

Appendix A - Independent Housing Ombudsman Complaint Handling Code Self-Assessment: Midland Heart; 2026

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 3, section 4.2) complaints-policy-april-2026-final.pdf	
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. We have delivered additional training to all managers to ensure that their teams understand this message. We have added a new section to our policy (page 4, 4.3) to make it clearer that complaints are recorded even where a tenant does not explicitly use the word complaint. 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 5 Section, 6.2 - 6.3) complaints-policy-april-2026-final.pdf We regularly review the complaints that are being raised to ensure they are raised in line with our policy. Our Customer Hub Team Leaders also complete regular quality assurance and call monitoring and identify any missed opportunities for raising complaints to feedback to staff.	
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	We follow HOS guidance on Service requests versus complaints. We have 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 Policy makes it clear to tenants and staff, the difference between a service request and a complaint (Page 3, section 4.1 and 4.2). 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 (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;	

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			Requesting a new service: When a tenant or resident informs us of a problem but are actually requesting a new service for the first time e.g. repair, ASB etc (Section 5.1). Our Complaint Tool kit was developed to support improvements in complaint handling. Within this, we include examples to support staff to understand where a complaint would be a service request versus a complaint in line with HOS guidance. complaints-policy-april-2026-final.pdf	
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. We have reviewed complaints made and confirmed that complaints are raised even where there are ongoing service requests.	
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 4, 4.4) to ensure tenants are aware of how expressions of dissatisfaction made through surveys are handled. complaints-policy-april-2026-final.pdf Where a tenant expresses dissatisfaction for a number of measures across surveys, email generated trigger alerts detailing the full interview are sent to service leads to investigate and follow up. These emails are sent immediately after telephone interviews are concluded.	
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 4, 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 in line with our Vulnerability Policy (Page 5, 7.1)	We have made efforts to better record how we log and track excluded complaints within our current systems this year. We recognise that this can be improved for reporting simplicity and this is one of the requirements for our new Case management system which we hope to have in place by December 2026. In addition to this, our tenant group have reviewed our standard template letters used when we decide to exclude a complaint in line with policy to ensure that they are empathetic, easy to read and HOS code complaint. Changes have been made and put into place for April 2026.

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2.2	A complaints policy must set out the circumstances in which a matter will not be considered as a complaint or escalated, and these circumstances must be fair and reasonable to residents. Acceptable exclusions include: - The issue giving rise to the complaint occurred over twelve months ago. - Legal proceedings have started. This is defined as details of the claim, such as the Claim Form and 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 , 5.1). This includes: - 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. complaints-policy-april-2026-final.pdf	We will strengthen our Policy by being clearer on Service Charge disputes and Insurance claims in line with HOS guidance by referencing how they are handled in other policies e.g. ASB and our new Unacceptable Behaviour Policy.
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 states that complaints referred to us within 12 months of an issue occurring, or a tenant becoming aware of the issue, will be accepted. Within the policy we do outline that this time limit will not apply if we are satisfied that there are exceptional circumstances involved. (Page 5, 5.3). complaints-policy-april-2026-final.pdf	
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 4, 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 (Page 5, 5.2). Example of an exclusion letter with Ombudsman referral rights included. We have provided evidence of complaints templates we use in these circumstances where we have communicated with tenants that the issue they are complaining about is excluded under our complaints policy. In addition to this, our involved tenant group have reviewed the letters used when we decide to exclude a complaint in line with policy to ensure they are empathetic, easy to read and HOS code compliant. Changes have been made and put into place effective from April 2026.	
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 4, 5.1). Our Exclusions section makes it clearer that we will take into consideration the individual circumstances of each complaint. (Page 5, 5.3). 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 5, 7.1) complaints-policy-april-2026-final.pdf	

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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 5, 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 5, 7.1). Examples of this include working with advocates, extending timescales where needed to allow for the provision of information and using our translator service 'language line' where needed. We have updated our Complaints Policy to cross reference how we will consider vulnerabilities and reasonable adjustments in line with our Vulnerability Policy. complaints-policy-april-2026-final.pdf	
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 5, 6.1) complaints-policy-april-2026-final.pdf 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 (page 7, section 10.2) and that complaints can be made to a member of staff (page 5, 6.1). All staff are made aware of how to raise a complaint and their responsibility to do so. This is included in our corporate in our corporate induction and complaints toolkit.	We recognise that we can strengthen training for our third party contractors and sub-contractors and plan to introduce an easy read training leaflet for this in 2026.
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 3, 2.1) complaints-policy-april-2026-final.pdf We have continued to promote the importance of complaints to all staff in our corporate inductions and included in our Corporate plan. Example included of month by month complaint volumes that are comparative to other similar size organisations. This is not seen as negative and indicative that promotion of our complaints is working well.	
3.4	Landlords must make their complaint policy available in a clear and accessible format for all residents. This will detail the two-stage process, what will happen at each stage, and the timeframes for responding. The policy must also be published on the landlord's website.	Yes	Our complaints policy is available in a clear and accessible format for all residents. An easy read version of our policy, alongside the full version, is available to our tenants on our webpage. Complaints - Midland Heart We provide details of our complaints process on our website which can be translated into alternative languages and has accessibility features i.e. large print, increased text size and colour contrast etc to help ensure our contest is accessible for all (webpage	

