contractors will act as managing agents. In addition, the Council has its own overarching complaints policy, which is not specific to housing.

Therefore, residents living in our properties are advised to contact the respective management agents to provide any feedback or raise service requests. As Registered Providers our Management agents follow the Housing Ombudsman guidance when handling, managing and reporting on complaint performance and service requests received from tenants of CBMDC owned homes.

Residents are entitled to receive services delivered by our contracted Management Agents and where appropriate the Council will signpost tenants to enable them to access the complaints process.

In April 2025, the Council appointed a dedicated HRA Contract Manager and Monitoring officer to enhance the level of oversight of contractor performance including regulatory compliance.

Section 1: Definition of a complaint

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
1.2	<p>A complaint must be defined as:</p> <p><i>‘an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the landlord, its own staff, or those acting on its behalf, affecting a resident or group of residents.’</i></p>	Yes	<p>Incommunities Complaints Policy (2024): https://www.incommunities.co.uk/complaints-and-compensation</p> <p>Mear Complaints Policy (2024): https://www.mearsliving.co.uk/mears-living-tenants/complaints-policy</p> <p>Feedback and complaints about your Social Housing Bradford Council</p> <p>CBMDC Corporate Complaints Policy (2022).</p>	<p>Both contracted agents adopt the Housing Ombudsman Services’ definition within their complaints policies.</p> <p>Incommunities – Section 3.1 Mears – Section 4</p>
1.3	<p>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.</p>	Yes	<p>Incommunities Complaints Policy (2024): https://www.incommunities.co.uk/complaints-and-compensation</p> <p>Mear Complaints Policy (2024): https://www.mearsliving.co.uk/mears-living-tenants/complaints-policy</p>	<p>Agents’ policies confirm that complaints can be raised without using the word ‘complaint’ and by representatives:</p> <p>Incommunities – Section 6.3 Mears – Section 5</p>

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	<p>Incommunities Complaints Policy (2024): https://www.incommunities.co.uk/complaints-and-compensation</p> <p>Mear Complaints Policy (2024): https://www.mearsliving.co.uk/mears-living-tenants/complaints-policy</p>	<p>Incommunities – Section 6.1 Mears – Section 4</p>
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	<p>Incommunities Complaints Policy (2024): https://www.incommunities.co.uk/complaints-and-compensation</p> <p>Mear Complaints Policy (2024): https://www.mearsliving.co.uk/mears-living-tenants/complaints-policy</p>	<p>Agents' procedures ensure dissatisfaction during a service request is logged as a complaint without closing the original service request. CBMDC reviews this via ongoing monitoring.</p> <p>Incommunities – Section 6 Mears – Section 4</p>
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	Yes	<p>Incommunities Complaints Policy (2024): https://www.incommunities.co.uk/complaints-and-compensation</p> <p>Mear Complaints Policy (2024): https://www.mearsliving.co.uk/mears-living-tenants/complaints-policy</p>	<p>While surveys capture dissatisfaction, they should provide signposting to the complaints process.</p> <p>Mears – Section 4.</p> <p>The Incommunities Self-assessment States</p>

	<p>aware of how they can pursue a complaint if they wish to. Where landlords ask for wider feedback about their services, they also must provide details of how residents can complain.</p>			<p>Causes of concern from satisfaction surveys are passed to the complaints team to log as complaints or service requests where applicable. Where wider feedback is asked, we will alert customers to our complaints process as part of the customer notice of the survey.</p>
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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	<p>Incommunities Complaints Policy (2024): https://www.incommunities.co.uk/complaints-and-compensation</p> <p>Mear Complaints Policy (2024): https://www.mearsliving.co.uk/mears-living-tenants/complaints-policy</p>	<p>Agents' policies confirm complaints are accepted unless a valid exclusion applies..</p> <p>Mears – Section 6 Incommunities – Section 6.2</p>
2.2	<p>A complaints policy must set out the circumstances in which a matter will not be considered as a complaint or escalated, and these circumstances must be fair and reasonable to residents. Acceptable exclusions include:</p> <ul style="list-style-type: none"> The issue giving rise to the complaint occurred over twelve months ago. Legal proceedings have started. This is defined as details of the claim, such as the Claim Form and Particulars of Claim, having been filed at court. 	Yes	<p>Incommunities Complaints Policy (2024): https://www.incommunities.co.uk/complaints-and-compensation</p> <p>Mear Complaints Policy (2024): https://www.mearsliving.co.uk/mears-living-tenants/complaints-policy</p>	<p>Exclusions are defined.</p> <p>Mears – Section 6 Incommunities – Section 6.2</p>

