

## Appendix A: Self-assessment form June 2025

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 and 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	From Complaints Policy and Procedure: <i>“We define a complaint as an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the organisation, its own staff or those acting on its behalf, affecting an individual resident or group of residents.”</i>
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	From Complaints Policy and Procedure: <i>“The person complaining does not have to use the word ‘complaint’ for their concern to be treated as a complaint.”</i>
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	From Complaints Policy and Procedure: <i>“There are some circumstances where we may choose not to use this procedure. These circumstances may also be reasons for declining to escalate a complaint:</i> <ul style="list-style-type: none"> <li><i>Where a resident is notifying us about a situation they wish to have rectified, this may be treated as a service request rather than a complaint.”</i></li> </ul>
1.5	A complaint must be raised when the resident expresses dissatisfaction with the response to their service request, even if	Yes	This duty is implicit in the scope of our Complaints Policy and Procedure, as it falls into the overarching definition of a complaint. Our record keeping for complaints contains examples of complaints that

	the handling of the service request remains ongoing. Landlords must not stop their efforts to address the service request if the resident complains.		have arisen as a result of a tenant's dissatisfaction with how we have handled a service request.
1.6	An expression of dissatisfaction with services made through a survey is not defined as a complaint, though wherever possible, the person completing the survey should be made aware of how they can pursue a complaint if they wish to. Where landlords ask for wider feedback about their services, they also must provide details of how residents can complain.	Yes	We ask for feedback about our services in line with the Regulator's Tenant Satisfaction Measures. We communicate with all residents about how they can make a complaint (see our website and sign-up documentation). Expressions of dissatisfaction made through our survey are followed up directly (where the tenant has allowed for their details to be shared) and a record of these interactions is retained.

## Section 2: Exclusions

Code provision	Code requirement	Comply: Yes / No	Evidence, commentary and 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	Complaints Policy provides an explicit list of reasons why a complaint may not be accepted. Also from Complaints Policy: <i>"In any case where a decision is taken not to respond to a complaint in accordance with this procedure, the complainant will be notified in writing with a full explanation provided."</i>
2.2	<p>A complaints policy must set out the circumstances in which a matter will not be considered as a complaint or escalated, and these circumstances must be fair and reasonable to residents. Acceptable exclusions include:</p> <ul style="list-style-type: none"> <li>• The issue giving rise to the complaint occurred over twelve months ago.</li> <li>• Legal proceedings have started. This is defined as details of the claim, such as the Claim Form and Particulars of Claim, having been filed at court.</li> <li>• Matters that have previously been considered under the complaints policy.</li> </ul>	Yes	<p>From Complaints Policy and Procedure: <i>"There are some circumstances where we may choose not to use this procedure. These circumstances may also be reasons for declining to escalate a complaint:</i></p> <ul style="list-style-type: none"> <li>• <i>Where a resident is notifying us about a situation they wish to have rectified, this may be treated as a service request rather than a complaint.</i></li> <li>• <i>Where a complainant is abusive or threatening towards staff when making a complaint.</i></li> <li>• <i>Where a complainant makes repeated complaints about similar or linked issues where these issues are being or have already been investigated.</i></li> <li>• <i>Where an unreasonable period of time has elapsed between incidents to which a complaint refers and the complaint being made (this time period may be extended in some circumstances, e.g. where the resident has only become aware of an issue in the past 12 months).</i></li> <li>• <i>Where legal proceedings relating to the subject of the complaint have been entered into.</i></li> <li>• <i>Where a complainant is making unreasonable demands of staff time and resources that are out of proportion to the complaint."</i></li> </ul>

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	See excerpt from Complaints Policy in 2.2, above.
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	See excerpt from Complaints Policy in 2.1, above.
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Yes	From Complaints Policy: <i>“Decisions not to proceed with a complaint will be taken on a case by case basis.”</i>

### Section 3: Accessibility and Awareness

Code provision	Code requirement	Comply: Yes / No	Evidence, commentary and 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	Yes	Complaints Policy: <i>“Complaints can be made through any of Elim’s communication channels, including social media.”</i> Elim is contactable by phone, post, email, and in person (with visits to most residents publicised in advance and many sites with staff on site).