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			accessibility features). We have buttons on our website that enable visitors to change the colour contrast/increase text size/use google translate on the webpage etc to help ensure our content is still accessible for them. We have ensured visitors can navigate webpages using only their keyboard (which important for individuals with motor impairments). We have also ensured colour contrast on the page is clear enough for anyone with a visual impairment (although the colour contrast feature also helps with this). Finally, we use a semantic structure with our headings to clearly show the order of importance of information and enable people who use screen readers to be able to navigate through the information and understand what is a title, a subheading, normal paragraph text for example.	
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 5, 6.4) Complaints form - Midland Heart	
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 5, 6.2). Example provided of complaint response provided to representative. complaints-policy-april-2026-final.pdf	We have strengthened our Policy to specifically state that residents can be represented or accompanied at any meeting with us, their 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	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. Examples provided. Complaints - Midland Heart In addition to this, our Complaints Learning Group have reviewed our standard template letters to ensure they are empathetic, easy to read and HOS Code compliant. Changes have been made and put in place from April 2026.	
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 including liaison with the Ombudsman and ensuring complaints are reported to the Governing body.	

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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 to 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. Operational Complaints Group meetings are held monthly, to address any blockages and share learning. Examples provided of standing weekly meetings included between senior leaders and frontline complaint handlers.	
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, this includes both internal and external training. Our complaints team includes a dedicated Housing Ombudsman Case Manager, Senior Customer Experience Officers, Team Leaders, Customer Experience Officers and Customer Experience Support Officers. In January 2026 we also appointed a Complaints Manager who has oversight of the whole team. During our process review (#MHOnPoint) from April 2026 we will again look at the skills, roles and resources required to meet the expectation of our tenants, the demands on the service and HOS regulatory requirements, both now and in the future to deliver our Corporate Plan.	
Section 5 – The Complaint Handling Process				
5.1	Landlords must have a single policy in place for dealing with complaints covered by this Code. Residents must not be treated differently if they complain.	Yes	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 3, 3.1) complaints-policy-april-2026-final.pdf	
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 we have removed the early resolution stage of our complaints process which was seen as an informal stage for complaint handling. We have a 2-stage process, as outlined in our policy, this includes a formal investigation and formal review stage (page 6, 9.1). Details of the complaints process are provided in the complaint's toolkit and internal knowledge pages. Within training delivered to our customer hub, advice is given on service requests, apologies and minor service failure payments that may be appropriate prior to raising a complaint, with the tenant's agreement.	

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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 6, 9.1) complaints-policy-april-2026-final.pdf	
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. External contractors do not handle complaints, and these are always dealt with by our Customer Experience Team. We have added a section (Page 6, 9.2) into our policy to make our approach to dealing with complaints regarding contractors clear to tenants. complaints-policy-april-2026-final.pdf	
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Yes	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. However, our contractors support our investigation of complaints and are not expected to handle complaints independently on their own. We have delivered training to our major contractor on our expectations of managing complaints and the Housing Ombudsman code.	We recognise that we can strengthen training for our third-party contractors and sub-contractors and plan to introduce an easy read training leaflet for this in 2026.
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. We have added a section (Page 7, 10.5) into our policy to make our approach to dealing with complaints clear to tenants. Our complaints logging process ensures that we capture full details of the complaint within our system for transparency. In addition to this, our Complaints Learning group have reviewed our standard template letters used to acknowledge a complaint in line with policy to ensure that they are empathetic, easy to read and HOS code complaint. Changes have been made and put into place for April 2026.	
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.	

