

Appendix A: Complaints Self-Assessment Form

This self-assessment form should be completed by the complaints officer and it must be reviewed and approved by the landlord's governing body at least annually.

Once approved, landlords must publish the self-assessment as part of the annual complaints performance and service improvement report on their website. The governing body's response to the report must be published alongside this.

Landlords are required to complete the self-assessment in full and support all statements with evidence, with additional commentary as necessary.

We recognise that there may be a small number of circumstances where landlords are unable to meet the requirements, for example, if they do not have a website. In these circumstances, we expect landlords to deliver the intentions of the Code in an alternative way, for example by publishing information in a public area so that it is easily accessible.

Section 1: Definition of a complaint

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
1.2	A complaint must be defined as: <i>'an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the landlord, its own staff, or those acting on its behalf, affecting a resident or group of residents.'</i>	YES	Section 2.1.1 of Complaints Policy and Process confirms our definition, accessed by the link below, or reproduced in the "Commentary/explanation" column. Complaints Policy & Process	"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."
1.3	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.	YES	Section 2.1.1 of Complaints Policy and Process confirms compliance around not having to use the word "complaint" definition, accessed by the link below, or reproduced in the "Commentary/explanation" column Complaints Policy & Process Section 4.1.4 of Complaints Policy and Process confirms compliance around complaints made by a third party, again accessed by the link below, or reproduced in the "Commentary/explanation" column Complaints Policy & Process	"The term 'complaint' does not need to be used to raise a complaint. We will accept any expression of dissatisfaction, which meets our complaint definition." "We will accept complaints that are raised by a third party on behalf of our residents. We will require written consent to release information surrounding the details of the complaint, which we will seek to obtain before we can formally respond to the complaint."
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	Sections 2.1.1-2.1.2 and 2.1.3-2.1.6 of Complaints Policy and Process confirms compliance around recognising the differences between a service request and a complaint, accessed by the link below, or reproduced in the "Commentary/explanation" column Complaints Policy & Process Practically, at emh, we have separate Service and Complaint Resolution Teams, both of which have dashboards reviewed weekly.	2.1.1 Definition of a Complaint 2.1.2 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. The term 'complaint' does not need to be used to raise a complaint. We will accept any expression of dissatisfaction which meets our complaint definition. 2.1.3 Definition of a

				<p>Service Request</p> <p>2.1.4 A service request is a request from a resident to their landlord requiring action to be taken to put something right.</p> <p>2.1.5 When something goes wrong, we will try to put this right as soon as possible. This may involve offering an apology, an explanation or further follow up actions. If a resident is dissatisfied with the action taken to resolve a service request, a request to escalate to a formal complaint can be made at any point.</p> <p>2.1.6 Service requests will be logged for information and learning purposes. We will use the data to improve the services we offer to our Residents."</p>
1.5	<p>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.</p>	YES	<p>Sections 2.1.5 of Complaints Policy and Process confirms compliance around escalating a service request to a complaint, accessed by the link below, or reproduced below</p> <p>Complaints Policy & Process</p> <p>"If a resident is dissatisfied with the action taken to resolve a service request, a request to escalate to a formal complaint can be made at any point."</p>	<p>In September 2024, emh established a Service Resolution Team. They are separate to, but work closely with, the Complaints Resolution Team. As part of their operating processes, any service request, where the resident expresses dissatisfaction at any point and any requests unresolved after 5 working days, are logged as a complaint, backdated to the date of the initial customer request.</p>
1.6	<p>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</p>	YES	<p>Our independent research and survey partner, Acuity are able to signpost customers to emh who wish to complain. Equally, as part of their question set, they ask "Would you be happy for emh homes to contact you to follow up any of the comments or issues you have raised?"</p> <p>The full question set is available within the links below</p> <p>tsm-soa-emh-homes-2526-lcra.docx</p> <p>tsm-soa-emh-homes-2526-lcho.docx</p>	<p>See "Evidence" section</p>

