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.

Section 1: Definition of a complaint

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
1.2	A complaint must be defined as: *'an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the landlord, its own staff, or those acting on its behalf, affecting a resident or group of residents.'*	Yes	This is the definition used in section 5.1 (Introduction and Scope) of our Complaints & Compensation Policy.	In 24/25, Shelter provided training to our staff to improve skills when helping customers who are dissatisfied. In 25/26, we have built on this and delivered awareness training to colleagues across the business and discussed complaint trends during colleague briefings. In the second half of year, we worked with frontline teams and partners to focus on ensuring all dissatisfaction, including, concerns resolved at the first point of contact, were reported to the Feedback team and logged as complaints. The Customer Director also covers this as part of their induction with all new starters, as well as the importance of hearing and addressing complaints. In 25/26, as part of our TSM submission, we have reported that the volume of stage 1 complaints received from LCRA customers equates to 17.5% of our stock. If we compare this figure with the Q4 TSM survey results, we can see that 24% of LCRA respondents said that they had made a complaint in the past 12 months. This gap of 6.5% between customers perceiving that they have made a complaint

				and actual complaints being logged is far smaller than most landlords in the sector. The work we have done to ensure that all complaints are being logged correctly has seen the volume of complaints increase each quarter during 25/26. If we take the Q4 figures and assume these volumes for the year ahead then this would narrow the gap between customers saying that they have reported a complaint in the past 12 months and the volume of complaints logged even further - to just 2%. In November 2024, we enhanced our IT software with Web360 which made it easier to log customer contact and flag negative interactives. During 25/26, we moved the logging and tracking of complaints and associated actions into Microsoft Lists to help make the make the management of these easier. In April 2026, we have taken the next step by implementing the world's leading CRM (Customer Relationship Management) system, Salesforce, which will give us the platform to improve communication further.
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	This is covered in section 5.1 (Introduction and Scope) of our Complaints & Compensation Policy.	As per the commentary in 1.2

	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.			
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	This is covered in section 5.1 (Introduction and Scope) and in section 5.2 (Complaint Exclusions) of our Complaints & Compensation Policy.	In addition to the commentary in 1.2, the Feedback team follow through on service requests that are passed on to other teams to ensure that the customer receives a timely response that is within our SLA.
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	This is covered in section 5.1 (Introduction and Scope) of our Complaints & Compensation Policy.	As per the commentary in 1.2

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	This is covered in section 5.1 (Introduction and Scope) of our Complaints & Compensation Policy.	The company who carries out our perception surveys and some of our transactional surveys flags to us any customers who have outstanding actions they wish to discuss and they also signpost respondents towards the web reporting form if they wish to make 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	This is covered in section 5.2 (Complaint Exclusions) and section 5.14 (Unreasonable Complainant Behaviour) of our Complaints & Compensation Policy.	
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 Particulars of Claim, having been filed at court. • Matters that have previously been considered under the complaints policy.	Yes	This is covered in section 5.2 (Complaint Exclusions) of our Complaints & Compensation 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	This is covered in section 5.2 (Complaint Exclusions) of our Complaints & Compensation Policy.	
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	This is covered in section 5.2 (Complaint Exclusions) of our Complaints & Compensation Policy.	
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Yes	This is covered in section 5.2 (Complaint Exclusions) of our Complaints & Compensation Policy.	

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	This is covered in sections 5.1 (Introduction and Scope) and 5.13 (Accessibility and Awareness) of our Complaints & Compensation Policy.	Customers can raise dissatisfaction through any of our channels or by talking to any of our colleagues, whether this be face-to-face, phone, e-mail, WhatsApp, via social media or online. Online reporting can be done here: Feedback and complaints - Brighter Places Dissatisfaction can also be raised by third parties acting on behalf of customers and customers are made aware they can be supported to make a complaint. The Tenancy Sustainment Team has acted as an Advocate for a customer within the complaints process where no Advocate was available

