

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.

2026 Self-Assessment Review Date	June 2026
Approval by Governance Committee/MRC	TBC 9 th June 2026
Review Due Date:	June 2027

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	Compliments, Comments and Complaints Policy, V7, 2026	Section 5.2 of the policy states; “A complaint is an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the landlord, the organisation, its own staff, or those acting on its behalf, affecting a resident or group of residents, or customer or group of customers.”
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	Compliments, Comments and Complaints Policy, V7, 2026	Any issues raised that fit the complaints definition, even if the term ‘complaint’ is not used, will be treated as such.
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	Yes	Compliments, Comments and Complaints Policy, V7, 2026	Section 5.3 of the policy states; “Service Requests (Housing Specific) 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.			YMCA requiring action to be taken to put something right. Service requests are not complaints, but must be recorded, monitored, and reviewed regularly.”
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	Compliments, Comments and Complaints Policy, V7, 2026	Section 5.3 of the policy states; “Where a resident expresses dissatisfaction with a service request response, it must be logged as a complaint at that point without delay.”
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	Resident Satisfaction Survey	Our Residents Satisfaction Survey including TSM Measures specifically asks residents about their experiences of raising complaints and allows them the opportunity to raise any concerns. All residents are provided with details of how they can 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	Compliments, Comments and Complaints Policy, V7, 2026	Section 11.1 of the policy states; "YMCA BCG will generally accept all complaints unless there is a valid reason not to do so, in line with Housing Ombudsman guidance."
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.	Yes	Compliments, Comments and Complaints Policy, V7, 2026	Section 11.2 of the policy states; "A complaint may be declined only where: • The issue has already been fully investigated and responded to • The matter falls outside the organisation's responsibility or jurisdiction • The issue is subject to ongoing legal proceedings or insurance claims • The issue relates to an employee grievance."

	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	Compliments, Comments and Complaints Policy, V7, 2026	Section 9.3 of the policy states; “We will accept complaints within 12 months of the issue occurring or the complainant becoming aware of the issue, unless there are reasons for this time frame to be extended.”
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	Compliments, Comments and Complaints Policy, V7, 2026	Section 11.3 of the policy states; “Where a complaint is not accepted, the decision will be clearly explained in writing to the complainant, including the reasons for the refusal. The response will also provide information about the complainant’s right to contact the Housing Ombudsman Service for further advice.”
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Yes	Compliments, Comments and Complaints Policy, V7, 2026	Section 11.1 of the policy states; “YMCA BCG will generally accept all complaints unless there is a valid reason not to do so, in line with Housing Ombudsman guidance.”

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	Compliments, Comments and Complaints Policy, V7, 2026	Section 16.1 of the policy states; "YMCA BCG is committed to the promotion of equality, diversity and a supportive environment for all members of our community. Our commitment to equality and diversity means that this policy has been screened in relation to the use of plain English, the promotion of the positive duty in relation to race, gender and disability and avoidance of discrimination to other equality groups related to age, disability, sex (gender), sexual orientation, religion or belief, gender reassignment, marriage and civil partnership or pregnancy and maternity. All YMCA BG's policies are subject to periodic review under the equality impact assessment process."

3.2	Residents must be able to raise their complaints in any way and with any member of staff. All staff must be aware of the complaints process and be able to pass details of the complaint to the appropriate person within the landlord.	Yes	Compliments, Comments and Complaints Policy, V7, 2026	Section 7.1 of the policy states; "We will ensure our complaints process is available through multiple channels (in person, phone, email, online and through social media.) We will ensure it is accessible to all service users and is inclusive to those requiring advocacy, translation and reasonable adjustments."
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	Compliments, Comments and Complaints Policy, V7, 2026	Section 1.1 of the policy states; "YMCA Black Country Group recognises the importance of customer feedback and welcomes compliments, comments and complaints about its services. YMCA Black Country Group is committed to using the information it receives to help drive forward improvements and welcome complaints, comments, and compliments as opportunities to improve services and outcomes for customers."

