BELLE ISLE TMO

Annual Complaint and Service Improvement Report 2025/26

How we comply with the Housing Ombudsman Complaint Handling Code.

Every year we self-assess against the Housing Ombudsman Complaint Handling Code which sets out the minimum requirements for how complaints should be managed, and the timescales involved . We are required to produce an annual report which sets out performance and improvements required to ensure compliance with the Code. In particular we must publish:

a. the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements (see below);

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.

This report demonstrates compliance with the Code. It will be published on the website, discussed at Board, and will be included in the Annual Report to Tenants.

Self-Assessment.

The self-assessment was previously completed in March 2025 and considered by the Board at the Board meeting on 29th March 2025. It was reported that we need to complete a number of actions to ensure compliance. All areas have been addressed.

The most recent assessment against the revised code has been completed and is detailed below. It was reviewed and accepted by the BITMO Board on 15th We consider that we are fully compliant with the code.

Analysis of complaints handling performance

In the financial year 2025 to 2026 we received 76 complaints which is an increase on the 39 complaints of the year before. 29 were upheld,34 were partially upheld and 13 were not upheld. 66 were resolved at stage 1 and 10 were considered at stage 2 of the procedure 100% of complaints were responded to within timescale. None were referred to the Ombudsman.
The increase in the number of complaints in the year means that numbers are more in line with expectations for a provider of social housing services. Satisfaction with complaints handling is 44% compared with 27% across Leeds as a whole.

Types of complaints

Category	No:	Upheld	Partially upheld	Not upheld
Repairs	54	25	19	10
Customer Service	21	4	15	2
Property condition				
Other	1			1

Complaints not accepted for consideration.

We take an open approach to considering complaints. They can be made in any way, via any platform, in writing or not, relating to any potential service failure that occurred within the previous twelve months. We keep complaints open until all the actions associated with their resolution are completed. The only potential complaints that we do not accept are where the “complaint” is actually a request for service that we have not yet had the opportunity to provide. relates to a service that we do not provide. Where complaints of this type are made, they are referred to the Board for future consideration in terms of our service offer.

There are other times when we receive a complaint that is a request for service that we do not present to the Board.

For example, we have received a complaint in the period that sound insulation in flats is inadequate and compliant with modern standards of construction. We did not accept the complaint, but we did engage with the tenant about the inadequacies of sound insulation.

The key issue here is that modern standards of sound insulation are not an obligation upon the landlord. They are not addressed through the regulatory framework, and remediation works are not cost effective. They do not therefore form part of the service offer.

We also received a complaint about a tenant. The complaining tenant expressed that the behaviour of their neighbour was unacceptable. This is not a complaint about the service we have provided. It is a complaint about another tenant. If we had been dealing with the matter as an anti-social behaviour case and had failed to act in accordance with our service standards, or the tenant was unhappy with the management of the case, it would then have been dealt with as a complaint.

Learning from complaints

Key learning from complaints in this period relates to communication and follow up. In order to provide better customer experience, we have made the following improvements to our service delivery:

We have briefed staff on the importance of effective follow up with tenants, produced improved calling cards, and briefed staff on how they can improve ownership of the issues that they deal with. We have clarified the difference between landlord and tenants responsibilities for gardens, that makes clear that where a garden issue is a structural issue that predates the commencement of the tenancy, it is for BITMO to resolve. Where issues are recurring with individuals these are picked up in one to ones.

Ombudsman cases

There have been none in the year.

Conclusion

The annual report of complaints provides transparency around the issues that our tenants feel we need to improve on to create a better customer experience. It evidences compliance with the Housing Ombudsman’s complaint Handling Code, and demonstrates the changes we have made to operational practice as a result of the lessons learnt.

Belle Isle TMO: Complaints handling self-assessment 2026

Housing Ombudsman Guidance:

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.

