



Housing Ombudsman Complaint Handling Code: Self-assessment form – for new Policy draft

Compliance with the Complaint Handling Code		
1	Definition of a complaint	Response
	<p>Does the complaints process use the following definition of a complaint?</p> <p><i>New Policy draft Section 3</i> <i>Includes the required definition: 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></p>	Yes
	<p>Does the policy have exclusions where a complaint will not be considered?</p> <p><i>New Policy draft, Section 7</i></p>	Yes
	<p>Are these exclusions reasonable and fair to residents?</p> <p>Evidence relied upon</p> <p><i>Existing policy</i></p> <ul style="list-style-type: none"> • <i>Complaints from a service user about another service user (covered under the ASB procedure)</i> • <i>Complaints made by staff employed by PRHA</i> <p><i>New Policy draft Section 7</i> <i>The draft for the new Policy has expanded these to include the list of the common examples of acceptable exclusions within the Housing Ombudsman’s guidance documents for the new Code.</i></p>	Yes
2	Accessibility	
	<p>Are multiple accessibility routes available for residents to make a complaint?</p> <p><i>New Policy draft Section 9</i></p>	Yes

	<p>Is the complaints policy and procedure available online?</p> <p>Our current Policy is available via a link on our website. Once the consultation process for our new Policy has been completed the new Policy will also be made available via the website.</p>	Yes
	<p>Do we have a reasonable adjustments policy?</p> <p>Although there is currently no separate Reasonable Adjustments Policy in place, the existing Complaints Policy does include clauses around accessibility, support and advocacy for complainants that would be required by such a Policy.</p> <p>These have been expanded to form a separate section in the new Policy draft (Section 9 Accessibility) to reinforce the key elements, and a Reasonable Adjustments Policy is being drafted to support and compliment the Accessibility section in the new Complaints Policy. This is being added as a priority and will be in place before 31st December 2020.</p>	In progress
	<p>Do we regularly advise residents about our complaints process?</p> <p>We already do this through the website and resident report New Policy draft Section 18</p>	Yes
3	Complaints team and process	
	<p>Is there a complaint officer or equivalent in post?</p> <p>Yes. She is part of the new Performance, Monitoring & Compliance Team and has other responsibilities in relation to resident engagement.</p>	Yes
	<p>Does the complaint officer have autonomy to resolve complaints?</p> <p>The post-holder is not part of a team with operational responsibilities. Discussions about how this could best be achieved are currently in progress alongside the Policy Review. This may take the form of a incorporating a direct link to senior management in relation to the functioning of the Complaints Officer to appropriately support this autonomy.</p>	In progress
	<p>Does the complaint officer have authority to compel engagement from other departments to resolve disputes?</p> <p>Discussions about how this could best be achieved are currently in progress alongside the Policy Review. This may take the form of a incorporating a direct link to senior management in relation to supporting the Complaints Officer to compel engagement from other departments should this become necessary.</p>	In progress
	<p>If there is a third stage to the complaints procedure are residents involved in the decision making?</p> <p>Existing Policy: the possibility of a Tenant Panel was discussed with residents via consultation by our existing Service Users Advisory but their decision was not to have a Tenant Panel.</p>	Yes

	New Policy draft: not applicable as no third stage proposed (subject to consultation)	n/a
	<p>Is any third stage optional for residents?</p> <p>Existing Policy</p> <p>New Policy draft: not applicable as no third stage proposed (subject to consultation ending January 2021)</p> <p>Results from the preliminary consultation undertaken in December supported the move to a two stage process.</p> <p>113 responses were received from supported and General Need residents and tenants.</p> <p>94.50% (103 responses) were in favour of a two stage process,</p> <p>5.50% (6 responses) were not in favour, and the reasons they provided for this will be explored during the next stage of the consultation process.</p> <p>The next phase of the consultation with residents to take place in January 2021.</p>	<p>Yes</p> <p>n/a (see comments)</p>
	<p>Does the final stage response set out residents' right to refer the matter to the Housing Ombudsman Service?</p> <p>Existing Policy and New Policy draft Section 16</p>	Yes
	Do we keep a record of complaint correspondence including correspondence from the resident?	Yes
	<p>At what stage are most complaints resolved?</p> <p>Stage 1</p>	89%
4	Communication	
	Are residents kept informed and updated during the complaints process?	Yes
	Are residents informed of the landlord's position and given a chance to respond and challenge any area of dispute before the final decision?	Yes
	Are all complaints acknowledged and logged within five days?	Yes
	Are residents advised of how to escalate at the end of each stage?	Yes
	<p>What proportion of complaints are resolved at stage one?</p> <p>Full year data 2019-20 (31 of 35)</p>	89%
	<p>What proportion of complaints are resolved at stage two?</p> <p>Full year data 2019-20 (3 of 35)</p>	9%