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	Website, CCC Form and Compliments, Comments and Complaints Policy, V7, 2026	The Compliments, Comments and Complaints Policy is published on our website. Complaints Policy - YMCA Black Country Group ymcabc.org.uk The Compliments, Comments and Complaints Form is also on our website and is provided to residents. YM185-CCC-Form.pdf ymcabc.org.uk Section 1.2 of the policy states "We operate a complaints process that is: • Easy to access • Fair and transparent • Responsive and resident/complainant-focused • Aligned with the Housing Ombudsman Complaint Handling Code."
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	Compliments, Comments and Complaints Policy, V7, 2026	Section 17 of the policy states; "A copy of YMCA Black Country Group's Compliments, Comments and Complaints Policy is available on our website: www.ymcabc.org.uk

				17.2 In addition, a copy of YMCA Black Country Group's Housing Ombudsman Complaints Handling Self-Assessment can be found on our website: https://www.ymcabc.org.uk/ 17.3 Posters will be displayed around projects notifying customers how to make a complaint, and information will be made available to residents of our Housing Services at point of induction into their accommodation."
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	Compliments, Comments and Complaints Policy, V7, 2026	Section 7.2 of the policy states; "Complainants may be represented by a third party and be accompanied in meetings if required."
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	Compliments, Comments and Complaints Policy, V7, 2026	Section 14.1 of the policy states; "If a complainant remains dissatisfied after completing Stage 2 of the complaints process, they have the right to refer their complaint to appropriate external body. 14.2 For residents within our Housing Services this is

				the Housing Ombudsman Service. Residents can contact the Housing Ombudsman at any stage for advice, and after Stage 2 for formal investigation.”
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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	Compliments, Comments and Complaints Policy, V7, 2026	Section 6.4 of the policy states; "Chief Finance Officer (for the purpose of this policy the 'Complaints Officer') will; • Log and file all compliments, comments and complaints and the responses (supported by CEO PA), together with a RAG rating for each entry. • Report to the Chief Officers on a quarterly basis of all compliments, comments and complaints received. • Report to the Governance Committee as part of the Corporate Quarterly KPIs a summary of all compliments, comments and complaints received. • Provide monthly feedback to the Senior

				Leadership Team as appropriate. • Take responsibility for complaint handling, oversight of the compliance with the Complaint Handling Code, liaison with the Ombudsman and ensuring complaints are reported to the relevant governing body.
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	Organisational Structure	The Complaints Officer is a senior member of staff with authority over all non-Chief Officer staff.
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	Compliments, Comments and Complaints Policy, V7, 2026	Section 1.1 of the policy states; "YMCA Black Country Group is committed to using the information it receives to help drive forward improvements and welcome complaints, comments, and compliments as opportunities to improve services and outcomes for customers."

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	Compliments, Comments and Complaints Policy, V7, 2026	YMCA BCG has one CCC Policy and in section 2.2 it states; "The procedure should be followed when dealing with a compliment, comment or complaint made by a customer, visitor or in some instances an employee. 2.3 This Policy applies to all YMCA Black Country Group members including its subsidiaries and associated companies." Terms of engagement with third parties
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	Compliments, Comments and Complaints Policy, V7, 2026	Section 9.1 of the policy states; "YMCA BCG operates a two-stage complaints process designed to ensure that complaints are handled promptly, fairly, and consistently. The process is intended to be accessible and responsive, ensuring that complainants are

				listened to and that appropriate outcomes are reached. YMCA BCG will seek to resolve complaints at the earliest opportunity, while still ensuring that the complainant has access to the formal complaints process where they remain dissatisfied.”
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	Compliments, Comments and Complaints Policy, V7, 2026	Section 1.2 of the policy states; “We operate a complaints process that is: • Easy to access • Fair and transparent • Responsive and resident/complainant-focused • Aligned with the Housing Ombudsman Complaint Handling Code”
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	Terms of engagement with third parties	Any third party handling a complaint will be required to work in line with The Compliments, Comments and Complaints Policy.

5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Yes	Terms of engagement with third parties	Any third party handling a complaint will be required to work in line with The Compliments, Comments and Complaints Policy.
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	Compliments, Comments and Complaints Policy, V7, 2026	Section 9.7 of the policy states in reference to our response to complainants “This response will clearly set out: • The issues raised by the complainant.”
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	Compliments, Comments and Complaints Policy, V7, 2026	Section 11.3 of the policy states; “Where a complaint is not accepted, the decision will be clearly explained in writing to the complainant, including the reasons for the refusal. The response will also provide information about the complainant’s right to contact the Housing Ombudsman Service for further advice.”
5.8	At each stage of the complaints process, complaint handlers must: a. deal with complaints on their merits, act independently, and have an open mind;	Yes	Compliments, Comments and Complaints Policy, V7, 2026	Section 1.2 of the policy states; “We operate a complaints process that is: • Easy to access

