

Providence Row Housing Association – Self-Assessment Form

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The Housing Ombudsman requires all Housing Associations to annually assess their complaints handling policy and procedures against the Ombudsman’s Complaints Handling Code using this self-assessment form. In April 2022 the Ombudsman issued a revised Code and we reviewed and amended our Policy and processes to ensure that they fully aligned with the revised Code. Our 2023 self-assessment contains information to stakeholders on how we are meeting the requirements of the Housing Ombudsman’s Code.

Section 1 - Definition of a complaint

Mandatory ‘must’ requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
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	PRHA’s Complaints Policy Section 3: <i>“A complaint shall be defined as: ‘an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the organisation, its own staff, or those acting on its behalf, affecting an individual resident or group of residents’.”</i>
1.3	The resident does not have to use the word ‘complaint’ for it to be treated as such. A complaint that is submitted via a third party or representative must still be handled in line with the landlord’s complaints policy.	Yes	This is included in our definition of a complaint in Section 3 of our Complaints Policy, as being “an expression of dissatisfaction, however made...” Section 5 of our Complaints Policy (‘Who can Complain’) affirms that complaints can be made via third parties and these will be handled in line with our Policy.
1.6	... if further enquiries are needed to resolve the matter, or if the resident requests it, the issue must be logged as a complaint.	Yes	Section 4 of our Complaints Policy reflects the following requirement of the current Housing Ombudsman’s Code – “Chasers on a service request, such as a missed appointment, can often be resolved ‘there and then’ with an apology and the provision of another appointment and may not need to enter the complaints system. However, if further enquiries are

			needed to resolve the matter, or if the resident requests it, the issue must be logged as a complaint”.
1.7	A landlord must accept a complaint unless there is a valid reason not to do so.	Yes	We clearly set out exclusions to our Complaints Policy in Section 7, and accept all complaints which do not fall within those exclusions.
1.8	A complaints policy must clearly set out the circumstances in which a matter will not be considered, and these circumstances should be fair and reasonable to residents.	Yes	Section 7 of our Complaints policy sets out exclusions to the policy and alternative routes for issues raised where appropriate. Our exclusions have been drawn up with reference to the examples for acceptable exclusions listed within the Housing Ombudsman’s guidance documents.
1.9	If a landlord decides not to accept a complaint, a detailed 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.	Yes	Section 7 of our Complaints policy confirms that when a decision is made not to accept a complaint the tenant will be provided with a detailed explanation for this, and informs them of their right to challenge this via the Ombudsman.

Best practice ‘should’ requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
1.4	Landlords should recognise the difference between a service request , where a resident may be unhappy with a situation that they wish to have rectified, and a complaint about the service they have/have not received.	Yes	Section 3 of our Complaints Policy sets out the definition of a complaint and explains the difference between a service request and a complaint, including the circumstances where a service request may then become a complaint.
1.5	Survey feedback may not necessarily need to be treated as a complaint, though, where possible, the person completing the survey should be made aware of how they can pursue their dissatisfaction as a complaint if they wish to.	Yes	Whilst we have not previously included information to survey respondents on taking forward issues they are dissatisfied with via our complaints process, we do contact residents who refer to issues that are outstanding in their responses (where they have given their permission for this). We are in the process of reviewing our overall approach to surveys in line with Regulator’s Tenant Satisfaction Measures and will build information on making a complaint into this process for future surveys

Section 2 - Accessibility and awareness

Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
2.1	Landlords must make it easy for residents to complain by providing different channels through which residents can make a complaint such as in person, over the telephone, in writing, by email and digitally. While the Ombudsman recognises that it may not be feasible for a landlord to use all of the potential channels, there must be more than one route of access into the complaints system.	Yes	Section 10 of our Complaints Policy ('How you can Complain') sets out the different ways in which a resident can complain, and confirms that whichever method a resident chooses to make their complaint it will be handled in the same way and in line with our Policy.
2.3	Landlords must make their complaint policy available in a clear and accessible format for all residents. This will detail the number of stages involved, what will happen at each stage and the timeframes for responding.	Yes	<p>Our Complaints Policy details the number of stages involved, what they can expect to happen at each stage, and the timeframes for our response.</p> <p>Our Policy is available on our website for residents and the public to download (www.prha.net) and is available in hard copy on request. In addition a copy (hard copy or electronic) is included with each Stage 1 complaint acknowledgement letter.</p> <p>However while we respond to requests around language needs and large font formats on an individual basis we are reviewing the best approaches to address language and accessibility needs on a more proactive basis.</p>
2.4	Landlord websites, if they exist, must include information on how to raise a complaint. The complaints policy and process must be easy to find on the website.	Yes	Our 'Reporting a Complaint' page appears under the top level 'Resident' options list on the entry page of our website www.prha.net . It is therefore accessible within "one click" from our website home page.

