



HOUSING OMBUDSMAN'S COMPLAINT HANDLING CODE SELF-ASSESSMENT FOR THE PERIOD MARCH 2025 TO APRIL 2026

This self-assessment sets out the current processes Eden Housing Association has in place to comply with the Housing Ombudsman's Complaint Handling Code. Further detailed compliance with the code is evidenced within our Policy and associated guidance which are accessible either on our website or upon request in a format to meet your requirements.

Code provision	Code requirement	Comply: Yes/No	Evidence	Commentary/explanation
	Section 1: Definition of a complaint			
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	<u>Evidenced:</u> Policy = Sec 8	Our Complaints Policy and associated guidance adopt this definition in full and require staff to apply it when identifying, recording and responding to expressions of dissatisfaction in line with the Complaint Handling Code
1.3	A resident does not have to use the word 'complaint' for it to be treated as such. Whenever a resident expresses dissatisfaction, the landlord must give them the choice to make a complaint. A complaint that is submitted via a third party or representative must be handled in line with the landlord's complaints policy.	Yes	<u>Evidenced:</u> Policy = Sec 8	Our Complaints Policy and associated guidance make clear that residents do not need to use the word 'complaint' for their concerns to be treated as one. This is reinforced through staff complaints training, which ensures staff can recognise expressions of dissatisfaction, offer the resident the choice to complain, and handle complaints made through representatives in line with our process.
1.4	Landlords must recognise the difference between a service request and a complaint. This must be set out	Yes	<u>Evidenced:</u> Policy = Sec 8	This is set out in our Policy and associated guidance.

	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.		Annual staff refresher training	Service requests are recorded through our Customer Relationship Management (CRM) and Housing Management systems. They are monitored through established operational and governance processes to ensure outcomes, themes and learning are identified and acted upon: • regular meetings between the Complaints and Resolutions Officer and Service Area Managers to review service request and complaint outcomes • reporting through the Operational Performance Report to the Operations and Consumer Committee • reporting to the Scrutiny Audit Panel and Complaints Panel • staff training and discussion sessions to maintain a clear and consistent understanding of the difference between service requests and complaints This approach ensures service requests are recorded, monitored and reviewed regularly, and that any learning is used to improve service delivery.
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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	<u>Evidenced:</u> Policy = Sec 8	Our Complaints Policy and associated guidance make clear that where a resident expresses dissatisfaction with the response to a service request, a complaint will be logged and handled through the complaints process. This does not stop or delay action to resolve the original service request, which remains open and continues to be progressed alongside the complaint. Staff are reminded of this approach through annual complaints training. Service request updates are discussed with the resident while the complaint is ongoing, and any relevant outcomes or outstanding actions are included in the final complaint response.
1.6	An expression of dissatisfaction with services made through a survey is not defined as a complaint, though wherever possible, the person completing the survey should be made aware of how they can pursue a complaint if they wish to. Where landlords ask for wider feedback about	Yes	<u>Evidenced:</u> Policy = Sec 8	This is set out in our Policy and associated guidance. It is also covered in annual staff training sessions. Whenever a resident expresses dissatisfaction with any of our services via a survey, our staff will contact them and give them the opportunity to make a complaint if

	their services, they also must provide details of how residents can complain.			they wish. This also includes complaints submitted via a third party or representative.
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Code provision	Code requirement	Comply: Yes/No	Evidence	Commentary/explanation
	Section 2: Exclusions			
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	<u>Evidenced:</u> Policy = Sec 9.1 Annual Service and Improvements Plan	This is set out in our Policy and associated guidance No complaints were excluded or refused to escalate during the 2025/26 reporting period
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.	Yes	<u>Evidenced:</u> Policy = Sec 9 and 9.1 Annual Service and Improvements Plan	Our Policy, Service Standard and associated guidance clearly set out where a matter will not be accepted as a complaint. No complaints were excluded or refused to escalate during the 2025/26 reporting period

	• 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. 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.			
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	<u>Evidenced:</u> Policy = Sec 9 and 9.1	Our Policy and associated guidance states that we will accept complaints referred within 12 months of the issue occurring or the resident becoming aware unless they are excluded on other grounds. However, each request to escalate/exclude will be considered on its own merits. We will not take a blanket approach.

