EDEN HOUSING ASSOCIATION LIMITED

COMPLAINTS POLICY

Document Reference Number:	**CORP14**
Document Owner:	**Customer Service Manager**
Approved By:	**Board**
Approved Date:	**22 September 2026**
Policy Implementation Date:	**23 September 2026**
Revision Cycle:	**1 year**

This policy applies to Eden Housing Association and all its wholly owned subsidiaries; and where relevant, to services delivered by Eden Housing Association on behalf of Mitre Housing Association

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1. Policy Statement

Providing our residents with excellent services is one of our main objectives. We aim to put the needs and aspirations of our residents at the heart of everything we do.

The Association views complaints as a key element of its organisational strategy and a means of monitoring, maintaining and improving the level and quality of service provided. In addition, we will use the feedback received from complaints to drive and deliver the improvements our residents want.

The Regulator of Social Housing's Transparency, Influence and Accountability Standard require registered providers to ensure complaints are addressed fairly, effectively and promptly. It also requires landlords to communicate clearly with tenants, provide accessible information, support effective scrutiny, and enable tenants to raise complaints and hold their landlord to account.

The main aim of this policy and associated guidance is to set out Eden Housing Association's (EHA) approach to resolving complaints, clearly demonstrating how we will meet this requirement.

2. References

Internal
EHA Strategy (2024-2028)
Data Protection Policy
Complaints Procedure
Managed Behaviour Policy
Remedies and Compensation Policy
Equality Diversity and Inclusion Strategy and Policy
Tenant Satisfaction Measures Procedure
Heat Network Policy/Procedure
Disrepair Policy

External
Housing Ombudsman's Complaint Handling Code
Gov.UK Regulatory Standards – Consumer Standard
Housing Ombudsman Scheme
UK General Data Protection Regulation (UK GDPR)
Equality Act 2010
Localism Act 2011
Housing Act 1996 (schedule 2)
Data Protection Act 2018
Consumer Standards – Transparency, Influence and Accountability Standard
Heat Network (Metering and Billing) Regulations 2014 (as amended 2015 & 2020)
Heat Networks (Market Framework) (Great Britain) under powers from the Energy Act 2023.
Ofgem – Consumer Standards
Social Tenant Access to Information Requirements (STAIRs): Policy Statement, Ministry of Housing, Communities and Local Government

3. Policy Content

EHA sets out to provide a high quality of service and satisfaction to all of our residents. However, we recognise that occasionally things do go wrong. We operate a two-stage, resident-focused complaints process, giving residents the opportunity to explain their views and desired outcome before a final decision is made.

We believe that a positive complaint handling culture across the whole organisation is integral to the effectiveness with which we resolve disputes, the quality of service we provide and our ability to learn and improve.

This Policy provides a means by which residents can inform us when they are dissatisfied with the service they have received. We will always encourage our staff to think creatively and use common sense when dealing with all complaints.

We do not see complaints as negative. In fact, we feel that they are indicative of a well-publicised and accessible complaints process.

4. Our Aim

- To deliver a seamless, high quality experience which is tailored to the individual's requirements
- To be fair, transparent and consistent in the way we manage complaints
- To learn from complaints and commit to making appropriate changes to prevent a recurrence
- To put things right as quickly as possible
- To ensure that we keep the resident informed of progress whilst we are dealing with the complaint
- To inform our residents when they have influenced changes to policy, improvements to services and publish our findings.
- To listen to residents and use their feedback to better understand individual needs, helping us to resolve issues early and prevent escalation

5. Our Approach to Complaint Handling

We define a complaint 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'.*

When dealing with complaints we will always:

- **Show respect** – treating everyone with fairness and dignity, in addition all information shared with us will be dealt with in a confidential manner by an appropriate member of staff
- **Be open, positive and flexible** - towards feedback and new ideas. We will encourage innovations and creativity that will improve outcomes for our residents

- **Work in partnership** – develop open communications and equal relationships with our residents, staff and partners, always valuing their contributions enabling us to work together to resolve issues effectively and efficiently
- **Deliver** – we will do what we say we are going to and be held accountable for all of our actions.

6. Who can make a Complaint?

Anyone receiving or requesting a service from EHA can make a Complaint.

- EHA Tenants and Leaseholders
- Residents (owner occupiers and private tenants)

In addition, we will accept complaints from family members, local Councillors or any other advocate acting in the best interests of our residents, providing they are authorised to do so. 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.

7. How can you make a Complaint and how can we help?

In order to encourage feedback from our residents we recognise that we must not set barriers in their way and will ensure that our Policy which includes information about the Housing Ombudsman and the Complaint Handling Code is available in a clear and accessible format for all residents. This includes via our website, email or hard copy on request from any of our staff. We value diversity and are committed to promoting equality of opportunities to ensure all residents are treated fairly. Residents are able to make complaints to any member of staff in a number of ways:

- Telephone
- Letter
- E-mail
- Website
- Social Media
- Online self-service portal
- In person
- Completing a survey

Complaints can be made through any channel, by representatives, and without using the word complaint.

Complaints received through our social media platforms will be handled in a way that protects confidentiality and privacy. Where a complaint is raised on a public page, we will contact the resident through a secure, private channel so that we can discuss their concerns directly.

We comply with the Data Protection Act 2018 at all times in relation to the collection, storage, access to, provision, and disclosure of data.

If a resident requires assistance to use our service, we will do everything we reasonably can to assist by agreeing adjustments to how we deliver our service. This

could include (but is not limited to):

- Providing advice and assistance about the process
- Providing information in appropriate alternative formats such as large print, braille and other languages
- Providing an interpreter
- Considering requests for a meeting or interview with a particular staff member, or with staff of a particular gender, where this is reasonable, possible and appropriate
- Extension of time limits (where it is lawful to do so)
- Use of email or telephone in preference to hard copy letters
- Rest or comfort breaks in any meetings

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 resident's needs.

Many adjustments will be straight forward to make and will be delivered with a minimum of delay. In some circumstances we may need to seek advice and consider our duties under the Equality Act 2010 and anticipate the needs and reasonable adjustments of residents who may need to access the complaints policy. Examples may include but are not exhaustive:

- How *effective* the adjustment will be – will the adjustment fully address the disadvantage it is meant to overcome?
- How *practical* the adjustment will be – eg we may not be able to extend timeframes if there is a legal deadline to meet
- The availability of *resources* to make the adjustment - an adjustment that is effective may not be considered reasonable. How reasonable an adjustment is will be considered in light of the resources required to make it. If an adjustment costs a significant amount of money, it may not be reasonable.
- How much *disruption* the adjustment will make to the delivery of our services, e.g. it will not usually be reasonable for a member of staff to only deal with one person – other residents and services will inevitably suffer.