Self-Assessment

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	Belle Isle TMO (BITMO) has a Complaints Policy (Complaints Information - Belle Isle TMO) for all of its services. The Policy defines a complaint as: 'An expression of dissatisfaction, however made, about the standard of service, actions, or lack of action by the organisation, its own staff, or those acting on its behalf, affecting an individual resident or group of residents.'	Staff training emphasises that complaints may be in writing or given verbally.
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	BITMO's policy states that complaints may be (i) an expression of dissatisfaction, however made, and (ii) made via a third party so authorised to act.	See above. Tenants are told that they have the right to raise a complaint whenever the situation demands. If a complaint is received from a third party we will check that representative permission is in place. If we don't have permission/advocacy in place to deal with that third party, we will ask for advocacy to be put in place,

				or address the response to the customer
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	BITMO - This is outlined within the complaints policy.	An assessment is made of service requests and complaints logged where requested/appropriate.
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	Investigators are tasked to both deal with the complaint and liaise with relevant teams to see through any outstanding works.	Work continues to resolve a service request issue whilst a complaint investigation is ongoing.
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	Our quarterly overall tenant satisfaction survey (the main survey programme we have in use) makes this clear to residents and signposts to how to log a complaint. People can also leave comments which may be picked up for service delivery.	Surveys are clearly described as such and the reasons for the survey are made clear.

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	BITMO Policy: *'What is not a complaint?* *A request for service, or information, or a complaint about a neighbour or other third party is not a complaint within the terms of this policy.* *A matter will not be normally considered under this policy if:* *- the issue giving rise to the complaint occurred over twelve months ago,* *- it is subject to legal proceedings* *- it has already been considered under the complaints policy.'*	If a complaint is not accepted the customer is written to, with an explanation.
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:	Yes	Reasons for exclusion are explained within the complaints policy (see above).	

	• 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.			
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	We accept all complaints referred to us within 12 months of the issue occurring or the resident becoming aware of the issue unless they are excluded on other grounds. Where the complaint is outside these timescales, we will apply exceptions where it reasonable to do so	
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	Yes	The customer is informed of the reason why we're unable to investigate and signpost to the relevant appeals process (if applicable) and to the Housing Ombudsman Service (HOS). If the HOS advises us to reconsider investigating a complaint, we will do so.	

	fairly applied, the Ombudsman may tell the landlord to take on the complaint.			
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Yes	All complaints are treated individually. Each complaint is dealt with by an investigating officer independent of the service concerned.	

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	The Policy states that customers may complain via the following: • In person at the Housing Office (Aberfield Gate LS10 3QH) • To any member of staff when they are on the estate • By telephone (0113 378 2188) • In writing to B.I.T.M.O (address below). • By e-mail to bitmocomplaints@belleisletmo.co.uk • Via our website - www.belleisletmo.co.uk • Via Leeds City Council: email complaints@leeds.gov.uk or phone 0113 222 4405 (Customer Relations) / 0800 188 4000 (Contact Centre). • Via a third party authorised to act on their behalf • Initial complaint communication may be made via BITMO social media. Subsequent dialogue will be conducted via other means in order to respect confidentiality.	

			• Our website information is font flexible and may be accessed via Read Aloud for the hard of hearing. We can also supply literature in large font if required. • We encourage discussion in order to make any reasonable adjustments to the process necessary in order to comply with requests under the Equality Act 2010.	
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	During any enquiry (email, telephone, or in person), if a customer expresses a wish to complain, we will direct or transfer the customer to the Complaints Team. We can also take the complaint on the customer's behalf if appropriate and send this to the Team to log and allocate for investigation. Staff are made aware of the complaint process and their role in supporting customers to access this process.	
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	The complaints process is disseminated through regular communication with customers. Levels of complaints are compared to levels of satisfaction measured elsewhere to ensure that there is compatibility. If that	

			is not the case then further investigation will take place. 2025-26 saw an increase in the number of complaints received.	
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	The policy is signposted in the Help and Support Feedback & Complaints - Belle Isle TMO section of the website, which is designed to be accessible. A printed copy of the policy can be provided on request and in large print and with translations.	
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	Details of how we do this are included in the policy.	
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	We accept complaints from advocates or representatives where this has been agreed with the customer. If no advocacy is in place, we would direct the response to the customer and give advice about how advocacy can be established. If a customer wishes to have an advocate present at any meetings, we will accommodate this where reasonable.	

