Mitre Housing Association (MHA) - compliance with the Housing Ombudsman's Complaint Handling Code, self-assessment 2026 (covering the period 1 January 2025 – 31 December 2025)

Mitre Housing Association (MHA) have contracted Eden Housing Association (EHA) to provide a Compliments, Complaints and Feedback service on their behalf. This service includes the recording, handling and reporting of complaints. Mitre Housing Association last adopted EHA's Compliments, Complaints and Feedback Policy and associated documents on 10 February 2026.

Although MHA have adopted EHA's policy and associated documents it is important to note that all letters/correspondence used in this process display Mitre's own identity logo/headed paper, in addition within all correspondence to the service user reference is made to the managing agent role. Mitre's board are provided with Annual and Quarterly performance reports for scrutiny and monitoring. All relevant information is publicised via Mitre's newsletter Mitre Messenger and the website.

This self-assessment sets out the current processes in place to comply with the Housing Ombudsman's Complaint Handling Code. Further detailed compliance with the code is evidenced within our Policy, Procedure and associated documentation which are all accessible on the website or upon request in a format to meet the requirements of the individual.

Code provision	Code requirement	Comply: Yes/No	Evidence	Commentary/explanation
	Section 1: Definition of a complaint			
1.2	A complaint must be defined as: *'an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the landlord, its own staff, or those acting on its behalf, affecting a resident or group of residents.'*	**Yes**	**Evidenced:** Policy = Sec 5 Procedure = Sec 2 Service Standard	Our Policy, Procedure and Service Standard include the complaint definition as detailed 1.2.
1.3	A resident does not have to use the word 'complaint' for it to be treated as such. Whenever a resident expresses dissatisfaction landlord must give them the choice to make a complaint. A complaint that is submitted via a third party or representative must be handled in line with the landlord's complaints policy.	**Yes**	**Evidenced:** Policy = Sec 6,8 Procedure = Sec 2, 5,8	Our Policy, Procedure sets out that: • The resident does not have to use the word complaint for it to be treated as such (they will be given the opportunity to make a Formal Complaint if required). • A complaint that is submitted via a third party or representative will be handled in line with the landlord's complaints policy.
1.4	Landlords must recognise the difference between a service request and a complaint. This must be set out	**Yes**	**Evidenced:** Policy = Sec 8	Our Policy, Procedure sets out the definitions of a Service Request/Follow Up Request/Formal Complaint.

	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.		Procedure = Sec 5 Annual refresher Training	In addition, our staff are fully trained to recognise the difference between Complaints/Service Requests/Follow Up Requests (annual refresher training is provided). Service Requests/Follow up requests are recorded on the Feedback Module of our Housing Management System (the same module used to log Formal Complaints).
1.5	A complaint must be raised when the resident expresses dissatisfaction with the response to their service request, even if the handling of the service request remains ongoing. Landlords must not stop their efforts to address the service request if the resident complains.	**Yes**	**<u>Evidenced:</u>** Policy = Sec 8 Procedure = Sec 5,7	Our Policy, Procedure sets out that we will always provide advice/guidance and offer to log as a formal complaint at this stage if the resident wishes, in addition we will not stop our efforts to address the request if a complaint is logged.

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**	**<u>Evidenced:</u>** Policy = Sec 8 Procedure = Sec 5	Whenever a customer expresses dissatisfaction with **<u>any of our</u>** services either via a survey, over the phone, in writing, email, person or our online portal (My Account) managers are responsible for ensuring the tenant is contacted and given the opportunity to make a formal complaint if they wish (this includes complaints submitted via a third party or representative). In addition, if the information is received via the annual Tenant Satisfaction Measures (TSM) Perception survey our Customer Service Team will contact the customer to ascertain if they would like to make a complaint.

Code provision	Code requirement	Comply: Yes/No	Evidence	Commentary/explanation
	Section 2: Exclusions			
2.1	Landlords must accept a complaint unless there is a valid reason not to do so. If landlords decide not to accept a complaint they must be able to evidence their reasoning. Each complaint must be considered on its own merits	**Yes**	**Evidenced:** Policy = Sec 9 Procedure = Sec 6	We will accept all complaints unless there is a valid reason not to do so as detailed within our Policy, Procedure.
2.2	A complaints policy must set out the circumstances in which a matter will not be considered as a complaint or escalated, and these circumstances must be fair and reasonable to residents. Acceptable exclusions include: • The issue giving rise to the complaint occurred over twelve months ago. • Legal proceedings have started. This is defined as details of the claim, such as the Claim Form and	**Yes**	**Evidenced:** Policy = Sec 9 Procedure = Sec 6	Our Policy, Procedure clearly sets out where a matter will not be accepted as a complaint.