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	<u>Evidenced:</u> Policy = Sec 9.1	Our Policy and associated guidance states that if a decision is made not to accept a complaint or escalate, we will provide the resident with a clear written explanation setting out the reasons for our decision and how they can challenge this. We will also advise them of their right to refer the matter to the Housing Ombudsman and provide contact details.
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Yes	<u>Evidenced:</u> Policy = Sec 9.1	Our Policy and associated guidance set out that we will not apply a 'blanket approach' when making these decisions. Decisions are made case by case, considering the resident's circumstances and the specific facts of the complaint.

Code provision	Code requirement	Comply: Yes/No	Evidence	Commentary/explanation
Section 3: Accessibility and Awareness				
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	<u>Evidenced:</u> Policy = Sec 7	Our Policy and associated guidance set out a wide range of avenues available for residents to make a complaint. We will not make assumptions about whether a resident requires a reasonable adjustment or about what those adjustments might be. We will discuss the requirements of a reasonable adjustment with the individual resident and seek to reach agreement on what will be reasonable in the circumstances to best suit the residents' needs ensuring at all times that we take account of our duties 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	<u>Evidenced:</u> Policy = Sec 7 Annual Staff Training	Our Complaints Policy and associated guidance make clear that residents can raise a complaint in any way and with any member of staff. • This is reinforced through staff induction and annual complaints training, ensuring all staff

				understand how to recognise a complaint, support the resident and pass details to the appropriate team without delay. Our Customer Service Team are responsible for: • logging and acknowledging complaints • making initial contact with the resident and explaining the complaints process and confirming the next steps • passing the information through to the Complaints and Resolutions Officer for full investigation
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	<u>Evidenced:</u> Policy = 9.3 Annual Staff Training New Staff Inductions	We promote a positive complaint handling culture through training, induction and regular staff and resident communications, making clear that high complaint volumes can indicate an accessible and well-publicised complaints process rather than poor performance alone.
3.4	Landlords must make their complaint policy available in a clear and accessible format for	Yes	<u>Evidenced:</u>	Our Policy and associated guidance set out the complaints process and are available in a range of appropriate

	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.		Policy and associated guidance	alternative formats to meet the needs of residents. The policy and guidance are also published on our website. Our website includes the Recite Me accessibility tool, which supports residents to access information in a format that works best for them, including alternative reading, translation and display options.
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	<u>Evidenced:</u> Policy = Sec 7	To encourage feedback and make it easy for residents to complain, we ensure there are no unnecessary barriers to accessing our complaints process. Our Complaints Policy, including information about the Housing Ombudsman and the Complaint Handling Code, is available in a clear and accessible format through a range of channels. Residents can access this information on our website, request a copy by email, ask for a hard copy, or speak to any member of staff for support. This helps ensure residents are aware of their rights, understand how to make a

				complaint, and know how to contact the Housing Ombudsman if they need advice or support.
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	<u>Evidenced</u> Policy = Sec 6	Our Policy and associated guidance states that residents will be given the opportunity to have a representative deal with their complaint on their behalf, and to be represented or accompanied at any meeting with us.
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	<u>Evidenced</u> • Website: www.edenha.org.uk • Policy • Displayed in all EHA public areas • All complaint related correspondence	We provide residents with the Housing Ombudsman's contact details in a range of different areas, including: • Our Website • In the public area of our offices and at our assisted living and extra care schemes • Complaints Policy and Service Standard • Acknowledgement, response and extension letters

Code provision	Code requirement	Comply: Yes/No	Evidence	Commentary/explanation
Section 4: Complaint Handling Staff				
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	<u>Evidenced:</u> Policy = Sec 9.2	Our Complaints Policy and associated guidance clearly set out responsibility for complaint handling, Ombudsman liaison and governance reporting. • Stage 1 complaints are investigated by the Complaints and Resolutions Officer, with oversight from the Customer Service Manager • Stage 2 complaints are investigated by a senior officer independent of Stage 1, which may include a Director, the Chief Executive or a Board Member • The Complaints and Resolutions Officer is the main point of contact for the Housing Ombudsman and prepares complaints data for governance reporting. Where this is not appropriate, these responsibilities may be undertaken by a member of the management team • Complaint reports and analysis are provided quarterly to the Senior

