

Appendix A: Self-assessment form

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

Once approved, landlords must publish the self-assessment as part of the annual Complaints Performance and Service Improvement Report on their website. The governing body's response to the report must be published alongside this.

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

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

City of Bradford Metropolitan District Council: Housing Landlord Complaint Handling Arrangements

City of Bradford Metropolitan District Council operates a mixed housing landlord management model and is the responsible for 420 Council-owned homes. This consists of 69 homes managed directly by the Council (Fletcher Court Extra Care) and 351 homes managed on the Council's behalf by under contract by Incommunities.

Complaints handled by Incommunities on the Council's behalf are managed in line with agreed complaint handling arrangements and the Housing Ombudsman Complaint Handling Code.

Until February 2026, Mears Housing Management handled complaints relating to the repairs and maintenance services it delivered on the Council's behalf under contract. From February 2026, responsibility of those services and any related complaints then transferred back to the Council when the management of Fletcher Court was taken back in-house.

The Council retains overall responsibility for compliance with the Code, oversight, remedies, learning and performance reporting across all Council-owned homes.

This self-assessment should be read alongside the Council's Housing Landlord Annual Complaints Performance and Service Improvement Report 2025/26 and the formal response to that report.

Section 1: Definition of a complaint

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
1.2	A complaint must be defined as: <i>'an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the landlord, its own staff, or those acting on its behalf, affecting a resident or group of residents.'</i>	YES	Complaints Policy (5.1.2, 14.2 & 14.3) Stage 1 Council Landlord Complaint Acknowledgement Template Housing Landlord Complaint Response Templates .	The Council's Complaints Policy adopts the Housing Ombudsman definition of a complaint for Council landlord services. This applies to complaints concerning Council-owned homes managed directly by the Council or on its behalf. Complaint handling templates are aligned to this definition and support compliance with the Housing Ombudsman Complaint Handling Code.
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	YES	Complaints Policy (5.1.3, 5.1.4, 5.2.5 & 8.4) Complaint Handling Policy and Procedure: https://www.bradford.gov.uk/comp	1.1 The policy confirms that residents do not need to use the word 'complaint' to access the complaints process. Where dissatisfaction is expressed regarding a housing landlord service request, residents are given 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.		liments-and-complaints/policies-and-procedures/complaint-handling-policy-and-procedure/ Service Requests & Complaints About Your Social Housing: https://www.bradford.gov.uk/housing/council-housing/service-requests-and-complaints-about-your-social-housing/ Stage 1 Council Landlord Complaint Acknowledgement Template.	opportunity to make a complaint. Complaints submitted by a representative or third party are handled in line with the policy.
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,	YES	1.2 Complaints Policy (5.2.1, 5.2.2, 5.2.4, 5.2.5 & 5.2.6) Complaint Handling Policy and Procedure: https://www.bradford.gov.uk/complaints-and-complaints/policies-and-procedures/complaint-handling-policy-and-procedure/	The policy clearly distinguishes between a service request and a complaint. A service request is a request for the Council, or an organisation acting on its behalf, to provide a service, take action or put something right. Housing landlord service requests are recorded, monitored and reviewed separately from complaints. Where a resident

	but must be recorded, monitored and reviewed regularly.		Service Requests & Complaints About Your Social Housing: https://www.bradford.gov.uk/housing/council-housing/service-requests-and-complaints-about-your-social-housing/ Service Requests & Complaints About Your Social Housing: https://www.bradford.gov.uk/housing/council-housing/service-requests-and-complaints-about-your-social-housing/	expresses dissatisfaction with the response to a housing landlord service request, they are given the opportunity to make a complaint.
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 Policy (5.1.4, 5.2.5 & 5.2.6) Complaint Handling Policy and Procedure: https://www.bradford.gov.uk/complaints-and-complaints/policies-and-procedures/complaint-handling-policy-and-procedure/ Service Requests & Complaints About Your Social Housing: https://www.bradford.gov.uk/housing/council-housing/service-requests-and-complaints-about-your-social-housing/	The policy confirms that where a resident expresses dissatisfaction with the response to a housing landlord service request, they are given the opportunity to make a complaint. The policy also confirms that raising a complaint does not stop, delay or prevent action required to resolve the service request.

