

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 complaint's 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.

This self-assessment covers the following legal entities - Bromford Flagship LiveWest Limited and its subsidiary Registered Providers (which includes Bromford Housing Association Limited, Bromford Home Ownership Limited, Merlin Housing Society Limited, Flagship Housing, and LiveWest Homes Limited).

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	Our complaints policy defines a complaint as “an expression of dissatisfaction, however made, about the standard of service, actions, or lack of action by BFL or those acting on its behalf, affecting an individual customer or group of customers”.	Our Complaints and Compliments Policy and group Housing Ombudsman Self-Assessment has been approved by Customer Committee with delegated authority from the Bromford Flagship LiveWest (BFL) Board.
1.3	A resident does not have to use the word ‘complaint’ for it to be treated as such. Whenever a resident expresses dissatisfaction landlords must give them the choice to make complaint. A complaint that is submitted via a third party or representative must be handled in line with the landlord’s complaints policy.	Yes	Within the “Scope” section of our policy we state customers do not need to use the word ‘complaint’ for their concern to be treated as such. Where a customer expresses dissatisfaction, BFL will offer them the choice to raise a complaint”. Our policy outlines that customers may be supported by a representative or advocate	

			when raising or pursuing a complaint, in line with the Complaints Procedure.	
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	Our policy contains the following definition: "A service request is a request for action where an issue has not previously been reported. Where a customer is dissatisfied with the handling of a service request, it will be treated as a complaint. We record service requests.	We meet the principles and continue to develop this with our teams trained and equipped with guidance to distinguish between service requests and complaints.
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	Our policy states that where a customer is dissatisfied with the handling of a service request, it will be treated as a complaint. Raising a complaint will not delay or prevent us from continuing to take action to resolve the underlying service request or issue.	
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	Yes	When a customer expresses dissatisfaction from a survey our teams will review scores and comments to identify whether further investigation within the relevant service area, or if a complaint needs to be raised. When wider feedback on surveys is requested, we signpost	

	their services, they also must provide details of how residents can complain.		customers to our complaints service.	
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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	Our policy states that if we cannot consider a complaint (or parts of it), we will explain the reasons and offer advice or support to help the customer resolve the issue. We will also inform customers that they may refer exclusion decisions directly to the Housing Ombudsman Service	
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 details of the claim, such as the Claim Form and	Yes	Our policy contains a list of matters excluded from our complaints service under the section “matters outside the scope of this policy”.	

	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	Our policy confirms that we will accept complaints where the issue occurred within the last 12 months, or within 12 months of the customer becoming aware of it. The policy outlines that we may also consider complaints outside this timeframe where there is good reason to do so, including where the matter forms part of an ongoing issue or where there are relevant vulnerabilities or equality considerations.	A customer's individual circumstance will be assessed in line with our policy and where appropriate, we will make adjustments.
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	Our policy states that where we are unable to consider either a complaint, or parts of it, we will explain why and offer advice or support to help the customer resolve the issue. We will also inform customers that they may refer exclusion	

			decisions directly 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	Our policy states that we assess exclusions on a case-by-case basis and may use discretion, including when considering issues older than 12 months.	

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	Under the "Accessibility, Fairness and Inclusion" section of our policy we state we will take account of preferred communication method, support needs, protected characteristics, and individual circumstances when responding to complaints and will provide reasonable adjustments where required to ensure customers can access the complaints process without disadvantage. We will: • advertise how to make a complaint through our website and new customer information • ensure complaints can be raised through multiple channels, verbally or in writing • provide reasonable adjustments for customers with support needs	The Complaints & Compliments Policy makes clear reference to our obligations under the Equality Act 2010, and we will adjust services to meet the individual needs of customers.