	Particulars of Claim, having been filed at court • Matters that have previously been considered under the complaints policy. Landlords must accept complaints referred to them within 12 months of the issue occurring or the resident becoming aware of the issue, unless they are excluded on other grounds. Landlords must consider whether to apply discretion to accept complaints made outside this time limit where there are good reasons to do so.			
2.3	Landlords must accept complaints referred to them within 12 months of the issue occurring or the resident becoming aware of the issue, unless they are excluded on other grounds. Landlords must consider whether to apply discretion to accept complaints made outside this time limit where there are good reasons to do so.	**Yes**	**Evidenced:** Policy = Sec 9 Procedure = Sec 6	Our Policy, Procedure states that we will accept complaints referred within 12 months of issue, in addition will apply discretion to accept complaints made outside of this time limit.
2.4	If a landlord decides not to accept a complaint, an explanation must be provided to the resident setting out the	**Yes**	**Evidenced:** Policy = Sec 9	Our Policy, Procedure states that if a decision is made not to accept a complaint a detailed explanation will be provided, it goes on to

	reasons why the matter is not suitable for the complaints process and the right to take that decision to the Ombudsman. If the Ombudsman does not agree that the exclusion has been fairly applied, the Ombudsman may tell the landlord to take on the complaint.		Procedure = Sec 6	advise that the complainant has the right to challenge this decision by taking their complaint to the Housing Ombudsman.
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	**Yes**	**<u>Evidenced:</u>** Policy = Sec 9 Procedure = Sec 6	Our Policy, Procedure sets out that we will not apply a 'blanket approach' when making these decisions.

Code provision	Code requirement	Comply: Yes/No	Evidence	Commentary/explanation
	Section 3: Accessibility and Awareness			
3.1	Landlords must make it easy for residents to complain by providing different channels through which they can make a complaint. Landlords must consider their duties under the Equality Act 2010 and anticipate the needs and reasonable adjustments of residents who may need to access the complaints process.	**Yes**	**<u>Evidenced:</u>** Policy = Sec 7 Procedure = Sec 3 Service Standard	Our Policy, Procedure sets out a wide range of avenues available for residents to make a complaint. We will not make assumptions about whether a resident requires a reasonable adjustment or about what those adjustments might be. We will discuss the requirements of a reasonable adjustment with the individual resident and seek to reach agreement on what will be reasonable in the circumstances to best suit the residents' needs ensuring at all times that we take account our duties under the Equality Act 2010.
3.2	Residents must be able to raise their complaints in any way and with any member of staff. All staff must be aware of the complaints process and be able to pass details of the complaint to the appropriate person within the landlord.	**Yes**	**<u>Evidenced:</u>** Policy = Sec 7 Procedure = Sec 3, 12 Service Standard	Our Policy and Procedure clearly sets out how residents can raise complaints with any member of staff. We run annual training for all staff on our Complaints Process, we have a dedicated Complaints & Resolutions Officer to assist with any queries and in addition our Policy, Procedure are available for staff at all times

			CHAT internal training sessions (recorded) www.edenha.org.uk	on our website and internal intranet. All new members of staff receive training on the Formal Complaints processes, learning and outcomes as part of their induction package.
3.3	High volumes of complaints must not be seen as a negative, as they can be indicative of a well-publicised and accessible complaints process. Low complaint volumes are potentially a sign that residents are unable to complain.	**Yes**	**<u>Evidenced:</u>** Annual Complaints Training CHAT Internal training sessions (recorded) Standard agenda item at management and team meetings Procedure = Sec 12	We hold annual training sessions with all staff to ensure that we embed a positive complaints culture which encourages staff to promote our complaints process during day to day interactions with our customers. In addition, we have pre-recorded internal training material which focuses on the importance of a well-publicised complaints process. These recorded sessions are used during our induction process for new staff Formal Complaint discussions are a standard agenda item at all Management and Team meetings.
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	**Yes**	**<u>Evidenced:</u>** Policy = Sec 7 Procedure = Sec 3 Service Standard	Our Policy, Procedure and associated documents set out the full complaints process and are available in a range of appropriate alternative formats to meet the needs of residents. In addition, our