Our Housing Management system allows us to store and view alerts relating to residents' needs and vulnerabilities. This information can then be used to prioritise complaints accordingly.

8. Definitions

The resident does not have to use the word complaint for it to be treated as such. Whenever a resident expresses dissatisfaction, we will give them the opportunity to make a complaint. A complaint that is submitted via a third party or representative will be handled in line with our complaints policy. Our staff will be trained to recognise the difference between a service request and a complaint, taking appropriate steps to resolve the issues as early as possible.

The definitions detailed below will ensure that the Policy and associated guidance are implemented consistently across the organisation.

Service Request – A service request is a request from a resident asking us to take action to put something right. This may include reporting an issue for the first time, asking us to provide information, or asking us to take action about one of our services.

For example, a service request could be:

- reporting a repair for the first time
- asking for an update on a repair
- asking us to remove fly-tipping
- requesting action about an estate issue
- asking for information or help with any of our housing services

We will record, monitor and review service requests regularly to make sure they are responded to appropriately and to help identify any learning or service improvements.

If the resident is dissatisfied with our service, actions, a lack of action, delay, or the outcome of a service request, we will treat this as a complaint. We will continue to deal with the service request even if a related complaint is raised.

Complaint – 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.

When dealing with a complaint we will not stop our efforts to address the original service request. If residents are dissatisfied with our response to a service request, we will raise this as a complaint and explain the next steps.

If dissatisfaction is raised via a survey for example our quarterly Tenant Satisfaction Measures (TSM) perception survey, our Customer Service Team will review the survey response promptly and contact the resident where dissatisfaction is identified. Staff must assess whether the issue meets the complaint definition and, where it does, log it as a complaint without requiring the resident to repeat the issue or complete a separate form.

9. Managing Complaints and Escalations

A complaint may be raised at any stage where a resident expresses dissatisfaction with the standard of service received, the actions taken or not taken by EHA, or the way in which a service request has been handled or resolved. We will accept 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.

Complaints can relate to one or more of the following areas. This list is not exhaustive.

- failure to provide a service
- failure to provide a service to the standard that could reasonably be expected
- failure to follow EHA policy or procedure
- unhelpful behaviour or attitude from a member of staff or contractor
- failure to provide information, or to provide accurate information, in a timely manner

- poor or unsuitable advice
- failure to respond to enquiries
- missed agreed appointments
- delay or neglect in administrative or other processes
- failure to consider all relevant information before reaching a decision
- failure to fulfil contractual obligations or commitments
- evidence of malice, bias, inequity or discrimination

9.1 Exclusions and requests to escalate a complaint

We will accept all complaints and all requests to escalate a complaint from Stage 1 to Stage 2 unless there is a valid reason not to do so (in line with the Housing Ombudsman's Complaint Handling Code). Residents do not need to explain why they would like to escalate their complaint.

We may decide not to treat a matter as a complaint, or not to escalate it, where:

- the issue happened more than 12 months ago, or our resident became aware of it more than 12 months ago, and there is no good reason for us to consider the complaint
- legal proceedings have started, meaning details of the claim, such as the Claim Form and Particulars of Claim have been filed at court
- the same issue has already been considered through our complaints process

We will not apply these exclusions as a blanket rule. Each complaint or request to escalate will be considered on its own merits. Where we decide not to accept or escalate a complaint, 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.

For the purposes of this policy, a matter does not become "legal" until court proceedings have been issued. Pre-action correspondence or a letter of claim will not, on its own, prevent us from investigating a complaint. In cases involving housing conditions or disrepair claims, we will remain committed to inspecting the property promptly and completing any works needed as soon as reasonably practicable

9.2 Complaints Process

We operate a two-stage, resident-focused complaints process, giving residents the opportunity to explain their views and desired outcome before a final decision is made. If the resident remains dissatisfied with our Stage 1 response, they can ask for the complaint to be escalated and considered at Stage 2.

The officer responsible for investigating and responding to Stage 1 Complaints is our:

- Complaints and Resolutions Officer with oversight from the Customer Service Manager

The officers responsible for investigating and responding to Stage 2 Complaints are:

- Directors

- Chief Executive
- Board Members

Stage 2 complaints will be considered by a suitably senior officer, Chief Executive or nominated Board Member who has not been involved in the Stage 1 investigation or decision, and who has no actual or perceived conflict of interest in relation to the complaint. This ensures that the Stage 2 review is independent, fair and provides appropriate senior oversight before Eden Housing Association's complaints process is concluded.

In the first instance, the Complaints and Resolutions Officer will liaise with the Ombudsman and prepare complaints data for presentation to the governing body. In their absence, or where it is not appropriate for the Complaints and Resolutions Officer to undertake this role, this may be carried out by any of the officers listed above.

9.3 Dealing with Complaints

When dealing with complaints, we will:

- welcome and encourage complaints and feedback, acknowledging where we have fallen short so that we can improve the services we deliver
- not view high volumes of complaints as negative, as they may indicate a well-publicised and accessible complaints process
- recognise that putting things right is the first step in repairing and rebuilding trust with residents
- give residents a fair opportunity to set out their position
- ensure investigating officers have access to staff at all levels, the authority to resolve disputes promptly and fairly, and have had no prior involvement or perceived conflict of interest in the complaint they are investigating
- maintain regular contact while the complaint is open, agreeing the frequency and method of communication with the resident where appropriate, giving them a fair opportunity to comment on any adverse findings before a final decision is made
- ensure internal and/or independent support or advocacy is available for residents who need it
- conduct investigations impartially, seeking sufficient reliable information from all parties so that fair and appropriate findings, recommendations and learning can be identified, including any recurring issues
- send the response to the resident when the answer to the complaint is known and not delay the response until any outstanding actions are completed
- track outstanding actions and ensure the resident receives regular updates until they are complete, in addition the Complaints and Resolutions Officer or other investigating officer will remain involved until all outstanding actions are complete
- incorporate additional complaint issues into the Stage 1 investigation/response where these are raised while the complaint remains open
- where the Stage 1 response has already been issued, or where new issues are unrelated or would unreasonably delay the response, we will log these as a new complaint
- explain the reason for any delay if we cannot meet the published timescale, confirm the revised response date, and provide the resident with the Housing