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	We include information on the Housing Ombudsman, and the Complaint Handling Code on the website: Feedback & Complaints - Belle Isle TMO. Information is also shared via the monthly tenant email, and social media. For those customers who aren't online, we make sure that communication clearly signposts the HOS at the beginning of the complaint's process, and in all stage 2 response letters.	

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	The Governance & Finance Team is tasked with managing this service, including liaison with the HOS and providing information to Board.	
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 complaints team work with Investigating Officers, who are empowered to resolve complaints and have priority of response when asking staff for information. Investigating Officers are also supported with guidance and advice from the complaints team if needed. Landlord (Leeds City Council) complaint handling training is provided for Investigating Officers.	

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	Staff are told of the importance of complaints handing during staff meetings and emails. Investigating Officer training is undertaken and processes are cascaded to other staff. Complaints investigations have priority responses. All responses are reviewed by senior management.	

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 policy is in place for all complaints.	All complaints are treated the same way via the 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	BITMO operates a two stage complaints code in line with Housing Ombudsman Service (HOS) guidance.	

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	BITMO operates a two stage complaints code in line with HOS guidance.	
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	Any liaison with third parties is conducted through the BITMO process. There is no duplication.	
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Yes	As 5.4 above.	
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	Written acknowledgements briefly describe the nature of the complaint. For complaints acknowledged over the phone, the officer will clarify all the details with the customer before allocating to an Investigating Officer. As part of the investigation, the Investigating Officer will attempt to speak to the customer about their complaint. This is our opportunity to understand the complaint in	

			full, the impact to the customer, and what the customer would like us to do to resolve the complaint.	
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	An initial review of the complaint is conducted by the investigations team to ascertain precisely what the issues are that need to go through the process. Clarification is sought from the complainant and senior officers as necessary.	
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; 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.	Yes	BITMO uses Leeds City Council complaint handling training for Investigating Officers. Further advice and guidance can be obtained from the Complaints Team or the LCC Customer Relations Teams as necessary. Additionally, the LCC Housing Customer Care and Inclusion team provide support sessions for Investigating Officers on individual complaints. All staff also undertake mandatory bi-annual information governance training so that we properly manage people's information.	
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	Yes	Dialogue is undertaken with the complainant if a time extension is necessary. Means of communication and frequency	The customer would be kept up to date with developments during any extension.

	keeping them informed about their complaint.		will be discussed with the complainant.	
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	We aim to accommodate requests for reasonable adjustments where possible. Any adjustments would be noted in discussion with the customer. A check would be made to details held on the housing management system (Civica Cx). A record of adjustments would be made through the CRM (CATS). The Policy states: We will seek to make any reasonable adjustments to process necessary in order to comply with requests under the Equality Act. Declared disabilities are recorded on the Housing management System. We are committed to understanding the impact of a complaint on a customer, taking their individual circumstances into account. To assist in this, where reasonable adjustments are required concerning how complaints are made, considered, or responded to, we	BITMO follows the Leeds City Council Individual Needs Policy, which was published during the year. The small nature of the handling team enables extra local focus and understanding of tenant needs. A training programme will be rolled out in coming months by Leeds City Council and BITMO will take part in this to further enhance the service.

			aim to accommodate requests where possible. We encourage in the first instance to discuss any reasonable adjustments with the complaint handling team.	
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	A customer will be provided with reasons for why their complaint isn't being escalated alongside signposting to the relevant appeals process (if applicable) and to the HOS.	
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	A central complaint logging system is maintained of all relevant records and summaries.	
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	Investigating Officers are empowered to resolve complaints at the earliest opportunity. Investigating Officers are also supported with guidance and advice from the handling team if needed. LCC and in-house complaint handling	

			training is provided for Investigating Officers.	
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	BITMO has a Code of Conduct in dealings with residents and the general public. It is made clear that unacceptable behaviour will not be tolerated. We seek as far as possible to apply a balanced approach to ensure residents can maintain access to our service and make service requests. Should any aspect of this policy be applied, officers will also consider any equality considerations. Our Policy details how we manage vexatious complainants.	
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	BITMO will only restrict or reduce customer contact as a last resort to safeguard staff. We will always ensure that a channel of communication is available.	