2.5	Landlords must comply with the Equality Act 2010 and may need to adapt normal policies, procedures, or processes to accommodate an individual's needs. Landlords must satisfy themselves that their policy sets out how they will respond to reasonable adjustments requests in line with the Equality Act and that complaints handlers have had appropriate training to deal with such requests.	Yes	Section 9 of our Complaints Policy sets our commitment to accessibility and to making reasonable adjustments. Appropriate training has been delivered to the Property Services Maintenance Manager and Administrators, and our Complaints and Compliance Coordinator.
2.6	Landlords must publicise the complaints policy and process, the Complaint Handling Code and the Housing Ombudsman Scheme in leaflets, posters, newsletters, online and as part of regular correspondence with residents.	Yes	Our Complaints Policy is on our website and is stated in response letters to Complaints. We will be increasing our process for raising awareness among our tenants and residents by fully adopting the methods specified in Section 2.6 of the Code.
2.7	Landlords must provide residents with contact information for the Ombudsman as part of its regular correspondence with residents	Yes	This information is included in all letter templates within the complaints process. We have expanded this by providing the information within regular correspondence with residents (for example by providing the information and leaflets when sending out rent statements).
2.8	Landlords must provide early advice to residents regarding their right to access the Housing Ombudsman Service throughout their complaint, not only when the landlord's complaints process is exhausted.	Yes	Our letter templates (for acknowledgement and at Stage 1 & Stage 2 of the process) advise the complainant that the Housing Ombudsman is available to provide them with support and guidance at any point within the complaints process. An information leaflet on the Housing Ombudsman is additionally provided to complainants. Our Stage 2 response template additionally informs them of their right to formally refer their complaint to the Ombudsman if they are unhappy with our response

Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
2.2	Where a landlord has set up channels to communicate with its residents via social media, then it should expect to receive complaints via those channels Policies should contain details of the steps that will be taken when a complaint is received via social media and how confidentiality and privacy will be maintained.	Yes	This is outlined in section 10 of our Complaints Policy and on our website under 'Reporting a Complaint'.

Section 3 - Complaint handling personnel

Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
3.1	Landlords must have a person or team assigned to take responsibility for complaint handling to ensure complaints receive the necessary attention, and that these are reported to the governing body. This Code will refer to that person or team as the "complaints officer"	Yes	Our Complaints and Compliance Coordinator is in place to support teams and departments with the complaints process, and to monitor complaints as part of our overall Performance and Monitoring Team. They fulfil the role of a "complaints officer" under the Code. Our Board receive reports from our Performance and Monitoring Team which include complaint performance.
3.2	...the complaint handler appointed must have appropriate complaint handling skills and no conflicts of interest.	Yes	Training has been provided on the Housing Ombudsman Complaints Handling Code for complaint handlers. The Complaints and Compliance Coordinator is independent of other teams and departments and is available to provide support and guidance for the investigating officers / managers at Stage 1. Managers assigned for complaints that are escalated to Stage 2 are independent of the department that handled the Stage 1 complaint.

Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
3.3	<p>Complaint handlers should:</p> <ul style="list-style-type: none"> • be able to act sensitively and fairly • be trained to handle complaints and deal with distressed and upset residents • have access to staff at all levels to facilitate quick resolution of complaints • have the authority and autonomy to act to resolve disputes quickly and fairly. 	Yes	This is addressed via our procedures and training.