Ombudsman's contact details

- our officers have access to appropriate remedies to resolve complaints in a range of ways, ensuring the solution or remedy reflects the extent and impact of any service failure. A complaint can be remedied at any stage of the process without the need for escalation
- any remedy offered will reflect the impact on the resident and may include an apology, practical action, service improvement, reimbursement, compensation, or a combination of these. In deciding what is appropriate, we will take account of our Remedies and Compensation Policy, including any statutory payments, evidenced financial loss, and the resident's time and trouble, distress and inconvenience
- escalate a complaint from Stage 1 to Stage 2 when requested, unless there is a valid reason not to do so in line with the Housing Ombudsman's Complaint Handling Code. Residents do not need to explain why they want their complaint to be escalated. We will not apply a 'one size fits all' approach, and each request will be considered on its own merits
- clearly set out our understanding of the obligations of both parties where a key issue of a complaint relates to legal obligations or entitlement to redress
- take ownership of complaints involving a third party, such as a contractor, and deal with them in line with our policy and procedure. We will ensure the third party is aware of our obligations under the Code and our approach to complaint handling. The resident will not be expected to go through two complaints processes
- send the resident a satisfaction survey once the complaint is closed, focusing on their experience at each stage of the process. Feedback will be used to improve services
- share/discuss the final response letter, including any outstanding actions, with the relevant service manager/team when a complaint is closed, so that learning and service improvements can be implemented promptly then shared with the wider organisation via our staff training sessions
- We will maintain complete records of complaints including correspondence, evidence gathered, decisions reached, remedies offered, learning identified and outcomes at each stage.

9.4 Acknowledging and responding to complaints

All complaints (at either Stage 1 or 2) will be acknowledged, defined and logged within 5 working days of the complaint being received. Staff may be required to obtain additional information from the residents to assist the process.

The acknowledgement will include:

- the complaint stage and reference number
- our understanding of the complaint and the outcome the resident is seeking
- areas of the complaint we are or are not responsible for
- name of the investigating officer
- timescale for the response
- details of how to access the Housing Ombudsman's dispute support advisors throughout the life of the complaint
- a copy of our service standard

We will issue a full response when the answer to the complaint is known not when the outstanding actions have been completed. We will respond within the Housing Ombudsman timeframes:

- Stage 1 complaints within 10 working days of the complaint being acknowledged
- Stage 2 complaints within 20 working days of the complaint being acknowledged

When responding to complaints at each stage, we will clearly set out:

- the complaint stage, complaint reference and our understanding of the complaint
- our decision on each point raised, with clear reasons for our decisions referencing the relevant policy, law and good practice where appropriate
- any remedy offered, including apologies, explanations, actions, timescales or compensation where appropriate
- any outstanding actions and when we expect them to be completed
- how to escalate the complaint to the next stage, where this applies, or how to refer the complaint to the Housing Ombudsman once our complaints process has ended
- what we have learned and any service improvements we will make, where relevant

For complex cases, we may need to extend our response timeframe but would not do so without good reason. We would always explain the reason for the extension, confirm the revised response date and keep the resident updated at suitable intervals until the complaint is resolved. In addition, we will also provide details of how to contact the Housing Ombudsman if the resident does not agree with the extension.

Extensions must be no more than:

- Stage 1 complaint by up to a further 10 working days
- Stage 2 complaint by up to a further 20 working days

The response provided by the investigating officer dealing with the Stage 2 complaint marks the end of Eden Housing Association's complaints process. The letter confirming the investigating officer's decision will include details of how the resident can refer their complaint to the Housing Ombudsman if they remain dissatisfied.

9.5 Referring to the Housing Ombudsman

Residents can contact the Housing Ombudsman at any point during the complaints process. Contact details are included in our Service Standard, which accompanies all acknowledgement, response and extension of time letters.

The Housing Ombudsman will consider each complaint with the aim of achieving the best outcome for the resident's individual circumstances.

We will co-operate with the Housing Ombudsman's requests for evidence and provide

this within the timescales set by the Ombudsman. In the first instance, the Complaints and Resolutions Officer will liaise with the Ombudsman. In their absence, or where appropriate, this may be undertaken by a member of the Management or Executive Team.

Further information on the Housing Ombudsman's Complaint Handling Code can be obtained by accessing their website www.housing-ombudsman.org.uk

10. Residents Responsibilities

We believe that our residents have the right to be heard, understood and respected, and that our staff should enjoy the same rights.

We recognise that when things go wrong our residents may be unhappy and show signs of stress and frustration when making a complaint. However, our residents have a responsibility not to engage in:

- Aggressive or abusive behaviour – for example verbal abuse and threats
- Making unreasonable demands – for example continual phone calls, letters, emails or visits to our offices repeatedly changing the content of a complaint or raising unrelated issues. We consider these demands unacceptable and unreasonable if they start to substantially impact on our work, such as taking up an excessive amount of staff time to the disadvantage of other residents
- Making malicious complaints – for example making malicious comments or complaints, which are without foundation
- Unreasonable Persistence – for example persisting in pursuing a matter when they have already exhausted other statutory routes of appeal, making complaints in order to make life difficult for EHA rather than to genuinely resolve a problem

Any action taken under the Managed Behaviour Policy will be proportionate, reviewed on a case-by-case basis, and will not prevent residents from accessing or progressing a complaint where it is reasonable and safe to do so.

Our Managed Behaviour Policy provides full details on our approach if a resident continuously behaves in a way that staff feel is unreasonable.

11. Staff Responsibilities

The Director of Operations retains overall responsibility for this Policy. All managers are responsible for implementation, including ensuring that appropriate monitoring, staff awareness, training, policy development and resident communications are in place.

We have a dedicated Complaints and Resolutions Officer who promotes a consistent, open and resident-centred approach to complaint handling. The role supports staff to follow internal processes and regulatory requirements, identifies learning and training needs, captures and reports complaint findings, and helps embed service improvements. Reporting to the Customer Service Manager, the role works closely with the Complaints Panel and Member Responsible for Complaints to support scrutiny, assurance and continuous learning.

All relevant staff have a standard objective within their annual personal development plans in relation to complaint handling and must demonstrate:

- a collaborative and cooperative approach to resolving complaints, working with colleagues across teams and departments
- collective responsibility for any shortfalls identified through complaints, rather than attributing blame
- compliance with any professional standards relevant to complaint handling

Staff learning from complaints is also supported through the arrangements set out in Section 15 – Monitoring, Review and Governance. This includes sharing learning through annual staff training sessions, our internal intranet and relevant management reporting routes.