			Stage 1 Council Landlord Complaint Acknowledgement Template.	
1.6	An expression of dissatisfaction with services made through a survey is not defined as a complaint, though wherever possible, the person completing the survey should be made aware of how they can pursue a complaint if they wish to. Where landlords ask for wider feedback about their services, they also must provide details of how residents can complain.	YES	Complaints Policy (5.1, 5.2, 5.3 & 5.4) Complaint Handling Policy and Procedure (weblink as above) Service Requests & Complaints About Your Social Housing (weblink as above)	The policy distinguishes between complaints, service requests, comments, feedback and compliments. Feedback received through surveys or other feedback channels is not automatically treated as a complaint. Residents are provided with information on how to access the complaints process where they wish to pursue a matter as a complaint.

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 Policy (Sections 9, 10 & 11) Complaint Handling Policy and Procedure (weblink as above) Complaint Not Accepted Template	The policy confirms that complaints will be accepted unless there is a valid reason not to do so. Where the Council decides not to accept a complaint about Council landlord services, the reasons will be explained to the resident. Each complaint will be considered on its own merits and the reason for any decision not to accept a complaint will be recorded
2.2	A complaints policy must set out the circumstances in which a matter will not be considered as a complaint or escalated, and these circumstances must be fair and reasonable to residents. Acceptable exclusions include: - The issue giving rise to the complaint occurred over twelve months ago. - Legal proceedings have started. This is defined as	YES	Complaints Policy (Sections 9, 10 & 11) Complaint Handling Policy and Procedure (weblink as above) Complaint Not Accepted Template	The policy sets out the circumstances in which a matter may not be considered under the complaints process or may be handled through an alternative route. This includes matters that fall outside the scope of the complaints process, complaints that have previously been considered, complaints made outside the published timescale where it is not reasonable or proportionate to investigate and matters subject to legal proceedings or another statutory process. Decisions are made on a case-by-case basis and reasons are explained to the resident.

	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.			
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 Policy (11.1 & 11.2) Complaint Handling Policy and Procedure (weblink as above) Complaint Not Accepted Template	The policy confirms that complaints should normally be made within 12 months of the issue occurring or the resident becoming aware of the issue. The Council may exercise discretion to consider complaints outside this timescale where there is good reason to do so and it remains reasonable and proportionate to investigate.
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	YES	Complaints Policy (10.3 & 24.1 to 24.4) Complaint Handling Policy and Procedure (weblink as above)	The policy confirms that where the Council decides not to accept a complaint about Council landlord services, the reasons for that decision are explained to the resident. Residents are advised why the matter is not

	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.		Complaint Not Accepted Template Service Requests & Complaints About Your Social Housing (weblink as above)	suitable for the complaints process and of their right to refer that decision to the Housing Ombudsman Service.
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	YES	Complaints Policy (9.1.2, 10.1, 10.2 & 11.2) Complaint Handling Policy and Procedure (weblink as above)	The policy does not apply blanket exclusions. Each complaint is considered on its own merits and the individual circumstances of the case are taken into account. The policy also allows discretion where appropriate, including where complaints are made outside the usual time limit.

Section 3: Accessibility and Awareness

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
3.1	Landlords must make it easy for	YES	Complaints Policy (6.1 & 6.3.1)	The policy confirms that complaints can be made online, by email, by telephone, in

	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.		Complaint Handling Policy and Procedure (weblink as above) Service Requests & Complaints About Your Social Housing (weblink as above)	writing or in person. Information about the complaints process can be provided in alternative formats on request and reasonable adjustments will be considered where required to support access to the complaints process.
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	YES	Complaints Policy (5.1.3 & 6.1) Complaint Handling Policy and Procedure (weblink as above) Service Requests & Complaints About Your Social Housing (weblink as above) Staff complaint handling guidance and training materials	The policy confirms that complaints can be raised through a range of channels and do not need to be made in a particular format. Staff guidance and training support staff to recognise expressions of dissatisfaction and ensure complaints are referred to the appropriate team for handling.