	residents can complain.			
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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	emh welcomes complaints and will always accept them unless there is a valid reason not to do so. This is evidenced in section 2.1.8 of our Complaints Policy and Process, accessed by the link below, or reproduced in the "Commentary/explanation" column Complaints Policy & Process	"2.1.8 Emh will accept a complaint unless there is a valid reason not to do so"
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"> • 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. 	YES	Section 2.1.8 of Complaints Policy and Process confirms our exclusions as being fair and reasonable, accessed by the link below, or reproduced in the "Commentary/explanation" column. Complaints Policy & Process	<ul style="list-style-type: none"> • The issue that the complaint is about 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. • The complaint has already previously been fully considered under the complaints policy. • Personal injury or third-party liability claims. These claims will be dealt with by our insurers. • Behaviour of our residents. We have a separate policy for how we manage complaints of Anti-Social Behaviour. However, if our residents are dissatisfied with how their ASB case was handled, a complaint can be raised. • Dissatisfaction with the content of our policies will not be dealt with as a

				complaint, but we will still provide you with a response to the issue and we will consider feedback when carrying out future policy reviews.”
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	Section 2.1.8 of Complaints Policy and Process confirms that a valid exclusion reason is if the issue occurred more than 12 months ago, hence complying with the requirement. Discretion is used where unique circumstances warrant inclusion and a customer focused approach is always used. Confirmation is accessed by the link below or reproduced in the “Commentary/explanation column.” Complaints Policy & Process	Valid exclusion - “The issue that the complaint is about occurred over twelve months ago” “Emh will apply discretion when considering if the complaint should be investigated if any of the above apply”
2.4	If a landlord decides not to accept a complaint, an explanation must be provided to the resident setting out the reasons why the matter is not suitable for the complaints process and the right to take that decision to the Ombudsman. If the Ombudsman does not agree that the exclusion has been fairly applied, the Ombudsman may tell the landlord to take on the complaint.	YES	Section 2.1.8 of Complaints Policy and Process outlines our approach as being compliant. Confirmation is accessed by the link below or reproduced in the “Commentary/explanation column.” Complaints Policy & Process Operationally, a “Complaint Exclusion Form” is completed in each case and these are stored centrally. In 2025/26, we refused 14 complaints, this being circa 0.6% of all complaints, meaning that 99.4% were accepted.	“We will provide a detailed explanation if we do not accept a complaint and the Ombudsman can be approached if the resident does not agree with the decision.”
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	YES	Section 2.1.8 of Complaints Policy and Process outlines our approach as being compliant. Confirmation is accessed by the link below or reproduced in the “Commentary/explanation column.” Complaints Policy & Process Discretion is used where unique circumstances warrant inclusion and a customer focused approach is always used.	“Emh will apply discretion when considering if the complaint should be investigated if any of the above (reasons for exclusion) apply.”

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	Section 4 of Complaints Policy and Process, entitled "Disability and Awareness" outlines our approach as being compliant. Confirmation is accessed by the link below or reproduced in the "Commentary/explanation" column. Complaints Policy & Process	<p>4.1.1 We will make it easy for residents to complain, by providing different channels through which residents can make a complaint. These include:</p> <ul style="list-style-type: none"> • Telephone • Myhomeonline and website • Face to face with an emh colleague • E-mail • Social Media Platforms • Contacting local MP or councillor • Write to emh homes, Memorial House, Whitwick Business Park, Stenson Road, Coalville, LE67 4JP. <p>If we receive a complaint via social media, we will always ask to receive a private message with the details. This is to ensure no confidential details are discussed. If details are not provided privately, then the complaint may not be logged, and a response will not be given.</p> <p>4.1.2 We are committed to ensuring that no one is at a disadvantage when accessing our services. We will accept reasonable adjustments that support you with our complaints process. A few examples could be: • Large Print Letters • Translation services • Verbal communication through telephone calls or home visits</p> <p>4.1.3 Our website includes information on how to raise a complaint and contains links to download both the complaints policy and process.</p> <p>4.1.4 We will accept complaints that are raised by a third party on behalf of our residents. We will require written consent to release information</p>