	residents who may need to access the complaints process.		
3.2	Residents must be able to raise their complaints in any way and with any member of staff. All staff must be aware of the complaints process and be able to pass details of the complaint to the appropriate person within the landlord.	Yes	<p>Training is delivered to all colleagues to ensure awareness of the Complaints Policy and Procedure and to ensure that colleagues consistently raise complaints in the correct manner.</p> <p>The last full colleague training session was delivered in December 2023, and the next is booked for August 2025. Complaints handling is also raised in team meetings, and colleagues are always encouraged to promote and accept complaints.</p>
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	<p>From Complaints Policy:  <i>"We understand that we will not get it right all the time. We will treat complaints as an opportunity to improve our services or our communication."</i></p> <p>This message is reinforced in training and a 'no-blame' culture of transparency throughout the organisation, underpinned by one of our core values: Accountability. Complaints are reported to a Board Committee on a quarterly basis.</p>
3.4	Landlords must make their complaint policy available in a clear and accessible format for all residents. This will detail the two stage process, what will happen at each stage, and the timeframes for responding. The policy must also be published on the landlord's website.	Yes	Policy is available online and provided in writing at sign up. We have arrangements in place to arrange for translation should it be required by any resident. The two-stage process is clearly outlined in the Policy.
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	See section in Complaints Policy and Procedure: <i>"Complaints Communication and Publicity"</i>
3.6	Landlords must give residents the opportunity to have a representative deal with their complaint on their behalf, and to	Yes	<p>From Complaints Policy and Procedure:  <i>"We are happy to accept complaints from representatives of our residents and will communicate this to all complainants."</i></p>

	be represented or accompanied at any meeting with the landlord.		
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	Ombudsman included within Complaints Procedure as escalation option after Stage 2. Correspondence to complainants at earlier stages of complaints advises that they are entitled to contact the Ombudsman at any time, though that the Ombudsman may require them to exhaust our internal procedure before picking up the case.

## Section 4: Complaint Handling Staff

Code provision	Code requirement	Comply: Yes / No	Evidence, commentary and 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	<p>The Complaints Officer role currently sits with the Deputy Chief Executive, as they have oversight of all the organisation's operations but do not directly line manager any front line colleagues.</p> <p>The Complaints Officer (DCEO) will ensure every complaint is recorded and that the Stage 1 complaint investigation is appropriately delegated to the most appropriate member of the Operational Leadership to respond. In most circumstances, the Complaints Officer will be responsible for undertaking a Stage Two investigation if the complaint is escalated.</p>
4.2	The complaints officer must have access to staff at all levels to facilitate the prompt resolution of complaints. They must also have the authority and autonomy to act to resolve disputes promptly and fairly.	Yes	The Deputy Chief Executive, and any leadership team member delegated to stage one complaint handling, has straightforward access to colleagues at all levels and in all teams, and has sufficient authority and autonomy to carry out the role.
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	<p>All colleagues receive regular training on complaints, recognising that it is important that complaints are responded to correctly from the moment they are received.</p> <p>Any learning from individual complaints is also addressed with the relevant colleagues and/or teams to reinforce the importance of complaints as part of a continuous improvement process.</p>



## Section 5: The Complaint Handling Process

Code provision	Code requirement	Comply: Yes / No	Evidence, commentary and 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	One single Complaints Policy and Procedure, as referenced throughout this self-assessment.
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	Our Policy and Procedure reflect this requirement.
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 only two stages within the Procedure.
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	Although this has not arisen as an issue as yet, we will adhere to this requirement of the code.
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Yes	Although this has not arisen as an issue as yet, we will adhere to this requirement of the code.
5.6	When a complaint is logged at Stage 1 or escalated to Stage 2, landlords must set	Yes	We will try to ensure clarity and a shared understanding of the complaint for all parties, at every stage of the complaint.

