

Housing Ombudsman Complaint Handling Code

Self-Assessment Form (April 2024)

Section 1 - Definition of a complaint

Code section	Code requirement	Comply: Yes/No	Evidence, commentary, and any explanations
1.2	A complaint must be defined as: <i>'an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the organisation, its own staff, or those acting on its behalf, affecting an individual resident or group of residents.'</i>	Yes	Policy – section 1.4.1.
1.3	The resident does not have to use the word 'complaint' for it to be treated as such. A complaint that is submitted via a third party or representative must still be handled in line with the landlord's complaints policy.	Yes	Policy – sections 1.4.2, 2.1.1 and 2.1.2.
1.4	Landlords must recognise the difference between a service request and a complaint. This must be set out in their complaints policy. A service request is a request from a resident to the landlord requiring action to be taken to put something right. Service requests are not complaints, but must be recorded, monitored and reviewed regularly.	Yes	Policy – sections 1.4.2 and 1.4.3.

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 – sections 1.4.2 and 1.4.3.
1.6	An expression of dissatisfaction with services made through a survey is not defined as a complaint, though wherever possible, the person completing the survey should be made aware of how they can pursue a complaint if they wish to. Where landlords ask for wider feedback about their services, they also must provide details of how residents can complain.	Yes	We routinely monitor survey feedback, contacting residents who leave negative reviews to determine whether we can resolve their concerns or need to raise the matter as a formal complaint. It is clearly set out on our website that residents can raise a complaint if they're dissatisfied with the service they've received.

Section 2 – Exclusions

Code section	Code requirement	Comply: Yes/No	Evidence, commentary, and any explanations
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	Policy – section 1.5

<p>2.2</p>	<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.</p> <p>Acceptable exclusions include:</p> <ul style="list-style-type: none"> • The issue giving rise to the complaint occurred over twelve months ago. • Legal proceedings have started. This is defined as details of the claim, such as the Claim Form and Particulars of Claim, having been filed at court. • Matters that have previously been considered under the complaints policy. 	<p>Yes</p>	<p>Policy – section 1.5.1</p>
<p>2.3</p>	<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>	<p>Yes</p>	<p>Policy – section 1.5.1</p>
<p>2.4</p>	<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 for the complaints process and the right to take that decision to the Ombudsman. If the Ombudsman does not agree that</p>	<p>Yes</p>	<p>Policy – section 1.5.2</p>

	the exclusion has been fairly applied, the Ombudsman may tell the landlord to take on the complaint.		
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Yes	Policy – section 1.5

Section 3 - Accessibility and awareness

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
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 – section 2.2.1
3.2	Residents must be able to raise their complaints in any way and with any member of staff. All staff must be aware of the complaints process and be able to pass details of the complaint to the appropriate person within the landlord.	Yes	Policy – section 2.2.1
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	Complaint volumes are tracked and reported to senior leaders monthly, CIC and Board quarterly

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	Our new Complaints & Resolutions policy (May 2024) has been reviewed by the Communications team to ensure it is easy to read and accessible. Our policy is published on our 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 – section 5.3
3.6	Landlords must give residents the opportunity to have a representative deal with their complaint on their behalf, and to be represented or accompanied at any meeting with the landlord.	Yes	Policy – section 2.1.2
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 – section 3.4

Section 4 - Complaint handling personnel

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
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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	There is a central complaints team at Eastlight which acts as 'complaints officer' (The Customer Experience team).
4.2	The complaints officer must have access to staff at all levels to facilitate the prompt resolution of complaints. They must also have the authority and autonomy to act to resolve disputes promptly and fairly.	Yes	The Customer Experience team consists of complaint handlers, a manager, and a head of service who have access to all levels of staff across the organisation.
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	The Customer Experience team consists of experienced and trained personnel. All staff have committed to an annual objective around complaint handling in 2024/25.

Section 5 – The Complaint Handling Process

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
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	There is one Complaints & Resolutions Policy at Eastlight.

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 – section 3.1.1 Our policy does not include a ‘stage zero’ or ‘pre-complaint stage.’
5.3	A process with more than two stages is not acceptable under any circumstances as this will make the complaint process unduly long and delay access to the Ombudsman.	Yes	Our policy sets out our two-stage approach to complaint handling.
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	All complaints are handled directly by Eastlight under our Complaints & Resolutions policy. Complaints about third parties such as contractors are not expected to be handled by the contractors or by other third parties.
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Yes	As above
5.6	When a complaint is logged at Stage 1 or escalated to Stage 2, landlords must set out their understanding of the complaint and the outcomes the resident is seeking. The Code will refer to this as “the complaint definition”. If any aspect of the complaint is unclear, the resident must be asked for clarification.	Yes	Our template acknowledgement letter ensures that the definition of the complaint is captured. Our process dictates that the complaint handler should contact the resident at the start of their complaint to ensure it is properly defined.