Section 4 - Complaint handling principles

Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
4.1	<p>Any decision to try and resolve a concern must be taken in agreement with the resident and a landlord's audit trail/records should be able to demonstrate this. Landlords must ensure that efforts to resolve a resident's concerns do not obstruct access to the complaints procedure or result in any unreasonable delay. It is not appropriate to have extra named stages (such as 'stage 0' or 'pre-complaint stage') as this causes unnecessary confusion for residents. When a complaint is made, it must be acknowledged and logged at stage one of the complaints procedure within five days of receipt.</p>	Yes	<p>Section 11 of our Policy sets out the potential for early and local resolution of issues with the agreement of the resident and outside of our formal complaints procedure. It confirms that this is not an "extra stage" to the formal process, and the resident has the right to request their complaint be handled formally instead at any point so that there is no delay. This is covered in training and procedures.</p> <p>Section 11 specifies that in such circumstances we retain a record of their concerns, the agreement to attempt early and local resolution, and the actions and outcomes for that resolution.</p> <p>We do not have extra stages and residents are able to ask for their issues to be investigated at Stage 1 of our complaints process at any time.</p> <p>Our Policy requires all formal complaints to be acknowledged within five days of receipt.</p>

4.2	Within the complaint acknowledgement, landlords must set out their understanding of the complaint and the outcomes the resident is seeking. If any aspect of the complaint is unclear, the resident must be asked for clarification and the full definition agreed between both parties.	Yes	Our standard acknowledgement templates were updated in 2022 to comply with the revised Housing Ombudsman's Code. They include the requirement for the person acknowledging to set out their understanding of the complaint and of the outcomes that the complainant is seeking. Also to request clarification if either is unclear. This would then be discussed and agreed as part of the investigation, response and remedy process.
4.6	A complaint investigation must be conducted in an impartial manner.	Yes	This is covered in our Complaints Procedure and in training
4.7	The complaint handler must: <ul style="list-style-type: none"> • deal with complaints on their merits • act independently and have an open mind • take measures to address any actual or perceived conflict of interest • consider all information and evidence carefully • keep the complaint confidential as far as possible, with information only disclosed if necessary to properly investigate the matter. 	Yes	This is covered in our Complaints Procedure and in training.
4.11	Landlords must adhere to any reasonable arrangements agreed with residents in terms of frequency and method of communication	Yes	Section 11 of our Policy outlines what complainants can expect of us when they make a complaint. This includes a provision to adhere to an agreed method of communication and frequency of communication during the complaint investigation, and also for the duration of the follow on actions (if part of the remedy).
4.12	The resident, and if applicable any staff member who is the subject of the complaint, must also be given a fair chance to: <ul style="list-style-type: none"> • set out their position • comment on any adverse findings before a final decision is made. 	Yes	Section 11 of our Policy outlines what residents can expect of us when they make a complaint, and this includes: discussion with the resident about their concerns and the outcomes they are seeking; and discussion of the actions being proposed to resolve the issues and to provide the opportunity for the resident to raise questions and comment on any concerns they may have with the remedy being offered and the decisions made.
4.13	A landlord must include in its complaints policy its timescales for a resident to request escalation of a complaint	Yes	Section 11 of our Complaints Policy 'How will your complaint be handled'.

4.14	A landlord must not unreasonably refuse to escalate a complaint through all stages of the complaints procedure and must have clear and valid reasons for taking that course of action. Reasons for declining to escalate a complaint must be clearly set out in a landlord's complaints policy and must be the same as the reasons for not accepting a complaint	Yes	Section 11 of our Complaints Policy 'How will your complaint be handled' informs the complainant that in the exceptional circumstance where we decline to escalate their complaint, they will be provided with a full explanation for this and are additionally advised that they can refer this decision to the Housing Ombudsman. This clause in Section 11 refers the complainant to the list of possible reasons for exclusion in Section 7 of the Policy.
4.15	A full record must be kept of the complaint, any review 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 reports or surveys prepared.	Yes	All complaints, along with supporting correspondence and documents, are logged on our internal database management system. The importance of this is highlighted in our complaints training.
4.18	Landlords must have policies and procedures in place for managing unacceptable behaviour from residents and/or their representatives when pursuing a complaint.	Yes	This is outlined in Section 8 of our Complaints Policy 'Managing Unacceptable Behaviour'.

Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
4.3	Landlords should manage residents' expectations from the outset, being clear where a desired outcome is unreasonable or unrealistic	Yes	Section 11 of our Policy outlines what complainants can expect of us when they make a complaint, and this includes that we are clear with the resident where we consider a desired outcome is not reasonable, or is unrealistic or unachievable
4.4	A complaint should be resolved at the earliest possible	Yes	Section 11 of our Policy includes a section on the potential for early and local resolution where appropriate and agreed with the resident. For complaints which enter our formal procedure, our Policy and our training stress the importance of investigating, responding and offering remedy for the resident without unwarranted delay.
4.5	Landlords should 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 where this is reasonable	Yes	Section 5 of our Policy 'Who can complain' and Section 10 of our Policy 'How you can complain' include confirmation that residents can have a complaint raised on their behalf by a third party, and be supported by a third party advocating on their behalf during the complaints process.

4.8	Where a key issue of a complaint relates to the parties' legal obligations landlords should clearly set out their understanding of the obligations of both parties.	Yes	Section 11 of our Policy outlines what complainants can expect of us when they make a complaint, and this includes that we are clear with the resident where we consider there to be legal obligations on either party in relation to their complaint.
4.9	Communication with the resident should not generally identify individual members of staff or contractors.	Yes	This is addressed via training and procedures.
4.10	Landlords should keep residents regularly updated about the progress of the investigation.	Yes	Section 11 of our Complaints policy 'How your complaint will be handled'.
4.16	Landlords should seek feedback from residents in relation to the landlord's complaint handling as part of the drive to encourage a positive complaint and learning culture.	Yes	We send out post-response complaints satisfaction surveys to those who have made a complaint, and our Annual Satisfaction Survey involved a section on satisfaction with our complaints process. We are also looking at alternative ways to receive regular feedback.
4.17	Landlords should recognise the impact that being complained about can have on future service delivery. Landlords should ensure that staff are supported and engaged in the complaints process, including the learning that can be gained	Yes	Our training focuses on the importance of viewing complaints as a positive process for learning and service improvement. Learning from complaints is a priority for the organisation and learning feedback is published via our website and in annual reporting. The review of complaints and learning is a standard agenda item for department and team meetings, and we are continually reviewing our processes around effectively capturing and sharing our learning from complaints, internally and with stakeholders.
4.19	Any restrictions placed on a resident's contact due to unacceptable behaviour should be appropriate to their needs and should demonstrate regard for the provisions of the Equality Act 2010.	Yes	Section 8 of our Policy 'Managing unacceptable behaviour' states that where we place restrictions on a resident's contact due to unacceptable behaviour we will ensure that those restrictions are appropriate to their needs. Further, that all decisions taken around restricting communication will have due regard for the circumstances of the individual resident and the provisions of the Equality Act 2010.

Section 5 - Complaint stages

Mandatory 'must' requirements

Stage 1

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
5.1	Landlords must respond to the complaint <u>within 10 working days</u> of the complaint being logged. Exceptionally, landlords may provide an explanation to the resident containing a clear timeframe for when the response will be received. This should not exceed a further 10 days without good reason.	Yes	<p>Our Policy requires that all complaints at Stage 1 be responded to within 10 working days, unless there are clear reasons for an extension to be applied. Section 12 of our Policy 'Extension to deadlines' states that where applied this should not exceed a further 10 days without good reason.</p> <p>However due to resourcing issues during the last financial year, and the continuation of a higher volume of complaints being received since the Housing Ombudsman's Code was introduced, we did not meet that target for 24 out of the 50 complaints received at Stage 1. 19 of the 50 Stage 1 complaints had an extension applied to allow for investigation and response.</p> <p>Extra resources were allocated towards the end of the last financial year, and for the first quarter of the current financial year 9 out of the 10 Stage 1 complaints received were responded to within timescale, showing an improvement for this requirement. We will continue to work towards providing all responses within 10 working days.</p>
5.5	A complaint response must be sent 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 expeditiously with regular updates provided to the resident.	Yes	Section 11 of our Policy outlines what complainants can expect of us when they make a complaint, including the distinction between the initial response and where ongoing actions are scheduled in order to resolve the issues raised. Section 11 confirms that where there are follow on actions these will be tracked and regular updates provided to the resident.
5.6	Landlords must address all points raised in the complaint and provide clear reasons for any decisions, referencing the relevant policy, law and good practice	Yes	This is addressed under Section 11 of our Policy, and is included in our template response letters.