	complaint to the appropriate person within the landlord.			
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 Policy (4.1, 25.1, 25.2, 25.4, 25.5 & 25.6) Complaint Handling Policy and Procedure (weblink as above) Housing Landlord Annual Complaints Performance and Service Improvement Report 2025/26	The Council recognises complaints as an important source of feedback and learning. Complaint outcomes, themes and trends are monitored and reported through the Council's governance arrangements to support service improvement, performance oversight and continuous improvement.
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	YES	Complaints Policy (6.2, 6.3.1, 14.5 & 14.6) Complaint Handling Policy and Procedure (weblink as above) Service Requests & Complaints About Your Social Housing (weblink as above)	The Complaints Policy is published on the Council's website and sets out the Council's landlord complaints process, including the two complaint stages, response timescales and escalation arrangements. Information about the complaints process can be provided in alternative formats on request to support accessibility and resident access to the complaints process.

	the timeframes for responding. The policy must also be published on the landlord's website.			
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 Policy (6.2, 14.4.4, 24.1 & 24.3) Complaint Handling Policy and Procedure (weblink as above) Service Requests & Complaints About Your Social Housing (weblink as above)	The Complaints Policy and supporting webpages provide information about the Council's landlord complaints process and how residents can access it. The policy also explains how residents can contact the Housing Ombudsman Service and signposts residents to the appropriate escalation route where they remain dissatisfied.
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	Complaints Policy (8.1, 8.3 & 8.4) Complaint Handling Policy and Procedure (weblink as above) Service Requests & Complaints About Your Social Housing (weblink as above)	The policy confirms that complaints may be made by a representative acting on behalf of a resident, subject to any necessary authority or consent requirements. Residents are also advised that they may ask a family member, friend, advocate, counsellor or other representative to act on their behalf during the complaints process.

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 Policy (10.3, 14.5.6, 14.6.6, 24.1, 24.3 & 24.4) Complaint Handling Policy and Procedure (weblink as above) Service Requests & Complaints About Your Social Housing (weblink as above) Stage 1 and Stage 2 Response Templates Complaint Not Accepted Template	The policy confirms that residents may contact the Housing Ombudsman Service at any stage of the complaints process for advice and support. Information about the Housing Ombudsman Service is provided through the Council's complaints policy, landlord complaints webpages and complaint correspondence.
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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	YES	Complaints Policy (14.3, 14.7.4, 14.7.5, 14.7.6 & 14.7.7) Complaint Handling Policy and Procedure (weblink as above) Housing Landlord Annual Complaints Performance and Service Improvement Report 2025/26	The Council retains overall responsibility for landlord complaint handling, oversight, reporting and compliance with the Housing Ombudsman Complaint Handling Code, including complaints relating to Council-owned homes managed on its behalf. Complaint performance is monitored and reported through the Council's governance arrangements.

	will refer to that person or team as the 'complaints officer'. This role may be in addition to other duties.			
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 Policy (14.3, 14.4.3, 14.4.5 & 14.7.7) Complaint Handling Policy and Procedure (weblink as above) Housing Landlord Annual Complaints Performance and Service Improvement Report 2025/26	The Council has arrangements in place to support the effective handling and oversight of landlord complaints. The Corporate Complaints Team works with Housing Services and, where relevant, Incommunities to obtain the information required to consider and respond to complaints. The Council retains overall responsibility for oversight and compliance with the Housing Ombudsman Complaint Handling Code.
4.3	Landlords are expected to prioritise complaint handling and a culture of learning from complaints. All relevant staff must be suitably trained in the importance of complaint handling. It is important that	YES	Complaints Policy (4.1, 25.1, 25.2, 25.4, 25.5 & 25.6) Housing Landlord Annual Complaints Performance and Service Improvement Report 2025/26	The Council recognises complaints as an important source of feedback and learning. Complaint outcomes are recorded and learning is used to inform service improvement, guidance, training and policy review. Complaint performance is monitored and reported through the Council's governance arrangements. Evidence of complaint handling training and resourcing arrangements is maintained operationally.

