

Independent Housing Ombudsman Complaint Handling Code Self-Assessment: Midland Heart; May 2024

Section 1 - Definition of a complaint				
Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations	Learning identified
1.2	A complaint must be defined as: <i>'an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the organisation, its own staff, or those acting on its behalf, affecting an individual resident or group of residents.'</i>	Yes	Our definition of a complaint within our Complaints Policy reflects that of the Independent Housing Ombudsman: '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' (Page 1 Section 4.4)	
1.3	The 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 still be handled in line with the landlord's complaints policy.	Yes	Our tenants do not need to use the word 'complaint' for it to be treated as such. In May 2024 we delivered additional training to all managers to ensure that their teams understand this message. Our complaints policy makes it clear that Complaints can be received on behalf of tenants or residents through other agencies e.g. advocates or support agencies. (Page 3 Section, 6.2 - 6.3)	We have added a new section to our policy (page 2, 4.5) to make it clearer that complaints are recorded even where a tenant does not explicitly use the word 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	Throughout 2023 we delivered additional training to all managers and front-line colleagues to ensure that their teams understand the difference between a service request and a complaint. Our Complaints Policy outlines that a service request is a request for us to take action to put something right. Whilst a service request is not a complaint we will record and monitor the types of service requests we receive. If at any time a tenant is dissatisfied with the action take to resolve their service request, we will raise their concerns as a complaint whilst we work to resolve the issue. (Page 1 Section 4.3) We also explain that a complaint does not cover requesting a new service: "We will always accept a complaint unless there is a valid reason not to do so. We will not be able to accept or escalate a complaint if you are: <ul style="list-style-type: none"> • Requesting a new service: When a tenant or resident informs us of a problem but are actually requesting a service for the first time e.g. repair, ASB. (Page 2, 5.1) 	We updated our policy to make it clearer to tenants and staff, the difference between a service request and a complaint (page 1, section 4)

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1.5	A complaint must be raised when the resident expresses dissatisfaction with the response to their service request, even if the handling of the service request remains ongoing. Landlords must not stop their efforts to address the service request if the resident complains.	Yes	We have undertaken training with all front-line managers to ensure that we are clear that our efforts to resolve a complaint do not stop when a complaint is raised. Our approach to handling complaints always involves the service area in question who will own and be accountable for any actions needed to put things right.	
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	Where customers express dissatisfaction in our satisfaction surveys (undertaken by an external agency), we automatically send emails to relevant service areas to review. Our interviewers have been trained to ensure that where customers express dissatisfaction they are advised of their right to make a complaint and signposted to more information on our policy.	We have added a new section into our policy (Page 2, 4.6) to ensure tenants are aware of how expressions of dissatisfaction made through surveys are handled.
Section 2 - Exclusions				
2.1	Landlords must accept a complaint unless there is a valid reason not to do so. If landlords decide not to accept a complaint, they must be able to evidence their reasoning. Each complaint must be considered on its own merits	Yes	Our complaints policy outlines the situations in which we would not accept a complaint. (Page 2, 5.1). In situations where we are not able to accept a complaint, we will write to the tenant to explain why this is the case. Our reasonable adjustments section outlines that we will make any reasonable adjustments needed to ensure tenants are able to participate in the complaints process (Page 3, 7.1)	
2.2	A complaints policy must set out the circumstances in which a matter will not be considered as a complaint or escalated, and these circumstances must be fair and reasonable to residents. Acceptable exclusions include: <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	Our complaints policy outlines the situations in which we would not accept a complaint. (Page 2, 5.1). This includes: <ul style="list-style-type: none"> • Requesting a new service: • An issue that is more than 12 months old • Closed complaints: • Complaints that refer to statutory or other external obligations (i.e. things we must do by law • Aspects of a complaint that refers to any issue where legal proceedings have commenced (either from us or a tenant) and have been filed at court. 	
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	Our complaints policy currently states that complaints referred to us within a 12-month period of time will not be accepted although this has not been updated on our website. Within the policy we do outline that this time limit will not apply if we are satisfied that there are exceptional circumstances involved. (Page 3, 5.3).	