	<ul style="list-style-type: none"> Matters that have previously been considered under the complaints policy. 			
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	<p>Incommunities Complaints Policy (2024): https://www.incommunities.co.uk/complaints-and-compensation</p> <p>Mear Complaints Policy (2024): https://www.mearsliving.co.uk/mears-living-tenants/complaints-policy</p>	<p>We expect our contracted management agents to accept complaints outside the time limit when there are good reasons to do so, the case is considered on its own merits</p> <p>Mears – Section 6 Incommunities – Section 6.2</p>
2.4	If a landlord decides not to accept a complaint, an explanation must be provided to the resident setting out the reasons why the matter is not suitable for the complaints process and the right to take that decision to the Ombudsman. If the Ombudsman does not agree that the exclusion has been fairly applied, the Ombudsman may tell the landlord to take on the complaint.	yes	<p>Incommunities Complaints Policy (2024): https://www.incommunities.co.uk/complaints-and-compensation</p> <p>Mear Complaints Policy (2024): https://www.mearsliving.co.uk/mears-living-tenants/complaints-policy</p>	<p>We expect our contracted management agents to outline the scope & limitations in their complaint policies and related correspondence providing reasons why a complaint may not be accepted.</p>
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Yes	<p>Incommunities Complaints Policy (2024): https://www.incommunities.co.uk/complaints-and-compensation</p> <p>Mear Complaints Policy (2024): https://www.mearsliving.co.uk/mears-living-tenants/complaints-policy</p>	<p>Our management agents will consider the individuals circumstances for each complaint made and will not take a blanket approach to exclusions.</p>

Section 3: Accessibility and Awareness

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
3.1	Landlords must make it easy for residents to complain by providing different channels through which they can make a complaint. Landlords must consider their duties under the Equality Act 2010 and anticipate the needs and reasonable adjustments of residents who may need to access the complaints process.	Yes	<p>Incommunities Complaints Policy (2024): https://www.incommunities.co.uk/complaints-and-compensation</p> <p>Mear Complaints Policy (2024): https://www.mearsliving.co.uk/mears-living-tenants/complaints-policy</p>	<p>Both Mears & Incommunities have a duty under the Equality Act 2010 to ensure access to reasonable adjustments are provided. Our managing agents' annual Housing Ombudsman self-assessment form will reflect how they adhere to the Equality Act 2010 when handling complaints from tenants who live in CBMDC properties.</p> <p>Mears – Section 8 & 13 Incommunities – Section 6.3</p>
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	<p>Mears' policy states that staff at all levels are responsible for the delivery of excellent service and for identifying and resolving issues at the earliest opportunity in order to fully satisfy customer expectations, and hence minimise customer dissatisfaction and complaints</p> <p>Incommunities complaints procedure sets out roles and responsibilities and states that All staff – will capture complaints and customer feedback in a positive non defensive way and ensure that information is recorded in the new complaints system</p>	<p>The Council expects our management agents to accept complaints to any member of staff. We expect our commissioned agents to train their staff to ensure they are aware of procedures when accepting a complaint and when to appropriately signpost complainants to the Council's complaints procedure.</p>

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	CBMDC and its managing agents treat all complaints as opportunities for learning & improvement. Complaint volumes are monitored through contract management meetings. Higher volumes are viewed positively as evidence of accessible complaints processes, while lower volumes are actively reviewed to ensure residents are not facing barriers to raising complaints.	In line with our ongoing improvements of complaint handling, we planning to engage further with our management agents to ensure that they are complying with the Ombudsman requirements and in line with CBMDC's culture of handling complaints.
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	<p>Incommunities Complaints Policy (2024) – Section 6: https://www.incommunities.co.uk/complaints-and-compensation</p> <p>Mear Complaints Policy (2024) – Section 9: https://www.mearsliving.co.uk/mears-living-tenants/complaints-policy</p> <p>Both agents have 'Recite Me' accessibility feature Enhanced Text to Speech Feature. Translation and language services are available</p>	We expect our management agents to ensure their complaints policies are accessible for all residents. As Registered Providers this should be reflected in their annual Housing Ombudsman self-assessment form
3.5	The policy must explain how the landlord will publicise details of the complaints policy, including information about the Ombudsman and this Code.	Yes	<p>Incommunities Complaints Policy (2024): https://www.incommunities.co.uk/complaints-and-compensation</p> <p>Mear Complaints Policy (2024): https://www.mearsliving.co.uk/mears-living-tenants/complaints-policy</p> <p>Feedback and complaints about your Social Housing Bradford Council</p>	We expect our contracted management agents' complaints policies to provide details of the complaints process and where it will be published. The complaints policies should also include details about the Ombudsman Service and the Code. The complaints policies and procedure should be publicised by agents, at the start of the new tenancies, on the