			• accept complaints from any customer or affected party, including tenants, leaseholders, shared owners, household members, and representatives (with appropriate consent where required) • avoid placing unnecessary barriers or burdens on customers wishing to complain and provide clear and accessible information explaining how to make a complaint, including through our website, customer communications, and other accessible formats • We will provide clear and accessible information on how to make a complaint, including directing customers to our website for up-to-date details on complaint channels and service standards. • Customers can access this information at https://www.bfl-places.co.uk/contact-us/making-a-complaint/ which will direct them to the appropriate service based on their landlord.	
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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	Our policy outlines the relevant roles and responsibilities. All staff are aware of the complaints process and customers can raise their complaints in any way and with any member of staff. We continue to update staff monthly on complaints and through operational briefings.	
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	Our policy outlines our approach to handling complaints ensuring that it is fair, accessible, transparent and focused on improving outcomes for customers. The "Purpose and Principles" section of our policy states that we will make it easy for customers to raise 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	Under the "Accessibility, Fairness and Inclusion" section of our policy we state that we will advertise how to make a complaint through our website and new customer information, and we will ensure complaints can be raised through multiple channels, verbally or in writing.	

			The policy outlines that we have a two-stage process and what will happen at each stage and the timeframes for responding. Our policy states BFL is committed to fair and inclusive complaint handling. We will take account of preferred communication method, support needs, protected characteristics, and individual circumstances when responding to complaints and will provide reasonable adjustments where required to ensure customers can access the complaints process without disadvantage. These may include, for example, providing information in alternative languages, large print, or Braille.	
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	Under the "Accessibility, Fairness and Inclusion" section of our policy we state that we will advertise how to make a complaint through our website and new customer information and will ensure complaints can be raised through multiple channels, verbally or in writing	

			We confirm that: • We will provide clear and accessible information on how to make a complaint, including directing customers to our website for up-to-date details on complaint channels and service standards. • Customers can access this information at https://www.bfl-places.co.uk/contact-us/making-a-complaint/ which will direct them to the appropriate service based on their landlord The policy is published on our website, together with details of the Housing Ombudsman Service and Complaint Handling Code.	
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	Under the “Scope” section of our policy we state that customers may be supported by a representative or advocate when raising or pursuing a complaint, in line with the Complaints Procedure. Our customers can be represented or accompanied by an advocate in any meetings regarding their complaint.	

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	Signposting to the Housing Ombudsman is contained in complaint acknowledgement and closure template letters. This provides contact information for customers about how they can contact the Ombudsman Service at any time during their complaint. Details of how to contact the Housing Ombudsman are detailed on our website and included in our Complaints & Compliments Policy.	
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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 will refer to that person or team as the 'complaints officer'. This role may be in addition to other duties.	Yes	Our policy outlines the relevant roles and responsibilities including the complaint's function. We have centralised complaints teams across BFL who have responsibility for complaint handling, including liaison with the Ombudsman.	Our Chief Customer Officer is the accountable Executive Team member.
4.2	The complaints officer must have access to staff at all levels to facilitate the prompt resolution of complaints. They must also have the authority and autonomy to act to resolve disputes promptly and fairly.	Yes	Our complaints teams have access to colleagues at all levels across the organisation, ensuring they can resolve complaints promptly and in line with the Code. Within our procedures we confirm that all complaint handlers have the authority and autonomy to act to resolve disputes promptly and fairly.	
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	Yes	The "Learning and Continuous Improvement" section of our policy recognises complaints, compliments and feedback as	

	importance of complaint handling. It is important that complaints are seen as a core service and must be resourced to handle complaints effectively		important sources of insight into customer experience, service quality and organisational performance. We will record and analyse trends, share learning across the organisation, and ensure that insight from complaints informs service improvement, policy development, and operational changes. The "Training Statement" section of our policy states that the complaints policy will be communicated and embedded through: • induction and ongoing training for relevant colleagues • guidance and supporting materials for operational teams • leadership oversight through governance and performance forums	
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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	The “Scope” section of our policy states that the policy applies to: • All customers of BFL and its subsidiary entities, except customers who have purchased an outright sale home. • Colleagues, contractors and partners acting on BFL’s behalf	Customers who purchase an Outright sale home are included in a separate policy which is available on our website and is covered by the New Homes Quality Board and subject to the New Homes Ombudsman. This policy has recently been audited by the New Homes Quality Board.
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	Our policy states that we operate a two-stage complaints process in line with the Housing Ombudsman Complaint Handling Code. It confirms that we will not operate an informal complaint stage outside of the formal complaints process.	
5.3	A process with more than two stages is not acceptable under any circumstances as this will make the	Yes	The “BFL Approach to Complaints” section of our policy states that we operate a	