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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	Our complaints policy outlines the situations in which we would not accept a complaint. (Page 2, 5.1). In situations where we are not able to accept a complaint, we will write to the tenant to explain why this is the case and signpost them to the Ombudsman if they do not agree that the exclusion has been fairly applied.	
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Yes	Our complaints policy outlines the situations in which we would not accept a complaint. (Page 2, 5.1). In situations where we are not able to accept a complaint, we will write to the tenant to explain why this is the case. Our reasonable adjustments section outlines that we will make any reasonable adjustments needed to ensure tenants are able to participate in the complaints process (Page 3, 5.3)	We have strengthened our exclusions section to make it clearer that we will take into consideration the individual circumstances of each complaint. (Page 3, 5.3).
Section 3 – Accessibility and Awareness				
3.1	Landlords must make it easy for residents to complain by providing different channels through which they can make a complaint. Landlords must consider their duties under the Equality Act 2010 and anticipate the needs and reasonable adjustments of residents who may need to access the complaints process.	Yes	Complaints can be received through any of our communication channels. This includes via phone, email and social media. Where complaints are received through social media to maintain privacy and confidentiality, we will respond via private message. (Page 3, 6.1) Our reasonable adjustments section outlines that we will make any reasonable adjustments needed to ensure tenants are able to access and participate in the complaints process (Page 3, 7.1)	
3.2	Residents must be able to raise their complaints in any way and with any member of staff. All staff must be aware of the complaints process and be able to pass details of the complaint to the appropriate person within the landlord.	Yes	Complaints can be received through any of our communication channels, and this includes to our staff. (Page 3, 6.1)	We have updated the accessibility and awareness section of our complaints policy to make it explicitly clear in our policy that we have a dedicated team to handle complaints and that complaints can be made to a member of staff.
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	Section 2 of our complaints policy outlines our approach to being open to complaints. (page 1, 2.1)	
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	We have an easy read version of our complaints policy alongside the full version available to all of our tenants including on our website. We also provide details of our complaints process on our website which can be translated into other languages or have other accessibility features (large print etc) added to it.	

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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	Our policy outlines that we will promote how a complaint can be made through all of our main communication channels, this includes our website, social media, posters, leaflets, letters and phone calls. (Page 3, 6.4)	We have added a section into our policy to outline how we will promote the policy. (Page 3, 6.4)
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	Our complaints policy makes it clear that Complaints can be received on behalf of tenants or residents through other agencies e.g. advocates or support agencies. (Page 3, 6.3)	
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	We provide the details of the Housing Ombudsman service on our website, complaints leaflets and at all stages of our complaints process including where complaints are extended or refused.	

Section 4 - Complaint Handling Staff

4.1	Landlords must have a person or team assigned to take responsibility for complaint handling, including liaison with the Ombudsman and ensuring complaints are reported to the governing body (or equivalent). This Code will refer to that person or team as the 'complaints officer'. This role may be in addition to other duties.	Yes	We have a Customer Experience Team who are assigned to take responsibility for complaint handling.	
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	Our Customer Experience Team have access to all staff and will regularly liaise with senior colleagues, Heads of Service and Directors to support effective complaint handling. The team are empowered too take action to deal with complaints quickly and fairly which may include calling complaints meetings, case reviews, escalating issues or actions and challenging findings from service areas. In addition, where service areas are experiencing high volumes of complaints (e.g. repairs) weekly meetings will take place with Managers to enable to prompt resolution of complaints.	
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	All members of staff who handle complaints have been required to read our Complaints Policy and have undertaken Communication and Complaints training to understand what we expect of them when handling a complaint. Taking on board the requirements from the Housing Ombudsman and the need to ensure complaints are investigated fully and accurately, over the last 12 months we have significantly increased the resource of our Customer Experience team which now includes a dedicated Housing Ombudsman Case Manager, 2 Senior Customer Experience Officers, 7 Customer Experience Officers and 1 Customer Experience Support Officer.	