			<p>CBMDC Corporate Complaints Policy (2022) – Section 3.3: https://www.bradford.gov.uk/compliments-and-complaints/policies-and-procedures/complaint-handling-policy-and-procedure/</p>	<p>organisations website and a copy will be always available in the office or by post on request.</p> <p>CBMDC will continue to liaise with our management agents if any amends to policies are required.</p> <p>.</p>
3.6	Landlords must give residents the opportunity to have a representative deal with their complaint on their behalf, and to be represented or accompanied at any meeting with the landlord.	Yes	<p>Incommunities Complaints Policy (2024): https://www.incommunities.co.uk/complaints-and-compensation</p> <p>Mear Complaints Policy (2024): https://www.mearsliving.co.uk/mears-living-tenants/complaints-policy</p>	We expect our property management agents to provide information inline with the Ombudsman's guidance about representation when making a complaint. This should be reflected in our management agents' annual Housing Ombudsman self-assessment form and their complaints policy
3.7	Landlords must provide residents with information on their right to access the Ombudsman service and how the individual can engage with the Ombudsman about their complaint.	Yes	<p>Incommunities Complaints Policy (2024): https://www.incommunities.co.uk/complaints-and-compensation</p> <p>Mear Complaints Policy (2024): https://www.mearsliving.co.uk/mears-living-tenants/complaints-policy</p> <p>CBMDC Corporate Complaints Policy (2022) – Section 3.3: https://www.bradford.gov.uk/compliments-and-complaints/policies-and-procedures/complaint-handling-policy-and-procedure/</p>	<p>The Ombudsman contact details are also included within complaint responses and advice is given to customers that are not satisfied with how their complaint is being managed.</p> <p>We are in the process of currently updated the Council's complaints policy in line with LGSCO updated guidance.</p>

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	<p>CBMDC's Corporate Complaints Team includes Link Officers for both the Housing Ombudsman Service and the Local Government & Social Care Ombudsman.</p> <p>Day to day complaint handling for Council housing stock is delivered by our commissioned Registered Providers management agents. Oversight is maintained through the Council's HRA Contract Manager, who liaises regularly with the agents and reviews reports, including complaints data and stage 2 responses where the Council is the landlord.</p> <p>https://www.incommunities.co.uk/make-a-complaint-comment-or-compliment/</p> <p>https://www.mearsliving.co.uk/living-in-your-home/complaints-and-compliments</p>	<p>The agents' complaints teams manage the acknowledgement, investigation and response to housing complaints on behalf of the Council. The Council retains landlord accountability to the Housing Ombudsman Service</p> <p>Where the Housing Ombudsman contacts CBMDC directly, the Link Officer co-ordinates the response in liaison with the Council's HRA Contract Manager.</p> <p>Complaint data and Ombudsman outcomes are reported to the Council's Governance & Audit Committee</p>
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	<p>Both Incommunities & Mears have dedicated complaints teams with delegated authority to resolve complaints promptly with authority to offer remedies, (apologies, service improvements or financial remedies). Escalations are managed with senior oversight.</p> <p>.</p>	<p>CBMDC provides additional oversight and its HRA Contract Manager can intervene as and when required.</p>

4.3	Landlords are expected to prioritise complaint handling and a culture of learning from complaints. All relevant staff must be suitably trained in the importance of complaint handling. It is important that complaints are seen as a core service and must be resourced to handle complaints effectively	Yes	Incommunities Complaints Policy (2024) – Section 10.1: https://www.incommunities.co.uk/complaints-and-compensation Mear Complaints Policy (2024) – Section 7: https://www.mearsliving.co.uk/mears-living-tenants/complaints-policy	We expect our agents to ensure they have on going complaint handling training in place for all staff (including new starters) and provide bespoke training for staff where needed. CBMDC works closely with our contracted agents to discuss any issues that arise when handling complaints about Council own properties this happens during regular contract and case review meetings held by the HRA Contract Manager with the Managing agent teams.
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Section 5: The Complaint Handling Process

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
5.1	Landlords must have a single policy in place for dealing with complaints covered by this Code. Residents must not be treated differently if they complain.	Yes	Incommunities Complaints Policy (2024) – https://www.incommunities.co.uk/complaints-and-compensation Mear Complaints Policy (2024) https://www.mearsliving.co.uk/mears-living-tenants/complaints-policy	All complaints covered by this code fall under our agents' Housing Complaint Policy Where a resident raises a complaint directly to CBMDC in relation to council-owned housing stock, the Council signposts the resident promptly to the appropriate managing agent.