	complaints are seen as a core service and must be resourced to handle complaints effectively			
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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	1.3 Complaints Policy (14.1, 14.2, 14.3 & 14.4)	The Council has a single Complaints Policy for landlord complaints covered by the Housing Ombudsman Complaint Handling Code. The policy sets out the arrangements for complaints relating to Council-managed homes and Council-owned homes managed on the Council's behalf. The Council retains overall landlord responsibility, oversight and compliance with the Housing Ombudsman Complaint Handling Code.
5.2	The early and local resolution of issues between landlords and residents is key to effective	YES	Complaints Policy (14.5 & 14.6) Service Requests & Complaints About Your Social Housing (weblink as above)	The Council's landlord complaints process consists of Stage 1 and Stage 2 only. Residents are not required to complete any informal or additional complaint stages before progressing their complaint.

	complaint handling. It is not appropriate to have extra named stages (such as 'stage 0' or 'informal complaint') as this causes unnecessary confusion.			
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 Policy (14.5 & 14.6)	The policy provides for a two-stage landlord complaints process. Stage 2 is the Council's final complaint response and residents are not required to complete any further complaint stage before accessing the Housing Ombudsman Service.
5.4	Where a landlord's complaint response is	YES	Complaints Policy (14.3, 14.4.2, 14.4.3 & 14.4.5)	Complaints relating to Council-owned homes managed by Incommunities are generally handled through Incommunities' complaints process. Where a complaint relates wholly or

	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.		Service Requests & Complaints About Your Social Housing (weblink as above)	partly to a service that remains the Council's responsibility, the Council will ensure the complaint is handled through the appropriate complaints arrangements. Residents are not required to pursue separate or additional complaints processes for the same complaint. The Council retains overall landlord responsibility and oversight of complaints relating to Council-owned homes managed on its behalf.
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	YES	Complaints Policy (14.3 & 14.4.5) Contract monitoring and performance reporting arrangements with Incommunities	The Council retains overall responsibility for compliance with the Housing Ombudsman Complaint Handling Code, including complaints relating to Council-owned homes managed on its behalf. The Council maintains oversight of complaints concerning Council-owned homes managed on its behalf, including complaint performance, outcomes and learning.

				The Council holds quarterly contract monitoring meetings and additional operational meetings with the managing agent where performance information and where appropriate, individual complaint cases are discussed.
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 Policy (14.5.3 & 14.6.4) Stage 1 Council Landlord Complaint Acknowledgement Template Stage 2 Council Landlord Complaint Acknowledgement Template	At Stage 1 and Stage 2, the Council sets out its understanding of the complaint and the outcomes the resident is seeking. Where any aspect of the complaint is unclear, clarification is sought before the complaint is progressed.

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 Policy (14.5.3 & 14.6.4) Stage 1 Council Landlord Complaint Acknowledgement Template Stage 2 Council Landlord Complaint Acknowledgement Template	At Stage 1 and Stage 2, the acknowledgement confirms the Council's understanding of the complaint, the outcomes the resident is seeking and which aspects of the complaint will and will not, be investigated or responded to under the landlord complaints process. Where any aspect of the complaint is unclear, clarification is sought from the resident.
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;	YES	Complaints Policy (4.1, 4.3, 14.5.3, 14.6.3 & 14.6.4)	Complaints are considered on their individual merits and relevant information and evidence are considered before a response is issued. The Council seeks clarification where required to ensure the complaint is fully understood and the outcomes sought by the resident are clear. Complaints are reviewed by the appropriate officer and Stage 2 complaints are reviewed by a different officer from the officer who responded at Stage 1, supporting a fair and independent review process.

	b) give the resident a fair chance to set out their position; c) take measures to address any actual or perceived conflict of interest; and d) consider all relevant information and evidence carefully.			
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	YES	Complaints Policy (14.5.7 & 14.6.7)	Where a complaint response is delayed, the Council agrees with the resident how often they will be updated and keeps them informed until a response is issued.