	timeframes for responding. The policy must also be published on the landlord's website.		www.edenha.org.uk	Policy, Procedure and Service Standard are all available 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**	**Evidenced:** Policy = Sec 7, 9, 13, Appendix 4 Procedure = 3, 10, Appendix 8	In order to encourage feedback from our customers we recognise that we must not put barriers in their way therefore our Policy is available in a clear and accessible format for all via our website and upon request. Within the policy we also include details of the Housing Ombudsman.
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**	**Evidenced** Policy = Sec 6 Procedure = Sec 2	Our Policy and procedure state that Complainants will be given the opportunity to have a representative deal with their complaint on their behalf, and to be represented or accompanied at any meeting with us.
3.7	Landlords must provide residents with information on their right to access the Ombudsman service and how the individual can engage with the Ombudsman about their complaint.	**Yes**	**Evidenced** • Website: www.mitre.org.uk • Policy and Procedure • Displayed in all of our public areas • All complaints related to correspondence	We provide residents with the Housing Ombudsman's contact details in a range of different areas, including: • Our Website • In the public area of our offices and at our assisted living and extra care schemes • Our Complaints Service Standard, Policy and Procedure

				• All formal correspondence with the resident whilst the complaint is ongoing

Code provision	Code requirement	Comply: Yes/No	Evidence	Commentary/explanation
	Section 4: Complaint Handling Staff			
4.1	Landlords must have a person or team assigned to take responsibility for complaint handling, including liaison with the Ombudsman and ensuring complaints are reported to the governing body (or equivalent). This Code will refer to that person or team as the 'complaints officer'. This role may be in addition to other duties.	**Yes**	**<u>Evidenced:</u>** Policy = Sec 9, Appendix 2 Procedure = Sec 10, Appendix 1	Our Policy and Procedures sets out responsibility for dealing with complaint handling. The responsibility for investigating and responding to Stage 1 Formal Complaints are: • Complaints & Resolutions Officer • Relevant Manager The responsibility for investigating and responding to Stage 2 Formal Complaints are: • Directors • Chief Executive • Board Members . In the first instance it will be the Complaints & Resolutions Officer that would liaise with the Ombudsman and prepare complaints data to be presented to the governing body however this can be carried out by any of the above

				officers in the absence of or if it was deemed not appropriate to be carried out by the Complaints & Resolutions Officer.
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**	**Evidenced:** Procedure = Sec 9	Our Procedure states that the Complaints & Resolutions Officer will have access to staff at all levels to ensure a timely and fair resolution to all disputes.
4.3	Landlords are expected to prioritise complaint handling and a culture of learning from complaints. All relevant staff must be suitably trained in the importance of complaint handling. It is important that complaints are seen as a core service and must be resourced to handle complaints effectively.	**Yes**	**Evidenced:** Policy = Sec 1,9,11 Procedure = Sec 9 12 Internal/external meetings Annual complaints training CHAT internal training sessions (recorded) Staff Personal Development Plans	We have a dedicated Complaints & Resolutions Officer. Our Complaints & Resolutions Officer holds regular meetings/training sessions with service managers and teams to discuss: • Individual complaints • Outcomes and learning • Service changes • Identified training Upon closure of an individual case the Complaints & Resolutions Officer will provide the service manager with a copy of the final response letter, summary of the case and any outstanding actions with target times for completion.

			New staff inductions All staff have a complaint related objective in their PDP	This ensures that: • The service manager can implement timely learning and improvements from the investigation • All outstanding actions are addressed and we keep in regular contact with the complainant until we are confident that all issues have been addressed to their satisfaction The Complaints & Resolutions Officer remains involved in the case until the outstanding actions are completed. Learning outcomes are also shared at: • internal team meetings • contractor performance meetings • board and complaints panel meetings • in our Annual Complaints and Service Improvements Plan