	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.			• Fair and transparent • Responsive and resident/complainant-focused • Aligned with the Housing Ombudsman Complaint Handling Code”
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	Compliments, Comments and Complaints Policy, V7, 2026	Section 10.1 of the policy states; “YMCA BCG aims to meet all response times; however, in exceptional circumstances, more time may be required to complete a thorough investigation. Any extension will not exceed 10 working days without agreement from the complainant. Where this occurs: • The complainant will be informed promptly • The reasons for the delay will be clearly explained • A revised response date will be provided 10.2 The organisation will keep the complainant updated throughout the extended period to ensure

				transparency and maintain trust.”
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	Compliments, Comments and Complaints Policy, V7, 2026	Section 16.1 of the policy states; “YMCA BCG is committed to the promotion of equality, diversity and a supportive environment for all members of our community. Our commitment to equality and diversity means that this policy has been screened in relation to the use of plain English, the promotion of the positive duty in relation to race, gender and disability and avoidance of discrimination to other equality groups related to age, disability, sex (gender), sexual orientation, religion or belief, gender reassignment, marriage and civil partnership or pregnancy and maternity. All YMCA BG’s policies are subject to periodic review under the equality impact assessment process.”
5.11	Landlords must not refuse to escalate a complaint through all stages of the complaints procedure unless it has	Yes	Compliments, Comments and Complaints Policy, V7, 2026	The Compliments, Comments and Complaints Policy makes no provision

	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.			to refuse to escalate a complaint through all stages, and therefore there are no grounds to do so.
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	Compliments, Comments and Complaints Policy, V7, 2026	Section 15.0 of the policy states; “All documentation relating to each compliment, comment or complaint will be kept electronically in a Central File on the Executive Team SharePoint, together with the Compliment, Comments and Complaints Log. 15.2 Departments may keep copies of compliment, comments and complaints received and response made, for inspection purposes in accordance with governing body guidelines. 15.3 Any personal data included as part of a compliment, comment or complaint is to be handled in accordance with the Association’s Data Protection Policy.”
5.13	Landlords must have processes in place to ensure a complaint can be remedied at any stage of its complaints	Yes	Compliments, Comments and Complaints Policy, V7, 2026	Section 9.1 of the policy states; “YMCA BCG operates a two-stage

	process. Landlords must ensure appropriate remedies can be provided at any stage of the complaints process without the need for escalation.			complaints process designed to ensure that complaints are handled promptly, fairly, and consistently. The process is intended to be accessible and responsive, ensuring that complainants are listened to and that appropriate outcomes are reached. YMCA BCG will seek to resolve complaints at the earliest opportunity, while still ensuring that the complainant has access to the formal complaints process where they remain dissatisfied.”
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	Compliments, Comments and Complaints Policy, V7, 2026, Resident Code of Conduct, Anti-Social Behaviour Policy, License Agreement or Tenancy, Fair Exit and Support Intervention Policy	Section 11.5 of the policy states; “YMCA BCG has a separate policy (within Housing) for managing unreasonable or unacceptable behaviour. This policy will be applied fairly and proportionately and will not be used to prevent a complaint from being investigated.”
5.15	Any restrictions placed on contact due to unacceptable behaviour must be proportionate and demonstrate regard	Yes	Compliments, Comments and Complaints Policy, V7, 2026	Section 16.1 of the policy states; “YMCA BCG is committed to the promotion

	for the provisions of the Equality Act 2010.			of equality, diversity and a supportive environment for all members of our community. Our commitment to equality and diversity means that this policy has been screened in relation to the use of plain English, the promotion of the positive duty in relation to race, gender and disability and avoidance of discrimination to other equality groups related to age, disability, sex (gender), sexual orientation, religion or belief, gender reassignment, marriage and civil partnership or pregnancy and maternity. All YMCA BG's policies are subject to periodic review under the equality impact assessment process."
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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	Compliments, Comments and Complaints Policy, V7, 2026	Section 9.1 of the policy states; "YMCA BCG will seek to resolve complaints at the earliest opportunity, while still ensuring that the complainant has access to the formal complaints process where they remain dissatisfied."
6.2	Complaints must be acknowledged, defined and logged at stage 1 of the complaints procedure <u>within five working days of the complaint being received</u> .	Yes	Compliments, Comments and Complaints Policy, V7, 2026	Section 9.4 of the policy states; "Upon receipt of a complaint, YMCA BCG will acknowledge the complaint within five working days . The acknowledgement will confirm that the complaint has been logged and outline the next steps in the process. A named contact will be provided for each complaint to ensure the complainant has a clear point of contact throughout the process."

