

# **2024 Housing Ombudsman Self Assessment Complaint Handling Code**

## Section 1: Definition of a complaint

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
1.2	<p>A complaint must be defined as:</p> <p><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></p>	Yes	Definitions Section	<p>All expressions of dissatisfaction received about ECBHA Services, Actions and Staff are recorded as Complaints or murmurs on the Complaints module, investigated and resolved.</p> <p>New Complaints Policy 2024, confirms the definition of a Complaint and will be published on the ECBHA Website</p>
1.3	<p>A resident does not have to use the word ‘complaint’ for it to be treated as such. Whenever a resident expresses dissatisfaction landlords must give them the choice to make complaint. A complaint that is submitted via a third party or representative must be handled in line with the landlord’s complaints policy.</p>	Yes	Policy Positions Section	<p>All contact from Residents, Stakeholders via telephone, in person, via email, or via a third party or representative, regarding dissatisfaction are listened to, heard, recorded and given the opportunity or choice to make a complaint, and are handled in line with ECBHA’S Complaints Policy</p> <p>ECBHA Complaint Handlers are fully aware that the word Complaint does not need to be used, for it to be listened to, heard, understood,</p>

				<p>investigated and resolved, and will use their communication skills to clarify the difference whilst dealing with the contact received.</p> <p>ECBHA recognises the importance of feedback from Residents to be given the choice as to how they wish their contact to be heard and dealt with All Expressions of Dissatisfaction are recorded on the Complaints Module as Informal or Formal</p>
1.4	<p>Landlords must recognise the difference between a service request and a complaint. This must be set out in their complaints policy. A service request is a request from a resident to the landlord requiring action to be taken to put something right. Service requests are not complaints, but must be recorded, monitored and reviewed regularly.</p>	Yes	Definitions Section	<p>ECBHA Complaint Handlers are fully aware that the word Complaint does not need to be used, for it to be listened to, heard, understood, investigated and resolved, and will use their communication skills to clarify the difference whilst dealing with the contact received.</p> <p>ECBHA recognises the importance of feedback from Residents to be given the choice as to how they wish their contact to be</p>

				heard and dealt with All Expressions of Dissatisfaction are recorded on the Complaints Module as Informal or Formal. The Complaints policy clearly defines the difference between a service request and a complaint. This can be found in Definitions section.
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	Policy Positions Section	All complaints are raised on the SDM Module, outlining an explanation of the Residents reason for the complaint and their dissatisfaction to a response to their service request. The Association will continue their efforts to address and resolve the service request, alongside the handling and resolving of the Residents' complaint(s) This document within the complaints policy is available on the Eldonians website.
1.6	An expression of dissatisfaction with services made through a survey is not	Yes	Definitions Section	All dissatisfaction expressions of services,

	<p>defined as a complaint, though wherever possible, the person completing the survey should be made aware of how they can pursue a complaint if they wish to. Where landlords ask for wider feedback about their services, they also must provide details of how residents can complain.</p>			<p>however received from Residents, are made aware of how to make a complaint and are greatly encouraged to do so should they wish. Complaints Policy is advertised on the Associations Website, alongside being set out in the ECBHA Newsletters which are delivered to all Residents</p>
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## Section 2: Exclusions

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
2.1	Landlords must accept a complaint unless there is a valid reason not to do so. If landlords decide not to accept a complaint they must be able to evidence their reasoning. Each complaint must be considered on its own merits	Yes	Definitions Section and Policy Positions Section	The Association will always accept complaints, and all complaints will be considered on its own merits. Complaints will never be rejected by the Association without good cause and a thorough explanation to support and evidence the reason for rejection. This is set out within the Complaints Policy
2.2	<p>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:</p> <ul style="list-style-type: none"> <li>• The issue giving rise to the complaint occurred over twelve months ago.</li> <li>• Legal proceedings have started. This is defined as details of the claim, such as the Claim Form and</li> </ul>	Yes	Definitions Section	The Association is aware of their responsibility to accept, consider and resolve Complaints that Residents have referred to them that have taken place within, or that have occurred within the last 12 months. The Association will consider applying discretion for the acceptance of complaints made outside the 12-month period, with good cause.