				<p>surrounding the details of the complaint, which we will seek to obtain before we can formally respond to the complaint.</p> <p>4.1.5 Our Website uses built-in BrowseAloud software which allows visitors who need reading support to listen to all content.</p> <p>4.1.6 Our complaints policy and process, the Complaint Handling Code and the Housing Ombudsman Scheme will be publicised in leaflets, newsletters and online.</p> <p>4.1.7 When a resident makes a complaint to emh we will provide contact information for the Ombudsman as part of its regular correspondence.</p> <p>4.1.8 We will provide early advice to residents regarding their right to access the Housing Ombudsman Service, not only at the point they have exhausted our complaints process. The Housing Ombudsman Service can assist residents throughout the life of a complaint. This affords the resident the opportunity to engage with the Ombudsman's dispute support advisors.</p> <p>4.1.9 We shall comply with the Equality Act 2010 and may need to adapt normal policies, procedures, or processes to accommodate an individual's needs. We would refer to our Equal Opportunity policy in place to address this.</p>
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	PARTIALLY	All Customer Services colleagues receive training on how to raise a complaint, both at induction and via refresher training. Refresher training was most recently carried out on 27 July 2026. A module of mandatory training for all staff is currently in plan for	New mandatory training for all colleagues as part of continuous improvement, by March 2027.

	person within the landlord.		delivery before end March 27.	
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	Emh do not target complaint numbers and welcome complaints as a means of improving services. After our Nov 24 judgment from the Regulator of Social Housing, a transformation has taken place within the complaints function. Alongside better teamwork with operational teams and the introduction of the Service Resolution Team, complaint volumes fell by 43%, from 2230 in 2024/25 to 1264 in 2025/26.	NONE
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	Section 3.1 of this self-assessment confirms the clear and accessible format of the Complaints Policy and Process. Sections 7.1.1 and 7.1.11 of the Complaints Policy and Process confirm the two-stage process and timeframes for responses, accessed by the link below to the published policy on our website. Complaints Policy & Process	NONE
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	Section 10.1.4 of our Complaints Policy and Process confirms compliance with these requirements. Confirmation is accessed by the link below or reproduced in the "Commentary/explanation column." Complaints Policy & Process	<p>"10.1.4 Emh is a member of the Housing Ombudsman Scheme and:</p> <ul style="list-style-type: none"> • follows the terms of the Scheme. • manages a complaints procedure in agreement with good practice recommended by the Ombudsman. • informs and publicises residents' rights to take their complaints to the Ombudsman. • manages complaints from residents in line with the stages set out within this policy on the rare occasions where this is not possible, within an agreed timescale with the resident. • publicises its membership

				<p>of the Scheme.</p> <ul style="list-style-type: none"> • publishes the complaints procedure on the emh website and includes a flow chart of the process in complaint communications to residents, online and in publications.”
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	<p>Section 6.1.8 of our Complaints Policy and Process confirms compliance with this requirement. Confirmation is accessed by the link below or reproduced in the “Commentary/explanation” column.</p> <p>Complaints Policy & Process</p>	<p>“6.1.8 All residents are entitled to have a representative deal with their complaint on their behalf, and to be represented or accompanied at any meeting with emh where this is reasonable.”</p>
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	<p>Section 4.1.8 of our Complaints Policy and Process confirms compliance with this requirement. Confirmation is accessed by the link below or reproduced in the “Commentary/explanation” column”.</p> <p>Complaints Policy & Process</p>	<p>4.1.8 We will provide early advice to residents regarding their right to access the Housing Ombudsman Service, not only at the point they have exhausted our complaints process. The Housing Ombudsman Service can assist residents throughout the life of a complaint. This affords the resident the opportunity to engage with the Ombudsman’s dispute support advisors.</p>

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	Section 5 of Complaints Policy and Procedure entitled "Complaint Handling Personnel" confirms compliance with this requirement. Confirmation is accessed by the link below or reproduced in the "Commentary/explanation" column. Complaints Policy & Process	"5.1.1 The Complaints Team will take responsibility for complaint handling to ensure complaints receive the necessary attention and that these are reported to the governing body. 5.1.2 The Complaints Team is responsible for ensuring that appropriate arrangements are in place for liaison with the Housing Ombudsman and appropriate cover exists to ensure consistency of service."
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	Section 5.1.3 confirms compliance with this requirement. Confirmation is accessed by the link below or reproduced in the "Commentary/explanation" column. Complaints Policy & Process	<ul style="list-style-type: none"> • have access to colleagues at all levels to facilitate quick resolution of complaints. • have the authority and autonomy to act to resolve disputes quickly and fairly."
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 "you said we listened" page is accessed via the link below You said, we listened - East Midlands Homes	The Complaints Resolution Team increased in numbers in the prior financial year and despite complaint reductions, emh maintained levels within the team to recognise the importance of complaint handling and compliance with the Complaint Handling Code. A "you said we listened" page records 43 changes made directly as a result of customer feedback in 2025/26. The Complaints Resolution Team receive full training in the importance of complaint handling and have the autonomy to resolve complaints.