6.3	Landlords must issue a full response to stage 1 complaints <u>within 10 working days</u> of the complaint being acknowledged.	Yes	Compliments, Comments and Complaints Policy, V7, 2026	Section 9.7 of the policy states; "A full written response will be provided within ten working days of the complaint being acknowledged."
6.4	Landlords must decide whether an extension to this timescale is needed when considering the complexity of the complaint and then inform the resident of the expected timescale for response. Any extension must be no more than 10 working days without good reason, and the reason(s) must be clearly explained to the resident.	Yes	Compliments, Comments and Complaints Policy, V7, 2026	Section 10.1 of the policy states; "10.1 YMCA BCG aims to meet all response times; however, in exceptional circumstances, more time may be required to complete a thorough investigation. Any extension will not exceed 10 working days without agreement from the complainant. Where this occurs: • The complainant will be informed promptly • The reasons for the delay will be clearly explained • A revised response date will be provided 10.2 The organisation will keep the complainant updated throughout the extended period to ensure transparency and maintain trust."

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	Compliments, Comments and Complaints Policy, V7, 2026	Section 14.2 of the policy states; "Residents can contact the Housing Ombudsman at any stage for advice, and after Stage 2 for formal investigation."
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	Compliments, Comments and Complaints Policy, V7, 2026	Section 9.8 of the policy states; "Where appropriate, the response will also confirm any outstanding actions and the expected timeframe for completion. These actions will continue to be monitored until resolved."
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	Compliments, Comments and Complaints Policy, V7, 2026	Section 9.7 of the policy states; "This response will clearly set out: • The issues raised by the complainant • The findings of the investigation • Whether the complaint is upheld, partially upheld, or not upheld • An apology where a service failure has been identified • Details of any actions taken or proposed to put things right

				- Any lessons learned or service improvements identified - Details of how to escalate their complaint Stage 2 if they are not satisfied
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	Compliments, Comments and Complaints Policy, V7, 2026	Additional complaints raised during the investigation will 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 will be logged as a new complaint.
6.9	Landlords must confirm the following in writing to the resident at the completion of stage 1 in clear, plain language: a. the complaint stage; b. the complaint definition; c. the decision on the complaint; d. the reasons for any decisions made; e. the details of any remedy offered to put things right;	Yes	Compliments, Comments and Complaints Policy, V7, 2026	Section 9.7 of the policy states; "A full written response will be provided within ten working days of the complaint being acknowledged. This response will clearly set out: The issues raised by the complainant

	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.			• The findings of the investigation • Whether the complaint is upheld, partially upheld, or not upheld • An apology where a service failure has been identified • Details of any actions taken or proposed to put things right • Any lessons learned or service improvements identified • Details of how to escalate their complaint Stage 2 if they are not satisfied. 9.8 Where appropriate, the response will also confirm any outstanding actions and the expected timeframe for completion. These actions will continue to be monitored until resolved.”
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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	Compliments, Comments and Complaints Policy, V7, 2026	Section 9.10 of the policy states; "If the complainant is dissatisfied with the Stage 1 response, they have the right to request escalation to Stage 2, which is the final stage of the internal complaints process."
6.11	Requests for stage 2 must be acknowledged, defined and logged at stage 2 of the complaints procedure within five working days of the escalation request being received.	Yes	Compliments, Comments and Complaints Policy, V7, 2026	Section 9.13 of the policy states; "The complaint will be acknowledged at Stage 2 within five working days."
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	Compliments, Comments and Complaints Policy, V7, 2026	Section 9.11 of the policy states; "The escalation request does not need to include new information or justification. YMCA BCG will accept the request and will not unreasonably refuse 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	Compliments, Comments and Complaints Policy, V7, 2026	Section 9.12 of the policy states; "The Stage 2 review will be carried out by a senior member of staff who has not been directly involved in the Stage 1 investigation. This ensures