	<p>Particulars of Claim, having been filed at court.</p> <ul style="list-style-type: none"> <li>• Matters that have previously been considered under the complaints policy.</li> </ul>			
2.3	<p>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.</p>	Yes	Definitions Section	<p>The Association would provide a thorough explanation to Residents why a complaint would be considered unsuitable and not accepted under the complaints process and the right for it to be taken to the ombudsman, ensuring the relevant information and assistance for contacting the Ombudsman is easily made available .</p> <p>The Association would take on board the Ombudsman decision that an exclusion has been unfairly applied and reconsider its acceptance.</p> <p>This is set out in the Complaints Policy available on the Associations website.</p>
2.4	<p>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</p>	Yes	Definitions Section and Housing Ombudsman Section	<p>The Association would provide a thorough explanation to Residents why a complaint would be</p>

	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.			<p>considered unsuitable and not accepted under the complaints process and the right for it to be taken to the ombudsman, ensuring the relevant information and assistance for contacting the Ombudsman is easily made available .</p> <p>The Association would take on board the Ombudsman decision that an exclusion has been unfairly applied and reconsider its acceptance.</p> <p>This is set out in the Complaints Policy available on the Associations website</p>
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Yes	Definitions Section	The Association would never take a blanket approach to exclude any complaints received and would always consider the individual circumstances of every complaint received



### Section 3: Accessibility and Awareness

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
3.1	Landlords must make it easy for residents to complain by providing different channels through which they can make a complaint. Landlords must consider their duties under the Equality Act 2010 and anticipate the needs and reasonable adjustments of residents who may need to access the complaints process.	Yes	Policy Position Section	The Association ensures, sets out and publishes all the channels available for Residents to make complaints, and provides continual reminders within newsletter publications to encourage complaints from Residents. The Association is aware and considers its duties and responsibilities and will always act in the best interests to anticipate and implement any reasonable adjustments required under the Equality Act 2010 for all Residents to access the complaints process
3.2	Residents must be able to raise their complaints in any way and with any member of staff. All staff must be aware of the complaints process and be able to pass details of the complaint	Yes	Policy Position Section	The Association will accept complaints received from Residents in any way and through all channels. All staff members are aware of the complaints process and

	to the appropriate person within the landlord.			how to accept, note and redirect Complaints to the designated Complaints Handlers
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	Policy Position Section	The Association greatly encourages Complaints from the Residents as a positive to ensure learning, and improvement. It enables the Association to evolve its policies and procedures
3.4	Landlords must make their complaint policy available in a clear and accessible format for all residents. This will detail the two stage process, what will happen at each stage, and the timeframes for responding. The policy must also be published on the landlord's website.	Yes	Policy Position Section and Process Appendix	The Association sets out clearly within their Complaints Policy, which is in an accessible format for all Residents, the two-stage process and what will happen at each stage, and the timeframe for responding. The Associations Complaint Policy is advertised on the Associations website.
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	Policy Position Section	The Complaints Policy clearly states the policy is available on the Eldonians website and that copies are available from our head office.
3.6	Landlords must give residents the opportunity to have a representative deal with their complaint on their	Yes	Policy Position Section	Where a tenant has indicated they would prefer for their complaint to be

	behalf, and to be represented or accompanied at any meeting with the landlord.			dealt with by a representative, or they wish to be accompanied at meetings, staff record this on the housing management system and this is stated within the Complaints Policy.
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	Policy Position Section, Housing Ombudsman Section and Appendix 1 Process.	Staff include as part of the communication with tenants, how they can make contact with the Ombudsman. Letters are stored on the individual complaints module on the housing management system.

## Section 4: Complaint Handling Staff

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
4.1	Landlords must have a person or team assigned to take responsibility for complaint handling, including liaison with the Ombudsman and ensuring complaints are reported to the governing body (or equivalent). This Code will refer to that person or team as the 'complaints officer'. This role may be in addition to other duties.	Yes	Responsibilities Section	Complaints officer roles are additional duties carried out by the the management team, this also includes liaison direct with the Ombudsman.
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	Responsibilities Section	Complaints officers/ handlers have access to all staff and have the authority to resolve disputes promptly and fairly, there is of course times when the housing manger can assist and help with these decisions.
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	Policy Positions Section Training sessions records available	Active ongoing training and review of complaints are used as a learning tool on how we can improve services , ECBHA focus on the positive culture of complaint handling