5.2	The early and local resolution of issues between landlords and residents is key to effective complaint handling. It is not appropriate to have extra named stages (such as 'stage 0' or 'informal complaint') as this causes unnecessary confusion.	Yes	Both contractors' complaints policies encompass a 2-stage approach	We expect our agents to follow the code of guidance on complaints without introducing additional and unnecessary stages.
5.3	A process with more than two stages is not acceptable under any circumstances as this will make the complaint process unduly long and delay access to the Ombudsman.	Yes	Our contracted housing management agents operate a two-stage complaints process in line with the Housing Ombudsman Code. No additional informal or extra stages exist.	
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	Our housing management agents operate a two-stage complaints process in line with the Housing Ombudsman Code. No additional informal or extra stages exist.	Complainants are only required to go through one formal two-stage process, not two parallel processes. If a resident raises an issue directly with CBMDC, the Corporate Complaints Team will review the details and signpost where appropriate. This ensures clarity and fairness for residents
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Yes	We expect our established agents to follow and comply with the code. The Council's dedicated HRA Contract Manager and Monitoring officer are in place to enhance the level of oversight of contractor performance including regulatory compliance to complaint handling.	Incommunities and Mears handle complaints in line with the Housing Ombudsman Code. CBMDC, as landlord, holds overall accountability. In instances of complex cases, we will ensure the resident is notified if there is a need to extend the

				deadlines, agreeing where necessary as per the Complaints Code.
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	<p>Incommunities Complaints Policy (2024) – https://www.incommunities.co.uk/complaints-and-compensation</p> <p>Mear Complaints Policy (2024) https://www.mearsliving.co.uk/mears-living-tenants/complaints-policy</p>	<p>We expect out agents to provide formal complaint acknowledgement letters that include details of the complaint as well as the outcomes/remedies that the resident is seeking. In any cases where further clarity is required, staff are advised to contact the resident for further clarification.</p> <p>Templates are used to ensure the responses contain all the necessary requirements</p>
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	Both agents issue written acknowledgements. Complaint terms of reference and desired outcomes are clarified.	We expect Mears & Incommunities to ensure appropriate signposting is provided if aspects of a complaint fall out of their jurisdiction
5.8	<p>At each stage of the complaints process, complaint handlers must:</p> <ul style="list-style-type: none"> a. deal with complaints on their merits, act independently, and have an open mind; b. give the resident a fair chance to set out their position; 	Yes	All staff dealing with complaints act independently with an open mind throughout complaint investigations. Staff at all levels of the processes are provided with sufficient time to ensure they can review relevant information and take the necessary measure to work alongside the resident.	<p>Our contracted housing agents have access to Housing Ombudsman Learning Hub. I-learn learning Site.</p> <p>We expect our contracted agents to follow the Ombudsman code for handling complaints, to carry out complaints impartially, carry out an objective review of the complaint, should there be any conflict of interest we expect our contracted agents to ensure that an appropriate</p>

	<p>c. take measures to address any actual or perceived conflict of interest; and</p> <p>d. consider all relevant information and evidence carefully.</p>			complaints person is allocated to the case. Our agents have a Quality Assurance process in place and are Registered Providers
5.9	Where a response to a complaint will fall outside the timescales set out in this Code, the landlord must agree with the resident suitable intervals for keeping them informed about their complaint.	Yes	We expect our contacted agents contact the complainant to let them know of the delay and advise when they are able to provide a response by. Time extensions are driven by the complexity of the complaint.	Both agents' procedures allow for extensions only in line with the Code. Residents are kept updated and informed of revised timescales.
5.10	Landlords must make reasonable adjustments for residents where appropriate under the Equality Act 2010. Landlords must keep a record of any reasonable adjustments agreed, as well as a record of any disabilities a resident has disclosed. Any agreed reasonable adjustments must be kept under active review.	Yes	As per commissioned housing management agents' complaints policies and procedures. And Equality & Diversity policies	Resident information should be stored on Housing Management systems, including vulnerabilities flags. If a vulnerability is noted through the complaints process, the investigating officer would ensure the system reflects the vulnerabilities, updating or adding to the management system as needed.
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	Yes	As per commissioned housing management agents' complaints policies and procedures.	Escalation to through all stages is always offered unless the complaint meets a valid exclusion as set out in Section 2. Written reasons are provided where escalation is refused. Our agents can refuse to escalate a complaint where a