	<p>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.</p>		<p>From the Policy and Procedure:  <i>“It benefits both the Complainant and the colleague handling the complaint to have clarity throughout these stages of the complaint handling process. We will typically seek to clarify the detail of a complaint and desired resolution as early as possible in the process and confirm this in writing with the Complainant. Whilst not set in stone throughout the Complaint process, if the detail and desired resolution of a complaint is changing frequently throughout the process or if unrelated matters are introduced, then the Complainant may be advised that the timescales of the complaint handling process for their complaint will be revised or that they should submit another, separate complaint.”</i></p>
5.7	<p>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.</p>	Yes	<p>This is done as a matter of course as part of our complaints handling.</p>
5.8	<p>At each stage of the complaints process, complaint handlers must:</p> <ol style="list-style-type: none"> <li>deal with complaints on their merits, act independently, and have an open mind;</li> <li>give the resident a fair chance to set out their position;</li> <li>take measures to address any actual or perceived conflict of interest; and</li> <li>consider all relevant information and evidence carefully.</li> </ol>	Yes	<p>These requirements are fulfilled as a matter of course as part of our complaint handling.</p> <p>The 2 stage process allows for scrutiny of the Stage 1 response, and the Member Responsible for Complaints also has access to complaint material for review and to gain assurance on request.</p>
5.9	<p>Where a response to a complaint will fall outside the timescales set out in this Code, the landlord must agree with the resident</p>	Yes	<p>There are consistent examples of this throughout our complaint handling. Any changes to routine timescale are agreed with the complainant in</p>

	suitable intervals for keeping them informed about their complaint.		advance, and there will be a record kept of the updated target response dates.
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	This is part of our standard practise in every aspect of our operations.
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	See response to 2.2, above.
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	Contained within complaint records. Complaint records have been reviewed by our Internal Auditors (Q4 2023/2024) and found to provide a high degree of assurance in their operation of controls.
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	Yes	Complaints training emphasises the benefits of early resolution and problem solving on the part of the person receiving the complaint. They are encouraged to act with autonomy to resolve matters before the complaint reaches Stage 1. This is detailed in the procedure.

	provided at any stage of the complaints process without the need for escalation.		
5.14	Landlords must have policies and procedures in place for managing unacceptable behaviour from residents and/or their representatives. Landlords must be able to evidence reasons for putting any restrictions in place and must keep restrictions under regular review.	Yes	Unacceptable behaviour Policy drafted June 2024.
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	This is part of our standard practise in every aspect of our operations.

## Section 6: Complaints Stages

### Stage 1

Code provision	Code requirement	Comply: Yes / No	Evidence, commentary and 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	<p>From Policy and Procedure:</p> <p>Once a complaint has been made, it will be acknowledged, defined and formally recorded within 5 working days of the complaint being received by Elim.</p> <p>Within this period, we will try and respond to the complaint as early as possible and will provide a prompt resolution to the complaint where this is satisfactory to the resident.</p> <p>The colleague receiving a complaint will attempt to resolve it in the first instance. They will do this by clarifying with the Complainant:</p> <ul style="list-style-type: none"> <li>a) The detail of their complaint, and</li> <li>b) How they would like to see the complaint resolved.</li> </ul> <p>They will then attempt to offer an appropriate resolution. This may take the form of an explanation, apology or alternative action that is satisfactory to the complainant.</p>
6.2	Complaints must be acknowledged, defined and logged at stage 1 of the complaints procedure <b><u>within five working days of the complaint being received.</u></b>	Yes	See 6.1, above.
6.3	Landlords must issue a full response to stage 1 complaints <b><u>within 10 working days</u></b> of the complaint being acknowledged.	Yes	<p><b><u>From Policy and Procedure</u></b></p> <p><b><u>Further investigation and stage 1 response – 10 Working Days</u></b></p> <p>If further investigation is required, the complaint will be passed to the Complaints Officer. The Complaints Officer will conduct an investigation,</p>

			usually involving further discussion with the Complainant. The Complaints Officer will respond to the Complainant with the final stage 1 response within 10 working days of the complaint being first acknowledged.
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	<p>From Policy and Procedure:</p> <p>If an extension to this timescale for the stage 1 response is required, for example, due to the complexity of the complaint or the nature of the investigation required, we will clearly communicate the reason for this extension to the resident and agree a revised response date with them. A stage 1 extension should only be required in exceptional circumstances and should be no more than 10 working days.</p>
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 done as a matter of course in our complaint handling correspondence.
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 through complaints record keeping.
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	Evidenced through complaints record keeping.
6.8	Where residents raise additional complaints during the investigation, these must be incorporated into the stage 1	Yes	<p>From Policy and Procedure:</p> <p>It benefits both the Complainant and the colleague handling the complaint to have clarity throughout all stages of the complaint handling process. We</p>