## Section 5: The Complaint Handling Process

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
5.1	Landlords must have a single policy in place for dealing with complaints covered by this Code. Residents must not be treated differently if they complain.	Yes	Only one policy in place	Complaints Policy is a one point of reference for tenants on how complaints are handled by ECBHA. The policy is written to ensure that the requirements of this code are the foundation of how we handle all tenant complaints. Staff receive ongoing training on complaints handling. The Policy is accessible to all tenants via the Eldonian Community Based Housing Association website.
5.2	The early and local resolution of issues between landlords and residents is key to effective complaint handling. It is not appropriate to have extra named stages (such as 'stage 0' or 'informal complaint') as this causes unnecessary confusion.	Yes	Policy Position Section	The Complaints Policy has two clearly defined stages and tenants are made aware of this upon a complaint being made/escalated.
5.3	A process with more than two stages is not acceptable under any	Yes	Policy Position Section	As above

	circumstances as this will make the complaint process unduly long and delay access to the Ombudsman.			
5.4	Where a landlord's complaint response is handled by a third party (e.g. a contractor or independent adjudicator) at any stage, it must form part of the two stage complaints process set out in this Code. Residents must not be expected to go through two complaints processes.	Yes	Policy Position Section	All complaints are handled by ECHBA staff at all stages of the process.
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Yes	Policy Position Section – Don't have third parties handling complaints	As above. All complaints are managed by ECBHA staff.
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	Appendix 1 Procedure	All staff receive training to ensure that they gain a clear understanding of the specifics of any complaint at both stage 1 & stage 2. This is recorded on the complaints module within the housing management system. Written communication is sent to the tenant to confirm this.
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	Yes	Definitions Section, Appendix 1 Procedure	All staff will provide written communication at any stage of a complaint to verify which aspects of the

	clarify any areas where this is not clear.			complaint they are responsible for, and those which they are not. This is to give the tenant clarity to avoid any misunderstanding or confusion.
5.8	<p>At each stage of the complaints process, complaint handlers must:</p> <ul style="list-style-type: none"> <li>a. deal with complaints on their merits, act independently, and have an open mind;</li> <li>b. give the resident a fair chance to set out their position;</li> <li>c. take measures to address any actual or perceived conflict of interest; and</li> <li>d. consider all relevant information and evidence carefully.</li> </ul>	Yes	Policy Position Section	<p>As per the Complaints Policy staff look at all complaints with an open mind and all aspects of a complaint based on its merits. Staff take every opportunity to give tenants space to express themselves and state their position.</p> <p>Staff will collate all relevant information relating to the complaint and take the appropriate time to consider all evidence available. Staff receive ongoing complaints training to ensure that they are equipped to manage complaints in a fair and equitable manner.</p>
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	Policy Positions Section	As set out in the Complaints Policy, staff will always communicate to the tenant if the response to a complaint will fall outside the timescales and agree clear

				timeframes in which contact will be made to give updates.
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	EDI section	Where the organisation is aware of a tenants need for adjustments, this will be recorded and stored securely on the tenants file on the housing management system.
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	Definitions Section, Policy Positions Section, Appendix 1 procedure.	As per the Complaints Policy, all complaints will be taken and recorded on the complaints module. In the circumstances that ECBHA are to refuse to accept a complaint, a letter will be sent to the resident.
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	Policy Positions Section	All complaints are logged on the complaints module with an audit trail including the original complaint and all subsequent relevant documents and actions taken.
5.13	Landlords must have processes in place to ensure a complaint can be	Yes	Policy Positions Section	ECBHA will always look to provide a pro-active



	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.			response to a complaint and remedy any identified issues at the earliest opportunity. This is recorded on the complaints module and where appropriate can be evidenced on the repairs module/property diary on the housing management system.
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	Unacceptable Behaviour Section	Evidence is recorded on the housing management system where tenants have displayed unacceptable behaviour (or persons representing the tenant). This records the reasons for the restrictions being put in place, and the length of time the restrictions will initially be in place and the date at which this decision will be reviewed.
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	Policy Position Section	Where restrictions are placed on tenants as a result of unacceptable behaviour, staff will carry out an assessment to ensure that any protected characteristics under the Equality Act 2010 are considered, to ensure that

				the action taken is reasonable, proportionate and does not unfairly discriminate against a tenant based on personal characteristics, as laid out in the Complaints policy.
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## Section 6: Complaints Stages

### Stage 1

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
6.1	Landlords must have processes in place to consider which complaints can be responded to as early as possible, and which require further investigation. Landlords must consider factors such as the complexity of the complaint and whether the resident is vulnerable or at risk. Most stage 1 complaints can be resolved promptly, and an explanation, apology or resolution provided to the resident.	Yes	Policy Positions Section and Appendix 1 Process	Staff will review the initial complaint once received and will, if appropriate and feasible take immediate actions to resolve the complaint. Where staff are aware of any kind of vulnerability appropriate action is taken to minimise the risk to the tenant (or others). This information would be shared with the tenant (or their representative) and recorded on the complaints module.
6.2	Complaints must be acknowledged, defined and logged at stage 1 of the complaints procedure <b><u>within five working days of the complaint being received.</u></b>	Yes	Appendix 1 process	All complaints are logged on the day received (unless received out of hours) and acknowledged within 3 working days. This is recorded on the complaints module on the housing management system.