				Contractors are trained to recognise complaints/dissatisfaction Colleague training on EDI included neurodiversity training, lived experiences and unconscious bias.
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	This is covered in sections 5.1 (Introduction and Scope) and 5.13 (Accessibility and Awareness) of our Complaints & Compensation Policy.	In addition to the commentary already highlighted in 1.2, we also have a separate reporting form that colleagues can use internally to ensure that they are gathering key information about a complaint at the first point of contact before passing it on to the dedicated Customer Feedback Team.
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	We are currently fourth quartile, according to Housemark, for the volume of complaints reported, which is a sign that we make reporting dissatisfaction easy and we welcome the opportunity to put things right and to learn. The escalations to Stage 2 remain relatively low at 16.7%, which shows that Stage 1 investigations are effective.	

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	This is covered in sections 1 (Policy Statement / Purpose) and 5.13 (Accessibility and Awareness) of our Complaints & Compensation Policy.	Our Complaints & Compensation Policy is available on our website. The different stages, timeframes for responding and the Ombudsman's contact details are also displayed on the website in an easy to read format: Feedback and complaints - Brighter Places
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	This is covered in section 5.13 (Accessibility and Awareness) of our Complaints & Compensation Policy.	This information is on our website and within complaint response letter templates. Leaflet.
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	This is covered in section 5.1 (Introduction and Scope) of our Complaints & Compensation Policy.	Our acknowledgement templates make this explicitly clear to complainants. Dissatisfaction can also be raised by third parties acting on behalf of customers and customers are made aware they can be supported to make a complaint. The Tenancy Sustainment Team has acted as an Advocate for a customer within the complaints

				process where no Advocate was available
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	This is covered in section 5.13 (Accessibility and Awareness) of our Complaints & Compensation Policy.	This is available online (Feedback and complaints - Brighter Places), in the leaflets we send customers at both Stage 1 and Stage 2 of the complaints process, including when a complaint extension is applied: Customer feedback and complaints leaflet v2

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	This is covered in section 5.6 (Complaint Response) of our Complaints & Compensation Policy. The Customer Feedback Team are responsible for acknowledging all complaints, as well as investigating and responding to Stage 1 complaints. The Customer Feedback Manager is responsible for liaison with the Ombudsman. They are supported by the Head of Customer Experience and between them they ensure that complaints are reported to various governing bodies, committees and panels. There are regular meetings with MRC where complaints performance, analysis and future enhancements are discussed.	

			Stage 2 complaints are investigated by a Senior Manager or Director	
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	The Customer Feedback Team has the skills to manage complaints sensitively and efficiently. To resolve complaints, they liaise with teams across the business, including managers and directors as well as our partners and contractors.	97% of complaints have been resolved in time, whilst satisfaction with complaints handling has increased by 14% in 25/26 to 45%. Based on landlord data in 24/25, this represents top quartile performance.
4.3	Landlords are expected to prioritise complaint handling and a culture of learning from complaints. All relevant staff must be suitably trained in the importance of complaint handling. It is important that complaints are seen as a core service and must be resourced to handle complaints effectively	Yes	We have a dedicated team of Customer Feedback Officers, alongside a Customer Feedback Manager. There is significant complaints handling experience within the team. Learning from complaints can be detailed in individual response letters, however, this can also take the form of informal discussions with colleagues and partners to help improve processes or more formal lessons learnt exercises where specific complaints are analysed to identify and address root causes.	All members of the Customer Feedback team attended the HQN Complaints Handling training in November 2025.