	<p>What proportion of complaint responses are sent within Code timescales?</p> <p>Note: this question refers to the new Code timescales, which are 10 days for Stage 1 and 20 days for Stage 2. This means that for Stage 1 complaints the figure is not against PRHA's current target (20 days) but the Code's 10 day target and so is not reflective of performance against the current policy targets.</p> <p>Stage 2 complaints are not affected as the timescale of 20 days matches that of PRHA.</p> <p>However, where extensions were in place for a complaint the figures have been measured against the Code's recommendation of a 10 day extension. Where the extension in place was over 10 days this also results in a lower percentage figure as it is being measured against Code timescales and not PRHA's timescales.</p> <p>For comparison the figures for performance against PRHA's targets are given after the figures for performance against the Code timescales.</p> <p>Performance against the Code timescales:</p> <ul style="list-style-type: none"> • Stage one (5 of 29) Stage one (with extension) (0 of 2) • Stage two (2 of 2) Stage two (with extension) (0 of 1) <p>Performance against PRHA's current timescales:</p> <ul style="list-style-type: none"> • Stage one (27 of 29) Stage one (with extension) (2 of 2) • Stage two (2 of 2) Stage two (with extension) (1 of 1) 	<p>17% 0% 100% 0%</p> <p>94% 100% 100% 100%</p>
	Where timescales have been extended did we have good reason?	Yes
	Where timescales have been extended did we keep the resident informed	Yes
	<p>What proportion of complaints do we resolve to residents' satisfaction</p> <p>From last annual Survey</p>	84%
5	Cooperation with Housing Ombudsman Service	
	<p>Were all requests for evidence responded to within 15 days? We have always met deadlines set by the Ombudsman Not previously tracked. Will be included in revised Procedures for complaints handling.</p>	See comments

	Where the timescale was extended did we keep the Ombudsman informed? No cases have been extended. Will be included in revised Procedures for complaints handling.	n/a
6	Fairness in complaint handling	
	Are residents able to complain via a representative throughout?	Yes
	If advice was given, was this accurate and easy to understand?	Yes
	How many cases did we refuse to escalate? What was the reason for the refusal?	0 n/a
	Did we explain our decision to the resident?	n/a
7	Outcomes and remedies	
	Where something has gone wrong are we taking appropriate steps to put things right?	Yes
8	Continuous learning and improvement	
	What improvements have we made as a result of learning from complaints? We have implemented a new approach to property inspections in potential cases of condensation. We are revising our compensation policy. We are reopening a local office to enhance communication with residents We are arranging training for our staff about communication skills New Policy draft Section 18: tracking improvements and learning from complaints to be a key part of demonstrating the effectiveness of PRHA's response to complaints to stakeholders within the organisation and to residents.	See comments
	How do we share these lessons with: a) residents? b) the board/governing body? c) In the Annual Report? Existing Policy: limited current focus on providing "lessons learned" with information provided to residents and Board more geared towards response to timescales, frequency by department, and satisfaction. New Policy Section 18: continuous learning and improvement embedded in the Policy.	See comments

	<p>Discussions being held concerning the frequency, content and audience for the reporting to key stakeholders including residents and service users.</p> <p>Annual Report to be reviewed to expand the existing statistical information to include appropriate information on learning from complaints.</p>	
	<p>Has the Code made a difference to how we respond to complaints?</p> <p>The complaints officer is in place and a new Feedback@prha.net email address is in use.</p> <p>The Policy has been re-drafted to align with Code, which has resulted in changes to specific areas outlined in this Self-Assessment and in the “key changes” review to the SMT. This will be implemented after the resident consultation closes and Board agrees the new policy at the end of January 2021.</p> <p>It has not made a difference to PRHA’s overall approach to complaints which is one of welcoming complaints in order to learn from them, which was present before the introduction of the Code.</p>	<p>Yes</p>
	<p>What changes have we made?</p> <p>Review and re-drafting of the Policy to align it with the requirements of the Code, where these were not already in place in the existing Policy.</p> <p>We are starting to track complaints in line with the Code’s requirements.</p> <p>Regular review of complaints handling against the Code and using this self-assessment template will form a key part of PRHA’s process for learning from complaints going forwards.</p>	<p>See comments</p>