	complaint process unduly long and delay access to the Ombudsman.		two-stage complaints process in line with the Housing Ombudsman Complaint Handling Code. This approach ensures that concerns are investigated objectively, decisions are transparent, and customers have appropriate opportunities to seek review where they remain dissatisfied.	
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	The "Scope" section of our policy states BFL complaints policy applies consistently across all legacy landlords although customers are currently expected to raise complaints through their respective legacy landlords. All complaints are handled within BFL. No complaints are handled by a third party.	
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Yes	The "Scope" section of our policy states BFL complaints policy applies consistently across all legacy landlords although customers are currently expected to raise complaints through their respective legacy landlords.	

			The policy applies to colleagues, contractors and partners acting on BFL's behalf. All complaints are handled within BFL. No complaints are handled by a third party.	
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	The “BFL Approach to Complaints” section of our policy states that at both Stage 1 and Stage 2, BFL will acknowledge complaints within five working days of receipt and will ensure customers understand: • our understanding of the complaint • the outcomes the customer is seeking • any aspects of the complaint BFL is, or is not, responsible for addressing • Where any aspect of the complaint is unclear, we will seek clarification from the customer of the issues being raised and the outcomes being sought. This is reflected in the complaint acknowledgement we issue to customers at stage 1 and 2.	

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	The “BFL Approach to Complaints” section of our policy states that at both Stage 1 and Stage 2, BFL will acknowledge complaints within five working days of receipt and will ensure customers understand any aspects of the complaint BFL is, or is not, responsible for addressing	
5.8	At each stage of the complaints process, complaint handlers must: - deal with complaints on their merits, act independently, and have an open mind; - give the resident a fair chance to set out their position; - take measures to address any actual or perceived conflict of interest; and - consider all relevant information and evidence carefully.	Yes	The “Purpose and Principles” section our policy states that we will: - investigate complaints objectively and without bias - fully investigate all issues raised by the customer - resolve complaints fairly and proportionately. Our complaint procedures outline that we will resolve issues as per the Housing Ombudsman Complaint Handling Code and Dispute Resolution Principles.	

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	The “BFL Approach to Complaints” section of our policy states that: For stage 1 complaints we will only extend timescales where there is a good reason, and any extension will be for no more than a further ten working days. Where this occurs, we will explain clearly why the extension is required, confirm the new response date with the customer, and keep the customer informed at mutually agreed intervals and these will be maintained until a final response is issued. For stage 2 complaints we will only extend timescales where there is a good reason, and any extension will be for no more than a further twenty working days. Where this occurs, we will explain clearly why the extension is required, confirm the new response date, and keep the customer informed at mutually agreed intervals and these will be maintained until a final response is issued	
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			We will agree appropriate communication and update arrangements with customers and provide regular updates throughout the complaint process.	
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	The “Accessibility, Fairness, and Inclusion” section of our policy states we will take account of preferred communication method, support needs, protected characteristics and individual circumstances when responding to complaints and will provide reasonable adjustments where required to ensure customers can access the complaints process without disadvantage. Our complaints policy highlights the Equality Act as associated legislation and regulation.	We understand the importance of understanding our customer's needs and have systems in place to capture this information which can be accessed by customer-facing colleagues when required. We adjust our service should a customer require it.
5.11	Landlords must not refuse to escalate a complaint through all stages of the complaints procedure unless it has valid reasons to do so. Landlords must clearly set out these reasons, and they must comply with the provisions set out in section 2 of this Code.	Yes	We will accept a complaint unless there is a valid reason not to do so. The “Matters outside the scope of this policy” section of our policy states that if we cannot consider a complaint (or parts of it), we will explain the	

			reasons and offer advice or support to help the customer resolve the issue. We assess exclusions on a case-by-case basis and may use discretion, including when considering issues older than 12 months.	
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	We record the full lifecycle of each complaint in line with the Housing Ombudsman's Complaint Handling Code. This includes the date the complaint was received, all stages of the complaint process, and all associated correspondence. All emails, telephone conversations, complaint correspondence - including the initial complaint, outcomes, and any third-party reports or surveys are recorded within our housing management systems.	
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	The "Purpose and Principles" section of our policy states that BFL will take all reasonable steps to identify and resolve concerns at the earliest appropriate stage.	