				Management Team, Operations and Consumer Committee, Complaints Panel and Scrutiny Audit Panel The annual self-assessment against the Complaint Handling Code is reviewed by Board for approval.
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	<u>Evidenced:</u> Policy = Sec 9.3	Our Policy and associated guidance state that the Complaints and Resolutions Officer, or any other officer managing complaints, will have access to staff at all levels to support timely and fair resolution of disputes.
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	<u>Evidenced:</u> Policy = Sec 15 Annual complaints training Internal Staff intranet Induction process for new members of staff Staff have a complaint related	We have a dedicated Complaints and Resolutions Officer who supports staff training, coordinates complaint learning and works with service managers to ensure actions are implemented. - Regular meetings are held with service managers and teams to review complaint and service request outcomes, identify learning, agree service improvements and address training needs - Learning from complaints, case studies and Housing Ombudsman Spotlight reports is shared through team meetings, our internal intranet,

			objective in their Personal Development Plan	contractor performance meetings, governance reporting the Annual Complaints Performance and Service Improvement Report.
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Code provision	Code requirement	Comply: Yes/No	Evidence	Commentary/explanation
	Section 5: The Complaint Handling Process			
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	<u>Evidenced:</u> EHA Policy	We have a single complaints policy in place for complaints covered by the Code, supported by one associated resident-facing guidance available on our website or on request in an accessible format.
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 'in complaint') as this causes unnecessary confusion.	Yes	<u>Evidenced:</u> Policy = Sec 3, 9	We do not have a stage zero within our complaints process. We include target dates within all of our acknowledgement letters and where possible look to respond before the target date.
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	<u>Evidenced:</u> Policy -	We do not have a third stage in the complaints process.
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	Yes	<u>Evidenced:</u> Policy = Sec 9.3	All complaints involving a third party are 'owned' by Eden Housing Association and dealt with in line with the policy and associated guidance.

	form part of the two stage complaints process set out in this Code. Residents must not be expected to go through two complaints processes.			In cases where a third party is involved, our Complaints and Resolutions Officer will lead, liaise and agree outcomes which will form part of the final response.
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Yes	<u>Evidenced:</u> Policy = 9.3	We retain ownership of complaints involving third parties. Where a third party is involved, the Complaints and Resolutions Officer will ensure they are aware of our obligations under the Code and our approach to complaint handling.
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	<u>Evidenced:</u> Policy = Sec 9.4	Our Stage 1 and Stage 2 acknowledgement letter templates require us to set out the complaint definition, including our understanding of the complaint and the outcomes the resident is seeking. If this is not clear we will go back to the resident for clarification.
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	<u>Evidenced:</u> Policy = Sec 9.4	Our acknowledgement letter templates require the officer to confirm their understanding of the complaint, the resident’s desired outcome, and any aspects that fall outside our responsibility. Where anything is

				unclear clarification must be obtained from the resident.
5.8	At each stage of the complaints process, complaint handlers must: - deal with complaints on their merits, act independently, and have an open mind; - give the resident a fair chance to set out their position; - take measures to address any actual or perceived conflict of interest; and - consider all relevant information and evidence carefully 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	<u>Evidenced:</u> Policy = Sec 9, 9.3, 9.4	Complaints are handled impartially, with staff gathering sufficient, reliable information to make fair findings and recommendations. Our staff are trained to act independently and with an open mind and will not investigate complaints where they have had prior involvement. We will only extend complaint timescales with the resident's agreement and will confirm the reason for any extension in writing.
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	<u>Evidenced:</u> Policy = 9.4	We aim to deal with all of our complaints within the set timescales unless there are exceptional circumstances. In these instances, we will provide an explanation for the delay and agree a revised date for the response (keeping the

				resident updated at suitable intervals until the complaint is resolved).
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	<u>Evidenced:</u> Policy = 7	Our Policy and associated guidance set out how we respond to reasonable adjustment requests in line with the Equality Act 2010. Staff receive regular training and updates to ensure requests are identified, considered and managed appropriately. Reasonable adjustments and any disclosed disabilities are recorded on our Housing Management System and kept under review.
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	<u>Evidenced:</u> Policy = Sec 9. 9.1	We would not refuse to escalate a complaint to the next stage of our process unless there is a valid reason 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	<u>Evidenced:</u> All complaint records are stored on our Housing Management System.	We currently use the complaints module within our MRI Housing Management System to log, manage and retain full records of all complaints. From 1 October 2026, complaints will be recorded and managed through the <u>new</u> complaints module in Customer Central (MRI).