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	We have a Complaints & Compensation Policy that is regularly reviewed in line with the statutory requirements of the Code. In January 2026, the HOS confirmed that we have a Code-compliant policy.	
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	This is covered in sections 1 (Policy Statement / Purpose) and 5.3 (Complaint Handling Process) of our Complaints & Compensation Policy.	
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	This is covered in sections 1 (Policy Statement / Purpose) and 5.3 (Complaint Handling Process) of our Complaints & Compensation Policy.	
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	N/A	All complaints are managed by our in-house Customer Feedback Team. They may liaise with contractors and partners to gather information to support	

	this Code. Residents must not be expected to go through two complaints processes.		their investigation, but the in-house team are responsible for responding to the customer as part of our two-stage process.	
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	N/A	All complaints are managed by our in-house Customer Feedback Team. They may liaise with contractors and partners to gather information to support their investigation, but the in-house team are responsible for responding to the customer as part of our two-stage process.	
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	This is covered in section 5.3 (Complaint Handling Process) of our Complaints & Compensation Policy.	
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	This is covered in section 5.3 (Complaint Handling Process) of our Complaints & Compensation Policy.	
5.8	At each stage of the complaints process, complaint handlers must:	Yes	This is covered in section 5.3 (Complaint Handling Process) of	Before any resolution letter is sent, quality assurance is

	a. deal with complaints on their merits, act independently, and have an open mind; b. give the resident a fair chance to set out their position; c. take measures to address any actual or perceived conflict of interest; and d. consider all relevant information and evidence carefully.		our Complaints & Compensation Policy.	carried out by a second person to ensure that all aspects of the complaint have been investigated fully and fairly; and the communication is clear and easy to understand.
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	This is covered in section 5.3 (Complaint Handling Process) of our Complaints & Compensation Policy.	
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	This is covered in section 5.13 (Accessibility and Awareness) of our Complaints & Compensation Policy.	Dissatisfaction can also be raised by third parties acting on behalf of customers and customers are made aware they can be supported to make a complaint. The Tenancy Sustainment Team has acted as an Advocate for a customer within the complaints process where no Advocate was available

				Reasonable adjustments considered within complaint handling, including communication preferences, timescales for delivery of actions
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	This is covered in section 5.13 (Accessibility and Awareness) of our Complaints & Compensation Policy. Exclusions can be found in sections 5.2 (Complaint Exclusions) and 5.14 (Unreasonable Complainant Behaviour).	
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	All documentation linked to each complaint are held within individual folders on our Sharepoint site. These are all easily located via a Feedback Tracker that is hosted on Microsoft Lists. Customer contact has previously been logged on our internal Web360 system, but from April 2026, this is logged on our new CRM system, Salesforce.	
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	Yes	The Customer Feedback Team will liaise with the resident, staff, contractors and partners to find solutions. They have the authority and autonomy to act to	

	at any stage of the complaints process without the need for escalation.		resolve disputes promptly and fairly. The Head of Customer Experience also has oversight of the Complaints / Feedback function as well as Customer Services, Engagement and Lettings, along with strong relationships with other senior managers and partners if there are blockages to remedies that need to be removed.	
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	This is covered in section 5.14 (Unreasonable Complainant Behaviour) of our Complaints & Compensation Policy.	
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	This is covered in section 5.14 (Unreasonable Complainant Behaviour) of our Complaints & Compensation Policy.	

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 Customer Feedback Team triage complaints cases daily to review complexity and individual caseloads. A meeting slot is also blocked out in colleagues diaries twice a week that allows the team to call team managers (subject matter experts) in so that they can attempt to resolve complaints more quickly, particularly those that may cross into more than one area of the business.	
6.2	Complaints must be acknowledged, defined and logged at stage 1 of the complaints procedure **within five working days of the complaint being received**.	Yes	This is covered in section 5.5 (Complaint Acknowledgement) of our Complaints & Compensation Policy.	Performance is reviewed daily, weekly and monthly and quarterly at different levels in the organisation.
6.3	Landlords must issue a full response to stage 1 complaints **within 10 working days** of the complaint being acknowledged.	Yes	This is covered in section 5.6 (Complaint Response) of our Complaints & Compensation Policy.	
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	Yes	This is covered in section 5.7 (“Extensions”) of our Complaints & Compensation Policy.	