Section 5 – The Complaint Handling Process

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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	We have one single Complaints policy that applies to anyone who is a tenant or resident. A tenant or resident is anyone who receives or requests a service from us or who is affected by our activities. (page 1, 3.1)	
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	Following learning from cases reviewed by the Housing Ombudsman over the last year we have removed the early resolution stage of our complaints process which was seen as an informal stage for complaint handling.	
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	We operate a two stage Complaints process as outlined in our policy. This includes a formal investigation and Formal Review stage. (Page 4, 9.1)	
5.4	Where a landlord's complaint response is handled by a third party (e.g. a contractor or independent adjudicator) at any stage, it must form part of the two stage complaints process set out in this Code. Residents must not be expected to go through two complaints processes.	Yes	All complaints are handled by our Customer Experience Team. Where complaints relate to our contractors, we would investigate these within our process	We have added a section (Page 4, 9.2) into our policy to make our approach to dealing with complaints regarding contractors clear to tenants
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Yes	We have delivered training to our major contractor on our expectations of managing complaints and the Housing Ombudsman code. Through our contract management process, we set performance measures for all contractors on complaints to ensure that we have oversight and assurance that they have been acted upon appropriately.	
5.6	When a complaint is logged at Stage 1 or escalated to Stage 2, landlords must set out their understanding of the complaint and the outcomes the resident is seeking. The Code will refer to this as "the complaint definition". If any aspect of the complaint is unclear, the resident must be asked for clarification.	Yes	When logging or escalating complaints our records will always include our understanding of the complaint and the outcome being sought. Samples of Complaints being logged have shown that we are accurately documenting this.	We have added a section (Page 5, 10.5) into our policy to make our approach to dealing with complaints clear to tenants
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	Our Complaint acknowledgement letters have been updated to ensure we are clear on the aspects of the complaint we are investigating	
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	Our Customer Experience team are an impartial and independent team to enable them to deal with complaints fairly with consideration given to all evidence received. In our acknowledgements to tenants, we provide them the opportunity to provide further evidence of their position to support and effective investigation.	
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	Our Complaints Policy sets out our approach to situations where our initial timescales agreed are not possible due to the specifics of the complaint. In these cases, we will agree an appropriate extension for response with the complainant and will keep the tenant or resident informed of how we will resolve the complaint (page 5, 10.1)	

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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	We keep details of tenant disabilities and vulnerabilities on our core housing management system. Our reasonable adjustments section outlines that we will make any reasonable adjustments needed to ensure tenants are able to access and participate in the complaints process (Page 3, 7.1)	
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	In January 2024 we received an Ombudsman determination where a service failure was found as we did not escalate a complaint relating to a legal query but had not yet reached the court stage. Learning from this determination and further publications from the Housing Ombudsman has led to us updating our policy to be clearer on where legal cases would not be accepted and brought in line with the expectations of the housing Ombudsman. Our complaints policy outlines the situations in which we would not accept a complaint. (Page 2, 5.1). This includes: <ul style="list-style-type: none"> Aspects of a complaint that refers to any issue where legal proceedings have commenced (either from us or a tenant) and have been filed at court. 	
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	All tenants who make a complaint have the details of their complaint and the outcome(s) stored securely on our systems.	We currently store core details of every complaint on our systems, but we have identified that sometimes correspondence can be held in different areas. Adopting a more consistent approach will improve record keeping and the tenant experience.
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	Our Complaints process enables remedies to be offered any stage of the process, with our Customer Experience Team given the autonomy to offer redress and remedies without escalation.	We have updated our policy (Page 6, section 11) to outline all the ways in which we can remedy complaints.
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	In our complaints policy we outline that we understand that upsetting and distressing circumstances can result in people acting out of character and we do not view behaviour as unacceptable just because a tenant or resident is forceful or determined. However, the actions of tenants or residents who are angry, demanding or persistent may result in unreasonable demands or unacceptable behaviour towards staff. If this happens, we may take action to tackle the behaviour and will use the Unreasonable Persistent Complainant Policy (page 6, 12.1)	
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	Our unreasonable Persistent Complainant policy ensures that decisions made are proportionate to the situation and take into account tenant needs. Prior to considering limited contact, staff should consider if there are any factors that may be influencing a customer's behaviour and whether there are steps/referrals we can make to address this. For example, staff should consider if a customer has communication or capacity issues. Any restrictions imposed will be reasonable and proportionate and based on individual circumstances, and may include third party support such as a support worker, healthcare professional or a legal advisor to be present in the decision	