Code provision	Code requirement	Comply: Yes/No	Evidence	Commentary/explanation
	Section 5: The Complaint Handling Process			
5.1	Landlords must have a single policy in place for dealing with complaints covered by this Code. Residents must not be treated differently if they complain.	**Yes**	**Evidenced:** EHA Policy	We have a single policy in place which is publicised on our website or upon request in a format to meet the needs of the individual.
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**	**Evidenced:** Policy = Sec 9 Procedure = Sec 9	We do not have a stage zero within our formal complaints process. We include target dates within all of our acknowledgement letters stating that we will look to respond before the target date where possible.
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**	**Evidenced:** Policy = Sec 9 Procedure = Sec 9 Service Standard -	Mitre Housing Association does not have a third stage in the Formal Complaints process.
5.4	Where a landlord's complaint response is handled by a third party (e.g. a contractor or independent adjudicator) at any stage, it must	**Yes**	**Evidenced:** Policy = Sec 9 Procedure = Sec 9	All complaints involving a third party are 'owned' by Mitre Housing Association and dealt with in line with the policy and procedure.

	form part of the two stage complaints process set out in this Code. Residents must not be expected to go through two complaints processes.			In cases where a third party is involved our Complaints & Resolutions Officer will lead, liaise and agree outcomes which will form part of the final response.
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	**Yes**	**Evidenced:** Policy = 9 Procedure = 9	**As above 5.4 –** We will always lead the complaint however where a third party is involved in a complaint the Complaints & Resolutions Officer will ensure that they are fully aware of our obligations in line with the Code and our approach to complaint handling.
5.6	When a complaint is logged at Stage 1 or escalated to Stage 2, landlords must set out their understanding of the complaint and the outcomes the resident is seeking. The Code will refer to this as "the complaint definition". If any aspect of the complaint is unclear, the resident must be asked for clarification.	**Yes**	**Evidenced:** Policy = Sec 9 Procedure = 9 Appendices 3-6	Our template letters for Stage 1 and Stage 2 will always include the 'complaint definition' within the mandatory sections of the letter. Where further information is required this will form part of the initial contact with the complainant.
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	**Yes**	**Evidenced:** Procedure = Appendix 3,5	Our Formal Complaint acknowledgement letters set out our understanding of the complaint and the residents desired outcome, and details of the complaint that we are, and are not responsible for.

	for and clarify any areas where this is not clear.			
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 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**	**Evidenced:** Policy = Sec 9 Procedure = Sec 9	Complaints are dealt with in an impartial manner where the handler will seek sufficient, reliable information from both parties so that fair and appropriate findings and recommendations can be made. All of our complaint handlers are trained to act independently with an open mind, in addition they will not be assigned the complaint if they've had any prior involvement.
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**	**Evidenced:** Procedure = Sec 9 Appendix 7	We aim to deal with all of our complaints within the set timescales unless there are delays as requested by the resident, in addition the investigating officer may require additional time to gather relevant information. In these instances, we will provide an

				explanation for the delay and agree a revised date for the response.
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**	**Evidenced:** Policy = Sec 7 Procedure = Sec 3 Service Standard Feedback Module of our Housing Management System	Our Policy and Procedure sets out how we will respond to reasonable adjustments requests in line with the Equality Act 2010, in addition staff are provided with regular training/updates to ensure that these requests can be met and dealt with appropriately. A record of any reasonable adjustments/disabilities are stored and reviewed using our Housing Management system Orchard.
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**	**Evidenced:** Policy = Sec 9 Procedure = Sec 6,9	We would not refuse to escalate a complaint to the next stage of our process unless there is a valid reason to do so (in line with section 2 of the code).
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	**Yes**	**Evidenced:** Feedback Module of our Housing Management System.	We use the Feedback Manager module of our Housing Management system to log, manage and store full details of all formal complaints. All data is stored and managed in line with EHA's Data Retention Policy.

	other parties, and any relevant supporting documentation such as reports or surveys.		Survey data is collected via Survey Monkey then stored internally.	
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**	**Evidenced:** Policy = Sec 9, 11 Procedure = Sec 9	We have a dedicated Complaints & Resolutions Officer, Service Managers and an Executive Team who are all responsible for providing appropriate remedies to resolve the complaint to the satisfaction of the complainant. These can be provided at any stage of the complaints process.
5.14	Landlords must have policies and procedures in place for managing unacceptable behaviour from residents and/or their representatives. Landlords must be able to evidence reasons for putting any restrictions in place and must keep restrictions under regular review	**Yes**	**Evidenced:** EHA's Unacceptable Action's Policy Policy = Sec 10	When implementing restrictions due to unacceptable behaviour we adhere to guidance as set out in our Unacceptable Action's Policy which demonstrates regard for the provisions of the Equality Act 2010.
5.15	Any restrictions placed on contact due to unacceptable behaviour must be proportionate and demonstrate regard for the provisions of the Equality Act 2010.	**Yes**	**Evidenced:** EHA's Unacceptable Actions Policy	When implementing restrictions due to unacceptable behaviour we adhere to guidance as set out in our Unacceptable Action's Policy which demonstrates regard for the provisions of the Equality Act 2010.