	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.			
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	This is covered in section 5.13 (Accessibility and Awareness) of our Complaints & Compensation Policy.	
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	This is covered in section 5.6 (Complaint Response) of our Complaints & Compensation Policy.	Although individual teams and managers are responsible for delivering the actions on time and keeping the customer updated, these are also tracked by the Customer Feedback Team to ensure that we are following through on the promises made in complaint response letters. We can also report on how many actions have been completed on time, how many dates had to be revised and how many became overdue.
6.7	Landlords must address all points raised in the complaint definition and provide clear reasons for any decisions, referencing the relevant	Yes	This is covered in section 5.6 (Complaint Response) of our Complaints & Compensation Policy.	

	policy, law and good practice where appropriate.			
6.8	Where residents raise additional complaints during the investigation, these must be incorporated into the stage 1 response if they are related and the stage 1 response has not been issued. Where the stage 1 response has been issued, the new issues are unrelated to the issues already being investigated or it would unreasonably delay the response, the new issues must be logged as a new complaint.	Yes	This is covered in section 5.8 (Additional Information Provided) of our Complaints & Compensation Policy.	
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 g. details of how to escalate the matter to stage 2 if the individual is not satisfied with the response.	Yes	This is covered in section 5.6 (Complaint Response) of our Complaints & Compensation Policy.	Template complaint response letters help ensure this structure. These letters are also reviewed by a second person before being sent. The letters themselves are stored on our internal Sharepoint site and going forward from April 2026, will also be accessible via our CRM system, Salesforce.

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	This is covered in section 5.4 (Escalating A Complaint To Stage 2) of our Complaints & Compensation Policy.	
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	This is covered in section 5.5 (Complaint Acknowledgement) of our Complaints & Compensation Policy.	
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	This is covered in section 5.4 (Escalating A Complaint To Stage 2) of our Complaints & Compensation Policy.	
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Yes	This is covered in section 5.4 (Escalating A Complaint To Stage 2) of our Complaints & Compensation Policy.	
6.14	Landlords must issue a final response to the stage 2 **within 20 working days** of the complaint being acknowledged.	Yes	This is covered in section 5.6 (Complaint Response) of our Complaints & Compensation Policy.	Performance is reviewed daily, weekly and monthly and quarterly at different levels in the organisation.
6.15	Landlords must decide whether an extension to this timescale is needed when considering the complexity of the	Yes	This is covered in sections 5.7 (Extensions) of our Complaints & Compensation Policy.	

	complaint and then inform the resident of the expected timescale for response. Any extension must be no more than 20 working days without good reason, and the reason(s) must be clearly explained to the resident.			
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	This is covered in sections 5.13 (“Accessibility & Awareness”) of our Complaints & Compensation Policy.	
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	This is covered in section 5.6 (Complaint Response) of our Complaints & Compensation Policy.	
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	This is covered in section 5.6 (Complaint Response) of our Complaints & Compensation Policy.	
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;	Yes	This is covered in section 5.6 (Complaint Response) of our Complaints & Compensation Policy.	

	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.			
6.20	Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.	Yes	This is covered in section 5.4 (Escalating A Complaint To Stage 2) of our Complaints & Compensation Policy.	

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	Template outcome letters and having a second person review response letters before they are sent help to ensure that we apologise for mistakes and take appropriate actions to put things right. This can be evidenced by the letters that are sent and stored on our internal Sharepoint site. Going forward from April 2026, these letters will also be available on our internal CRM system, Salesforce. Our Complaints & Compensation Policy helps us determine the levels of compensation that are fair and consistent. It also has a section around "goodwill & practical actions" to prompt staff to think about other ways to resolve dissatisfaction.	The launch of our Customer First training is focused on looking at issues from the customer's perspective and the impact on them.
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Yes	This is covered in section 5.10 (Putting Things Right (Including Compensation)) of our Complaints & Compensation Policy.	
7.3	The remedy offer must clearly set out what will happen and by when, in	Yes	Although individual teams and managers are responsible for	

	agreement with the resident where appropriate. Any remedy proposed must be followed through to completion.		delivering the actions on time and keeping the customer updated, these are also tracked by the Customer Feedback Team to ensure that we are following through on the promises made in complaint response letters. We can also report on how many actions have been completed on time, how many dates had to be revised and how many became overdue. This is covered in section 5.6 (Complaint Response) of our Complaints & Compensation Policy.	
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes	Complaints handling is a priority so guidance, spotlight reports and learning from the experiences of others ensure that we continue to take appropriate actions.	