12. Complaints and Information Requests Handled Under Specialist Routes

Some complaints or information requests may need to be handled under specialist procedures or referred to another body. These routes do not remove a resident's right to use our landlord complaints process where there is related dissatisfaction with our service.

Heysham Gardens Heat Network - Energy Ombudsman

Complaints about the shared heating system, or Heat Network, at Heysham Gardens will be handled in line with the Heat Networks Complaints Policy/Procedure and its timescales. If the complaint remains unresolved after eight weeks, the resident may contact the Energy Ombudsman.

Contact details are included in our Heat Networks Complaints Policy/Procedure.

We will co-operate with the Energy Ombudsman's requests for evidence and provide this within 15 working days. In the first instance, the Complaints and Resolutions Officer will liaise with the Energy Ombudsman. In their absence, or where appropriate, this may be undertaken by a member of the Management or Executive Team.

Information Commissioner's Office (ICO)

Any complaint about the handling of personal data will be reviewed internally by our Data Protection Officer. If the resident remains dissatisfied with the outcome, they can contact the Information Commissioner's Office (ICO) to escalate their concerns. The ICO's contact details are set out in our Data Protection Complaint Procedure and Staff Guidance.

Social Tenant Access to Information Requirements (STAIRs)

The Social Tenant Access to Information Requirements (STAIRs) give tenants of private registered providers of social housing new rights to access information about how their homes and housing services are managed. From 1 October 2026, registered providers must proactively publish certain information. From 1 April 2027, tenants will also be able to make direct information requests to their landlord.

Where a request relates to information covered by STAIRs, it will be managed in line

with our STAIRs process and any associated staff guidance. This is separate from the landlord complaints process, although we will consider any related service failure or dissatisfaction under this Complaints Policy where appropriate.

If a resident is dissatisfied with how their STAIRs information request has been handled, or does not receive a response within 30 calendar days from 1 April 2027, they may refer the matter to the Housing Ombudsman under its STAIRs complaint process. The Housing Ombudsman may consider whether the landlord has handled the information request appropriately and may require action to put matters right.

The above are specialist complaint routes for specific complaint types and do not remove access to the landlord complaints process where applicable.

13. Equality Impact Assessment (EIA)

Eden Housing Association is committed to ensuring that no person or group is treated less favourably because of a protected characteristic. In applying this Policy, we will have due regard to equality, diversity and inclusion and our duties under the Equality Act 2010, including the following protected characteristics:

- Age
- Disability
- Gender reassignment
- Marriage and civil partnership
- Pregnancy and maternity
- Race
- Religion or belief
- Sex
- Sexual orientation

A copy of the Equality Impact Assessment can be found in Appendix 3.

14. Complaints Panel

We have a Complaints Panel made up of two Board Members, two Scrutiny Panel Members and two fellow elected tenants. We have a Member Responsible for Complaints (MRC) who sits on our Complaints Panel, Operations and Consumer Committee and provides the Board with assurance on the effectiveness of our complaints process. The Member Responsible for Complaints provides independent oversight of complaint handling and reports regularly to the Board/Operations and Consumer Committee on performance, compliance, learning outcomes and service improvement.

The Panel is supported by our Complaints and Resolutions Officer and Customer Service Manager and meets quarterly, aligned with our board/committee meetings. The Complaints Panel provides oversight, scrutiny and assurance on complaint handling performance, learning, compliance, themes and trends. The Panel's role is strategic and assurance-focused. It is separate from the complaint investigation and decision-making process and does not investigate individual complaints, hear appeals, reconsider complaint outcomes, or overturn or amend complaint decisions.

Tenant and Scrutiny Panel Member involvement is for governance, scrutiny and

assurance purposes only. Members of the Panel will not be provided with personal or identifiable complaint information unless this has been appropriately anonymised or the resident has been given informed consent, where this is required. Information shared with the Panel will be limited to what is necessary to understand complaint handling performance, themes, learning and service improvement.

The role of the Panel is to provide oversight, scrutiny and assurance by:

- understanding the impact of complaint handling on our residents, using feedback from our quarterly TSM surveys as part of the drive to encourage a positive complaint and learning culture
- reviewing issues and trends arising from complaint handling
- ensuring that learning is being used to drive service improvements, including reviewing whether any reasonable adjustments requested can help us take wider steps to improve our services
- supporting effective handling, prevention, learning and development
- using data to assess performance and risks
- analysing the volume, category and outcome of complaints alongside timely compliance with published timeframes and any Ombudsman orders
- instructing “Deep Dives” into areas where complaint trends indicate an increase in dissatisfaction
- participating in detailed complaint case studies, allowing the Panel to gain an understanding of the resident’s journey and how learning outcomes are captured and implemented

To ensure the Panel remains separate from complaint handling decisions, the Panel **will not**:

- investigate or hear individual complaints
- deal with appeals
- overturn or amend the investigating officer’s decision

15. Monitoring, Review and Governance

This Policy will be reviewed annually in line with the Housing Ombudsman’s Complaint Handling Code, or sooner where required by changes in regulation and/or legislation.

We will also produce an Annual Complaints Performance and Service Improvement Report each year. This will be published on our website and will include:

- Complaint volumes and outcomes
- Compliance with timescales
- Learning outcomes and service improvements
- Ombudsman decisions and compliance

Whilst we tailor our approach to each complainant’s individual needs, we also identify common themes in relation to outcomes, learning and best practice. This learning is captured, shared, discussed and implemented through a range of resident, governance, management and staff communication channels.

- 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 training sessions
- Staff via the internal intranet

Any actions identified from learning outcomes are implemented, embedded and monitored by the relevant service managers.

Overall monitoring and review of the Policy will be undertaken in consultation with:

- Service Users
- Complaints Panel Members
- Scrutiny Audit Panel Members
- Operations and Consumer Committee
- Board Members

All reviews will consider whether:

- the current Policy adheres to legislative and regulatory requirements and reflects current good practice
- the aims and objectives of the Policy are being met
- the current Policy outcomes meet the needs and aspirations of our resident base
- service users are aware of and understand the Policy and believe it to be consistent and fair
- the service offers value for money

Our policy and associated guidance aims to promote a positive approach from all staff. Regular training and updates will be provided to further enhance that approach.