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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	The team operates independently and impartially and is managed within the CX Directorate, separately from service delivery teams, which sit outside the directorate. Training plans for complaint handlers include Housing Ombudsman online training for dispute resolution, record keeping, and damp and mould and the HOS Code. Dispute resolution focuses on the principles of acting fairly, putting things right and learning from outcomes. The Team are independent and impartial and are managed separately from service delivery teams - for example, repairs team, lettings teams. They are also empowered to act quickly and fairly, including having the authority to expedite compensation payments.	We recognise that we can further strengthen our quality assurance and in 2026, we will develop and commence our Quality Assurance Framework – Complaints.
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 inform the tenant of the need to extend, provide reasoning, a new response date and agree with the complainant how we will keep them informed about their complaint. complaints-policy-april-2026-final.pdf	
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. Within our policy, 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. We have also cross referenced how we will handle complaints in line with our Vulnerability Policy.	
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	Our complaints policy outlines the situations in which we would not accept a complaint. (Page 4, 5.1). This includes: 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. We have not received any referrals to the Ombudsman where we have refused to escalate a complaint, and we have not received any Complaint Handling Failure Orders. complaints-policy-april-2026-final.pdf	

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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. Where we previously identified that correspondence can be held across different systems, we have adopted a more consistent approach to improve record keeping. We have delivered training on record keeping across the business and we have seen a considerable improvement. A recent internal audit completed has noted improvements in record keeping when compared to previous financial years. We also produce an investigation report for each complaint responded to.	We have recognised that our knowledge and information management in complaints can be further improved and simplified and this is the main requirements for our new Case management system which we hope to have in place by December 2026. We also recognise that we can further strengthen our quality assurance and in 2026 we will develop and deliver our new Quality Assurance Framework – Complaints.
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 at any stage of the process, with our Customer Experience Team given autonomy to offer redress and remedies without escalation. Our complaints policy outlines all the ways in which we can remedy complaints (section 11) and our compensation policy outlines circumstances in which we might offer financial compensation. complaints-policy-april-2026-final.pdf	We have updated our Compensation policy and framework to align to the HOS Compensation guidance in place from April 2026.
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 (page 9, 12.1). 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 follow our Unacceptable Behaviour Policy.	
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 Unacceptable Behaviour Policy ensures that decisions made are proportionate to the situation and consider tenant needs. Our policy states that 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 that 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 making. Any restrictions will be subject to a review period.	

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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	All complaints are assessed to understand what is required to fully consider the issues and resolution actions. Actions are prioritised to ensure the complaint is resolved as quickly and as fairly as possible dependant on complexity and risk. Officers identify vulnerabilities and risk during communication with residents in line with our Vulnerabilities Policy. We use this to prioritise actions and provide a response at the earliest opportunity. Section 10.5 of our Complaints Policy clarifies this. Training materials also stress the importance of dealing with complaints as early as possible and to consider any known vulnerabilities or risks.	
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 Stage 1 complaints within 5 working days. (page 7, 10.1) complaints-policy-april-2026-final.pdf	
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 we will respond to stage 1 complaints within 10 working days (page 7, 10.1) complaints-policy-april-2026-final.pdf	
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 stage 1 of the process, there may be occasions where we aren't able to provide a response to within the timescales we set. Where this happens, we will inform the tenant of the expected timescale for a response and of their right to contact the Housing Ombudsman. Any extension will be no more than 10 working days for a Stage 1 response unless there is good reason to extend further. (page 7, 10.1) complaints-policy-april-2026-final.pdf	
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	Where we have informs a tenant about an extension we will provide written confirmation of their right to contact the Housing Ombudsman and the details of how to do this.	
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 the resident will receive a response a 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 residents are informed of any updates regarding these actions (page 8, section 10.7). We have updated our response letters to be clear on any actions that will remain ongoing after our response has been issued. We track and monitor follow on actions to ensure that they are completed in a timely manner. These are also reported monthly to Directors Group.	Whilst we are fully compliant with the requirements of this section, we remain committed to continually improving our processes. Our new Customer Strategy (launched in 2026) provides an opportunity to review how we work with tenants to ensure they are satisfied with how we address complete outstanding actions and keep tenants informed.

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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 officer 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 7-8, section 10.5) into our policy to make our approach to addressing tenant queries clearer. complaints-policy-april-2026-final.pdf	
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	Our policy states that 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. Section 10.1 (page 7) of our policy set out our approach to addressing additional complaints and new issues.	
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	Our letters have been reviewed to ensure they comply with all of the elements of 6.9. Our Complaints Learning group have also reviewed the letters to ensure the tone and style meets tenant needs.	