5.7	When a complaint is acknowledged at either stage, landlords must be clear which aspects of the complaint they are, and are not, responsible for and clarify any areas where this is not clear.	Yes	As above
5.8	At each stage of the complaints process, complaint handlers must: a. deal with complaints on their merits, act independently, and have an open mind; b. give the resident a fair chance to set out their position; c. take measures to address any actual or perceived conflict of interest; and d. consider all relevant information and evidence carefully.	Yes	Policy – section 3.2.5 Job descriptions for our Customer Experience Team dictate that complaints should be addressed in this way. Complaint responses are monitored by Customer Experience Manager throughout the process and at the end of the complaint, to ensure that the complaint has been properly addressed.
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 – section 3.2.5
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	Yes	Policy – section 3.2.4 and 5.1.1

	resident has disclosed. Any agreed reasonable adjustments must be kept under active review.		
5.11	Landlords must not refuse to escalate a complaint through all stages of the complaints procedure unless it has valid reasons to do so. Landlords must clearly set out these reasons, and they must comply with the provisions set out in section 2 of this Code.	Yes	Policy – sections 3.3.6 and 3.3.7
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	Record of the complaint, reviews and outcomes at each stage are kept on our housing management system, with a unique case reference.
5.13	Landlords must have processes in place to ensure a complaint can be remedied at any stage of its complaints process. Landlords must ensure appropriate remedies can be provided at any stage of the complaints process without the need for escalation.	Yes	Complaint handlers are trained to ensure that the complaint can be resolved at any stage, and as early as possible in the process.
5.14	Landlords must have policies and procedures in place for managing unacceptable behaviour from residents and/or their representatives. Landlords must be able to evidence	Yes	Policy – section 4

	reasons for putting any restrictions in place and must keep restrictions under regular review.		
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 – section 4.2.2.

Section 6 - Complaint stages

Stage 1

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
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 – section 3.2.3
6.2	Complaints must be acknowledged, defined and logged at stage 1 of the complaint procedure within five working days of the complaint being received.	Yes	Policy – section 3.2.1

6.3	Landlords must issue a full response to stage 1 complaints within 10 working days of the complaint being acknowledged.	Yes	Policy – section 3.2.5
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	Policy – section 3.2.5
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	Contact details for the Housing Ombudsman are provided to the resident throughout the complaints process at Stage 1 and Stage 2 and in our policy section 3.4.1, with encouragement to make contact if they wish to do so.
6.6	A complaint response must be provided to the resident when the answer to the complaint is known, not when the outstanding actions required to address the issue are completed. Outstanding actions must still be tracked and actioned promptly with appropriate updates provided to the resident.	Yes	Policy – section 3.2.6
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	Our template final response letter dictates that complaint responses should be broken down into the constituent components of the complaint, with a response provided for each component.

6.8	Where residents raise additional complaints during the investigation, these must be incorporated into the stage 1 response if they are related, and the stage 1 response has not been issued. Where the stage 1 response has been issued, the new issues are unrelated to the issues already being investigated or it would unreasonably delay the response, the new issues must be logged as a new complaint.	Yes	Policy – section 3.2.3
6.9	Landlords must confirm the following in writing to the resident at the completion of stage 1 in clear, plain language: a. the complaint stage; b. the complaint definition; c. the decision on the complaint; d. the reasons for any decisions made; e. the details of any remedy offered to put things right; f. details of any outstanding actions; and g. details of how to escalate the matter to stage 2 if the individual is not satisfied with the response.	Yes	Policy – section 3.2.5. Our Stage 1 template ensures these points are covered and can be evidenced by anonymised examples.

Stage 2

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
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6.10	If all or part of the complaint is not resolved to the resident's satisfaction at stage 1, it must be progressed to stage 2 of the landlord's procedure. Stage 2 is the landlord's final response.	Yes	Policy – section 3.3.1
6.11	Requests for stage 2 must be acknowledged, defined and logged at stage 2 of the complaint procedure within five working days of the escalation request being received.	Yes	Policy – section 3.3.3
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	Policy – section 3.3.1. This simply states that if the resident is unhappy with the outcome, they can ask for the complaint to be escalated. There is no expectation to explain the reasons for this.
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Yes	Policy – section 3.3.4
6.14	Landlords must issue a final response to the stage 2 within 20 working days of the complaint being acknowledged.	Yes	Policy – section 3.3.5
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	Policy – section 3.3.5

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	Contact details for the Housing Ombudsman are provided to the resident throughout the complaints process at Stage 1 and Stage 2 and in our policy section 3.4.2, with encouragement to make contact if they wish to do so.
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	Policy – section 3.2.6
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	Our Stage 2 template ensures these points are covered and can be evidenced by anonymised examples.
6.19	Landlords must confirm the following in writing to the resident at the completion of stage 2 in clear, plain language: a. the complaint stage; b. the complaint definition; c. the decision on the complaint; d. the reasons for any decisions made; e. the details of any remedy offered to put things right; f. details of any outstanding actions; and g. details of how to escalate the matter to the Ombudsman Service if the individual remains dissatisfied.	Yes	Policy – section 3.3.5. Our Stage 2 template ensures these points are covered and can be evidenced by anonymised examples.