			In addition, the "Remedies and Compensation" section sets out our approach to putting things right where service failures are identified.	
5.14	Landlords must have policies and procedures in place for managing unacceptable behaviour from residents and/or their representatives. Landlords must be able to evidence reasons for putting any restrictions in place and must keep restrictions under regular review.	Yes	The "Misuse of Process" section of our policy states where a customer behaves unreasonably in relation to a complaint, we will follow our Unacceptable Behaviour Policy, which includes consideration of the Equality Act 2010.	
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	Any restrictions placed on a contact due to unacceptable behaviour will include consideration of the Equality Act 2010 and will follow relevant policies and procedures.	

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	The “BFL Approach to Complaints” section of our policy states that we are committed to handling complaints in a way that is fair, timely, and focused on achieving meaningful outcomes for customers. Our complaint’s function, triage incoming complaints with a consistent goal of resolving all complaints effectively and promptly.	
6.2	Complaints must be acknowledged, defined and logged at stage 1 of the complaint’s procedure <u>within five working days of the complaint being received</u> .	Yes	The “BFL Approach to Complaints” section of our policy states that stage 1 complaints will be acknowledged, defined and logged within five working days of receipt.	
6.3	Landlords must issue a full response to stage 1 complaints <u>within 10 working days</u> of the complaint being acknowledged.	Yes	The “BFL Approach to Complaints” section of our policy states that we will provide a full response within ten working days of the complaint being acknowledged.	We record and regularly review this measure by reporting to our governance Committees.

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	The “BFL Approach to Complaints” section of our policy states we will only extend timescales where there is a good reason, and any extension will be for no more than a further ten working days. Where this occurs, we will explain clearly why the extension is required, confirm the new response date with the customer, and keep the customer informed	
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	Our policy states the Housing Ombudsman Service can be contacted through their website at www.housing-ombudsman.org.uk or by telephone on 0300 111 3000. The Housing Ombudsman contact details are provided at each stage of the complaint and when extending a complaint response.	
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	Yes	The “BFL Approach to Complaints” section of our policy states that at both stage 1 and 2 a complaint response will be provided when the answer to the complaint is known, not when the outstanding actions required to	

	appropriate updates provided to the resident.		address the issue are completed. Any outstanding actions will continue to be tracked, actioned and communicated to the customer at mutually agreed intervals.	
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	The "Purpose and Principles" section of our policy states that BFL will fully investigate all issues raised by the customer and resolve complaints fairly and proportionately.	
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	The "BFL Approach to Complaints" section of our policy states that where additional related issues are identified during the investigation, we will seek to address these as part of the existing Stage 1 complaint where appropriate. Where new or unrelated issues are identified, these will be logged and managed as separate complaints	
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;	Yes	Within our complaints processes, written responses will be in clear plain language and confirm: a) the complaint stage; b) the complaint definition; c) the decision on the complaint;	To support the quality of our responses and to ensure consistency we have template letters that colleagues use to ensure all the required information is included in their response.

	d. the reasons for any decisions made; e. the details of any remedy offered to put things right; f. details of any outstanding actions; and g. details of how to escalate the matter to stage 2 if the individual is not satisfied with the response.		d) the reasons for any decisions made; e) the details of any remedy offered to put things right; f) details of any outstanding actions; and g) details of how to escalate the matter to stage 2 if the individual is not satisfied with the response	We also complete quality assurance checks of complaint responses to ensure fairness and consistency.
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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	The "BFL Approach to Complaints" section of our policy states customers may request escalation to Stage 2 within two months of receiving the Stage 1 response. Stage 2 is our final response to a complaint.	In our stage 1 complaint response we inform customers how they can escalate their complaint to stage 2 if they are not satisfied.
6.11	Requests for stage 2 must be acknowledged, defined and logged at stage 2 of the complaint's procedure within five working days of the escalation request being received.	Yes	The "BFL Approach to Complaints" section of our policy states that stage 2 complaints will be acknowledged, defined and logged within five working days of receipt.	