			Survey data is collected via Microsoft forms and then stored internally.	All complaints data is stored, managed and retained in line with EHA's Data Retention Policy.
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	<u>Evidenced:</u> Policy = Sec 9.3	We have a dedicated Complaints and Resolutions Officer, service managers and an Executive Team who are responsible for providing appropriate remedies to resolve complaints. These can be provided at any stage of the complaints process.
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	<u>Evidenced:</u> EHA's Unacceptable Actions Policy	When implementing restrictions in response to unacceptable behaviour, we follow our Unacceptable Actions Policy. Any restrictions are proportionate, clearly evidenced, kept under review and applied with regard to the provisions of the Equality Act 2010.
5.15	Any restrictions placed on contact due to unacceptable behaviour must be proportionate and demonstrate regard for the provisions of the Equality Act 2010.	Yes	<u>Evidenced:</u> EHA's Unacceptable Actions Policy	Our Unacceptable Actions Policy sets out how any contact restrictions are considered, approved, communicated and reviewed. Restrictions are only used where necessary, must be proportionate to the behaviour

				demonstrated, and are supported by clear evidence. When considering or applying restrictions, we take account of the resident's individual circumstances, including any known vulnerabilities, reasonable adjustments or duties under the Equality Act 2010. Any restrictions are kept under review to ensure they remain appropriate and do not create unnecessary barriers to accessing the complaints process.
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Code provision	Code requirement	Comply: Yes/No	Evidence	Commentary/explanation
Section 6: Complaints Stages – Stage 1				
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	<u>Evidenced:</u> Policy = Sec 7 Alerts stored on Housing Management System	Our Housing Management System records alerts about a complainant's needs, vulnerabilities or relevant circumstances. The Complaints and Resolutions Officer reviews this information at the outset and throughout the complaint to ensure any relevant factors are considered and remain up to date. Where a complaint is less complex, we aim to provide a response as early as possible and without unnecessary delay.
6.2	Complaints must be acknowledged, defined and logged at stage 1 of the complaint's procedure <u>within five working days of the complaint being received.</u>	Yes	<u>Evidenced:</u> Policy = Sec 9.4	Our Policy and associated guidance set out that Stage 1 complaints are acknowledged, defined and logged within five working days.

6.3	Landlords must issue a full response to stage 1 complaints <u>within 10 working days</u> of the complaint being acknowledged.	Yes	<u>Evidenced:</u> Policy = Sec 9.4	All of our complaints are responded to within 10 working days unless there are exceptional circumstances or as requested by the resident. In these instances, we will provide an explanation for the delay and agree a revised date for the response with the resident (this will not exceed a further 10 days).
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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	<u>Evidenced:</u> Policy = Sec 9.4	If a Stage 1 response cannot be issued within 10 working days, we will write to the resident explaining the reason for the delay and confirming the revised response date. - Any extension will be no more than a further 10 working days unless there is good reason. - We will also provide the resident with details of how to contact the Housing Ombudsman if they do not agree with the extension.
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	<u>Evidenced:</u> Policy = 9.4	Our Stage 1 extension letter template includes the Housing Ombudsman's contact details, alongside the reason for the extension, the revised response date, and confirmation of the resident's right to contact the Ombudsman for advice and support.
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	Yes	<u>Evidenced:</u> Policy = Sec 9.4	When responding to a complaint we will set out how we aim to resolve the issue (if there has not been an immediate resolution). We will include details of the outstanding actions and assurance that our Complaints and Resolutions Officer will

	promptly with appropriate updates provided to the resident.			remain involved in the case until all outstanding actions are complete.
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	<u>Evidenced:</u> Policy = 9.4	Our Stage 1 response letter template requires the investigating officer to address every point in the complaint definition and to give clear reasons for each decision, including reference to the relevant policy, law or 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	<u>Evidenced:</u> Policy = Sec 9.3	Our Policy and associated guidance state that any related issues raised while a Stage 1 complaint remains open can be incorporated into the Stage 1 response, provided this does not unreasonably delay the response. Where the Stage 1 response has already been issued, or the new issues are unrelated, the matter 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;	Yes	<u>Evidenced:</u> Policy = 9.4	Our Stage 1 response letter template includes mandatory prompts for the complaint stage, the complaint definition, the decision, the reasons for the decision, any remedy offered, details of any outstanding actions, and how to escalate to Stage 2 if the resident remains dissatisfied.