6.20	Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.	Yes	Policy – section 3.3.4

Section 7 - Putting things right

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
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"> • Apologising; • Acknowledging where things have gone wrong; • Providing an explanation, assistance or reasons; • Taking action if there has been delay; • Reconsidering or changing a decision; • Amending a record or adding a correction or addendum; • Providing a financial remedy; • Changing policies, procedures or practices. 	Yes	<p>These principles are included in our complaints handling training for staff. Complaint response templates set out a structure to follow this principle and can be evidenced in anonymised complaint responses.</p>

7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Yes	Compensation policy – section 4.2.1
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	Policy – sections 3.2.5 and 3.2.6
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes	These principles are included in our complaints handling training for staff. Complaint response templates set out a structure to follow this principle.

Section 8 – Self-assessment, reporting and compliance

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
8.1	Landlords must produce an annual complaints performance and service improvement report for scrutiny and challenge, which must include: a. the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements. b. a qualitative and quantitative analysis of the landlord’s complaint handling performance. This must also include a summary of the types of complaints the landlord has refused to accept; c. any findings of non-compliance with this Code by the Ombudsman; d. the service improvements made as a result of the learning from complaints;	Yes	<ul style="list-style-type: none"> a) The annual self-assessment is reported to Board each May. b) Complaint handling performance is analysed quarterly and reported to CIC and Board through the Customer Voice paper. c) The Customer Voice paper includes any non-compliance of the code or maladministration found by the Ombudsman.

	<p>e. any annual report about the landlord’s performance from the Ombudsman; and</p> <p>f. any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord.</p>		<p>d) The Customer Voice paper also identifies service improvements.</p> <p>e) Eastlight has not received a report from the Ombudsman on our performance to date, but this will be included in the Customer Voice paper should one be received.</p> <p>f) Relevant reports from the Ombudsman are circulated to the leadership team with a summary on receipt. Learning from these reports will be factored into our Customer Voice paper.</p> <p>The Customer Voice paper is produced quarterly for CIC and Board. An annual summary will be presented each May.</p>
8.2	<p>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.</p>	Yes	As above
8.3	<p>Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.</p>	Yes	<p>The self-assessment was completed following restructure of the complaint handling team in October 2023, and has</p>

			now been completed on revision of the Complaints & Resolution policy in April 2024.
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	Yes	Eastlight has not been asked to review the self-assessment by the Ombudsman to date.
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	To date, there have not been any exceptional circumstances which mean we have been unable to comply with the code.

Section 9 – Scrutiny & oversight: continuous learning and improvement

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
9.1	Landlords must look beyond the circumstances of the individual complaint and consider whether service improvements can be made because of any learning from the complaint.	Yes	All complaints are analysed to determine which service improvements should be made.
9.2	A positive complaint handling culture is integral to the effectiveness with which landlords resolve disputes. Landlords must use complaints as a source of intelligence to identify issues and introduce positive changes in service delivery.	Yes	Complaint trends are monitored monthly by a group of operational heads of service, the wider leadership team, and quarterly by CIC and Board.

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	Information about complaints is included in our annual report. KPIs and complaint outcomes are reported regularly to residents via our newsletter and on the website in Q2 2024/25.
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	The Customer Experience team acts as Eastlight's Complaints Officer, with a head of service overseeing the team and providing oversight of systemic issues, risks, or policies /procedures which require revision.
9.5	In addition to this a member of the governing body (or equivalent) must be appointed to have lead responsibility for complaints to support a positive complaint handling culture. This person is referred to as the Member Responsible for Complaints ('the MRC').	Yes	The Chair of CIC, who is also a Board member, is the MRC for Eastlight.
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	The MRC & Board are presented with information on complaints quarterly.
9.7	As a minimum, the MRC and the governing body (or equivalent) must receive:	Yes	A Customer Voice paper which covers these requirements is produced quarterly,

	<p>a. regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance;</p> <p>b. regular reviews of issues and trends arising from complaint handling;</p> <p>c. regular updates on the outcomes of the Ombudsman’s investigations and progress made in complying with orders related to severe maladministration findings; and</p> <p>d. annual complaints performance and service improvement report.</p>		scrutinised by our Customer Influence Committee and our Board.
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 cooperative 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	All staff have a standard complaint handling objective in 2024/25.