	they must comply with the provisions set out in section 2 of this Code.			complainant reaches the criteria of a vexatious complainant, as defined in their complaint policies & procedures. .
5.12	A full record must be kept of the complaint, and the outcomes at each stage. This must include the original complaint and the date received, all correspondence with the resident, correspondence with other parties, and any relevant supporting documentation such as reports or surveys.	Yes	Incommunities and Mears complaint management systems Contract monitoring arrangements	Both agents maintain case management systems capturing full complaint records. CBMDC has the right to review case files (where the complaint relates to the Council as the Landlord) via contract oversight.
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	If it becomes clear that a remedy is readily available to resolve a complaint this be in enacted even if the complaint process continues.	We expect our agents to take action to resolve and remedy the complaint during any stage of the complaints process.
5.14	Landlords must have policies and procedures in place for managing unacceptable behaviour from residents and/or their representatives. Landlords must be able to evidence reasons for putting any restrictions in place	Yes	If it becomes necessary to put restrictions in place, CBMDC expects our contracted agents to reference their own Managing Vexatious Complaints Policy and apply their process appropriately	Both agents and CBMDC have policies for managing unreasonable or unacceptable behaviour, aligned with the Housing Ombudsman's guidance. Restrictions are applied only where necessary, proportionate, and evidence based. Reviews are built into the policies to ensure fairness.

	and must keep restrictions under regular review.			
5.15	Any restrictions placed on contact due to unacceptable behaviour must be proportionate and demonstrate regard for the provisions of the Equality Act 2010.	Yes	As per commissioned housing management agents' complaints policies and procedures.	Restrictions are applied only as a last resort and with due regard to the Equality Act 2010. The application of restrictions should be proportionate, time-limited and subject to review. This protects residents' rights while ensuring staff safety.

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	As per commissioned housing management agents' complaints policies and procedures. Oversight of Stage 1 performance is included in contract management arrangements.	We expect response dates tracked to ensure formal responses are completed in as timely a manner as possible. We expect the agents to actively encourage colleagues to respond to and resolve complaints as soon as practicably possible. We plan to engage further with our contracted agents to satisfy ourselves that the appropriate in complaints training is in place.
6.2	Complaints must be acknowledged, defined and logged at stage 1 of the complaints procedure <u>within five working days of the complaint being received.</u>	Yes	Incommunities Complaints Policy (2024) – https://www.incommunities.co.uk/complaints-and-compensation Mear Complaints Policy (2024) https://www.mearsliving.co.uk/mears-living-tenants/complaints-policy	Both agents' policies confirm complaints are acknowledged within five working days.
6.3	Landlords must issue a full response to stage 1 complaints <u>within 10 working days</u> of the complaint being acknowledged.	Yes	As per commissioned housing management agents' complaints policies and procedures. Contract management monitoring.	Policies for both agents require Stage 1 responses within 10 working days. Extensions may be applied where cases are complex.

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	Incommunities and Mears complaints procedures Extension protocols CBMDC contract oversight	We expect our agents to comply with the Ombudsman's guidance
6.5	When an organisation informs a resident about an extension to these timescales, they must be provided with the contact details of the Ombudsman.	Yes	Incommunities & Mears submit annual self-assessment forms which cover the handling of complaints including Council owned properties. The information in their submissions also reflects information on properties they manage on behalf of the Council	If a complaint requires an extension, the Housing Ombudsman details will be provided at all stages. All response letters to complainants also include details with how a resident can contact the Housing Ombudsman.
6.6	A complaint response must be provided to the resident when the answer to the complaint is known, not when the outstanding actions required to address the issue are completed. Outstanding actions must still be tracked and actioned promptly with appropriate updates provided to the resident.	Yes	Response to complaints and timescales for this are set out in Mears' & Incommunities complaints policies	We expect our contracted agents to send a complaint response to the resident when the answer to complaint is known. Agents should have a process in place to track and monitor completion of promised actions
6.7	Landlords must address all points raised in the complaint definition and	Yes	Incommunities and Mears complaint procedures require staff to respond to each	We expect our contracted agents to provide complaint responses at a good standard,

	provide clear reasons for any decisions, referencing the relevant policy, law and good practice where appropriate.		<p>element of the complaint and give written reasons for the outcome.</p> <p>Agents' annual self-assessments & contract monitoring provide additional assurance.</p>	including clear findings, outcomes and actions, referencing all relevant policies and regulations where appropriate.
6.8	Where residents raise additional complaints during the investigation, these must be incorporated into the stage 1 response if they are related and the stage 1 response has not been issued. Where the stage 1 response has been issued, the new issues are unrelated to the issues already being investigated or it would unreasonably delay the response, the new issues must be logged as a new complaint.	Yes	Agents' annual self-assessments & contract monitoring provide additional assurance.	We expect our agents to ensure complaints systems are kept updated. Training support should be provided to complaint officers in tracking actions and updating tenant where necessary
6.9	<p>Landlords must confirm the following in writing to the resident at the completion of stage 1 in clear, plain language:</p> <ul style="list-style-type: none"> a. the complaint stage; b. the complaint definition; c. the decision on the complaint; d. the reasons for any decisions made; e. the details of any remedy offered to put things right; f. details of any outstanding actions; and 	Yes	<p>As per commissioned housing management agents' complaints policies and procedures.</p> <p>Agents' annual self-assessments & contract monitoring provide additional assurance.</p>	We expect our agents to have standard template letter and stage 1 guidance to provide structure to complaint responses

	g. details of how to escalate the matter to stage 2 if the individual is not satisfied with the response.			
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Stage 2