6.3	Landlords must issue a full response to stage 1 complaints <b><u>within 10 working days</u></b> of the complaint being acknowledged.	Yes	Appendix 1 process	All complaints are recorded on the complaints module and tenants are made aware in writing that we will investigate and provide a full response within 10 working days in line with the Complaints Policy.
6.4	Landlords must decide whether an extension to this timescale is needed when considering the complexity of the complaint and then inform the resident 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	Appendix 1 process	Can be evidenced on the complaints module. Where it is likely that a complaint may take longer than 10 working days to fully investigate a complaint fully, contact is made with the tenant to inform them of this, and an agreed extended timescale is agreed with the tenant. This is recorded on the complaints module in line with the policy.
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	Appendix 1 process	Any agreed extension on the timescale with the tenant is communicated in writing. Included are details of how to contact the Ombudsman.
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	Yes	Appendix 1 process	In line with the policy, a response is sent to the tenant detailing the outcome of the investigation along

	the issue are completed. Outstanding actions must still be tracked and actioned promptly with appropriate updates provided to the resident.			with any actions required to resolve the matter. Staff will monitor any outstanding actions to ensure that they are done within an acceptable timescale. Staff record this on the complaints module and update the tenant when any actions have been completed.
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	Policy Position Section	Letters are sent to a tenant who has complained specifically detailing a response to all points raised in the complaint referencing where appropriate organisational policy, legislation (i.e. Gas Safety – HSE), as well as ways of working that are seen as good practice. Copies of all letters are placed on the Complaints module.
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	Yes	Additional Complaints Section	Where a resident has made an initial complaint and they make further contact with additional issues that relate to the original complaint this has been included as part of the initial complaint. If a response has already been

	investigated or it would unreasonably delay the response, the new issues must be logged as a new complaint.			sent then the additional information will be logged on the housing management system.
6.9	<p>Landlords must confirm the following in writing to the resident at the completion of stage 1 in clear, plain language:</p> <ul style="list-style-type: none"> <li>a. the complaint stage;</li> <li>b. the complaint definition;</li> <li>c. the decision on the complaint;</li> <li>d. the reasons for any decisions made;</li> <li>e. the details of any remedy offered to put things right;</li> <li>f. details of any outstanding actions; and</li> <li>g. details of how to escalate the matter to stage 2 if the individual is not satisfied with the response.</li> </ul>	Yes	Template Letter	<p>Acknowledgment letter sent out within 3 days, detailing stage 1 complaint. Details of the complaint received are confirmed. Following investigation further letter sent within 10 working days with a decision, along with the reason behind any decisions made. Actions to be taken to remedy the issue that has resulted in the complaint. Stage 1 completion letter gives specific details of how to escalate to stage 2 if not satisfied with the stage 1 outcome. This is recorded on the complaints module</p>

## Stage 2

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
6.10	If all or part of the complaint is not resolved to the resident's satisfaction at stage 1, it must be progressed to stage	Yes	Complaints Policy Appendix 1 Procedure	Complaint officers have been given additional and

	2 of the landlord's procedure. Stage 2 is the landlord's final response.			on going training to embed the revised policy.
6.11	Requests for stage 2 must be acknowledged, defined and logged at stage 2 of the complaints procedure within five working days of the escalation request being received.	Yes	Appendix 1 Procedure Previous responses also can evidence the correct escalation process.	Complaints officers and COO are aware of this element.
6.12	Residents must not be required to explain their reasons for requesting a stage 2 consideration. Landlords are expected to make reasonable efforts to understand why a resident remains unhappy as part of its stage 2 response.	Yes	Appendix 1 Procedure	Complaints officers are trained and aware of all require to within the code.
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Yes	Responsibilities Section	As per the policy stage 2 would be dealt with by a member of the leadership team.
6.14	Landlords must issue a final response to the stage 2 <b><u>within 20 working days</u></b> of the complaint being acknowledged.	Yes	Appendix 1 Procedure	The team have been given additional training and are aware of time frames to be adhered to as per the complaint handling code.
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	Appendix 1 Procedure	The complaints handling officers are aware of the additional time frames and can use their discretion on the additional extension of time that may be needed.