	where appropriate.		
5.8	<p>Landlords must confirm the following in writing to the resident at the completion of stage one in clear, plain language:</p> <ul style="list-style-type: none"> • the complaint stage • the decision on the complaint • the reasons for any decisions made • the details of any remedy offered to put things right • details of any outstanding actions • details of how to escalate the matter to stage two if the resident is not satisfied with the answer 	Yes	This is addressed under Section 11 of our Policy, and is included in our template response letters

Stage 2

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
5.9	<p>If all or part of the complaint is not resolved to the resident's satisfaction at stage one it must be progressed to stage two of the landlord's procedure, unless an exclusion ground now applies.</p> <p>In instances where a landlord declines to escalate a complaint it must clearly communicate in writing its reasons for not escalating as well as the resident's right to approach the Ombudsman about its decision.</p>	Yes	<p>The escalation process is laid out in Section 11 of our Policy and information concerning how to escalate a complaint to Stage 2 forms part of our standard Stage 1 response letter templates.</p> <p>Section 11 also states that where we decline to escalate a complaint to Stage 2 of our procedure for any reason, we will clearly communicate those reasons to the resident in writing and include details of how to refer our decision to the Ombudsman</p>

5.10	On receipt of the escalation request, landlords must set out their understanding of issues outstanding and the outcomes the resident is seeking. If any aspect of the complaint is unclear, the resident must be asked for clarification and the full definition agreed between both parties.	Yes	Our Stage 2 acknowledgement templates comply with the revised Housing Ombudsman's Code. They include the requirement for the acknowledgement letter to set out our understanding of the reasons an escalation is being requested and the outcomes the complainant is seeking, and to request clarification if either is unclear. They would also be discussed directly and agreed as part of the Stage 2 investigation, response and remedy process.
5.11	Landlords must only escalate a complaint to stage two once it has completed stage one and at the request of the resident.	Yes	This is detailed in Section 11 'How will your complaint be handled' of our Complaints Policy.
5.12	The person considering the complaint at stage two, must not be the same person that considered the complaint at stage one.	Yes	This is detailed in Section 11 'How will your complaint be handled' of our Complaints Policy.
5.13	Landlords must respond to the stage two complaint <u>within 20 working days</u> of the complaint being escalated. Exceptionally, landlords may provide an explanation to the resident containing a clear timeframe for when the response will be received. This should not exceed a further 10 days without good reason.	Yes	<p>Our Policy requires that all complaints at Stage 2 be responded to within 20 working days, unless there are clear reasons for an extension to be applied. Section 12 of our Policy 'Extension to deadlines' states that where applied this should not exceed a further 10 days without good reason.</p> <p>However for the financial year 2022-23 we did not meet this timescale for 3 out of the 6 complaints escalated to Stage 2. 4 of the 6 Stage 2 complaints had an extension applied to allow for investigation and response.</p> <p>Extra resources were allocated towards the end of the last financial year, and for the first quarter of the current financial year the one escalation request received was responded to within timescale.</p> <p>We will continue to work towards providing responses within 20 working days.</p>

5.16	<p>Landlords must confirm the following in writing to the resident at the completion of stage two in clear, plain language:</p> <ul style="list-style-type: none"> • the complaint stage • the complaint definition • the decision on the complaint • the reasons for any decisions made • the details of any remedy offered to put things right • details of any outstanding actions <p>and</p> <ul style="list-style-type: none"> • if the landlord has a third stage, details of how to escalate the matter to stage three • if this was the final stage, details of how to escalate the matter to the Housing Ombudsman Service if the resident remains dissatisfied 	Yes	<p>This is addressed under Section 11 of our Policy, and is included in our Stage 2 template response letters</p> <p>We do not have a third stage, and details of how to escalate the matter to the Housing Ombudsman is stated in the stage 2 response letter.</p>
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Stage 3

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
5.17	<p>Two stage landlord complaint procedures are ideal. This ensures that the complaint process is not unduly long. If landlords strongly believe a third stage is necessary, they must set out their reasons for this as part of their self-assessment. A process with more than three stages is not acceptable under any circumstances.</p>	N/A	<p>We do not have a Stage 3 within our complaints procedure.</p>