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	The “BFL Approach to Complaints” section of our policy states that customers may request escalation to stage 2 within two months of receiving the stage 1 response. Customers are not required to explain their reasons for requesting escalation.	
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Yes	The “BFL Approach to Complaints” section of our policy states stage 2 complaints will be reviewed independently by a colleague who was not involved in the Stage 1 investigation or decision, in line with the Housing Ombudsman Complaint Handling Code.	Stage 1 and stage 2 complaints are managed by different colleagues, as specified in our Complaints & Compliments Policy.
6.14	Landlords must issue a final response to the stage 2 <u>within 20 working days</u> of the complaint being acknowledged.	Yes	The “BFL Approach to Complaints” section of our policy states that we will provide a final response within twenty working days of the complaint being acknowledged.	We record and regularly review this measure by reporting to our governance committees.
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,	Yes	The “BFL Approach to Complaints” section of our policy states we will only extend timescales where there is a good reason, and any extension will be for no more than a further twenty working days. Where this occurs,	

	and the reason(s) must be clearly explained to the resident.		we will explain clearly why the extension is required, confirm the new response date, and keep the customer informed.	
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	Our policy states the Housing Ombudsman Service can be contacted through their website at www.housing-ombudsman.org.uk or by telephone on 0300 111 3000. The Housing Ombudsman contact details are provided at each stage of the complaint and when extending a complaint response.	
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	The "BFL Approach to Complaints" section of our policy states that at both stage 1 and 2 a complaint response will be provided when the answer to the complaint is known, not when the outstanding actions required to address the issue are completed. Any outstanding actions will continue to be tracked, actioned and communicated to the customer at mutually agreed intervals.	
6.18	Landlords must address all points raised in the complaint definition and	Yes	The "Purpose and Principles" section of our policy states that	

	provide clear reasons for any decisions, referencing the relevant policy, law and good practice where appropriate.		BFL will fully investigate all issues raised by the customer and resolve complaints fairly and proportionately.	
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	Within our complaints processes we say that the written response will be in clear plain language and confirm: 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.	To support the quality of responses and to ensure consistency we have letter templates that colleagues use to ensure all the required information is included in their response. We also complete quality assurance checks of complaint responses to ensure fairness and consistency.
6.20	Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.	Yes	The "BFL Approach to Complaints" section of our policy states that Stage 2 is our final response to a complaint.	

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	Within our complaints policy we state our approach to complaints as being that we: • Listen and understand • Say sorry when we get it wrong • Put things right • Learn and improve The complaint closure letters require the complaint handler to confirm the actions taken to put things right and any outstanding actions that are required The “Remedies and Compensation” section of our policy confirms where BFL identifies that a service failure has occurred; we will consider appropriate remedies to put things right.	
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Yes	The “Remedies and Compensation” section of our policy sets out our approach to remedies and compensation and states	Remedies/compensation guidance is in line with the Housing Ombudsman remedies document.

			where we identify that a service failure has occurred, we will consider appropriate remedies to put things right. Remedies may include an apology, explanation, service improvement actions, practical resolution, or financial compensation where appropriate.	Compensation awards consider the customers' costs associated with the complaint and other relevant factors.
7.3	The remedy offer must clearly set out what will happen and by when, in agreement with the resident where appropriate. Any remedy proposed must be followed through to completion.	Yes	The "Remedies and Compensation" section of our policy sets out our approach to remedies and compensation. Our complaint template letters include a section for compensation which details the level of compensation and for what issue, and the level of financial payment offered	Our complaint teams record and regularly review remedial actions through to completion.
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes	The "Remedies and Compensation" section of our policy states colleagues may agree goodwill gestures or compensation in line with the Compensation and Remedies Policy and the Housing Ombudsman's Remedies Guidance.	

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: - the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements. - 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; - any findings of non-compliance with this Code by the Ombudsman; - the service improvements made as a result of the learning from complaints; - any annual report about the landlord's performance from the Ombudsman; and - any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord.	Yes	The "Measuring effectiveness" section of our policy states the effectiveness of the complaints policy, and compliance with it, will be measured and monitored through: - Complaint volumes, outcomes and timeliness - Housing Ombudsman determinations and findings - Customer satisfaction with complaint handling - Evidence of service improvement arising from complaints - Self-assessment against the Housing Ombudsman Complaint Handling Code - Performance reporting to senior leadership, relevant committees and the Board - Customer influence and scrutiny arrangements	