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
6.10	If all or part of the complaint is not resolved to the resident's satisfaction at stage 1, it must be progressed to stage 2 of the landlord's procedure. Stage 2 is the landlord's final response.	Yes	As per commissioned housing management agents' complaints policies and procedures. Agents' annual self-assessments & contract monitoring provide additional assurance.	Both Incommunities and Mears policies confirm that residents may escalate to Stage 2 if dissatisfied with a Stage 1 outcome. Stage 2 represents the landlord's final response. CBMDC, as landlord, retains accountability and oversight.
6.11	Requests for stage 2 must be acknowledged, defined and logged at stage 2 of the complaints procedure within five working days of the escalation request being received.	Yes	As per commissioned housing management agents' complaints policies and procedures. Agents' annual self-assessments & contract monitoring provide additional assurance.	We expect the timescales to be adhered to.
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	As per commissioned housing management agents' complaints policies and procedures. Agents' annual self-assessments & contract monitoring provide additional assurance.	CBMDC does not expect residents to provide reasoning for their request of an escalation to stage 2. If required, it is accepted that the agents will seek additional information as to why the resident was not satisfied with the stage 1 response. However,

				this is not a prerequisite of a stage 2 consideration.
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Yes	As per commissioned housing management agents' complaints policies and procedures. Agents' annual self-assessments & contract monitoring provide additional assurance.	We expect that Stage 2 investigations are allocated to an officer without previous involvement in the Stage 1 decision. This ensures independence.
6.14	Landlords must issue a final response to the stage 2 <u>within 20 working days</u> of the complaint being acknowledged.	Yes	As per commissioned housing management agents' complaints policies and procedures. Agents' annual self-assessments & contract monitoring provide additional assurance.	We expect our contracted agents to include response timeframes at stage 2 in their complaint policy.
6.15	Landlords must decide whether an extension to this timescale is needed when considering the complexity of the complaint and then inform the resident of the expected timescale for response. Any extension must be no more than 20 working days without good reason, and the reason(s) must be clearly explained to the resident.	Yes	As per commissioned housing management agents' complaints policies and procedures. Agents' annual self-assessments & contract monitoring provide additional assurance.	We expect our agents to update complainants at Stage 2 complaints if an extension is required, this should include reasoning for the extension.
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	As per commissioned housing management agents' complaints policies and procedures. Agents' annual self-assessments & contract monitoring provide additional assurance.	CBMDC expects our contracted agents to ensure timescales are provided to the complainants when extensions are required and that they provide the Housing Ombudsman's details in their correspondence

6.17	A complaint response must be provided to the resident when the answer to the complaint is known, not when the outstanding actions required to address the issue are completed. Outstanding actions must still be tracked and actioned promptly with appropriate updates provided to the resident.	Yes	<p>As per commissioned housing management agents' complaints policies and procedures.</p> <p>Agents' annual self-assessments & contract monitoring provide additional assurance.</p>	The complaint response is sent to the complainant when the answer to complaint is known. If there should be any outstanding actions, CBMDC expect our agents to outline outstanding actions in the complaint response, so they are clearly communicated.
6.18	Landlords must address all points raised in the complaint definition and provide clear reasons for any decisions, referencing the relevant policy, law and good practice where appropriate.	Yes	<p>As per commissioned housing management agents' complaints policies and procedures.</p> <p>Agents' annual self-assessments & contract monitoring provide additional assurance.</p>	Our agents are expected to address all points raised in their complaints responses and also provide clear reasons for the decisions made.
6.19	<p>Landlords must confirm the following in writing to the resident at the completion of stage 2 in clear, plain language:</p> <ol 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; and details of how to escalate the matter to the Ombudsman Service if the individual remains dissatisfied. 	Yes	<p>As per commissioned housing management agents' complaints policies and procedures.</p> <p>Agents' annual self-assessments & contract monitoring provide additional assurance.</p>	As a part of handling complaints from tenants who reside in Council owned properties, our Agents use their own template letters. We expect our agents to ensure that they comply with the Ombudsman's guidance when writing a stage 2 complaint response.