	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			
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Code provision	Code requirement	Comply: Yes/No	Evidence	Commentary/explanation
	Stage 2 Complaint			
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	<u>Evidenced:</u> Policy = Sec 9.1	If the complainant remains dissatisfied with the response at Stage 1, they can escalate the complaint to Stage 2 of the complaints process. We may invite them to tell us which parts of the response remain unresolved and what outcome they are seeking so we can understand their concerns and respond fully, but they are not required to do so in order to access Stage 2.
6.11	Requests for stage 2 must be acknowledged, defined and logged at stage 2 of the complaint's procedure within five working days of the escalation request being received.	Yes	<u>Evidenced:</u> Policy = 9.4	Our Policy and associated guidance set out that Stage 2 complaints are acknowledged, defined and logged 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	Yes	<u>Evidenced:</u> Policy = Sec 9.1	If the complainant remains dissatisfied with the response, they can escalate to Stage 2 of the complaints process without being expected to explain their reasons.

	remains unhappy as part of its stage 2 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	<u>Evidenced:</u> Policy = 9.2	We have separate officers dealing with Stage 1 and Stage 2 complaints. • Stage 1 complaints are dealt with by the Complaints and Resolutions Officer or appropriate manager in their absence. • Stage 2 complaints are dealt with by a Director, Chief Executive or Board Member.
6.14	Landlords must issue a final response to the stage 2 within 20 working days of the complaint being acknowledged.	Yes	<u>Evidenced:</u> Policy = 9.4	Stage 2 complaints will be responded to within 20 working days of acknowledgement wherever possible. If we are unable to meet this timescale, we will explain the reason for the delay and agree a revised response date with the resident. Any extension will not exceed a further 20 working days unless there is good reason.

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	<u>Evidenced:</u> Policy = 9.4	If a Stage 2 response cannot be issued within 20 working days, we will write to the resident explaining the delay, confirming the revised response date, and providing Housing Ombudsman contact details. Any extension will not exceed a further 20 working days unless there is good 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	<u>Evidenced:</u> Policy = 9.4	Our Stage 2 extension letter template includes the reason for the extension, the revised response date, Housing Ombudsman contact details, and confirmation of the resident's right to seek advice and support.
6.17	A complaint response must be provided to the resident when the answer to the complaint is known, not when the outstanding actions required to address the issue are completed. Outstanding actions must still be tracked and actioned promptly with appropriate updates provided to the resident.	Yes	<u>Evidenced:</u> Policy = Sec 9.4	We issue the complaint response when the outcome is known, setting out any agreed remedy, outstanding actions and timescales. The Complaints and Resolutions Officer remains involved until actions are completed and the resident is kept updated.
6.18	Landlords must address all points raised in the complaint definition and	Yes	<u>Evidenced:</u> Policy = 9.4	Our Stage 2 response template requires all points in the complaint definition to be addressed, with clear reasons for each

	provide clear reasons for any decisions, referencing the relevant policy, law and good practice where appropriate.			decision and reference to relevant policy, law or good practice where appropriate.
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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	<u>Evidenced:</u> Policy = 9.4	Our Stage 2 response letter template includes mandatory prompts for: the complaint stage, the complaint definition, the decision, the reasons for the decision, any remedy offered, details of any outstanding actions, and how to refer the matter to the Housing Ombudsman if the resident remains dissatisfied.
6.20	Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.	Yes	<u>Evidenced:</u> Policy = 9.2	Our Stage 2 complaints are dealt with and a response issued by the investigating officer, which will be one of the following: • Relevant Director • Chief Executive • Nominated Board Member

Code provision	Code requirement	Comply: Yes/No	Evidence	Commentary/explanation
	Section 7: Putting things right			
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 practice	Yes	<u>Evidenced:</u> Policy = 9.4	We will always acknowledge where something has gone wrong and will set out in our complaint response letters, • any remedy offered, including apologies, actions, explanations timescales or compensation where appropriate • any outstanding actions and when we expect them to be completed
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Yes	<u>Evidenced:</u> Policy = 9.3	Where fault is identified, we consider the impact on the resident and provide an appropriate remedy, which may include an