	<p>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.</p>		<p>will typically seek to clarify the detail of a complaint and desired resolution as early as possible in the process and confirm this in writing with the Complainant.</p> <p>We recognise that additional complaints may arise during the complaints process. Where these are related to the initial complaint and raised before the response is issued to the Complainant, we will ensure these issues are considered and incorporated into the stage one response.</p> <p>If the detail and desired resolution of a complaint is changing frequently throughout the process or if unrelated matters are introduced, then the Complainant may be advised that the timescales of the complaint handling process for their complaint will be revised or that they should submit another, separate complaint.</p>
6.9	<p>Landlords must confirm the following in writing to the resident at the completion of stage 1 in clear, plain language:</p> <ul style="list-style-type: none"> <li>a. the complaint stage;</li> <li>b. the complaint definition;</li> <li>c. the decision on the complaint;</li> <li>d. the reasons for any decisions made;</li> <li>e. the details of any remedy offered to put things right;</li> <li>f. details of any outstanding actions; and</li> <li>g. details of how to escalate the matter to stage 2 if the individual is not satisfied with the response.</li> </ul>	Yes	Evidenced through all Stage 1 responses in complaints record keeping.

## Stage 2

Code provision	Code requirement	Comply: Yes / No	Evidence, commentary and explanation
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6.10	If all or part of the complaint is not resolved to the resident's satisfaction at stage 1, it must be progressed to stage 2 of the landlord's procedure. Stage 2 is the landlord's final response.	Yes	<p>From Procedure:  <i>"If the Complainant is not satisfied with the outcome, then they would follow the escalation instructions within 10 working days and proceed to Stage 2."</i></p> <p>Stage 2 is the final stage of our Complaints Procedure.</p>
6.11	Requests for stage 2 must be acknowledged, defined and logged at stage 2 of the complaints procedure within five working days of the escalation request being received.	Yes	<p>From Procedure:  <b><u>Escalation and stage 2 response – 20 working days</u></b></p> <p>Once a request for stage 2 consideration has been made, it will be acknowledged, defined and formally recorded within 5 working days of the escalation request being received.</p> <p>Once a complaint has been escalated, it will be passed to a member of the Senior Leadership Team (SLT) and a deadline will be provided for a final response. This deadline will be no more than 20 working days from the date of escalation.</p>
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	Our procedure does not require this.
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Yes	<p>From Procedure:  <i>"Once a complaint has been escalated, it will be passed to a member of the Senior Leadership Team (SLT) to carry out the stage 2 review.</i>  A member of the SLT will only carry out Stage 1 investigations in exceptional circumstances. In this instance, any stage 2 complaint will be considered by a different member of the SLT.</p>
6.14	Landlords must issue a final response to the stage 2 <b><u>within 20 working days</u></b> of the complaint being acknowledged.	Yes	See 6.11, above.



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	This has not been necessary as yet. Any extension required will fulfil this requirement.
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	Ombudsman contact details are provided to the complainant as a matter of course.
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	<p>From Policy and Procedure:</p> <p><b>Actions arising from Complaints</b></p> <p>Where action has been identified as outstanding or where new actions have been proposed as part of a complaint response, it will be the responsibility of the member of staff who has identified or proposed these actions to ensure that these actions are tracked and completed within an appropriate timeframe.</p> <p>For the avoidance of doubt, the complaint responses will 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.</p> <p>Updates on the progress of any outstanding actions must be provided to the resident after the complaint response has been provided.</p>
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 can be evidenced through our complaints record keeping.

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	This can be evidenced through our complaints record keeping
6.20	Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.	Yes	There are no further stages to our Complaints Procedure.

## Section 7: Putting things right

Code provision	Code requirement	Comply: Yes / No	Evidence, commentary and 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: • Apologising; • Acknowledging where things have gone wrong;	Yes	Our complaint responses detail how we have fulfilled this requirement.  Our Compensation Policy also sets out our approach to financial remedy where appropriate.

	<ul style="list-style-type: none"> <li>• Providing an explanation, assistance or reasons;</li> <li>• Taking action if there has been delay;</li> <li>• Reconsidering or changing a decision;</li> <li>• Amending a record or adding a correction or addendum;</li> <li>• Providing a financial remedy;</li> <li>• Changing policies, procedures or practices.</li> </ul>		
<b>7.2</b>	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Yes	See 7.1, above.
<b>7.3</b>	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	See 7.1, above.
<b>7.4</b>	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes	We are committed to reflecting this in our complaint responses, and can evidence this in the 2024-2025 period where any proposed financial remedies align with the Ombudsman guidance.