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			making. Any restrictions will be subject to review after 12 months.	
Section 6 – Complaints Stages				
STAGE 1				
6.1	Landlords must have processes in place to consider which complaints can be responded to as early as possible, and which require further investigation. Landlords must consider factors such as the complexity of the complaint and whether the resident is vulnerable or at risk. Most stage 1 complaints can be resolved promptly, and an explanation, apology or resolution provided to the resident.	Yes	We assess all complaints individually and will look to resolve them as early as possible. We have recently created 2 new Senior Customer Experience Officer roles to support with the handling of more complex complaints.	
6.2	Complaints must be acknowledged, defined and logged at stage 1 of the complaints procedure within five working days of the complaint being received.	Yes	Our complaints policy states that we will acknowledge requests for both formal and review stage complaints within 5 working days. (page 5, 10.1)	
6.3	Landlords must issue a full response to stage 1 complaints within 10 working days of the complaint being acknowledged.	Yes	Our complaints policy states that where an investigation is required our target to respond will be 10 working days (page 5, 10.1)	
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	Our complaints policy states that during both formal investigation and review stages of the process, there may be occasions where we aren't able to provide you a response to your complaint within the timescales we set. Where this happens, we will inform you of the expected timescale for a response and ensure you are aware of your right to contact the Housing Ombudsman. Any extension will be no more than 10 working days for a Stage 1 response and 20 working days for a stage 2 response unless there is good reason to extend further. (page 4-5, 10.1)	
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	We have revised our extension request template to ensure that when we inform a resident about a request for an extension, that they are signposted to the Housing 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	Our complaints policy states that You will receive a response to your complaint when the answer is known. There may be situations where actions are ongoing or outstanding following a complaint being closed. We will ensure that these actions are tracked, and you are kept informed of any updates regarding these actions. (Page 5, 10.7)	
6.7	Landlords must address all points raised in the complaint definition and provide clear reasons for any decisions, referencing the relevant policy, law and good practice where appropriate.	Yes	Our complaint letters clearly set out each element that a tenant or resident has asked us to investigate and the member responding to complaints will set out clearly our response to each section, our decision and reason for this on each section of the complaint.	We have added a new section (Page 5, 10.5) into our policy to make our approach to addressing tenant queries clearer in our policy.

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6.8	Where residents raise additional complaints during the investigation, these must be incorporated into the stage 1 response if they are related and the stage 1 response has not been issued. Where the stage 1 response has been issued, the new issues are unrelated to the issues already being investigated or it would unreasonably delay the response, the new issues must be logged as a new complaint.	Yes	We will incorporate any new complaints raised as part of the investigation into our stage 1 response where they relate to the investigation in question. If an issue is unrelated or will cause an unreasonable delay to us responding to the original complaint, this will be logged as a new complaint.	We have added a new section (Page 4, 10.1) into our policy to make our approach to addressing tenant queries clearer in our policy.
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	We use a consistent structure in our complaint outcome letters at stage 1, this includes aspects a-g referenced in the code	
STAGE 2				
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	Our complaints policy outlines that if a tenant is unhappy with our resolution to their complaint, we will escalate this to stage 2, which is our final stage. (page 4, section 9)	
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	Our complaints policy states that we will acknowledge requests for both formal and review stage complaints within 5 working days. (page 5, 10.1)	
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	It is helpful for us to understand why a tenant remains unhappy with our response when their complaint is escalated. Tenants may be contacted to help us understand how we can work with them to find a resolution that they are happy with, however this is not a requirement of a complaint being escalated and is not included in our list of exclusions.	
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Yes	Our complaints policy outlines all stage 2 complaints will be considered by a Director or Head of Service. Stage 1 Complaints are considered by our Customer Experience Team (page 5, 10.2-10.4)	
6.14	Landlords must issue a final response to the stage 2 within 20 working days of the complaint being acknowledged.	Yes	Our complaints policy states that where a formal review is required our target to respond will be 20 working days (page 5, 10.1)	
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	Our complaints policy states that during both formal investigation and review stages of the process, there may be occasions where we aren't able to provide you a response to your complaint within the timescales we set. Where this happens, we will inform you of the expected timescale for a response and ensure you are aware of your right to contact the Housing Ombudsman.	We updated the timescales in our policy for extending stage 2 complaints from 10 days to 20 days in line with the code. (page 5, 10.1)

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			Any extension will be no more than 10 working days for a Stage 1 response and 20 working days for a stage 2 response unless there is good reason to extend further. (page 4-5, 10.1)	
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	We have revised our extension request template to ensure that when we inform a resident about a request for an extension, that they are signposted to the Housing Ombudsman	
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	Our complaints policy states that You will receive a response to your complaint when the answer is known. There may be situations where actions are ongoing or outstanding following a complaint being closed. We will ensure that these actions are tracked, and you are kept informed of any updates regarding these actions. (Page 5, 10.7)	
6.18	Landlords must address all points raised in the complaint definition and provide clear reasons for any decisions, referencing the relevant policy, law and good practice where appropriate.	Yes	Our complaint letters clearly set out each element that a tenant or resident has asked us to investigate and the member responding to complaints will set out clearly our response to each section, our decision and reason for this on each section of the complaint.	
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	We use a consistent structure in our complaint outcome letters at stage 2, this includes aspects a-g referenced in the code	
6.20	Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.	Yes	Our complaints policy outlines that if a tenant is unhappy with our resolution to their complaint, we will escalate this to stage 2, which is our final stage. At this stage the investigation will include a review by a Director or Head of Service. (page 4, section 9)	
Section 7 – Putting things right				
7.1	Where something has gone wrong a landlord must acknowledge this and set out the actions it has already taken, or intends to take, to put things right. These can include: • Apologising; • Acknowledging where things have gone wrong; • Providing an explanation, assistance or reasons; • Taking action if there has been delay; • Reconsidering or changing a decision; • Amending a record, adding a correction or addendum; • Providing a financial remedy; • Changing policies, procedures or practices.	Yes	We will consider the full suite of remedies when considering the action needed to put things right and will track and monitor these actions to ensure we learn from trends.	We have updated our policy (section 11) to outline all the ways in which we can remedy complaints.