Section 8: Putting things right

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
8.1	Landlords must produce an annual complaints performance and service improvement report for scrutiny and challenge, which must include: a. the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements. b. a qualitative and quantitative analysis of the landlord's complaint handling performance. This must also include a summary of the types of complaints the landlord has refused to accept; c. any findings of non-compliance with this Code by the Ombudsman; d. the service improvements made as a result of the learning from complaints; e. any annual report about the landlord's performance from the Ombudsman; and f. any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord.	Yes	Our annual complaints report and self-assessment is reviewed by our Exec Team, Customer Experience Committee, the MRC (member responsible for complaints) and our Board. They are also published on our website: (Feedback and complaints - Brighter Places).	
8.2	The annual complaints performance and service improvement report must	Yes	Our annual complaints report includes comments from the	

	be reported to the landlord's governing body (or equivalent) and published on the on the section of its website relating to complaints. The governing body's response to the report must be published alongside this.		MRC (member responsible for complaints) and is published on our website: (Feedback and complaints - Brighter Places).	
8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	Yes	A restructure took place in April 2025 and in May 2025 we updated our Complaints & Compensation policy to reflect our new ways of working in relation to complaints handling, following a successful trial that had started in July 2024. A self-assessment was undertaken shortly after this and some small tweaks were made to this and our policy in July 2025 and again in January 2026 following a handful of recommendations from the HOS. In January 2026, the HOS confirmed that we had a Code-compliant policy. A self-assessment was also done following the merger in 2021.	
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	Yes	If asked to do this as part of an investigation we will do.	
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	Yes	If this situation occurs, the Ombudsman will be informed.	

	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.			

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	We identified and implemented a number of improvements as a result of learning from our complaints in 25/26. These include: • Introducing a risk-based estate inspection model, increasing inspection frequency and direct customer engagement in higher-issue areas. • Enhancing a formal process for sub-standard homes, to include a dedicated support to help customers move when homes are sold. • Strengthening contractor management, with regular joint meetings, longer appointment slots, improved communications, and cross-team lessons-learnt	These are shared quarterly with the CEC and annually with Board.

			reviews to address repeat repairs issues. • Launching Customer First training to embed a more respectful, empathetic, and customer-focused culture. • Implementation of Salesforce to improve record-keeping, visibility of customer contact, and communication across teams.	
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	As per the commentary in 9.1	
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 Customer Experience Committee review complaints performance on a quarterly basis. We report back to customers on our complaints performance through our newsletters and tp colleagues / contractors through learning and training sessions.	

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	The Customer Feedback Manager, working alongside the Head of Customer Experience are the people accountable for complaints performance, including the learning that comes from them to shape changes to how we work.	
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	Gillian Durden is our MRC and is a member of our Customer Experience Committee (CEC).	
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 Head of Customer Experience, the Customer Director and the MRC meet at least quarterly to review complaints performance and future improvements. Complaints performance is also reviewed by the Customer Experience Committee.	
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;	Yes	The Head of Customer Experience, the Customer Director and the MRC meet at least quarterly to review complaints performance and future improvements. The MRC is also included on updates that	

	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.		are circulated in relation to complaints handling.	
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	Our Customer Care Standards set out certain expectations for Customer Care more generally. Whilst our values describe the "how" – our approach. Although not mentioned specifically, if everyone applies these values to complaints handling then owning our mistakes, collaboration to find solutions and thinking innovatively to improve customer experiences would be the result. The culture towards positive complaints handling is also demonstrated by the various reports and updates being analysed at all levels and with customers at the CEC and Engagement Panel.	