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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 6, section 9.1)	
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 stage 2 complaints within 5 working days. (page 7, 10.1). When acknowledging Stage two complaints, we summarise our understanding of the issues outstanding and the desired outcomes. Where possible, we'll phone a resident to gain a further understanding of the issue. We include as part of our standard letters, a way for the resident to highlight if something is missed or misunderstood within the letter or email.	
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	We do not require an explanation of reasons for requesting a Stage two review. Tenants may be contacted to help us understand why they remain unhappy and the outcomes they're seeking to resolve the complaint, so that we can give an effective response. However, this is not a requirement of a complaint being escalated and is not included in our list of exclusions in our policy (page 4, section 5).	
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 states all stage 2 complaints will be considered by a Director or Head of Service who has not been involved at stage 1.	
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 we will respond to stage 2 complaints within 20 working days (page 7, 10.1) of acknowledgement.	
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 there may be occasions where we aren't able to provide a Stage 2 response within the timescales set. Where this happens, we will inform the resident of the expected timescale for a response and ensure they are aware of their right to contact the Housing Ombudsman. Any extension will be no more than 20 working days unless there is a good reason to extend further (page 7, 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 the resident will receive a response a 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 residents are informed of any updates regarding these actions. We have updated our response letters to be clear on any actions that will remain ongoing after our response has been issued.	

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			We track and monitor follow on actions to ensure that they are completed in a timely manner. These are also reported monthly to Directors Group.	
6.18	Landlords must address all points raised in the complaint definition and provide clear reasons for any decisions, referencing the relevant policy, law and good practice where appropriate.	Yes	Our Stage 2 Response 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., referencing policy, law or good practice where appropriate.	
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	Our letters have been reviewed to ensure they comply with all of the elements of 6.9. Our Complaints Learning group, chaired by tenants, has also reviewed the letters to ensure the tone and style meets tenant needs.	
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 initial 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 6, section 9). After gaining an understanding of the outcomes required for the complaint to be resolved at acknowledgement stage, the officer arranges a discussion with all appropriate colleagues to support the resolution and response. A Head of Service or Director reviews and signs off all stage two response letters. This ensures that all relevant colleagues have been involved in investigating and responding to the complaint and that appropriate redress has been considered.	
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: - Acknowledging where things have gone wrong; - Providing an explanation, assistance or reasons; - Taking action if there has been delay; - Reconsidering or changing a decision;	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. Our policy (page 8, section 11) outlines all the ways in which we can remedy complaints. In our responses to tenants, we apologise, acknowledge where things went wrong and say what we'll do to fix the problem. We offer compensation in line with our complaints and compensation policies. We outline in our response, where lessons have been learnt, and any improvements that have been made as a result of the complaint, where	

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	- Amending a record, adding a correction or addendum; - Providing a financial remedy; - Changing policies, procedures or practices.		applicable. Lessons learnt are fed into training and coaching for colleagues in both complaints and operational teams on an ongoing basis. We involve tenants where we plan to make significant changes to policy.	
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 8, 11.3). Our compensation policy sets out our approach to remedying complaints with financial redress and has been aligned with the new Housing Ombudsman guidance April 2026 complaints-policy-april-2026-final.pdf	
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	The follow up actions needed to resolve the complaint are clearly stated in our response letter to the resident. We track all actions needed to remedy a complaint in our core housing management system and these are monitored daily by our Heads of Service and Directors.	
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes	Our complaints policy states that any compensation offered will be appropriate, fair, in accordance with our Compensation Matrix, and the Housing Ombudsman remedies guidance (page 9, 11.6)	From April 2026 The HOS issued new Compensation guidance and our Compensation Policy and Matrix has been updated to reflect the new guidance amounts.
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 publish an annual Complaints Performance and Service Improvement Report, which is made available to tenants and stakeholders for scrutiny and challenge. This report includes: a. our annual self-assessment against the Complaint Handling Code, ensuring our policy remains compliant; b. qualitative and quantitative analysis of complaint handling performance, including volumes, outcomes, response times, and a summary of complaints refused with reasons; c. details of any findings of non-compliance with the Code identified by the Ombudsman and actions taken; d. any service improvements made as a result of learning from complaints; e. information on any annual report issued by the Ombudsman regarding our performance; and f. reference to any other relevant Ombudsman reports or publications relating to our work. The report is informed by ongoing monitoring throughout the year, including quarterly reviews with tenants, which support scrutiny, identify emerging themes, and ensure continuous service improvement.	