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	Initial complaint screening is undertaken by the Complaints Team and reference is made to a senior manager where needed. All Investigating Officers are encouraged to contact customers as soon as possible to discuss the complaint and what resolution the customer is seeking	
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 set out in our procedures and template that is sent to Investigating Officers. Logging of complaints is completed by Leeds CC Complaints Team.	
6.3	Landlords must issue a full response to stage 1 complaints **within 10 working days** of the complaint being acknowledged.	Yes	This is set out in our policy.	Between April 2025 and March 2026, 100% of Stage 1 complaints received a response within the initial 10 working days from acknowledgement or within the extended 10 working

				day agreed timeframe (2024-25 – 97.3%).
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	Initial analysis of the case looks at complexity and the likelihood of responding within timescales. Guidance is given via pro-forma templates to Investigating Officers. Additional guidance has been shared with staff on how to apply extensions where required ensuring that customers are kept updated as to the reason.	
6.5	When an organisation informs a resident about an extension to these timescales, they must be provided with the contact details of the Ombudsman.	Yes	As part of the update to the customer about the extension, the contact details for the HOS are provided.	
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 in line with guidance to Investigating Officers.	
6.7	Landlords must address all points raised in the complaint definition and provide clear reasons for any decisions, referencing the relevant	Yes	Response templates support and guide Investigating Officers to respond to the complaint in full, with all relevant information.	

	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	Investigating Officers are encouraged to be flexible. At both stage 1 and stage 2, the complainant is given the opportunity to speak with the Investigating Officer for both the Investigating Officer and customer to understand each other's position and to help provide a considered and high-quality response. At this time, additional concerns or queries can be raised, if relevant.	
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	Response templates ensure that customers are receiving detailed responses to their complaints..	The response template is in accord with that used by Leeds City Council. These templates are updated when relevant and based on feedback.

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	Within our two stage policy, should a customer be unhappy with how their complaint has been handled at stage 1, they are able to escalate this to stage 2. A stage 2 response to a complaint would be considered the final decision and would then allow the customer to address their complaint to the relevant Ombudsman Service.	
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 set out in the policy.	Acknowledgments are logged by Leeds City Council Complaints Team.
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	Customers are invited, but not required, to set out the reasons for their dissatisfaction and these will be investigated by a senior officer. The complainant is given the opportunity to speak with the Investigating Officer for both the Investigating Officer and customer to understand each other's position and to help	

			provide a considered and high-quality response.	
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Yes	As per policy, the Stage 2 will be investigated by different officer than the one who conducted Stage 1.	
6.14	Landlords must issue a final response to the stage 2 **within 20 working days** of the complaint being acknowledged.	Yes	The BITMO policy aims for a Stage 2 response within 20 working days.	Between April 2025 and March 2026, 100% of stage 2 complaints received a response in the initial 20 working days from acknowledgement or within the extended 20 working day timeframe (2024-25 100%).
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	The complexity of the case is considered throughout the investigation. If at any time an extension is needed the customer is informed of the valid reasons and a new timescale agreed.	Additional guidance has been shared with staff on how to apply extensions where required ensuring that customers are kept updated as to the reason.
6.16	When an organisation informs a resident about an extension to these timescales, they must be provided with the contact details of the Ombudsman.	Yes	As part of the update to the customer about the extension, the contact details for the HOS are provided.	In line with the LCC template.
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	Yes	This is in line with guidance to Investigating Officers.	

	the issue are completed. Outstanding actions must still be tracked and actioned promptly with appropriate updates provided to the resident.			
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	As detailed in the response templates and in staff training.	Response templates support and guide Investigating Officers to respond to the complaint in full, with all relevant information.
6.19	Landlords must confirm the following in writing to the resident at the completion of stage 2 in clear, plain language: the complaint stage; the complaint definition; the decision on the complaint; the reasons for any decisions made; the details of any remedy offered to put things right; details of any outstanding actions; and details of how to escalate the matter to the Ombudsman Service if the individual remains dissatisfied.	Yes	The response templates used ensure that customers receive detailed responses to their complaints.	In line with the LCC template.
6.20	Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.	Yes	As per policy, Stage 2 is dealt with by an appropriate senior officer who will liaise with all relevant staff members before	

			sending a final, considered, response.	