			EHA's Remedies and Compensation Policy	apology, practical action, reimbursement, compensation or a combination of these. Compensation and remedies are considered in line with our Remedies and Compensation Policy, taking account of evidenced financial loss, time, trouble, distress and inconvenience.
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	<u>Evidenced:</u> Policy = 9.3, 9.4	Our complaint response letters set out details of any remedies offered to put things right, along with any outstanding actions and a clear timeframe for completion. Our Complaints and Resolutions Officer will remain involved until all outstanding actions are complete.
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes	<u>Evidenced:</u> EHA's Remedies and Compensation Policy	Our policy/processes are all written in line with Eden Housing Association's • Remedies and Compensation Policy • Housing Ombudsman's remedies guidance.

Code provision	Code requirement	Comply: Yes/No	Evidence	Commentary/explanation
	Section 8: Self-assessment, reporting and compliance			
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	Yes	<u>Evidenced:</u> Our Annual Plan is published on our Website www.edenha.org.uk	We produce an Annual Complaints Performance and Service Improvement Report for scrutiny and challenge. It includes the annual Code self-assessment, complaint handling performance analysis, complaints not accepted, complaint learning and resulting service improvements. Where relevant, the report also includes Ombudsman findings, complaint handling failure orders, reports relating to Eden Housing Association and other relevant Ombudsman publications.

	f. any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord.			
8.2	The annual complaints performance and service improvement report must be reported to the landlord's governing body (or equivalent) and published on the section of its website relating to complaints. The governing body's response to the report must be published alongside this.	Yes	<u>Evidenced:</u> As 8.1	The Annual Complaints Performance and Service Improvement Report is presented to the governing body for scrutiny and challenge and published in the complaints section of our website. The governing body's response is published alongside the report, providing assurance on the scrutiny undertaken, the key issues identified and the actions agreed in response.
8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	Yes	<u>Evidenced:</u> Copies of historical self-assessments available upon request	Eden Housing Association maintains a record of published self-assessments completed since the introduction of the Complaint Handling Code as part of its compliance framework. A further self-assessment will be completed and published following any significant restructure, merger, or material change to our complaints policy, procedure or operating model.
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	Yes	<u>Evidenced:</u> See commentary	If the Housing Ombudsman requires us to review our self-assessment following an investigation, we will complete that review promptly, update the self-assessment where

				necessary, and use the outcome to inform any required policy, procedure or service changes. This forms part of our wider complaints learning and compliance arrangements.
8.5	If a landlord is unable to comply with the Code due to exceptional circumstances, such as a cyber incident, they must inform the Ombudsman, provide information to residents who may be affected, and publish this on their website Landlords must provide a timescale for returning to compliance with the Code.	Yes	<u>Evidenced:</u> See commentary	If exceptional circumstances temporarily prevent compliance with the Code, Eden Housing Association will notify the Housing Ombudsman, inform affected residents, publish relevant information on its website, explain any interim arrangements, and set out the timescale for returning to compliance Any such communication will explain the nature of the temporary non-compliance, the likely impact on residents, the interim arrangements in place, and the expected timescale for returning to full compliance.

Code provision	Code requirement	Comply: Yes/No	Evidence	Commentary/explanation
	Section 9: Scrutiny & oversight: continuous learning and improvement			
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	<u>Evidenced:</u> Tenant Satisfaction Measures Results Annual complaints performance and service improvement report Business process review of our Complaints Service Feedback from Complaints Survey Tenants Voice Report	We look beyond the individual circumstances of each complaint to identify wider learning, themes and opportunities for service improvement. Learning is reviewed with relevant service managers, shared through staff training, management and governance reporting, and used to improve policies, procedures, practice and service delivery. Any actions identified are recorded, monitored and followed through to completion.