				an independent and objective reassessment of the complaint.”
6.14	Landlords must issue a final response to the stage 2 <u>within 20 working days</u> of the complaint being acknowledged.	Yes	Compliments, Comments and Complaints Policy, V7, 2026	Section 9.13 of the policy states; “The complaint will be acknowledged at Stage 2 within five working days, and a final written response will be issued within twenty working days.”
6.15	Landlords must decide whether an extension to this timescale is needed when considering the complexity of the complaint and then inform the resident of the expected timescale for response. Any extension must be no more than 20 working days without good reason, and the reason(s) must be clearly explained to the resident.	Yes	Compliments, Comments and Complaints Policy, V7, 2026	Section 10.1 of the policy states; “YMCA BCG aims to meet all response times; however, in exceptional circumstances, more time may be required to complete a thorough investigation. Any extension will not exceed 10 working days without agreement from the complainant.”
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	Compliments, Comments and Complaints Policy, V7, 2026	Section 14.2 of the policy states; “For residents within our Housing Services this is the Housing Ombudsman Service. Residents can contact the Housing Ombudsman at any stage for advice, and after Stage 2 for formal investigation.”
6.17	A complaint response must be provided to the resident when the answer to the	Yes	Compliments, Comments and Complaints Policy, V7, 2026	Section 9.13 of the policy states; “The complaint will

	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.			be acknowledged at Stage 2 within five working days, and a final written response will be issued within twenty working days. The Stage 2 response will: • Reassess the original complaint and Stage 1 findings • Address any ongoing concerns raised by the complainant • Provide a clear and final decision on the complaint • Outline any further actions to be taken to resolve the matter Confirm that this is the organisation's final response and that the complaint is closed."
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	Compliments, Comments and Complaints Policy, V7, 2026	Section 9.13 of the policy states; "The complaint will be acknowledged at Stage 2 within five working days, and a final written response will be issued within twenty working days. The Stage 2 response will:

				• Reassess the original complaint and Stage 1 findings • Address any ongoing concerns raised by the complainant • Provide a clear and final decision on the complaint • Outline any further actions to be taken to resolve the matter Confirm that this is the organisation's final response and that the complaint is closed."
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	Compliments, Comments and Complaints Policy, V7, 2026	Section 9.13 of the policy states; "The complaint will be acknowledged at Stage 2 within five working days, and a final written response will be issued within twenty working days. The Stage 2 response will: • Reassess the original complaint and Stage 1 findings • Address any ongoing concerns raised by the complainant

				• Provide a clear and final decision on the complaint • Outline any further actions to be taken to resolve the matter • Confirm that this is the organisation's final response and that the complaint is closed."
6.20	Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.	Yes	Compliments, Comments and Complaints Policy, V7, 2026	Section 9.12 of the policy states; "The Stage 2 review will be carried out by a senior member of staff who has not been directly involved in the Stage 1 investigation. This ensures an independent and objective reassessment of the 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;	Yes	Compliments, Comments and Complaints Policy, V7, 2026	Section 12.1 of the policy states; "Where an investigation identifies that YMCA BCG has failed to meet its service standards, appropriate action will be

	• 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.			taken to remedy the situation. This may include: • A clear and sincere apology • Taking practical steps to resolve the issue • Reviewing and improving processes or procedures • Providing compensation where appropriate and proportionate”
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Yes	Examples of responses given	Any remedy offered will reflect the impact in the resident.
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	Examples of responses given	Any remedy offered will clearly outline what will happen and have clear timescales
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes	Examples of responses given	We will reflect the Ombudsman guidance when issuing remedies.

Section 8: Self-assessment, reporting and compliance

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
8.1	Landlords must produce an annual complaints performance and service improvement report for scrutiny and challenge, which must include: a. the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements. b. a qualitative and quantitative analysis of the landlord's complaint handling performance. This must also include a summary of the types of complaints the landlord has refused to accept; c. any findings of non-compliance with this Code by the Ombudsman; d. the service improvements made as a result of the learning from complaints; e. any annual report about the landlord's performance from the Ombudsman; and f. any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord.	Yes	Compliments, Comments and Complaints Policy, V7, 2026 & copies of the Service Improvement Report	Section 6.2 of the policy states "The Board of Directors will; • Receive and monitor annual Compliments, Comments & Complaints Reports" Section 13.2 states; "Regular reports will be presented to the Senior Leadership Team, Governance Committee, and Board. These reports will highlight trends, lessons learned, and actions taken to improve service delivery. 13.3 In addition, the organisation will: • Publish an annual complaints performance report • Complete and publish an annual Housing Ombudsman Complaint Handling Code self-assessment"