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	The template response used by Investigating Officers prompts the officer to describe the actions they are taking to put things right. For example, putting right any outstanding repairs, undertaking further visits or appointments to support tenants, or working with our contractors to carry out any further works. Any practical action to put the customer back in the position they would have been in if something hadn't gone wrong, including an apology for the failure in service. Investigating Officers have the autonomy to consider a financial remedy if this is appropriate.	Financial compensation may be offered even if not requested by the complainant.
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Yes	Investigating Officers are encouraged to understand the individual impact of any service failures and take appropriate action. This includes taking	

			measures or steps to support residents with any additional needs.	
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	As per the guidance provided to Investigating Officers.	
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes	HOS Spotlight reports are referred to as necessary and guidance taken.	

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: 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	Regular complaints management information is given to BITMO Board members to give the opportunity for query and challenge of performance and wider complaints management activity. An annual self-assessment is conducted against the HOS Code and shared with the Board. It delineates any areas of non-compliance with the code and the actions to be taken. Learning from complaints and service improvements are included in the annual review report that is presented to Board.	
8.2	The annual complaints performance and service improvement report must	Yes	Complaint reports are made to the BITMO Board and this and	Future end of year reports to the BITMO Board will be

	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.		any Board responses are published on the website with board papers.	called an 'Annual Complaint and Service Improvement Report'
8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	Yes	This will be completed as required.	
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	Yes	We will review as per any HOS outcome recommendation.	
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	We would update the HOS if relevant and inform residents who may be affected.	

Section 9: Scrutiny & oversight: continuous learning and improvement

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
9.1	Landlords must look beyond the circumstances of the individual complaint and consider whether service improvements can be made as a result of any learning from the complaint.	Yes	Complaints outcomes are discussed at regular management meetings and the complaints log is also reviewed by managers jointly to monitor lessons learnt.	
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	Complaint outcomes are regularly discussed at management meetings in order to review lessons learnt. Details are also discussed regularly with the Member Responsible for Complaints (MRC).	
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	Lessons learnt are fed back to Board members and staff on a regular basis. We also tie in with LCC personnel and reporting structures.	
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	The Chief Executive (aided by the Head of Governance & Finance) is accountable for complaint handling. Complaints are analysed by type and	

	serious risks, or policies and procedures that require revision.		reviewed for themes, trends, risks and any policy implications.	
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	The BITMO Board appoints a Member Responsible for Complaints each year.	
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	Detailed information and updates are given to the MRC on a regular basis.	
9.7	As a minimum, the MRC and the governing body (or equivalent) must receive: regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance; regular reviews of issues and trends arising from complaint handling; regular updates on the outcomes of the Ombudsman's investigations and progress made in complying with	Yes	As 9.6 re MRC above. Regular reporting presented to and discussed by management and Board.	

	orders related to severe maladministration findings; and 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: have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments; take collective responsibility for any shortfalls identified through complaints, rather than blaming others; and act within the professional standards for engaging with complaints as set by any relevant professional body.	Yes	**All staff** Are required to: (i) Work with customers to resolve queries at first point of contact where possible (ii) Be familiar with the complaints policy so that they can advise customers about this and how they can access the complaints process if needed. (iii) Take complaints from customers and pass these on to the BITMO Complaints Team. **Investigating Officers** Must: • Work with colleagues and other service areas to respond to complaints in line with the Housing Ombudsman Complaint Handling Code • Ensure that individual circumstances are taken into	

			account, and reasonable adjustments considered for customers going through the complaints process • Use the support and training available in order to provide high quality complaints responses • Undertake refresher training every 18 months or more regularly if needed. **Managers** Help create a strong learning from complaints culture by: (i) regularly monitoring performance and reviewing the quality of complaint responses across the organisation (ii) identifying and sharing learning from complaints. (iii) supporting teams to resolve issues at the earliest opportunity.	