## Section 8: Putting things right

Code provision	Code requirement	Comply: Yes / No	Evidence, commentary and explanation
8.1	<p>Landlords must produce an annual complaints performance and service improvement report for scrutiny and challenge, which must include:</p> <ul style="list-style-type: none"> <li>a. the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements.</li> <li>b. a qualitative and quantitative analysis of the landlord's complaint handling performance. This must also include a summary of the types of complaints the landlord has refused to accept;</li> <li>c. any findings of non-compliance with this Code by the Ombudsman;</li> <li>d. the service improvements made as a result of the learning from complaints;</li> <li>e. any annual report about the landlord's performance from the Ombudsman; and</li> <li>f. any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord.</li> </ul>	Yes	<p>The first annual report was produced and reported to the People and Culture Committee meeting in June 2024.</p> <p>The 2024-2025 annual report will be provided to the Customer Service Committee for review in July 2025. After approval and the final governing body response has been received from the Customer Service Committee, the final report will be circulated to the Group Board.</p>

8.2	The annual complaints performance and service improvement report must be reported to the landlord's governing body (or equivalent) and published on the on the section of its website relating to complaints. The governing body's response to the report must be published alongside this.	Yes	See 8.1, above  The annual complaints and service improvement report, alongside our Board's response to this report is published on our website:  <a href="http://www.elimhousing.co.uk/resident-zone/complaints-feedback">www.elimhousing.co.uk/resident-zone/complaints-feedback</a>
8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	Yes	This is noted and will be carried out as necessary.
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	Yes	This is noted and we would comply with any such request as necessary.
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 will adhere to this requirement if the situation arises.

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

Code provision	Code requirement	Comply: Yes / No	Evidence, commentary and 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	This can be evidenced through our complaint correspondence and also through our annual reports.
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	See 9.1, above.
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	<p>Our annual report is available to view on our website and will be circulated to colleagues and to residents through our e-newsletter.</p> <p>A Complaints Report is produced annually and is available to all stakeholders on our website.</p> <p>In 2025, we will also schedule an online Customer Complaints Session, which will enable the Annual Complaints report and findings to be presented and discussed with any Elim customer able to attend.</p>

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	<p>The Deputy Chief Executive has been appointed as Complaints Officer with accountability for our organisational complaint handling and learning from complaints.</p> <p>The Deputy Chief Executive will meet with the Board Member Responsible for complaints to discuss complaints information and outcomes between Customer Service Committee meetings.</p> <p>Complaints data is also reviewed quarterly by our Customer Service Committee, who have the authority to escalate trends or points for further consideration to Board.</p>
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	<p>Meenakshi Sharma is a full member of our governing board and has been appointed as the Member Responsible for Complaints. Meenakshi also sits on the Customer Service Committee.</p>
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	<p>Complaints information is provided to the Customer Service Committee quarterly, and the MRC is part of the information and review process.</p> <p>We also provide the MRC with access to our full complaint handling monitoring spreadsheet and provide any additional information or detail on request.</p>
9.7	As a minimum, the MRC and the governing body (or equivalent) must receive:	Yes	<p>This information is reported to Customer Service Committee quarterly, and can be evidenced through CSC papers.</p>

	<p>a. regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance;</p> <p>b. regular reviews of issues and trends arising from complaint handling;</p> <p>c. regular updates on the outcomes of the Ombudsman's investigations and progress made in complying with orders related to severe maladministration findings; and</p> <p>d. annual complaints performance and service improvement report.</p>		
9.8	<p>Landlords must have a standard objective in relation to complaint handling for all relevant employees or third parties that reflects the need to:</p> <p>a. have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments;</p> <p>b. take collective responsibility for any shortfalls identified through complaints, rather than blaming others; and</p> <p>c. act within the professional standards for engaging with complaints as set by any relevant professional body.</p>	Yes	<p>From Complaint Officer's annual targets: <i><u>"Complaint Handling"</u></i></p> <p>➤ <i>To ensure complaint handling is carried out in accordance with the Ombudsman's Code.</i></p> <p>➤ <i>To collect and share complaint information as required by both the Code and our Board.</i></p> <p><i>To provide information to the Member Responsible for Complaints to ensure that accountability and appropriate scrutiny of Elim's complaint handling."</i></p>