			Policy = Sec 10	

Code provision	Code requirement	Comply: Yes/No	Evidence	Commentary/explanation
	Section 6: Complaints Stages – Stage 1			
6.1	Landlords must have processes in place to consider which complaints can be responded to as early as possible, and which require further investigation. Landlords must consider factors such as the complexity of the complaint and whether the resident is vulnerable or at risk. Most stage 1 complaints can be resolved promptly, and an explanation, apology or resolution provided to the resident.	**Yes**	**Evidenced:** Policy = Sec 7 Procedure = Sec 3 Alerts stored on Housing Management System	Our Housing Management system allows us to store and view alerts relating to the complainants needs and vulnerabilities. Our Complaints & Resolutions Officer reviews information held on the system in order to prioritise complaints. Where a complaint is less complex our Complaints & Resolutions Officer will look to provide a response at the earliest opportunity without undue delay.
6.2	Complaints must be acknowledged, defined and logged at stage 1 of the complaint's procedure **within five working days of the complaint being received.**	**Yes**	**Evidenced:** Policy = Sec 9 and Appendix 2 Procedure = Sec 9 Appendix 1	Our Policy and Procedure sets out that Stage 1 complaints are acknowledged, defined and logged within five working days.

			Service Standard	
6.3	Landlords must issue a full response to stage 1 complaints **within 10 working days** of the complaint being acknowledged.	**Yes**	**Evidenced:** Policy = Sec 9 Appendix 2 Procedure = Sec 9 Appendix 1 Service Standard	All of our complaints are responded to within 10 working days unless there are delays as requested by the resident. In addition the investigating officer may require additional time to gather relevant information. In these instances, we will provide an explanation for the delay and agree a revised date for the response with the resident (this will not exceed a further 10 days without good reason).

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**	**Evidenced:** Policy = Sec 9 Appendix 2 Procedure = Sec 9 Appendix 1 Service Standard	As 6.3
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**	**Evidenced:** Procedure = Appendix 7	Housing Ombudsman Details are provided within our extension agreement letter.
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**	**Evidenced:** Policy = Sec 9 Procedure = Sec 9	When responding to a complaint we will set out how we aim to resolve the issue (if there has not been an immediate resolution). We will include details of the outstanding actions, a clear timeframe for their completion and a commitment to provide regular updates until all actions are closed.
6.7	Landlords must address all points raised in the complaint definition and	**Yes**	**Evidenced:**	Our Stage 1 Formal Complaint template response letter includes clear direction to

	provide clear reasons for any decisions, referencing the relevant policy, law and good practice where appropriate.		Procedure = Appendix 4	ensure that all points raised within the complaint are covered and clear reasons for decisions provided.
6.8	Where residents raise additional complaints during the investigation, these must be incorporated into the stage 1 response if they are related and the stage 1 response has not been issued. Where the stage 1 response has been issued, the new issues are unrelated to the issues already being investigated or it would unreasonably delay the response, the new issues must be logged as a new complaint.	**Yes**	**<u>Evidenced:</u>** Policy = Sec 9 Procedure = Sec 9	Our Policy, Procedure sets out that additional complaints can be incorporated in to the stage one response at any time whilst the complaint is open. Where the stage 1 response has been issued, and the new issues are unrelated a new complaint will be logged.
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	**Yes**	**<u>Evidenced:</u>** Procedure = Appendix 4	Our Stage 1 Formal Complaint template response letter includes a prompt for the investigating officer to include information as detailed in 6.9 criteria.

	g. details of how to escalate the matter to stage 2 if the individual is not satisfied with the response			