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	The Complaints Policy and Process is the single policy for complaints under the Housing Ombudsman's Complaint Handling Code jurisdiction, accessed below Complaints Policy & Process	Complaints are welcomed and residents are not treated differently if they complain.
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	There are just two stages, Stage 1 and Stage 2, of our complaints process, as detailed in our Complaints Policy and Process, accessed below Complaints Policy & Process	None
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	There are just two stages, Stage 1 and Stage 2, of our complaints process, as detailed in our Complaints Policy and Process, accessed below Complaints Policy & Process	None
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	None	Complaints are all handled by emh, even where the complaint relates to the actions of a third party, e.g. a contractor.
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	YES	We are aware of our obligations under this provision of the Code and would comply with the requirements should these circumstances arise.	Emh handles all of its complaints
5.6	When a complaint is logged at Stage 1 or escalated to Stage 2,	YES	The acknowledgment letter at either stage complies with all the requirements of this	"6.1.4 Within the complaint acknowledgement, we

	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.		section, detailed in section 6.1.4-6.1.6 of our Complaints Policy and Process, accessed below or reproduced in the “Commentary/explanation” column. Complaints Policy & Process	will set out: <ul style="list-style-type: none"> • our understanding of the complaint. • the outcomes the resident is seeking. 6.1.5 If any aspect of the complaint is unclear, the resident will be asked for clarification and the full definition agreed between both parties. 6.1.6 We will manage residents’ expectations from the outset, being clear where a desired outcome is unreasonable or unrealistic.”
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	The acknowledgment letter at either stage complies with all the requirements of this section, detailed in section 6.1.5-6.1.6 of our Complaints Policy and Process, accessed below or reproduced in the “Commentary/explanation” column. Complaints Policy & Process	“6.1.5 If any aspect of the complaint is unclear, the resident will be asked for clarification and the full definition agreed between both parties. 6.1.6 We will manage residents’ expectations from the outset, being clear where a desired outcome is unreasonable or unrealistic.”
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	Section 6.1.10 confirms compliance with this requirement. Confirmation is accessed by the link below or reproduced in the “Commentary/explanation” column. Complaints Policy & Process	6.1.10 Our complaint handlers will: <ul style="list-style-type: none"> • manage complaints on their merits • act independently • have an open mind • take measures to address any actual or perceived conflict of interest • consider all information and evidence carefully • have access to staff at all levels to facilitate the prompt resolution of complaints • have the authority and autonomy to act to resolve disputes promptly and fairly • keep the complaint confidential as far as possible, with

				information only disclosed, if necessary, to properly investigate the matter.
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	Sections 7.1.4 and 7.1.18 confirm compliance with this requirement. Confirmation is accessed by the link below or reproduced in the "Commentary/explanation" column. Complaints Policy & Process	Stage 1 – "7.1.4 If an extension beyond 20 working days is required to enable the landlord to respond to the complaint fully, this will be agreed by both parties. The details of the Ombudsman will be provided at this point to enable escalation if required." Stage 2 – "7.1.18 If an extension beyond 20 working days is required to enable the landlord to respond to the complaint fully, this will be agreed by both parties. The details of the Ombudsman will be provided at this point to enable escalation if required."
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	Section 4.1.9 of our Complaints Policy and Process states "We shall comply with the Equality Act 2010 and may need to adapt normal policies, procedures, or processes to accommodate an individual's needs. We would refer to our Equal Opportunity policy in place to address this." Complaints Policy & Process	The process for recording reasonable adjustments within our housing management always forms part of our consideration when determining the Stage 1 or Stage 2 resolution. A Compensation Calculator has been built and automated and within that, there is a mandatory category to understand the impact of the service failure on the complainant, taking into account any reasonable adjustments necessary.
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	YES	Section 2 of this self-assessment outlines the limited reasons for refusing to log a complaint at Stage 1. For Stage 2, section 7.1.13 confirms compliance with this requirement. Confirmation is accessed by the link below or reproduced in the	"7.1.13 If we decline to escalate a complaint, we will clearly communicate in writing the reasons for not escalating as well as the resident's right to approach the Ombudsman about its