	informed about their complaint.			
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	Complaints Policy (6.3.1 & 6.3.2) Complaint records where reasonable adjustments, disabilities or support needs are identified or disclosed Customer records showing agreed reasonable adjustments (where applicable)	The Council is committed to complying with the Equality Act 2010 by providing reasonable adjustments to support access to the complaints process. Residents may request support with communication, accessibility or format where required. Where reasonable adjustments, disabilities or support needs are disclosed, this information is recorded and reviewed as part of the complaint handling process.
5.11	Landlords must not refuse to escalate a complaint	YES	Complaints Policy (10.1, 10.2, 10.3 & 14.6.1)	Where a resident remains dissatisfied following Stage 1, the complaint can be progressed to Stage 2. The Council will only refuse to accept or progress 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.			where there is a valid reason to do so in line with the Complaints Policy. Where this applies, the reasons for the decision are explained to the resident.
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	YES	Complaints Policy (21.1, 21.2, 21.3 & 21.4) Complaint case records, including complaint details, correspondence, supporting evidence and complaint outcomes	Complaint records are maintained throughout the complaints process and include complaint details, correspondence, supporting evidence and outcomes at each stage. Complaint information is recorded and retained in accordance with the Council's records management arrangements.

	documentation such as reports or surveys.			
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 Policy (14.5.9, 14.6.9, 20.1, 20.2, 20.3 & 20.4)	The policy provides for remedies to be offered at any stage of the complaints process. Remedies may include apologies, corrective action, service improvements or financial remedies where appropriate, without requiring the complaint to be escalated.
5.14	Landlords must have policies and procedures in place for managing unacceptable	YES	Complaints Policy (22.1, 22.2, 22.3 & 22.4) Managing Vexatious Complaint & Requests: https://www.bradford.gov.uk/complime	The Council has policies and procedures in place for managing unreasonable, persistent or unacceptable behaviour. Any restrictions are applied in line with the relevant policy, are supported by recorded reasons and are subject to review. Where restrictions are

	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.		nts-and-complaints/policies-and-procedures/managing-vexatious-complainants-and-requests-policy/ Managing Unacceptable Customer Behaviours Policy: https://www.bradford.gov.uk/complaints-and-complaints/policies-and-procedures/managing-unacceptable-customer-behaviour-policy/ Customer contact restriction record tracker, where applicable.	applied, this may affect how contact with the Council is managed and the arrangements are recorded and monitored.
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 Policy (22.4) Managing Vexatious Complaints and Requests Policy Managing Unacceptable Customer Behaviour Policy	Restrictions are supported by recorded reasons and reviewed under the relevant policy. Before restrictions are applied, the Council considers any reasonable adjustments or support needs that may affect how communication is managed.

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 Policy (14.5.1, 14.5.3 & 14.5.8)	Stage 1 is the initial landlord complaint response and provides an opportunity to resolve complaints at the earliest appropriate stage. Complaints are acknowledged, defined and investigated as necessary and responses may include an explanation, apology, remedy or actions to put matters right.
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	Complaints Policy (14.5.2 & 14.5.3) Stage 1 Council Landlord Complaint Acknowledgement Template	Stage 1 complaints are acknowledged, defined and logged within five working days of receipt. The Stage 1 acknowledgement confirms the Council's understanding of the complaint, the outcomes sought by the resident and the relevant complaint timescales.

6.3	Landlords must issue a full response to stage 1 complaints <u>within 10 working days</u> of the complaint being acknowledged.	YES	1.4 Complaints Policy (14.5.5)	The policy provides for a full Stage 1 response to be issued within 10 working days of the complaint being acknowledged.
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 Policy (14.5.6) Stage 1 Extension Letter Template	The policy confirms that where an extension is needed at Stage 1, the resident will be told the reason, the revised response date and how to contact the Housing Ombudsman Service. Any Stage 1 extension will not exceed a further 10 w/days unless there is a clear and valid reason.
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 Policy (14.5.6) Stage 1 extension letter template	The policy confirms that where a resident is informed about an extension to the Stage 1 timescale, they will also be provided with information about how to contact the Housing Ombudsman Service.