Code provision	Code requirement	Comply: Yes/No	Evidence	Commentary/explanation
	Stage 2 Formal Complaint			
6.10	If all or part of the complaint is not resolved to the resident's satisfaction at stage 1, it must be progressed to stage 2 of the landlord's procedure. Stage 2 is the landlord's final response.	**Yes**	**Evidenced:** Policy = Sec 9 Procedure = Sec 9 Service Standard	If the complainant remains dissatisfied with the response at Stage 1 they can escalate to Stage 2 of the Formal Complaints process, we will ask them to confirm which element of the complaint they remain dissatisfied with and what action they feel would resolve the complaint.
6.11	Requests for stage 2 must be acknowledged, defined and logged at stage 2 of the complaint's procedure within five working days of the escalation request being received.	**Yes**	**Evidenced:** Policy = Appendix 2 Procedure = Appendix 1 Service Standard	Our Stage 2 Formal Complaint acknowledgement letter includes: • our understanding of the outstanding issues • the outcome required by the resident If any of these issues are unclear we will seek clarity from the resident that our understanding of their escalation request is correct. The complaint will be defined and logged within five working days.

6.12	Residents must not be required to explain their reasons for requesting a stage 2 consideration. Landlords are expected to make reasonable efforts to understand why a resident remains unhappy as part of its stage 2 response.	**Yes**	**Evidenced:** Policy = Sec 9 Procedure = Sec 9	If the complainant remains dissatisfied with the response they can escalate to Stage 2 of the Formal Complaints process without being expected to explain their reasons.
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	**Yes**	**Evidenced:** Policy = Appendix 2 Procedure = Appendix 1 Service Standard	We have separate officers dealing with Stage 1 and Stage 2 Formal Complaints. • Stage 1 Formal Complaints are dealt with by the Complaints & Resolutions Officer or appropriate manager • Stage 2 Formal Complaints are dealt with by a Director, Chief Executive or Chair, Vice Chair of Board or Chair, Vice Chair of Audit and Risk Committee.
6.14	Landlords must issue a final response to the stage **2 within 20 working days** of the complaint being acknowledged.	**Yes**	**Evidenced:** Policy = Appendix 2 Procedure = Appendix 1	All of our complaints will be responded to within 20 working days unless the investigating officer is unable to resolve the complaint within this period. In these instances, we will provide an explanation for the delay and agree a revised date for the

			Service Standard	response (this will not exceed a further 20 days without good reason).

6.15	Landlords must decide whether an extension to this timescale is needed when considering the complexity of the complaint and then inform the resident of the expected timescale for response. Any extension must be no more than 20 working days without good reason, and the reason(s) must be clearly explained to the resident.	**Yes**	**Evidenced:** Policy = appendix 2 Procedure = Sec 9 Appendix 1,7	As 6.15
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**	**Evidenced:** Procedure = Appendix 7	Housing Ombudsman Details are provided within our extension agreement letter.
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**	**Evidenced:** Policy = Sec 9 Procedure = Sec 9	When responding to a complaint we will set out how we aim to resolve the issue (if there has not been an immediate resolution). We will include details of the outstanding actions, a clear timeframe for their completion and a commitment to provide regular updates until all actions are closed.
6.18	Landlords must address all points raised in the complaint definition and	**Yes**	**Evidenced:** Procedure = Appendix 6	Our Stage 2 Formal Complaint template response letter includes clear direction to ensure that all points raised within the

	provide clear reasons for any decisions, referencing the relevant policy, law and good practice where appropriate.			complaint are covered and clear reasons for decisions provided.

6.19	Landlords must confirm the following in writing to the resident at the completion of stage 2 in clear, plain language: a. the complaint stage; b. the complaint definition; c. the decision on the complaint; d. the reasons for any decisions made; e. the details of any remedy offered to put things right; f. details of any outstanding actions; and g. details of how to escalate the matter to the Ombudsman Service if the individual remains dissatisfied.	**Yes**	**<u>Evidenced:</u>** Procedure = Appendix 6	Our Stage 2 Formal Complaint response letter includes all of the information as detailed in 6.19.
6.20	Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.	**Yes**	**<u>Evidenced:</u>** Policy = Appendix 2 Procedure = Appendix 1 Service Standard	Our Stage 2 Formal Complaints are dealt with and a formal response issued by the investigating officer which will either be • Relevant Director • Chief Executive • Nominated board member.