	with the provisions set out in section 2 of this Code.		“Commentary/explanation” column. Complaints Policy & Process	decision. We will only use the reasons stated in the policy for not escalating a complaint.”
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	This has been witnessed by our customer led Scrutiny Panel.	We use a Complaints Dashboard, via PowerBi for automatically reporting data and then store all relevant documentation for each individual complaint in one place, as part of our MRI housing management system
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	Internal monitoring and weekly meetings evidence the escalation rates from service requests through to complaints and then again from Stage 1 to Stage 2. Cases referred to the Housing Ombudsman are checked again (because of extensive Housing Ombudsman delays) to review current circumstances, all with the proactive intent of seeking resolution.	Colleagues are actively encouraged to resolve complaints as soon as dissatisfaction is raised, be that at service request, Stage 1 or Stage 2. A pragmatic, customer centric approach is taken and minor omissions or points of contention are sometimes resolved quickly without the need to escalate to Stage 2.
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	The Acceptable Behaviour Policy is shown on our website, under the following link acceptable-behaviour-policy-final.pdf	None
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	Restrictions made under the Acceptable Behaviour Policy are only used in exceptional circumstances and approved by a Head of, or above, to ensure compliance with Equality Act 2010.	None

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	This has been witnessed by our customer led Scrutiny Panel.	Complaints are reviewed daily by Team Leaders and the Complaints Officer assigned that day to administrative duties. The complaints are prioritised according to age, complexity and vulnerabilities.
6.2	Complaints must be acknowledged, defined and logged at stage 1 of the complaints procedure <u>within five working days of the complaint being received.</u>	YES	This has been witnessed by our customer led Scrutiny Panel, is a metric tracked by the Complaints Team and a regular checking feature of internal audits. It is referenced in our Complaints Policy & Procedure; Section 7.1.2 "A complaint will be logged within 5 days of receiving it" Complaints Policy & Process	None
6.3	Landlords must issue a full response to stage 1 complaints <u>within 10 working days</u> of the complaint being acknowledged.	NO	58.45% of complaints were resolved within 10 working days in 2025/26. This is behind industry norms of 79% and is the focus of improvement plans, currently underway.	None
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)	YES	A much improved 95.58% of complaints overall were resolved within the allowed extension period of a further 10 working days in 2025/26; this being 10% ahead of industry averages. Just 59 complaints were out of timescales and individual arrangements	None

	must be clearly explained to the resident.		made with complainants.	
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	This is referenced in our Complaints Policy and Process 7.1.4 "If an extension beyond 20 working days is required to enable the landlord to respond to the complaint fully, this will be agreed by both parties. The details of the Ombudsman will be provided at this point to enable escalation if required." Complaints Policy & Process	In all complaints' correspondence, customers are provided with the contact details of 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 the issue are completed. Outstanding actions must still be tracked and actioned promptly with appropriate updates provided to the resident.	YES	This is evidenced by our Complaints Policy and Process, Section 7.1.6 "We will send a complaint response to the resident when the answer to the complaint is known and not when any outstanding actions required to address the issue, are completed. Any outstanding actions will still be pursued and actioned promptly with regular updates provided to the resident." Complaints Policy & Process	When there is an outstanding action to fully resolve a complaint, for example a repair, the complaint letter is sent, referencing the date the repair is booked for and the team track this through to completion.
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	This is evidenced by our Complaints Policy and Process, Section 7.1.7 "We will address all points raised in the complaint and provide clear reasons for any decisions, referencing the relevant policy, law, and good practice where appropriate." Complaints Policy & Process	None
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,	YES	This is evidenced by our Complaints Policy and Process, Section 7.1.9 "If residents raise additional complaints during the investigation, these will be incorporated into the stage one response if	None