6.20	Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.	Yes	As per commissioned housing management agents' complaints policies and procedures. Agents' annual self-assessments & contract monitoring provide additional assurance.	Allocated Stage 2 investigation Officers will consult with all appropriate staff
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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: <ul style="list-style-type: none"> • Apologising; • Acknowledging where things have gone wrong; • Providing an explanation, assistance or reasons; • Taking action if there has been delay; • Reconsidering or changing a decision; • Amending a record or adding a correction or addendum; • Providing a financial remedy; • Changing policies, procedures or practices. 	Yes	As per commissioned housing management agents' complaints policies and procedures. Agents' annual self-assessments & contract monitoring provide additional assurance.	Our contracted agents are expected to comply to Ombudsman's guidance when errors or maladministration has been identified. Where fault is found it should be acknowledged and an apology should be provided, rectification should be completed as soon as possible. A financial remedy should be considered in line with the Ombudsman's guidance, if appropriate. Learning from complaints is important to CBMDC, any learning should be shared with relevant service areas.

7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Yes	<p>As per commissioned housing management agents' complaints policies and procedures.</p> <p>Agents' annual self-assessments & contract monitoring provide additional assurance.</p>	<p>We encourage our agents to ensure the remedies offered reflect the impact on the resident.</p>
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	<p>As per commissioned housing management agents' complaints policies and procedures.</p> <p>Agents' annual self-assessments & contract monitoring provide additional assurance.</p>	<p>In line with the Council's complaints practice under the guidance of LGSCO, we expect our agents to provide response letters which clearly set out what actions will be taken as part of the remedy, Wherever known, agents should include the timescales of said actions.</p> <p>In cases where appropriate outstanding actions, appointments, repairs are to be made as an outcome of a complaint, the agents are expected to arrive at an agreement with the resident.</p> <p>All remedies should be processed through to completion and noted on the case file.</p>
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes	As per commissioned housing management agents' complaints policies and procedures.	We expect our contracted agents to refer to the Ombudsman's guidance when deciding upon remedies for our complaint cases.

			Agents' annual self-assessments & contract monitoring provide additional assurance.	
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Section 8: Self-assessment, reporting and compliance

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
8.1	<p>Landlords must produce an annual complaints performance and service improvement report for scrutiny and challenge, which must include:</p> <ul style="list-style-type: none"> 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	<p>The self-assessment against this code is published on our website Self Assessment Form (bradford.gov.uk)</p> <p>Incommunities & Mears submit annual self-assessment forms which cover the handling of complaints including Council owned properties. The information in their submissions also reflects information on properties they manage on behalf of the Council</p>	<p>Further to an ongoing review of the Council's Housing Team, the Team will collaborate with the Corporate Complaints Team when producing annual complaints performance and service improvement to the Council's Governance and Audit Committee to ensure that we report on Housing Complaints.</p> <p>The report will include the annual self-assessment. The Council will ensure that our contracted agents' Housing Complaints policy remains in line with its requirements and the Code.</p> <p>Whilst we recognise that our agents have their own reporting and governance in place, we acknowledge that further work needs to be put in place for 2024/2025 to ensure that CBMDC holds a robust mechanism in place, including any learning from the previous year's housing complaints and service improvements. It will include findings of non-compliance and</p>

				investigations carried out by the Housing Ombudsman.
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	Incommunities & Mears submit annual self-assessment forms which cover the handling of complaints including Council owned properties. The information in their submissions also reflects information on properties they manage on behalf of the Council	We will continue to work closely with our contracted agents to ensure that reports are signposted on our website and where appropriate, we will look to provide a council response.
8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	Yes		The Council established a new HRA team in April 2025 and this self-assessment reflects changes in contract reporting arrangements since then
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	Yes		We commit to carrying out a review and update of our self-assessment should we be requested to do so by the Housing Ombudsman Service. We would also expect our managing agents to update us on any Ombudsman investigations directly affecting our properties and/or any investigations having an impact on their wider approach to complaint handling.