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 Policy (14.5.8)	The policy confirms that a Stage 1 response will be issued once the Council's position is known and will not be delayed solely because actions remain outstanding. Where actions remain outstanding, these are clearly identified and residents are kept updated until they are completed.
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 Policy (14.5.8) Stage 1 Council Landlord Complaint Response Template	Where a resident raises additional issues during a Stage 1 investigation, these will be included within the existing complaint where they are related and the Stage 1 response has not been issued. Where the issues are unrelated, raised after the Stage 1 response has been issued, or would unreasonably delay the response, they may be logged as a new complaint. .
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	YES	Complaints Policy (14.5.4) .	Where a resident raises additional issues during a Stage 1 investigation, these will be included within the existing complaint where they are related and the Stage 1 response has not been issued. Where the issues are unrelated, raised after the Stage 1 response has been issued, or would unreasonably

	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.			delay the response, they may be logged as a new complaint.
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; 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 Policy (14.5.8) Stage 1 Council Landlord Complaint Response Template	The Stage 1 response provides the resident with a clear written outcome to their complaint. It confirms the complaint definition, the decision reached and the reasons for that decision. It also explains any remedy offered, any outstanding actions and how the resident can escalate the complaint if they remain dissatisfied.

	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	Complaints Policy (14.6.1 & 14.6.3)	Where all or part of a complaint remains unresolved to the resident's satisfaction following Stage 1, the complaint can be progressed to Stage 2 where the resident wishes to do so. Stage 2 is the Council's final response under the landlord complaints process.
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	Complaints Policy (14.6.4) Stage 2 Council Landlord Complaint Acknowledgement Template	Stage 2 requests are acknowledged, defined and logged within five working days of receipt. The Stage 2 acknowledgement confirms the Council's understanding of the complaint, the outcomes sought by the resident and which aspects of the complaint will be investigated or responded

				to. Where any aspect of the complaint is unclear, clarification is sought from the resident.
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 Policy (14.6.2) Stage 2 Council Landlord Complaint Acknowledgement Template	Residents can request a Stage 2 review without providing detailed reasons for escalation. Where appropriate, the Council will seek to understand which aspects of the complaint remain unresolved so these can be considered as part of the Stage 2 review.
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 Policy (14.6.3)	The policy confirms that the person considering the complaint at Stage 2 will not be the same person who considered the complaint at Stage 1.
6.14	Landlords must issue a final response to the stage 2 <u>within 20 working days</u> of the complaint being acknowledged.	YES	Complaints Policy (14.6.5)	Stage 2 complaints receive a final response within 20 working days of acknowledgement. .
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	YES	Complaints Policy (14.6.6) Stage 2 Extension Letter Template	Residents are kept informed when a Stage 2 response cannot be provided within the original timescale. Any revised timescales are clearly communicated together with an explanation for the delay.

	more than 20 working days without good reason, and the reason(s) must be clearly explained to the resident.			.
6.16	When an organisation informs a resident about an extension to these timescales, they must be provided with the contact details of the Ombudsman.	YES	Complaints Policy (14.6.6) Stage 2 Extension Letter Template	Residents are provided with Housing Ombudsman Service contact details when a Stage 2 response timescale is extended.
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	Complaints Policy (14.6.8)	Stage 2 responses are issued once the Council has reached its final decision on the complaint and are not delayed solely because actions remain outstanding. Where any actions remain outstanding, residents are informed and kept updated on progress until those actions are completed.
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 Policy (14.6.9) Stage 2 Council Landlord Complaint Response Template	The Stage 2 response addresses the issues raised in the complaint definition and explains the final decision and the reasons for that decision. Where appropriate, responses reference relevant policy, legislation or good practice

				and explain any actions identified to resolve outstanding matters.
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 g) details of how to escalate the matter to the Ombudsman Service if the individual remains dissatisfied.	YES	Complaints Policy (14.6.9) Stage 2 Council Landlord Complaint Response Template	The Stage 2 response provides the resident with the Council's final position on the complaint and explains how that decision has been reached. It confirms any actions required following the review and provides information about the resident's right to refer the matter to the Housing Ombudsman Service if they remain 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 Policy (14.6.3, 14.6.8 & 14.6.9)	Stage 2 is the Council's final response under the landlord complaints process. Before a final response is issued, information from the services involved in the complaint is considered alongside the available evidence to ensure the Council's final position addresses the issues raised.

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 Policy (20.1, 20.2, 20.3, 20.4 & 20.5)	Where service failure is identified, the Council explains the action taken, or to be taken, to put things right. This may include an apology, corrective action, service improvement, amendment of records or a financial remedy where appropriate.