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	<u>Evidenced:</u> Tenant Satisfaction Measures Results Business process review of our Complaints Service Annual staff Complaints training Quarterly Reports to Operations and Consumer Committee Annual complaints performance and service improvement report Feedback from Complaints Survey	Our approach to complaint handling is embedded in our Complaints Policy, associated guidance and operational practice. We promote a positive complaint handling culture by using complaints and service request outcomes to identify learning, agree actions and improve services. • The Complaints and Resolutions Officer works with relevant managers to resolve complaints, identify themes, agree service improvements and monitor actions through to completion This is supported by: • staff inductions • annual complaints training • management actions dashboard • complaints module within our Housing Management System • governance reporting • complaint survey satisfaction feedback • Complaints Business Process Review.
9.3	Accountability and transparency are also integral to a positive complaint handling culture. Landlords must report back on	Yes	<u>Evidenced:</u> Policy = 15	Whilst we tailor our approach to the complainant's individual needs we also identify where there are common themes in terms of outcomes, learnings and best

	wider learning and improvements from complaints to stakeholders, such as residents' panels, staff and relevant committees.		Tenant Satisfaction Measures Results Annual complaints performance and service improvement report Complaints focused CHAT sessions	practice. We capture, share, discuss and implement this learning with: • Residents via our newsletter Viewpoint, website and social media channels • Complaints Panel • Scrutiny Audit Panel • Board • Operations and Consumer Committee • Management Team reports • Management actions dashboard • Staff via annual CHAT sessions • Staff via internal intranet Any identified actions from the learning outcomes are implemented, embedded and monitored by the relevant service managers.
9.4	Landlords must appoint a suitably senior lead person as accountable for their complaint handling. This person must assess any themes or trends to identify potential systemic issues, serious risks, or policies and procedures that require revision.	Yes	<u>Evidenced:</u> Policy = 11	The Director of Operations is the senior lead with overall accountability for complaint handling, working alongside the MRC. Supported by the Complaints and Resolutions Officer, Management Team and our, Complaints and Scrutiny Audit Panels. They review complaint themes, trends and learning to identify potential systemic issues, service risks, and any policies or procedures requiring change.

				This oversight is informed by regular performance reporting, learning summaries, complaint outcomes, case studies and service improvement actions, which are used to challenge performance and drive continuous improvement.
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	<u>Evidenced:</u> Policy = Sec 14 EHA Governance Structure	We have a Member Responsible for Complaints (MRC) who sits on our Complaints Panel, Operations and Consumer Committee and Board.
9.6	The MRC will be responsible for ensuring the governing body receives regular information on complaints that provides insight on the landlord's complaint handling performance. This person must have access to suitable information and staff to perform this role and report on their findings.	Yes	<u>Evidenced:</u> Our MRC attends Board, Operations and Consumer Committee and Complaints Panel meetings.	The Member Responsible for Complaints receives regular complaint performance information through the Complaints Panel, Operations and Consumer Committee, and Board reporting arrangements. This includes complaint volumes, categories, outcomes, themes, learning, service improvement actions, and updates from the Complaints and Resolutions Officer, relevant managers and the Executive Team where required.

				This enables the MRC to scrutinise performance, seek assurance and report findings or concerns to the governing body.
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	<u>Evidenced:</u> Regular reports are shared with Board, Operations and Consumer Committee and the Complaints Panel. These reports include: • volumes, categories, outcomes and performance • trends and themes • HOS determinations and compliance with orders	The Operations and Consumer Committee, which includes the MRC, has delegated responsibility for complaints assurance and receives quarterly complaint handling performance and learning reports • The Board receives quarterly complaint updates, the annual complaints performance report, and the annual self-assessment for final approval. • The MRC and Complaints Panel have direct access to the Complaints and Resolutions Officer where additional information or assurance is required.

			Annual CHC self-assessment	
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 cooperative approach towards resolving complaints, working with colleagues across teams and departments; b. take collective responsibility for any shortfalls identified through complaints, rather than blaming others; and c. act within the professional standards for engaging with complaints as set by any relevant professional body.	Yes	<u>Evidenced:</u> Policy = Sec 11	Providing excellent service to residents is one of our core objectives. We aim to place the needs and aspirations of our residents at the heart of everything we do. Complaint handling is a key part of this approach. We view complaints as an important source of insight, helping us to monitor service quality, identify shortfalls and deliver the improvements our residents want to see. - All relevant staff have a standard complaint handling objective within their annual personal development plans. This reinforces the expectation that staff work collaboratively, take shared responsibility for resolving complaints, and use learning to improve services. - Six-weekly meetings are held between the Complaints and Resolutions Officer and service managers to review complaint and service request outcomes, identify themes, agree learning and monitor actions. Learning

				is then shared with teams by managers and reinforced through organisational training and the staff intranet. • Staff are expected to comply with the Complaint Handling Code and to demonstrate a cooperative, resolution-focused approach when handling complaints.
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