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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	The annual Complaints Performance and Service Improvement Report is presented to our governing body for review and challenge and is published on the complaints section of our website. The Board response to the report is also published alongside to ensure transparency and accountability.	
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 any circumstances in 8.3 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.	
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	In the event that we are unable to comply with the Code due to exceptional circumstances, we will inform the Housing Ombudsman and provide clear and timely information to affected residents. This includes updates via our website, social media, and app to ensure residents are kept informed. We will publish information on our website about the impact on our services and a clear timescale for returning to compliance with the Code, ensuring transparency while taking into account any necessary confidentiality or security considerations. Clear internal accountability is in place to ensure timely communication with the Ombudsman and residents.	
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	We review individual complaints and look beyond the specific case to identify wider learning and service improvements. This learning is shared through our Annual Service Improvement Report and Complaints Learning Group. Since introducing our Lessons Learned Framework at the end of 2025, we have strengthened how learning is identified and acted upon. This has already led to improvements in how we communicate with tenants and ensure learning is applied across services rather than remaining case-specific.	

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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 embedded a positive complaints handling culture where complaints are actively used as intelligence to improve services. Our approach is supported by our Lessons Learned Framework, introduced at the end of 2025, which ensures complaint insights are systematically reviewed and used across the organisation. This includes a tenant-led Complaints Learning Group, a managerial task and finish group, and a senior steering group focused on strategic service improvement. We also analyse complaint trends and root causes through deep dives, using findings to inform service development and organisational learning, including sharing themes with staff through our annual Staff Conference.	
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 Complaints Performance and Service Improvement 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) on a bi-monthly basis and to stakeholders through our governance framework quarterly. Our complaint learning group meetings in collaboration with tenant insight, the purpose of which is to allow our involved tenants to understand and contribute towards our complaints process, whilst sharing learning and insights from complaints about our service.	
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 sets out that our Executive Director for Tenancy Services is the senior accountable lead for complaint handling. They are responsible for ensuring that the Board receives regular information on complaints, providing oversight of performance and insight into trends, themes, and potential systemic issues (page 9, section 13.4). The Executive Director is supported by the Director of Customer Experience and the Complaints Manager, who are responsible for operational oversight of complaint handling, monitoring performance, and identifying emerging themes and learning. This structure ensures that complaint trends are analysed and escalated appropriately to identify systemic issues, risks, and opportunities for policy or service improvement.	
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	we have an appointed Member Responsible for Complaints (MRC) who is a member of our governing body and supports a positive complaint handling culture. The MRC provides Board-level oversight and assurance of complaint handling performance. They ensure that complaint outcomes, themes, and learning are considered at governing body level, supporting transparency, accountability, and continuous improvement across the organisation. Reference: Section 13.5, Complaints Policy (pages 9–10)	

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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 Member Responsible for Complaints (MRC) receives regular information on complaint handling performance, providing insight into trends, themes, outcomes, and service performance for oversight at governing body level. The MRC has access to appropriate data and reporting within the Customer Experience Team to support them in carrying out this role effectively. They engage with the team on an ongoing basis to ensure they receive the information required to monitor performance and report findings to the governing body	
9.7	As a minimum, the MRC and the governing body (or equivalent) must receive: a. regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance; b. regular reviews of issues and trends arising from complaint handling; c. regular updates on the outcomes of the Ombudsman's investigations and progress made in complying with orders related to severe maladministration findings; and d. annual complaints performance and service improvement report.	Yes	The MRC and governing body receive regular information through our monthly performance reporting and Complaints Learning Report, alongside the annual Complaints Performance and Service Improvement Report. Our monthly performance report provides oversight of complaint volumes, categories, outcomes, compliance, and key performance indicators including maladministration and upheld rates, as well as Housing Ombudsman outcomes where applicable. The Complaints Learning Report focuses on themes, trends, and learning arising from complaints and Ombudsman cases, and tracks progress against actions from previous reports to ensure continuous improvement. The annual report brings together this information to provide a comprehensive overview of performance and service improvements for scrutiny by the governing body and MRC.	
9.8	Landlords must have a standard objective in relation to complaint handling for all relevant employees or third parties that reflects the need to: a. have a collaborative and 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	Our Complaints Policy sets out a standard objective for all employees involved in complaint handling which reflects the need to work collaboratively and co-operatively to resolve complaints, working across teams and departments. It also emphasises that staff take collective responsibility for identifying and addressing service failures, rather than attributing blame, and that complaint handling is approached in a constructive and solution-focused way. Staff are also required to act in line with relevant professional standards for complaint handling, including those set by the Chartered Institute of Housing (page 6, section 8.1). In addition, complaints performance is embedded within internal performance objectives for senior leaders across the organisation, reinforcing accountability for effective complaint handling and continuous improvement.	