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7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Yes	Our remedies section outlines that any remedy offered will reflect the impact on the resident as a result of any fault identified. (Page 6, 11.3)
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	We track all actions needed to remedy a complaint are tracked on our core housing management system and monitored regularly.
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes	Our complaints process outlines that any compensation offered will be appropriate, fair in accordance with our Compensation Matrix as appropriate and the Housing Ombudsman remedies guidance (page 6, 11.6)
Section 8 - Self-assessment, reporting and compliance			
8.1	Landlords must produce an annual complaints performance and service improvement report for scrutiny and challenge, which must include: a. the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements. b. a qualitative and quantitative analysis of the landlord's complaint handling performance. This must also include a summary of the types of complaints the landlord has refused to accept; c. any findings of non-compliance with this Code by the Ombudsman; d. the service improvements made as a result of the learning from complaints; 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	We currently share learning from complaints with our tenants through our Customer Annual Report which includes the learning we have taken, key trends in root causes of complaints and quantitative information in relation to our complaints performance. Our annual complaints performance and service improvement report was shared with our governing body on 26 th June, ahead of the deadline for publication.
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	Our annual complaints performance and service improvement report was shared with our governing body on 26 th June and published on our website ahead of the deadline for publication (30 th June).
8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	Yes	We will undertake a self-assessment should these circumstances occur.
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	Yes	We will comply with any orders made by the Ombudsman which includes reviewing and updating our self-assessment where required.

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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 ensure that we update our tenants and the Housing Ombudsman if we are unable to comply with the code in exceptional circumstances. For our tenants we have the ability to notify them instantly through our website, social media and app.	We will review our business continuity plan to ensure there is a clearer process for this
Section 9 – Scrutiny and oversight: continuous learning and improvement				
9.1	Landlords must look beyond the circumstances of the individual complaint and consider whether service improvements can be made as a result of any learning from the complaint.	Yes	Section 2 of our policy outlines that we will learn from complaints to improve our services (Page 1, 2.1) we share this learning with our tenants through our Customer Annual Report	
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	Section 2 of our policy outlines that we welcome all complaints, comments and compliments and see them as an opportunity to identify issues and introduce positive changes and improvements (Page 1, 2.1)	
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	We currently share learning from complaints with our tenants through our Customer Annual Report which includes the learning we have taken, key trends in root causes of complaints and quantitative information in relation to our complaint's performance. We share performance with Complaints with our tenant panel (my Impact) bi-monthly and to stakeholders through our governance framework quarterly.	
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	Our Complaints Policy outlines that Our Executive Director for Operations will have lead responsibility for complaints to support a positive complaint handling culture. (Page 7, 13.4)	
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	A member of our Board has been elected as our MRC	
9.6	The MRC will be responsible for ensuring the governing body receives regular information on complaints that provides insight on the landlord's complaint handling performance. This person must have access to suitable information and staff to perform this role and report on their findings.	Yes	Our MRC has met with our Customer Experience team to provide details of the regular information he wishes to receive to undertake his role	
9.7	As a minimum, the MRC and the governing body (or equivalent) must receive: a. regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance; b. regular reviews of issues and trends arising from	Yes	Our MRC receives the required outcomes in a-d.	

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	<p>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>Our Complaints Policy clearly sets out that We have a standard objective in relation to complaint handling for all employees that reflects the need to: have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments and take collective responsibility for any shortfalls identified through complaints rather than blaming others act within the Professional Standards for engaging with complaints as set by the Chartered Institute of Housing. (Page 3, 8.1)</p>	