7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	YES	Complaints Policy (20.2)	When determining an appropriate remedy, the Council considers the impact of any identified fault on the resident. This may include distress, inconvenience, delay, loss of service or other relevant impact arising from the complaint.
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	Complaints Policy (20.4) Stage 1 and Stage 2 response letter templates Outstanding actions update template	Where a remedy is offered, the Council explains the action to be taken and where possible, the timescale for completion. The Council monitors agreed actions and follows them through to completion.
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	YES	Complaints Policy (20.1, 20.2, 20.3 & 20.4) Housing Ombudsman Guidance on Remedies	When determining remedies, the Council considers the circumstances of the complaint, the impact on the resident and relevant Housing Ombudsman guidance to support fair and proportionate outcomes.

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;	YES	Complaints Policy (14.7.6, 25.4, 25.5 & 25.6) Housing Landlord Annual Complaints Performance and Service Improvement Report 2025/26 Housing Ombudsman Self-Assessment 2025/26	The Council produces an annual Housing Landlord Complaints Performance and Service Improvement Report which reviews complaint performance, learning and service improvements arising from complaints. The report is published alongside the annual Housing Ombudsman self-assessment and includes relevant Housing Ombudsman findings and publications where applicable.

	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.			
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	YES	Complaints Policy (14.7.6) The Housing Ombudsman Complaint Handling Code and Self-Assessment webpage www.bradford.gov.uk/housing/council-housing/the-housing-ombudsman-	The Housing Landlord Annual Complaints Performance & Service Improvement Report and Self-Assessment are published on the Council's Housing Ombudsman webpage as part of the annual Housing Ombudsman submission, which is made by 30 September each year. The Governing Body Response

	section of its website relating to complaints. The governing body's response to the report must be published alongside this.		complaint-handling-code-self-assessment/ <i>(This webpage publishes the Housing Landlord Annual Complaints Performance & Service Improvement Report, Housing Ombudsman Complaint Handling Code Self-Assessment and following consideration through the Governance & Audit Committee process, the Governing Body Response.)</i> Governance & Audit Committee meeting page (26 November 2026) https://bradford.moderngov.co.uk/ie/ListDocuments.aspx?CId=144&MIId=8715&Ver=4	forms part of the Council's governance arrangements and is considered through the Governance & Audit Committee process. For 2026, the report, self-assessment and Governing Body Response are scheduled to be considered by the Governance & Audit Committee on 26 November 2026. Following consideration through those arrangements, the Council's Housing Ombudsman webpage is updated to publish the Governing Body Response alongside the report and self-assessment.
8.3	Landlords must also carry out a self-assessment following a significant restructure,	YES	Complaints Policy (14.7.5) Housing Ombudsman Self-Assessment 2025/26	The Council reviews and updates the Housing Ombudsman self-assessment where significant changes affect landlord complaint handling arrangements. The 2025/26 self-assessment reflects

	merger and/or change in procedures.		Internal records relating to changes to landlord complaint handling arrangements following the transfer of services previously managed by Mears	changes to landlord service delivery arrangements following the transfer of services previously managed by Mears and updates made to the Complaints Policy to maintain compliance with the Housing Ombudsman Complaint Handling Code.
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	YES	Complaints Policy (14.7.5) Housing Ombudsman Self-Assessment 2025/26	Findings, orders, recommendations and learning from Housing Ombudsman investigations are considered through the Council's landlord complaint oversight arrangements and where required, reflected in the Housing Ombudsman self-assessment, Complaints Policy or complaint handling arrangements.
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	YES	Complaints Policy (14.7.8) . .	Where exceptional circumstances affect landlord complaint handling, the Council will keep affected residents and the Housing Ombudsman Service informed and explain any temporary arrangements that apply until normal complaint handling arrangements are restored.