				Demonstrate how complaints have led to service improvements”
8.2	The annual complaints performance and service improvement report must be reported to the landlord’s governing body (or equivalent) and published on the on the section of its website relating to complaints. The governing body’s response to the report must be published alongside this.	Yes	Compliments, Comments and Complaints Policy, V7, 2026, copies of the Service Improvement Report and Governing Bodies responses	Section 6.2 of the policy states “The Board of Directors will; Receive and monitor annual Compliments, Comments & Complaints Reports”
8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	Yes	N/A	In the event of a significant restructure or merger, this self-assessment will be revisited.
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	Yes	N/A	We will comply if required.
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	N/A	We will comply if required.

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	Compliments, Comments and Complaints Policy, V7, 2026	Section 1.1 of the policy states; "YMCA Black Country Group is committed to using the information it receives to help drive forward improvements and welcome complaints, comments, and compliments as opportunities to improve services and outcomes for customers."
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	Compliments, Comments and Complaints Policy, V7, 2026	Section 13.1 of the policy states; "Complaints are a valuable source of insight and play a key role in improving services. As such, YMCA BCG will ensure that: • All complaints are recorded centrally and accurately • Data is monitored and analysed to identify patterns or recurring issues

				Outcomes and learning points are shared with relevant teams and senior management”
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	Compliments, Comments and Complaints Policy, V7, 2026	Section 13.2 of the policy states; “Regular reports will be presented to the Senior Leadership Team, Governance Committee, and Board. These reports will highlight trends, lessons learned, and actions taken to improve service delivery. 13.3 In addition, the organisation will: - Publish an annual complaints performance report - Complete and publish an annual Housing Ombudsman Complaint Handling Code self-assessment - Demonstrate how complaints have led to service improvements”
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,	Yes	Compliments, Comments and Complaints Policy, V7, 2026	Section 6.4 of the policy states; “The Chief Finance Officer (for the purpose of this policy the ‘Complaints Officer’) will;

	serious risks, or policies and procedures that require revision.			• Log and file all compliments, comments and complaints and the responses (supported by CEO PA), together with a RAG rating for each entry. • Report to the Chief Officers on a quarterly basis of all compliments, comments and complaints received. • Report to the Governance Committee as part of the Corporate Quarterly KPIs a summary of all compliments, comments and complaints received. • Provide monthly feedback to the Senior Leadership Team as appropriate. • Take responsibility for complaint handling, oversight of the compliance with the Complaint Handling Code, liaison with the Ombudsman and ensuring.”
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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	Compliments, Comments and Complaints Policy, V7, 2026	Section 6.2 of the policy states;" The Board of Directors will; • Appoint a member of the Governing Body (the Member Responsible for Complaints, MRC) to have lead responsibility for complaints to support a positive complaint handling culture. The MRC will take a specific interest in all Complaints and Service requests received within the Housing Department."
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	Compliments, Comments and Complaints Policy, V7, 2026	Section 6.2 of the policy states;" The Board of Directors will; • Appoint a member of the Governing Body (the Member Responsible for Complaints, MRC) to have lead responsibility for complaints to support a positive complaint handling culture. The MRC will take a specific interest in all Complaints and Service requests received within the Housing Department."

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	Compliments, Comments and Complaints Policy, V7, 2026	Section 6.2 of the policy states;" The Board of Directors will; • Appoint a member of the Governing Body (the Member Responsible for Complaints, MRC) to have lead responsibility for complaints to support a positive complaint handling culture. The MRC will take a specific interest in all Complaints and Service requests received within the Housing Department."
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	Yes	Compliments, Comments and Complaints Policy, V7, 2026	In section 4.1 of the policy it states; "In line with Housing Ombudsman's Complaint Handling Code, YMCA BCG is committed to the following: • Treating all complaints seriously • Acting fairly and proportionately • Putting things right where we have failed • Learning from complaints to improve services

	as set by any relevant professional body.			• Providing clear outcomes and explanations”
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The Governance Sub Committee of the Board of Trustees scrutinised and approved the Housing Ombudsman Complaints Handling Self-Assessment on the 9th of June 2026.