			Internal audits and assurance reviews/activity We will provide regular reporting to the relevant committee, senior leadership team, the Board, and customer scrutiny bodies. Reports will include an overview of complaint handling and management, complaint themes, outcomes, volumes, timeliness, and evidence of service improvements. We will publish an annual complaints performance and service improvement report that meets all Housing Ombudsman requirements, to enable effective scrutiny and challenge.	
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 section of its website relating to complaints. The governing body's response to the report must be published alongside this.	Yes	As above our policy states that we will also produce and publish an annual Complaints Performance and Service Improvement Report. In addition to this we will also publish the Board's response to the report alongside this on our website.	It has been agreed with the Housing Ombudsman on 26 January 2026 that the governing body response can be produced by a member of the board on its behalf. For BFL, this will be our non-executive Customer Committee.

8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	Yes	We will repeat the self-assessment following significant change.	This self-assessment is being carried out following the formal merger of Bromford Flagship Limited and LiveWest Homes Limited which was completed on 29/01/2026.
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	Yes	We will comply with all HOS investigations, orders and recommendations.	
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	If we are unable to comply with the code due to exceptional circumstances, we will inform the Ombudsman and customers and identify the timescale for restoring compliance.	

Section 9: Scrutiny & oversight: continuous learning and improvement

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
9.1	Landlords must look beyond the circumstances of the individual complaint and consider whether service improvements can be made as a result of any learning from the complaint.	Yes	The “Learning and Continuous Improvement” section of our policy states that we will record and analyse trends, share learning across the organisation, and ensure that insight from complaints informs service improvement, policy development and operational change.	Each month, we compile a comprehensive complaints report detailing our complaint handling performance. This report is then reviewed through our governance committees, reaching the executive and Board. Additionally, we track and review emerging themes to drive continuous improvement and produce the annual Complaints and Service Improvement report, which provides details on our learning, progress and next steps.
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	The “Purpose and Principles” section of our policy states we will embed a positive complaint handling culture across the organisation and learn from complaints to improve services and prevent repeat failures.	

			The “Learning and Continuous Improvement” section of our policy sets out our approach to learning from complaints to ensure that insight from complaints informs service improvement, policy development and operational change.	
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	Our complaints policy outlines our approach to complaints which is underpinned by legal duties, regulatory expectations, and a commitment to fairness, accountability, and transparency. We will provide regular reporting to the relevant committee, senior leadership, the Board, and customer scrutiny bodies.	
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	Our policy outlines roles and responsibilities. Paul Coates, the Chief Customer Officer within Bromford Flagship LiveWest is accountable for complaint handling.	
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	Yes	The “Roles and Responsibilities” section of our policy outlines the role of the board member with responsibility for complaints.	Joanna Crane is the non-executive Board member appointed as our MRC. Joanna Crane is also a

	complaint handling culture. This person is referred to as the Member Responsible for Complaints ('the MRC').			member of our Bromford Flagship LiveWest Customer Committee and Bromford Flagship LiveWest Board.
9.6	The MRC will be responsible for ensuring the governing body receives regular information on complaints that provides insight on the landlord's complaint handling performance. This person must have access to suitable information and staff to perform this role and report on their findings.	Yes	The MRC receives a quarterly report about complaint handling performance and complaints insight.	The MRC has access to the complaint handling team and complaint performance reporting.
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	The "Measuring effectiveness" section of our policy states that we are committed to strong governance, transparent assurance, and effective oversight in complaint handling. We will provide regular reporting to the relevant committee, senior leadership, the Board, and customer scrutiny bodies. Reports include an overview of complaint handling and management, covering complaint themes, outcomes, volumes, timeliness, Ombudsman investigations and compliance and evidence of service improvements.	

			Including the annual complaints performance and service improvement report.	
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	The “Roles and Responsibilities” section of our policy outlines roles and responsibilities across the organisation and our approach to complaints. Detailed operational requirements, workflows and responsibilities are set out in procedures and guidance issued to colleagues. All colleagues are expected to understand the complaints policy as it relates to their role, complete any required training, and seek support where clarification is needed. Our approach is underpinned by legal duties, regulatory expectations, and a commitment to fairness, accountability, and transparency.	