	returning to compliance with the Code.			
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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	Complaints Policy (14.7.3) Housing Landlord Annual Complaints Performance and Service Improvement Report 2025/26	The Council reviews complaint themes, outcomes, remedies and learning to identify opportunities for service improvement across Council landlord services, including homes managed on its behalf. Learning from complaints informs service improvements and changes to processes and working practices where appropriate.
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 Policy (14.7.2, 14.7.3, 25.1 & 25.2) Housing Landlord Annual Complaints Performance and Service Improvement Report 2025/26 Housing Management Contract Meetings	The Council uses complaints as a source of intelligence to identify where landlord services are performing well and where improvements are required. Complaint data, themes, trends, outcomes and remedies are reviewed to identify recurring issues, service risks and opportunities to improve services and complaint handling.
9.3	Accountability and transparency are also integral to a positive	YES	Complaints Policy (14.7.4, 14.7.5 & 14.7.6)	The Housing Landlord Annual Complaints Performance & Service

	complaint handling culture. Landlords must report back on wider learning and improvements from complaints to stakeholders, such as residents' panels, staff and relevant committees.		Housing Landlord Annual Complaints Performance and Service Improvement Report 2025/26 Housing Ombudsman Complaint Handling Code Self-Assessment webpage Governance & Audit Committee reporting arrangements (Governance & Audit Committee webpages and published committee reports)	Improvement Report provides information on complaint handling performance, complaint themes, learning outcomes and actions taken. The report supports transparency and accountability by reporting how complaints have informed service improvements and changes arising from learning identified through complaints.
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	Complaints Policy (14.7.3 & 14.7.7) Housing Landlord Annual Complaints Performance and Service Improvement Report 2025/26	1.5 The Assistant Director for Housing is the senior officer accountable for landlord complaint handling. Complaint themes, outcomes, remedies, learning and Housing Ombudsman findings are reviewed to identify service improvements, emerging risks and any policies, procedures or practices that may require review.

9.5	In addition to this a member of the governing body (or equivalent) must be appointed to have lead responsibility for complaints to support a positive complaint handling culture. This person is referred to as the Member Responsible for Complaints ('the MRC').	YES	Complaints Policy (14.7.7) Member Responsible for Complaints (MRC) Governance & Audit Committee arrangements	The Chair of the Governance & Audit Committee has been designated as the Member Responsible for Complaints (MRC) for Council landlord complaints. The MRC provides member-level oversight of landlord complaint handling through the Council's governance arrangements and supports scrutiny of complaint performance, learning and service improvement.
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	Complaints Policy (14.7.7) Member Responsible for Complaints (MRC) - Cllr Caroline Firth, Chair of the Governance and Audit Committee Housing Landlord Annual Complaints Performance & Service Improvement Report 2025/26 Complaint data and analysis prepared by the Corporate Complaints Team, including data from Incommunities and	1.6 The MRC receives information on landlord complaint handling performance, learning and service improvement activity through the Council's governance arrangements. The MRC has access to relevant officers, including the Assistant Director for Housing, Housing Services and the Corporate Complaints Team, together with the information required to support effective oversight and scrutiny. The MRC's role is supported through the Council's governance arrangements, including the Governing Body Response and

			Council-managed housing, supported by information and assurance from Housing Services Governance & Audit Committee arrangements	Governance & Audit Committee reporting arrangements.
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 Policy (14.7.1, 14.7.2, 14.7.3 & 14.7.7) Housing Landlord Annual Complaints Performance & Service Improvement Report 2025/26 Landlord complaint performance information, including Council-managed homes and Council-owned homes managed by Incommunities Housing Ombudsman findings, orders and recommendations relating to Council-owned homes (where applicable) Governance & Audit Committee arrangements and published	The Housing Landlord Annual Complaints Performance & Service Improvement Report and supporting complaint information are reported through the Council's governance arrangements to the MRC and governing body. Reporting includes information relating to Council-managed homes and Council-owned homes managed by Incommunities.

			committee reports (Governance and Audit Committee webpages)	
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; 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.	YES	Complaints Policy (14.2, 14.3, 14.4 & 14.7) Corporate complaint handling procedure, staff guidance and role expectations Complaint handling training and briefing materials Housing Ombudsman complaint handling training and learning resources completed by relevant staff (where applicable) Operational arrangements with Incommunities for Council-owned homes managed on the Council's behalf Complaint learning and service improvement actions	The Corporate Complaints Team works collaboratively with Housing Services, Incommunities and other relevant Council services to investigate and respond to landlord complaints. Complaint handling is supported by staff guidance, training and professional standards. Where a shortfall is identified, the focus is on learning and service improvement to support future practice.