Code provision	Code requirement	Comply: Yes/No	Evidence	Commentary/explanation
	Section 7: Putting things right			
7.1	Where something has gone wrong a landlord must acknowledge this and set out the actions it has already taken, or intends to take, to put things right. These can include: • Apologising; • Acknowledging where things have gone wrong; • Providing an explanation, assistance or reasons; • Taking action if there has been delay; • Reconsidering or changing a decision; • Amending a record or adding a correction or addendum; • Providing a financial remedy; • Changing policies, procedures or practice	**Yes**	**Evidenced:** Procedure = Sec 9 Appendix 6	We will always acknowledge where something has gone wrong and will set out in our formal complaint response letters the actions we have already taken or intend to take to resolve the issues.
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	**Yes**	**Evidenced:** Policy = 9 Procedure = Sec 9	Where it is clearly demonstrated that we have failed to deliver some aspect of our service, a customer has suffered as a result and the

			EHA's Compensation Policy	reasons for this were within the control of the Association, we ensure that our remedy always reflects the impact on the resident. In some instances, we may consider paying compensation, in awarding compensation, we will consider whether any statutory payments are due, if any quantifiable losses have been incurred as well as the time and trouble a complainant has been put to as well as any distress and inconvenience caused.
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**	**Evidenced:** Procedure = Appendix 4,6	Our Formal Complaint response letters set out details of any remedies offered/accepted along with any proposed remedies and a clear timeframe for completion.
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	**Yes**	**Evidenced:** Policy = 9 Procedure = 9	Our policy, processes and template letters are all written aligned with sections 2,3 and 4 of the Housing Ombudsman's Remedies Policy.

Code provision	Code requirement	Comply: Yes/No	Evidence	Commentary/explanation
	Section 8: Self – assessment, reporting and compliance			
8.1	Landlords must produce an annual complaints performance and service improvement report for scrutiny and challenge, which must include: a. the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements. b. a qualitative and quantitative analysis of the landlord's complaint handling performance. This must also include a summary of the types of complaints the landlord has refused to accept; c. any findings of non -compliance with this Code by the Ombudsman; d. the service improvements made as a result of the learning from complaints;	**Yes**	**<u>Evidenced:</u>** Minutes of Complaints Panel meetings Minutes of Mitre Board meetings Minutes of Scrutiny Audit Panel meetings Mitre Website mitre.org.uk	We produced an annual report which includes items (a-d) of 8.1. This report is shared with: • Complaints Panel • Scrutiny Audit Panel • Board Members • Website Mitre Messenger (newsletter)

	e. any annual report about the landlord's performance from the Ombudsman; and f. any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord.			

8.2	The annual complaints performance and service improvement report must be reported to the landlord's governing body (or equivalent) and published on the section of its website relating to complaints. The governing body's response to the report must be published alongside this.	**Yes**	**Evidenced:** As 8.1	As 8.1 – in addition the governing body's response to the report will be published on our website alongside the Performance and Service Improvement report.
8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	**Yes**	**Evidenced:** Copies of historical self-assessments	Since the implementation of the Complaints Handling Code we have completed and published the following self-assessments. • **Self Assessment No 1** Completed and published December 2021 • **Self Assessment No 2** Completed and published March 2021 • **Self Assessment No 3** Completed and Published July 2022 • **Self Assessment No 4** Completed and Published July 2023 • **Self Assessment No 5** Completed and Published June 2024

				• Self Assessment No 6 Completed and Published May 2025 • Self Assessment No 7 Completed and Published Feb 2026 To date there have been no **significant** restructure, merger and or changes in procedures.
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	**Yes**	**Evidenced:** See commentary	Mitre are committed to update and review the self-assessment if required after 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**	**Evidenced:** See commentary	Mitre are committed to informing the Ombudsman if they are unable to comply with the code due to exceptional circumstances.

Code provision	Code requirement	Comply: Yes/No	Evidence	Commentary/explanation
	Section 9: Scrutiny & oversight: continuous learning and improvement			
9.1	Landlords must look beyond the circumstances of the individual complaint and consider whether service improvements can be made as a result of any learning from the complaint	**Yes**	**<u>Evidenced:</u>** Policy = Sec 11 Procedure = Sec 11 Minutes of meetings Staff Personal Development Plans Learning and Outcomes summary Annual complaints performance and service	Whilst we tailor our approach to the complainant's individual needs we also identify where there are common themes in terms of outcomes, learnings and best practice. We capture, share this information with: • Residents via our newsletter Viewpoint, website and social media channels • Complaints Panel • Scrutiny Audit Panel • Board reports • Management Team reports • Management actions dashboard Any identified actions from the learning outcomes are implemented, embedded and monitored by the relevant service leads.