Performance monitoring will be undertaken in the following areas to assess the impact of:

- The number of complaints recorded
- The number of complaints where the timescale for a response has been extended
- The number of complaints upheld, not upheld
- Details of the service improvements implemented as a result of complaints
- The number of Stage 2 Complaints referred to the Housing Ombudsman
- The number of Complaint Handling Failure Orders issued by the Housing Ombudsman

We will carry out an annual self-assessment against the Housing Ombudsman's Complaint Handling Code to ensure our complaint handling remains compliant with its requirements. We will also complete a further self-assessment following any significant restructure or change that may affect complaint handling.

The Annual Complaints Performance and Service Improvement Report will sit

alongside our annual self-assessment against the Housing Ombudsman's Complaint Handling Code. They will be reported to the governing body for scrutiny and challenge and published on the complaints section of our website. The governing body's response to the report will be published alongside it.

If exceptional circumstances temporarily affect our ability to comply with the Housing Ombudsman's Complaint Handling Code, we will inform affected residents, notify the Housing Ombudsman where required, publish relevant information in the complaints section of our website, explain any interim arrangements, and set out the expected timescale for returning to full compliance.

Updated: 20.10.26
Appendix 1

Complaints Service Standard

Providing excellent service to our residents is one of our main objectives. We aim to put residents' needs and aspirations at the heart of everything we do. We view complaints as a way of monitoring, maintaining and improving the level and quality of service we provide.

You can make a service request or complaint in a number of ways:

- Visit our offices in person
- Ring us on 01768 861400
- Send us an email to enquiry@edenha.org.uk
- Write to us at Blain House, Bridge Lane, Penrith CA11 8QU
- Log into 'My Account' on our Tenant Portal
- Complete a survey

In addition, we will accept complaints from family members, local councillors or any other advocate acting in your best interests (provided you have authorised them to do so).

If you require assistance to use our service, we will do everything we can to assist by agreeing adjustments to how we deliver our service and acknowledging our obligations under the Equality Act 2010. This could include (but is not limited to):

- Providing advice and assistance about the process
- Providing information in appropriate alternative formats such as large print, braille and other languages
- Providing an interpreter
- Considering requests for a meeting or interview with a particular staff member, or with staff of a particular gender, where this is reasonable, possible and appropriate
- Extension of time limits (where it is lawful to do so)
- Use of email or telephone in preference to hard copy letters
- Rest or comfort breaks in any meeting

We will not make assumptions about whether you require any reasonable adjustment or about what those adjustments might be. We will discuss your requirements to reach an agreement that best suits your individual needs.

We will make our complaints policy and service standard available in clear and accessible formats. We will also publicise how residents can make a complaint so that the process is easy to find, understand and use.

Definitions:

We define a complaint 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'.*

You do not have to use the word 'complaint' for us to treat it as a complaint. Whenever you express dissatisfaction, we will make sure this is recognised and handled appropriately. If you are dissatisfied with our response to a service request, we will raise this as a complaint.

We will use the following definition to help distinguish service requests from complaints:

Service request – A service request is a request from a resident asking us to take action to put something right. This may include reporting an issue for the first time, asking us to provide information, or asking us to take action about one of our services. For example, a service request could be:

- reporting a repair for the first time
- asking for an update on a repair
- asking us to remove fly-tipping
- requesting action about an estate issue
- asking for information or help with any of our housing services

If you are dissatisfied with our service, our actions, a lack of action, delay, or the outcome of a service request, we will treat this as a complaint. We will continue to deal with the service request even if a related complaint is raised.

We will record, monitor and review service requests regularly to make sure they are responded to appropriately and to help identify any learning or service improvements.

When dealing with a complaint we will not stop our efforts to address the original service request. If you are dissatisfied with our response to a service request, we will raise this as a complaint and explain the next steps.

When we may not treat something as a complaint

We will accept a complaint unless there is a valid reason not to do so. Each complaint will be considered on its own merits, and we will not apply exclusions in a blanket way.

We will accept complaints referred to us within 12 months of the issue occurring, or within 12 months of you becoming aware of the issue, unless there is another valid reason for us not to do so.

We may decide not to treat a matter as a complaint, or not to escalate it, where:

- the issue happened more than 12 months ago, or you became aware of it more than 12 months ago, and there is no good reason for us to consider it
- legal proceedings have started, meaning details of the claim, such as the Claim Form and Particulars of Claim, have been filed at court

- the same issue has already been considered through our complaints process

If we decide not to accept or escalate a complaint, we will explain our reasons clearly in writing and keep a record of our decision. We will also tell you how you can challenge that decision, including your right to contact the Housing Ombudsman about our decision.

We operate a two-stage, resident-focused complaints process which gives you the opportunity to explain your point of view and the outcome you are seeking before a final decision is reached. If you remain dissatisfied with our Stage 1 response, you can ask for your complaint to be considered at Stage 2. You do not need to explain why you want your complaint to be escalated, although it will help us if you tell us which parts of the response you remain dissatisfied with and what outcome you are seeking.

All complaints (at either Stage 1 or 2) will be acknowledged, defined and logged within five working days of the complaint being received. The acknowledgement will include:

- the complaint stage and reference number
- our understanding of the complaint and the outcome you are seeking
- areas of the complaint we are or are not responsible for
- name of the investigating officer
- timescale for the response
- details of how to access the Housing Ombudsman's dispute support advisors throughout the life of the complaint
- a copy of our Service Standard

When responding to complaints at each stage, we will clearly set out:

- the complaint stage, complaint reference and our understanding of the complaint
- our decision on each point raised, with clear reasons for our decision
- any remedy offered, including apologies, explanations, actions, timescales or compensation where appropriate
- any outstanding actions and when we expect them to be completed
- how to escalate the complaint to the next stage, where this applies, or how to refer the complaint to the Housing Ombudsman once our complaints process has ended
- what we have learned and any service improvements we will make, where relevant

The response provided to the Stage 2 complaint marks the end of Eden Housing Association's complaints process. If you remain dissatisfied with our response, you can refer your complaint to the Housing Ombudsman. You can contact the Housing Ombudsman at any point during the complaints process for advice and support.

The table below demonstrates who will deal with complaints, the timeframe for response and how to escalate your complaint to the Housing Ombudsman if you remain dissatisfied.

Stage 1 Complaint

We will provide a full response within 10 working days of acknowledgement of the complaint.

For complex cases, we may extend this by up to a further 10 working days. We will explain the reason for the extension, confirm the revised response date, keep you updated, and provide details of how to contact the Housing Ombudsman if you do not agree with the extension.