	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.		they are relevant, and the stage one response has not been issued. Where the stage one response has been issued, or it would unreasonably delay the response, the complaint will be logged as a new complaint.” Complaints Policy & Process	
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	This is evidenced by our Complaints Policy and Process, 7.1.10 “We will confirm the following in writing to the resident at the completion of stage one: • the complaint stage. • the complaint definition. • the decision on the complaint. • the reasons for any decisions made, referencing policies, law and good practice where appropriate. • how we will remedy and put things right. • details of any outstanding actions. • details of how to escalate the matter to stage two if the resident is not satisfied with the response.” Complaints Policy & Process	None

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 2 of the landlord’s procedure. Stage 2 is the landlord’s final response.	YES	This is evidenced by our Complaints Policy and Process, 7.1.12 “If any part of the complaint is not resolved to the resident’s satisfaction at stage one it will be progressed to stage two of our complaint’s procedure.” Complaints Policy & Process	None
6.11	Requests for stage 2 must be acknowledged, defined and logged at stage 2 of the complaints procedure within	YES	This is evidenced by our Complaints Policy and Process, 7.1.12 “it will be progressed to stage	None

	five working days of the escalation request being received.		two of our complaint's procedure, within 5 days of receiving the request". Complaints Policy & Process	
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	The Complaints Policy and Process, section 7.1.11 does not indicate that any reason must be given to escalate a complaint to Stage 2 and is therefore compliant. Complaints Policy & Process	None
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	YES	The Complaints Policy & Process confirms compliance, Section 7.1.16 "The person considering the complaint at stage two, will not be the same person that considered the complaint at stage one." Complaints Policy & Process	Typically, Stage 2 complaints are resolved by operational managers, independent of the Complaints Resolution Team and compliant with this requirement.
6.14	Landlords must issue a final response to the stage 2 <u>within 20 working days</u> of the complaint being acknowledged.	YES	84.69% of complaints were resolved within 20 working days in 2025/26, this being slightly ahead of the sector average of 83% (this latter average includes allowable extension).	None
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	A much improved 93.54% of complaints overall were resolved within the allowed extension period of a further 20 working days in 2025/26, this being 10% ahead of expectations.	None
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	This is covered by Complaints Policy & Process, Section 7.1.18 "If an extension beyond 20 working days is required to enable the landlord to respond to the complaint fully, this will be agreed by both	In all complaints' correspondence, customers are provided with the contact details of The Ombudsman.

			parties. The details of the Ombudsman will be provided at this point to enable escalation if required.” Complaints Policy & Process	
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	This is evidenced by our Complaints Policy and Process, Section 7.1.6 “We will send a complaint response to the resident when the answer to the complaint is known and not when any outstanding actions required to address the issue, are completed. Any outstanding actions will still be pursued and actioned promptly with regular updates provided to the resident.” Complaints Policy & Process	When there is an outstanding action to fully resolve a complaint, for example a repair, the complaint letter is sent, referencing the date the repair is booked for and the team track this through to completion.
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	This is evidenced by our Complaints Policy and Process, Section 7.1.7 “We will address all points raised in the complaint and provide clear reasons for any decisions, referencing the relevant policy, law, and good practice where appropriate.” Complaints Policy & Process	None
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	YES	This is evidenced by our Complaints Policy and Process, Section 7.1.19 “We will confirm the following in writing to the resident at the completion of stage two: • the complaint stage. • the complaint definition. • the decision on the complaint. • the reasons for any decision made, referencing policies, law and good practice where appropriate. • how we will remedy and put things right. • details of any outstanding actions. • details of how to	None

	individual remains dissatisfied.		escalate the matter to the Housing Ombudsman Service if the resident remains dissatisfied.” Complaints Policy & Process	
6.20	Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.	YES	emh offers a two-stage process only, in compliance with Housing Ombudsman's Complaint Handling Code. As such, Stage 2 is the final response and is Head of Service or above led. See Complaints Policy & Process	None

Section 7: Putting things right

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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: <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	This is evidenced by Section 8.1.1 of Complaints Policy and Process, copied in the “commentary” column, or accessed below. Complaints Policy & Process	“8.1.1 Where something has gone wrong, we will acknowledge this and set out the actions we have already taken, or intend to take, to put things right. These can include acknowledging where things have gone wrong. <ul style="list-style-type: none"> • providing an explanation, assistance or reasons. • apologising. • acting if there has been a delay. • reconsidering or changing a decision. • amending a record. • providing a financial remedy. • changing policies, procedures, or practices.”
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	YES	This is evidenced by Section 8.1.2 of Complaints Policy and Process, copied in the “commentary” column, or accessed below. Complaints Policy & Process	“8.1.2 Remedies offered will reflect the extent of any service failures and the level of detriment caused to the resident as a result.”