			improvement report Complaints focused CHAT sessions	
9.2	A positive complaint handling culture is integral to the effectiveness with which landlords resolve disputes. Landlords must use complaints as a source of intelligence to identify issues and introduce positive changes in service delivery.	**Yes**	**<u>Evidenced:</u>** Policy, Procedure documents Annual Complaints training Quarterly Reports to board and Complaints Panel Annual complaints performance and service improvement report Survey Monkey feedback from Complaints Survey	Our approach to complaint handling adheres to this element of the code and is reflected in the wording of the Policy, Procedure content. We have a shared understanding of the complaints process and a learning culture from the role of the dedicated Complaints & Resolutions Officer to the relevant managers who liaise with each other resolving complaints and implementing learning outcomes. We embed this approach through annual training, staff inductions and ongoing monitoring of learning. We have a Management actions dashboard which captures all formal complaint actions. These are then assigned to the relevant manager for completion. The Management actions dashboard acts as a working document to record when improvement actions have been implemented. We have introduced a Formal Complaints

				process satisfaction survey which is sent to all complainants once their case has been closed. The survey focuses on how satisfied they were with each stage of the process, including listening, understanding their desired outcomes and what they feel we can do to improve our services.
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**	**Evidenced:** Policy = Sec 11 Procedure = Sec 11 Minutes of meetings Staff Personal Development Plans Learning and Outcomes summary	See 9.1
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	**Yes**	**Evidenced:** Policy = 11	The Director of Operations retains the overall responsibility for the Policy assisted by the Complaints and Resolutions Officer /Management Team

	and procedures that 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**	**<u>Evidenced:</u>** Policy = Sec 13,14 Procedure = Sec 11 EHA Governance Structure	We have a Member Responsible for Complaints (MRC) who provides assurance on the effectiveness of our complaints process: The role of the MRC and complaints panel includes where we will: • Use the data to assess performance and risks • Support effective complaint handling, prevention, learning and development
9.6	The MRC will be responsible for ensuring the governing body receives regular information on complaints that provides insight on the landlord's complaint handling performance. This person must have access to suitable information and staff to perform this role and report on their findings.	**Yes**	**<u>Evidenced:</u>** Board/Complaints Panel meetings	See above 9.5 We hold regular Complaints Panel meetings which are aligned with our Board Meeting calendar to ensure: • Dissemination of relevant information including performance and learning outcomes • Access to key complaint handling staff • Complaints Officer/relevant managers and members of the executive team

9.7	As a minimum, the MRC and the governing body (or equivalent) must receive: a. regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance; b. regular reviews of issues and trends arising from complaint handling; c. regular updates on the outcomes of the Ombudsman's investigations and progress made in complying with orders related to severe maladministration findings; and d. annual complaints performance and service improvement report.	**Yes**	**Evidenced:** Agenda/Minutes of Board and Complaints Panel meetings	We provide the MRC and the governing body with the following: • Quarterly performance reports (a, b, c, d) • Annual YTD complaints summary information (a) • Housing Ombudsman Spotlight Reports in order to enhance our understanding of complaints across the sector • Annual Complaints Performance and service improvements report • Year to date compensation/service failure reports • Focused "deep dive" sessions facilitated by managers into the areas where our complaint trends indicate dissatisfaction.
9.8	Landlords must have a standard objective in relation to complaint handling for all relevant employees or third parties that reflects the need to: a. have a collaborative and cooperative approach towards resolving complaints, working with	**Yes**	**Evidenced:** Policy = Sec 1,11 Procedure = Sec 12	Providing excellent customer service is one of our main objectives. We aim to put the needs and aspirations of our customers at the heart of everything we do. The Association views Compliments, Complaints and Feedback handling as a key element of its Customer Strategy and a means

	colleagues across teams and departments; b. take collective responsibility for any shortfalls identified through complaints, rather than blaming others; and c. act within the professional standards for engaging with complaints as set by any relevant professional body.			of monitoring, maintaining and improving the level and quality of service provided. In addition, we will use the feedback received to drive and deliver the improvements our customers want. All relevant staff have a standard objective within their annual personal development plans in relation to complaint handling