General complaint	Complaint relating to the behaviour of a member of staff	Complaint relating to the behaviour of a Director	Complaint relating to the behaviour of the Chief Executive or Board Member
Who will deal with the Stage 1 complaint?			
Complaints and Resolutions Officer or appropriate manager	**Appropriate manager (in consultation with HR if required)**	**Chief Executive (in consultation with HR if required)**	**Nominated Board Member**

Stage 2 Complaint

We will provide a full response within 20 working days of acknowledgement of the complaint.

For complex cases, we may extend this by up to a further 20 working days. We will explain the reason for the extension, confirm the revised response date, keep you updated, and provide details of how to contact the Housing Ombudsman if you do not agree with the extension.

Who will deal with the Stage 2 complaint?			
Director or Chief Executive	**Director or Chief Executive**	**Nominated Board Member**	**Nominated Board Member**

This concludes Eden Housing Association's complaints process

If you remain dissatisfied, you can refer your complaint to the Housing Ombudsman

Housing Ombudsman – If you remain dissatisfied, you can refer your complaint to the Housing Ombudsman. Their aim is to deal with each complaint to find the best outcome for the individual circumstances.

Once the complaint has been received the Housing Ombudsman may:

- Work with you and the landlord to resolve the dispute under their early resolution procedure. For example, they may use their experience of resolving complaints to make suggestions to you and/or the landlord.
- Carry out an investigation. This generally takes place when the Housing Ombudsman decides an investigation is proportionate to the circumstances and evidence presented.
- Refer the case to a different organisation if it is an issue that does not fall within the Housing Ombudsman's jurisdiction

Further information relating to the Housing Ombudsman can be obtained by contacting the Housing Ombudsman:

- Tel: 0300 111 3000
- Post: Housing Ombudsman Service, PO Box 1484, Unit D, Preston, PR2 0ET
- Online www.housing-ombudsman.org.uk

Phoneline opening hours:

- Monday, Tuesday, Wednesday and Friday: 9am - 5pm. Thursday: 9am to 3.30pm
- The phone lines are closed on weekends and bank holidays.
- Calls to and from 0300 111 3000 and direct dial lines of the Dispute Resolution Team are recorded for training and monitoring purposes.

Please note the Housing Ombudsman: strongly encourages you to use the online complaint form (which can be found on their website) to raise a complaint rather than sending via post. **Do not** send original documents by post as they are unable to post them back to you. The Housing Ombudsman does not accept any new case enquiries sent via email.

Appendix 2

The Housing Ombudsman Scheme

The Housing Ombudsman Scheme is approved by the Secretary of State under section 51 of, and Schedule 2 to, the Housing Act 1996 as amended by the Localism Act 2011, the Building Safety Act 2022 and the Social Housing (Regulation) Act 2023 (the Act).

The Act requires social landlords, as defined by section 51(2) of the Act, to be members of an approved scheme. Others may join the Scheme on a voluntary basis.

The purpose of the Housing Ombudsman Scheme is to enable tenants and other individuals to have complaints about members investigated by a Housing Ombudsman. The Ombudsman:

- makes the final decision on disputes between residents and member landlords
- makes the final decision on complaints about private registered providers concerning the Social Tenant Access to Information Requirements (STAIRs)
- issues, and monitors, compliance with a statutory Code of Practice for complaint handling by its members which promotes a positive complaint handling culture
- may issue good practice guidance to its members on the delivery of housing activities and order self-assessment against this guidance
- investigates the root causes of complaints, at both member and sector level, producing reports to share learning, improve services and prevent recurrences; and
- makes referrals to the Regulator of Social Housing where there is evidence of a systemic failing.
- The service is free for those eligible to use it. Their decisions are independent, impartial and fair.

The Complaint Handling Code

The Social Housing (Regulation) Act 2023 (the Act) empowered the Housing Ombudsman to issue a code of practice about the procedures members of the Scheme should have in place for considering complaints.

It also placed a duty on the Ombudsman to monitor compliance with a code of practice that it has issued. The Ombudsman consulted on the Complaint Handling Code (the Code) and our intended approach to the duty to monitor in late 2023. The Code became statutory on 1 April 2024 and our duty to monitor compliance commenced at the same time.

Compliance with the Code

The Ombudsman believes all members must comply with all provisions in the Code as this represents best practice in complaint handling.

Where the Housing Ombudsman finds an organisation has deviated from the Code in policy or practice, it may use its powers to put matters right and ensure compliance

with the Code. Where a landlord's policy does not comply with the Code, it must provide a detailed explanation for non-compliance in its self-assessment and the date by which it intends to comply.

Where there are exceptional circumstances which mean a landlord cannot meet specific requirements of Code, for example a small provider does not have a website, the Ombudsman will take a proportionate approach. In these circumstances, landlords must undertake all reasonable endeavours 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.

Where a landlord is unable to comply with the Code due to exceptional circumstances, such as a cyber incident, it must inform the Ombudsman of its reasons, provide information to residents who may be affected and publish this on their website. The landlord must provide all parties with a timescale for returning to compliance with the Code and the reasonableness of exemptions to the Code during this period may be assessed by the Ombudsman.

Monitoring compliance with the Code

The Ombudsman would like all landlords to have strong local complaint handling and a positive complaint handling culture – resolving complaints earlier and potentially without referral to the Ombudsman extends fairness to the benefit of all residents. This also leads to better services and strengthens relationships with residents.

We will use the duty to monitor compliance to further these aims by supporting better practice and providing opportunities for landlords to demonstrate complaint handling improvements.

Support for improvement will be provided through the Centre for Learning, accessible via our website, which hosts an ever-growing range of tools targeted at complaints handlers, senior managers and governing bodies.

We will monitor compliance in 3 ways. This will involve ensuring that the landlord:

- has scrutinised and challenged its compliance with the Code at its governing body through review of its self-assessment against the Code, its complaints handling performance and its learning from complaints, and published the outcome on its website annually
- complies with the Code in policy
- complies with the Code in practice

Where a landlord does not meet the requirements in any of the areas and does not move into compliance within a reasonable timescale, the Ombudsman may issue a Complaint Handling Failure Order (CHFO).