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	Appendix 1 Procedure	Complaint officers/ handlers are aware of the information that must be provided to residents when requesting additional time.
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	Appendix 1 Procedure	This is part of the culture ECBHA are creating to be open and transparent and accepting responsibility when complaints have clear outcomes.
6.18	Landlords must address all points raised in the complaint definition and provide clear reasons for any decisions, referencing the relevant policy, law and good practice where appropriate.	Yes	Appendix 1 Procedure	The complaint officer has a full understanding of what information they need to give for any decisions which are made.
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	Yes	Template Letters	The complaints officers have template letters which have been reproduced from the Housing Ombudsman website as required.



	Service if the individual remains dissatisfied.			
6.20	Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.	Yes	Responsibilities Section	This is escalated to leadership team

### Section 7: Putting things right

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
7.1	<p>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:</p> <ul style="list-style-type: none"> <li>• Apologising;</li> <li>• Acknowledging where things have gone wrong;</li> <li>• Providing an explanation, assistance or reasons;</li> <li>• Taking action if there has been delay;</li> <li>• Reconsidering or changing a decision;</li> <li>• Amending a record or adding a correction or addendum;</li> <li>• Providing a financial remedy;</li> <li>• Changing policies, procedures or practices.</li> </ul>	yes	Policy positions section	The complaints officers and leadership team are are of the provision within the Complaints Handling Code.

7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Yes	Policy positions section Compensation Section	Complaints officers are trained and offers to remedy are reflective of the impact to the residents , this is made in conjunction with the Leadership team.
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	Template Letter	Complaint officers are aware of the Complaint Handling Code and what is required to meet the clear standards of the code.
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes	Policy Position Section	Where guidance is given by the Ombudsman this would always be considered.

## Section 8: Putting things right

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
8.1	<p>Landlords must produce an annual complaints performance and service improvement report for scrutiny and challenge, which must include:</p> <ul style="list-style-type: none"> <li>a. the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements.</li> <li>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;</li> <li>c. any findings of non-compliance with this Code by the Ombudsman;</li> <li>d. the service improvements made as a result of the learning from complaints;</li> <li>e. any annual report about the landlord's performance from the Ombudsman; and</li> <li>f. any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord.</li> </ul>	Yes	Annual Report, Published Self Assessment	<p>The annual report is sent all residents This work is being worked on and will be reported as per the evidence section of this self assessment it will cover all the 6 sections of the code requirement for this section of the self assessment.</p>

8.2	The annual complaints performance and service improvement report must be reported to the landlord's governing body (or equivalent) and published on the on the section of its website relating to complaints. The governing body's response to the report must be published alongside this.	Yes	Board Reports, News letters, and website. www.eldonians.org.uk	Quarterly and then annual complaints are reported to board and published in the annual report and also published on the website
8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	N/A	No significant restructures have occurred	N/A
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	Yes	Performance Management & Reporting Section	This procedure is in the revised policy currently. We will review and update the self-assessment following an Ombudsman investigation
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	Policy Positions Section	Leadership team are aware of reporting such circumstances

## Section 9: Scrutiny & oversight: continuous learning and improvement

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
9.1	Landlords must look beyond the circumstances of the individual complaint and consider whether service improvements can be made as a result of any learning from the complaint.	Yes	Policy Position Section	This is reinforced with the complaints officer
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	Policy Position Section	Continual training and positive attitude from the leadership team
9.3	Accountability and transparency are also integral to a positive complaint handling culture. Landlords must report back on wider learning and improvements from complaints to stakeholders, such as residents' panels, staff and relevant committees.	Yes	Policy Position Section, Monitoring and Reporting Section	ECBHA promote a positive complaints culture and report to stake holders in annual reports, board reports are taken to ECBHA board and shared with all staff.
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	Responsibilities Section	The leadership team and inparticlaur the COO has responsibility for this reporting which is produced quarterly.

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	Responsibilities section	ECBHA board have appointed a complaints champion as the MRC
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	Responsibilities section	The MRC reviews this and it is reported in the companies annual report.
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	Yes	Responsibilities section	This is carried out and given to the MRC in board reports and annual reports.

	d. annual complaints performance and service improvement report.			
9.8	<p>Landlords must have a standard objective in relation to complaint handling for all relevant employees or third parties that reflects the need to:</p> <p>a. have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments;</p> <p>b. take collective responsibility for any shortfalls identified through complaints, rather than blaming others; and</p> <p>c. act within the professional standards for engaging with complaints as set by any relevant professional body.</p>	Yes	Revised policy, Policy positions and ECBHA Principles Making it right	This section of the policy covers all the aspects in this section of the code. In reviewing this self-assessment all complaint officers were involved to further their knowledge and provide a better understanding of the Complaints Handling Code.