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	This is evidenced by Section 8.1.5 and 8.1.4 of Complaints Policy and Process, copied in the “commentary” column, or accessed below. Complaints Policy & Process	<p>“8.1.5 We will agree with the resident, where appropriate, the resolution and this will clearly set out what will happen and when.</p> <p>8.1.4 Factors that we will consider when formulating a remedy can include, but are not limited to, the:</p> <ul style="list-style-type: none"> • length of time that a situation has been ongoing. • frequency with which something has occurred • severity of any service failure or omission. • number of different failures. • cumulative impact on the resident. • resident’s particular circumstances or vulnerabilities.”
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	YES	This is evidenced by Section 8.1.8 of Complaints Policy and Process, copied in the “commentary” column, or accessed below Complaints Policy & Process	“8.1.8 We will take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.”

Section 8: Self-assessment, reporting and compliance

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
8.1	Landlords must produce an annual complaints performance and service improvement report for scrutiny and challenge, which must include: a. the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements. b. a qualitative and quantitative analysis of the landlord's complaint handling performance. This must also include a summary of the types of complaints the landlord has refused to accept; c. any findings of non-compliance with this Code by the Ombudsman; d. the service improvements made as a result of the learning from complaints; e. any annual report about the landlord's performance from the Ombudsman; and f. any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord.	YES	None	Annual Complaints Performance and Service Improvement report to be presented and discussed at September Homes and Group Boards. All documents including Board response to annual report will then be published on website, prior to 30 Sep 2026.
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	None	Annual Complaints Performance and Service Improvement report to be presented and discussed at September Homes and Group Boards. All documents including Board response to annual report will then be published on website, prior to 30 Sep 2026.

8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	YES	We are aware of our obligations under this provision of the Code and would comply with the requirements should these circumstances arise.	No instances during the year to trigger this clause.
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	YES	We are aware of our obligations under this provision of the Code and would comply with the requirements should these circumstances arise.	We have not been asked to do this during the year.
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	We are aware of our obligations under this provision of the Code and would comply with the requirements should these circumstances arise.	No instances during the year to trigger this clause.

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	We have a “you said we listened” page on our website to evidence improvements made as a result of customer feedback. There were 43 in 2025/26 You said, we listened - East Midlands Homes	None
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	We have a “you said we listened” page on our website to evidence improvements made as a result of customer feedback. There were 43 in 2025/26 You said, we listened - East Midlands Homes	None
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	These are reported to Resident Influence Committee, Homes Board, Group Board, Executive Leadership Team and discussed at colleague roadshows and update events	None
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 lead is Director of Customer Experience, reporting through to the Executive Director of Housing and Development.	None
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	Gail Puttock, Resident Member of Group Board is appointed as MRC.	None
9.6	The MRC will be responsible for ensuring the governing body receives regular information on complaints	YES	Monthly meetings are held between MRC and Director of Customer Experience and in	None

	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.		addition, further ad hoc meetings are called where necessary.	
9.7	<p>As a minimum, the MRC and the governing body (or equivalent) must receive:</p> <ul style="list-style-type: none"> 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	<p>A Voice of Customer Report is presented at each Board round (quarterly), keeping the governing body abreast of the requirements referenced. In addition, a suite of complaint metrics, including the maladministration rate are included in Board scorecards. Please see 8.2 for annual reporting.</p>	None
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> <ul style="list-style-type: none"> a. have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments; b. take collective responsibility for any shortfalls identified through complaints, rather than blaming others; and c. act within the professional standards for engaging with complaints as set by any relevant professional body. 	YES	<p>Colleagues from the Complaint Resolution Team comply with the standard objective outlined</p>	None