More detailed advice, support and guidance about the Housing Ombudsman can be accessed on their website: www.housing-ombudsman.org.uk

Appendix 3

Equality Impact Assessment (2.7.25)

Question	Response
1. Summary of aims and objectives of the policy/practice/activity	To demonstrate our commitment to upholding a positive complaint handling culture across the whole organisation.
2. What involvement, consultation, engagement has taken place for the policy/practice/activity (*e.g relevant groups/stakeholders*)	Refer to Tenant Engagement Assessment appendix 4
3. Who is affected by the policy/practice/activity (consider Armed Forces/Veterans)	Anyone receiving or requesting a service can make a complaint. The policy also applies to residents and service users who are serving members of the Armed Forces, veterans or members of Armed Forces families. Potential needs will be considered individually, including mobility, absence from home, communication arrangements, health conditions and access to representation.
4. What are the arrangements for monitoring and reviewing the impact of the policy/practice/activity	All Complaints are recorded on the Complaints area of Customer Central (which includes appropriate retention timeframes) • Cases are reviewed on a weekly basis by the Complaints & Resolutions Officer • Data provided is disseminated to Board/Operations and Consumer Committee/Complaints Panel via the quarterly reporting cycle • Data reported and discussed at management team meetings • Data reported and discussed at team meetings • Feedback monitored against TSM perception survey results • Policy and associated procedures are reviewed annually, or in line with changes in regulation and/or legislation • Annual Complaints Handling Code self-assessment completed and published • Complaints Satisfaction Survey sent out after each complaint is closed down • Scrutiny Audit Taskforce focusing on Complaints • Business Process Review focusing on Complaints

Protected Group	Is there a potential for a positive or negative impact	Action to address the impact
Disability: includes physical, sensory, neurodiversity, learning disabilities, mental health conditions / communication methods / range of support needed to participate / hearing loops or interpreters / accessibility – venue, location, transport	Positive and potential negative impact. The range of complaint channels, availability of representatives and commitment to reasonable adjustments should improve access. However, disabled residents may experience barriers arising from inaccessible information, digital exclusion, communication needs, sensory impairment, learning disability, neurodiversity, reduced mobility, mental health conditions or difficulty meeting standard timescales. The impact may be greater where a resident's disability affects how they communicate, understand information or engage consistently with the process.	Ask residents whether they need support or adjustments without requiring them to use specific terminology. Agree and record adjustments, preferred communication methods and accessibility needs. Provide information in appropriate formats, including large print, braille, accessible electronic formats and Easy Read where required. Arrange interpreters, advocates, additional explanation, rest breaks or adjusted contact arrangements where appropriate. Keep agreed adjustments under review and monitor complaint access, outcomes,

		satisfaction and timeliness for disabled residents where reliable data is available.
Gender reassignment: (transgender) people should be about to disclose their gender identity without fear or prejudice	Potential positive and negative impact. A respectful, confidential and flexible complaints process should support access. There is nevertheless a risk of distress, misgendering, inappropriate disclosure of previous identity, or reluctance to complain because of fear of prejudice or loss of confidentiality. A complaint may itself concern discrimination or inappropriate conduct associated with gender reassignment.	Use the resident's stated name, title and pronouns. Restrict access to personal information to staff who need it and avoid unnecessary references to previous identity. Allow the resident to choose an appropriate communication route or representative. Ensure allegations of discrimination or prejudicial treatment are explicitly identified and investigated. Monitor relevant themes without disclosing personal information.
Marriage or civil partnership: all couples or partners, regardless of gender, should be able to access services	Generally neutral, with a potential positive impact. The policy permits authorised partners and representatives to support or act for a resident. A potential disadvantage could arise if staff make assumptions about who may represent a resident or fail to recognise a spouse or civil partner equally.	Apply authorisation and confidentiality requirements consistently to all spouses and civil partners, regardless of sex or gender. Do not assume that one partner may speak for another without appropriate authority.
Pregnancy or maternity: consider flexible hours of service or project / is there access to private are for breastfeeding, milk storage etc. / returning to work considerations	Positive and potential negative impact. Flexible communication and meeting arrangements should promote access. Pregnancy, maternity leave, caring responsibilities, medical appointments, fatigue or recovery following childbirth may make it more difficult to respond within standard timescales or attend meetings.	Offer flexible appointment and contact arrangements, remote participation, additional time where lawful and reasonable, rest or comfort breaks and the option of a representative. Where an in-person meeting is necessary, consider privacy, accessibility and the resident's individual needs. Ensure service delays or reduced availability associated with pregnancy or maternity do not disadvantage the complainant.
Race: includes ethnicity, nationality and GRT communities. Consider the size of the BME communities that your service or project affects / languages spoken and understood / culture such as hygiene, clothing physical activities, mixed gender activities	Positive and potential negative impact. The availability of interpreters and information in other languages should improve access. Residents who do not use English as their first language, have limited literacy, or have different communication needs may otherwise find it difficult to understand the complaints process or articulate their desired outcome. There is also a risk that cultural assumptions, stereotyping or discriminatory behaviour could affect how a complaint is interpreted or investigated.	Offer appropriate interpretation and translated or accessible information where needed. Do not rely on children or other inappropriate family members to interpret sensitive complaint information. Establish the resident's preferred language and communication method. Explicitly identify and investigate any allegation of racial discrimination, harassment, bias or stereotyping. Monitor themes and outcomes by ethnicity where reliable data and numbers permit meaningful and confidential analysis.
Religion or belief: consider dates and times of events in relation to religious practices and festivals / the diversity within the communities that your service or project affects / prayer times, meal times, food cultural habit or belief, religious holidays such as Ramadan	Generally neutral, with possible positive and negative impacts. Flexible channels should support access, but fixed meetings or contact arrangements may conflict with religious observance, festivals or prayer times. Some residents may also have preferences relating to the sex of a staff member in particular circumstances. Complaints may involve alleged religious	Where reasonable and practicable, arrange meetings and contact around known religious observance and consider requests concerning the sex of the staff member dealing directly with the resident. Do not make assumptions about an individual's beliefs or needs. Identify and investigate allegations of discrimination or prejudice expressly.