8.5	If a landlord is unable to comply with the Code due to exceptional circumstances, such as a cyber incident, they must inform the Ombudsman, provide information to residents who may be affected, and publish this on their website Landlords must provide a timescale for returning to compliance with the Code.	Yes	Incommunities & Mears submit annual self-assessment forms which cover the handling of complaints including Council owned properties. The information in their submissions also reflects information on properties they manage on behalf of the Council	If our contracted managing agents are unable to comply with the code due to exceptional circumstances, we expect them to inform ourselves as Landlords and the Housing Ombudsman Service and provide information to our customers/tenants with timescales for returning to compliance.
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Section 9: Scrutiny & oversight: continuous learning and improvement

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
9.1	Landlords must look beyond the circumstances of the individual complaint and consider whether service improvements can be made as a result of any learning from the complaint.	Yes	Incommunities and Mears complaints performance and service improvement reports. CBMDC Complaints annual report (service improvements section)	Both managing agents review complaints for patterns and feed outcomes into service improvement plans. CBMDC Corporate Complaints Team also captures learning from LGSCO cases, ensuring service-wide improvements are considered beyond individual cases.
9.2	A positive complaint handling culture is integral to the effectiveness with which landlords resolve disputes. Landlords must use complaints as a source of intelligence to identify issues and introduce positive changes in service delivery.	Yes	Incommunities and Mears complaints performance and service improvement report with board responses and feedback. CBMDC Complaints reporting mechanisms to Council services (themes/outcome/learning)	While policies emphasise positive complaint handling, CBMDC must strengthen assurance that agents use complaints consistently as "intelligence" to drive service improvement.
9.3	Accountability and transparency are also integral to a positive complaint handling culture. Landlords must report back on wider learning and improvements from complaints to stakeholders, such as residents' panels, staff and relevant committees.	Yes	CBMDC reporting to Council committees (Corporate Complaints Team) Your Voice Mears Group PLC Your Voice Incommunities	CBMDC publishes annual complaints learning in reports to Council committees.
9.4	Landlords must appoint a suitably senior lead person as accountable for their complaint handling. This person	Yes	CBMDC Corporate Complaints Manager. Both agents have managers overseeing the complaints process	CBMDC has senior officers in place accountable for corporate and landlord complaints, including Ombudsman liaison.

	must assess any themes or trends to identify potential systemic issues, serious risks, or policies and procedures that require revision.		Incommunities and Mears complaints lead officers	Contract/Compliance management requires agents to appoint a senior lead.
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').	Partially	CBMDC Corporate Governance arrangements <u>Scrutiny and Committee oversight reports (last GAC report)</u>	CBMDC has a governance framework for monitoring landlord complaints. The Council has appointed a Housing Contract Compliance Manger in 2025, who works closely with the Council's contracted housing management agents. This role includes reviewing complaints where the Council is the landlord, collating data from agents and feeding into the Council's reporting cycle. This provides assurance, supports transparency and continuous improvement in complaint handling. . .
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	Role of Housing Contract Compliance Manager Complaint data returns from contracted housing management agents Governance & Audit Committee reporting cycle	

9.7	<p>As a minimum, the MRC and the governing body (or equivalent) must receive:</p> <ul style="list-style-type: none"> a. regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance; b. regular reviews of issues and trends arising from complaint handling; c. regular updates on the outcomes of the Ombudsman's investigations and progress made in complying with orders related to severe maladministration findings; and d. annual complaints performance and service improvement report. 	Yes	<p>Quarterly monitoring reports prepared by the Housing Contract Compliance Manager.</p> <p>Reports submitted to Governance and Audit Committee (GAC).</p> <p>Corporate Complaints Team liaison with the Housing Ombudsman when required.</p>	<p>The Council has arrangements in place to ensure that the MRC and governing body receive regular oversight information.</p> <p>This includes updates on the volume and categories of complaints where the Council is the landlord, the outcomes of these complaints and performance data from contracted housing agents.</p> <p>Trends and learning points are highlighted in quarterly reports to GAC.</p> <p>Any Ombudsman determinations or investigations are reported corporately, with compliance overseen by the Housing Contract Compliance Manager and escalated where necessary.</p>
9.8	<p>Landlords must have a standard objective in relation to complaint handling for all relevant employees or third parties that reflects the need to:</p> <ul style="list-style-type: none"> a. have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments; b. take collective responsibility for any shortfalls identified through complaints, rather than blaming others; and 	Yes	<p>Contract management arrangements with Incommunities and Mears.</p> <p>Corporate Complaints policy and procedures.</p> <p>professional codes of conduct.</p>	<p>The Council requires its contracted housing management agents to comply with the standards set out in the Housing Ombudsman Code and to apply a collaborative and constructive approach to complaint handling.</p> <p>Staff and contractors are expected to take shared responsibility for addressing issues raised, ensuring lessons are learned, and avoiding a culture of blame.</p>

	c. act within the professional standards for engaging with complaints as set by any relevant professional body.			Professional standards, including customer care and fairness in handling complaints, are embedded through corporate policies and reinforced through contract monitoring. The Housing Contract Compliance Manager ensures that these principles are upheld across third-party agents and reports on compliance to the Council.
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