	discrimination or prejudice.	
Sexual orientation: consider LGB+ people should feel safe to disclose their sexual orientation without fear of prejudice	Potential positive and negative impact. A confidential and respectful process should support access. Residents may nevertheless be reluctant to disclose relevant information because they fear prejudice, unwanted disclosure or discriminatory treatment. A complaint may relate directly to homophobic or biphobic behaviour.	Only request or record information about sexual orientation where it is relevant and necessary. Maintain confidentiality and avoid unnecessary disclosure. Allow use of an advocate or preferred communication route. Explicitly investigate allegations of discrimination, harassment or prejudicial treatment and monitor themes in a way that protects residents' identities.
Sex (gender): consider the impact on different genders / childcare and dependents care / mixed or single gender groups or activities / timing of services	Positive and potential negative impact. Offering different contact methods and considering requests for a staff member of a particular sex may improve access. Caring responsibilities, experiences of domestic abuse, harassment, trauma, or concerns about meeting a staff member or contractor of a particular sex may affect a resident's ability or willingness to use the process.	Consider reasonable requests for a staff member of a particular sex where possible and appropriate. Offer safe and private communication methods and allow representatives or supporters. Avoid assumptions based on sex. Where a complaint indicates safeguarding, domestic abuse, harassment or discrimination concerns, follow the relevant specialist procedures while preserving access to the complaints process. The main policy already allows consideration of a particular staff member or staff member of a particular gender where reasonable, possible and appropriate.
Age: consider the way younger and older people access services differently / use of technology / childcare or dependents care / transport arrangements / venue location	Positive and potential negative impact. Multiple complaint channels and the ability to use a representative should improve accessibility. Some older residents may experience digital exclusion, sensory impairment or difficulty with complex written information. Some younger residents may be less familiar with formal processes, may not recognise that dissatisfaction can be treated as a complaint, or may prefer digital communication. Age may also intersect with disability, caring responsibilities or access to transport.	Maintain non-digital routes and do not direct residents exclusively to the online portal. Provide clear, plain-English information and offer help to explain the process. Confirm preferred communication methods and allow authorised representatives. Monitor whether particular age groups appear less likely to complain, escalate complaints or respond to satisfaction surveys.
Rurality: consider if there is a disproportionate impact on tenants living in rural localities	Potential positive and negative impact. Telephone, email, post and online channels reduce the need to travel. However, residents in rural areas may experience limited public transport, weak mobile or broadband coverage, greater travel distances and reduced access to face-to-face support. Digital or telephone-only arrangements may therefore create barriers for some residents.	Retain a genuine choice of channels, including post and face-to-face support where needed. Do not disadvantage a resident because broadband, mobile coverage or transport affects their ability to respond. Consider remote, home-based or locally accessible arrangements where reasonable and appropriate. Monitor complaints access and satisfaction by locality where the data supports meaningful analysis.

Question	Explanation
Is it possible the proposed policy/practice/activity could discriminate or unfairly disadvantage people	Yes, potential barriers or differential impacts have been identified, particularly in relation to disability, age, race and language, pregnancy and maternity, sex, gender

	reassignment, sexual orientation, religion or belief, and rurality. These primarily relate to communication, accessible information, digital access, confidentiality, meeting arrangements, timescales and the risk of discrimination or inappropriate assumptions. The policy includes controls intended to remove or reduce these barriers, including multiple complaint channels, authorised representatives, alternative formats, interpretation, flexible communication arrangements and individually agreed reasonable adjustments. Implementation and complaint data will be monitored to identify whether any group experiences poorer access, timeliness, outcomes or satisfaction. No unmitigated adverse impact has been identified at this stage. EHA will comply with its legal duties in relation to reasonable adjustments and will consider residents' individual communication, accessibility and support needs throughout the complaints process.

Decision	Tick the relevant box	Include any justification required
1. No barriers identified and no change required – **proceed**	N/A	
2. Barriers identified towards one (or more) protected groups – **adapt or change** the policy/practice/activity to remove any barriers. This will better advance equality and/or foster good relations	X	Potential access and participation barriers have been identified for a number of protected groups. The policy has been designed to mitigate these through multiple complaint channels, accessible information, interpretation, representation, flexible communication and individually agreed reasonable adjustments. The EIA has been updated to record the potential impacts and the controls required. Subject to these controls being implemented and monitored, the policy may proceed.
3. Barriers identified towards one (or more) protected groups – **stop.** There are adverse effects which cannot be prevented / mitigated	N/A	
4. Barriers identified towards one (or more) protected groups – no proportionate way to amend the policy/practice/activity so **proceed with caution.**	N/A	

Action (To be completed as required)

If the evaluation has resulted in Decision 4, complete a risk assessment and record on Operational Risk Register	**Date Completed:** N/A

Appendix 4

Tenant Engagement Assessment – is engagement with tenants necessary?

Impact	Tick relevant box	Note any details / justification
No Impact on current tenants – you can proceed without engagement, explaining why.		
Direct or indirect impact on current tenants. **Stop!** Identify who will be affected i.e. all tenants or a specific group.	x	Anyone receiving or requesting a service can make, Complaint

Influence	Tick relevant box	Note any details / justification
No influence for tenants – i.e. wholly legislative – you can proceed without engagement, explaining why.		
Possible influence on areas of policy/ practice/ activity impacting on tenants – **stop. Arrange engagement with EIO**	x	Engagement carried out with • EHA Complaints Panel • Scrutiny Audit Panel • Recent Service Users
Best place for influence is the practical delivery of the policy – through procedure. Please summarise approach for procedure review		

Summary of engagement (To be completed as required)

Tenant group impacted and engaged (i.e. all/ sheltered)	Anyone receiving or requesting a service can make a Complaint.
Consultation method	Face-to-face, in person, email, phone
Summary of engagement	Full review of the Policy, Procedure and associated documents in line with the Housing Ombudsman's Complaint Handling Code. Feedback was also sought from the Complaints Panel, Scrutiny Audit Taskforce and Business Process Review, both of which focused on Complaints.
Key themes/ implications	

Appendix 5

Health & Safety Policy Review Assessment

Question	Additional information	
Does this policy/practice/activity address any Health & Safety practices?	N/A	
What is the key legislation related to this policy?	Housing Ombudsman's Complaint Handling Code	
Is the policy a control of a corporate or operational risk register? (if yes name risk)	N/A	
Tick groups/ departments who require knowledge of this policy		
	All staff	**Yes**
	ICT	
	Finance	
	Housing Options	
	Housing	
	Customer Services	
	Property	
	HR	
	Governance	
	Assisted Living	
	Contractors	
	Tenants	
Risk to tenants	**Tick the relevant box**	**Additional Information**
1. Are there additional measures required to reduce risk level to tenants.	N/A	
2. Has that risk been assessed?	N/A	
3. No Health & Safety implications	N/A	
4. Does it require tenant visibility?	Yes	If yes – upload to website

All assessments completed by:	Author: Heidi Ware Date: August 2026
All assessments reviewed by:	Reviewer(s): EHA Board Date:
Will these assessments be published?	Completed assessments are appended to each policy. Any appropriate public related policies are uploaded to the EHA website