5.20	Landlords must confirm the following in writing to the resident at the completion of stage three in clear, plain language: <ul style="list-style-type: none"> • the complaint stage • the complaint definition • the decision on the complaint • the reasons for any decisions made • the details of any remedy offered to put things right • details of any outstanding actions • details of how to escalate the matter to the Housing Ombudsman Service if the resident remains dissatisfied 	N/A	We do not have a Stage 3 within our complaints procedure.
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Best practice 'should' requirements

Stage 1

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
5.2	If an extension beyond 20 working days is required to enable the landlord to respond to the complaint fully, this should be agreed by both parties	Yes	Section 12 of our Policy 'Extension to Deadlines' contains this clause. All extensions for Stage 1 complaints in 2022-23 were within 20 working days.
5.3	Where agreement over an extension period cannot be reached, landlords should provide the Housing Ombudsman's contact details so the resident can challenge the landlord's plan for responding and/or the proposed timeliness of a landlord's response.	Yes	Section 12 of our Policy 'Extension to Deadlines' specifies that where agreement over an extension period of more than 20 days at Stage 1 cannot be reached we will provide the resident with the Housing Ombudsman's contact details so that they may challenge our proposed timeline.
5.4	Where the problem is a recurring issue, the landlord should consider any older reports as part of the background to the complaint if this will help to resolve the issue for the resident.	Yes	Searches for previous records are undertaken on receipt of a complaint in relation to the resident and the issues being reported, so that if present they can be reviewed and taken into consideration for the response and for the actions necessary to provide the resident with the appropriate remedy.

5.7	<p>Where residents raise additional complaints during the investigation, these should be incorporated into the stage one response if they are relevant and the stage one response has not been issued.</p> <p>Where the stage one response has been issued, or it would unreasonably delay the response, the complaint should be logged as a new complaint.</p>	Yes	This is detailed in section 11 of our Complaints Policy.
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Stage 2

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
5.14	If an extension beyond 10 working days is required to enable the landlord to respond to the complaint fully, this should be agreed by both parties.	Yes	<p>Section 12 of our Policy 'Extension to Deadlines' contains this clause.</p> <p>All extensions for Stage 2 complaints in 2022-23 were within 10 working days.</p>
5.15	Where agreement over an extension period cannot be reached, landlords should provide the Housing Ombudsman's contact details so the resident can challenge the landlord's plan for responding and/or the proposed timeliness of a landlord's response	Yes	Section 12 of our Policy 'Extension to Deadlines' specifies that where agreement over an extension period of more than 10 days at Stage 2 cannot be reached we will provide the resident with the Housing Ombudsman's contact details so that they may challenge our proposed timeline.

Stage 3

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
5.18	Complaints should only go to a third stage if the resident has actively requested a third stage review of their complaint. Where a third stage is in place and has been requested, landlords must respond to the stage three complaint within 20 working days of the complaint being escalated. Additional time will only be justified if related to convening a panel. An explanation and a date for when the stage three response will be received should be provided to the resident.	N/A	We do not have a Stage 3 within our complaints procedure.
5.19	Where agreement over an extension period cannot be reached, landlords should provide the Housing Ombudsman's contact details so the resident can challenge the landlord's plan for responding and/or the proposed timeliness of a landlord's response.	N/A	We do not have a Stage 3 within our complaints procedure.

Section 6 - Putting things right

Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
6.1	Effective dispute resolution requires a process designed to resolve complaints. 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.	Yes	Section 11 of our Policy outlines that we will acknowledge where something has gone wrong and lay out the actions we have taken / intend to take to put things right for the resident. This is also part of our standard template response letter.
6.2	Any remedy offered must reflect the extent of any service failures and the level of detriment caused to the resident as a result. A landlord must carefully manage the expectations of residents and not promise anything that cannot be delivered or would cause unfairness to other residents.	Yes	Section 11 of our Policy outlines that any remedy offered will be reflective of the extent of any service failure and will take into account the level of detriment to the resident. The remedies available to put things right in individual complaints are in line with relevant policies, including compensation and ex-gratia payments. Any financial remedy will be in line with our Compensation and Ex-gratia Payment Policy and Procedure, which allows for discretionary payment based on the impact caused to the resident and their individual circumstances.
6.5	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	Section 11 of our Policy contains these conditions. They are also set out in our template response letter. Cases are kept open on our system until all actions are completed.
6.6	In awarding compensation, a landlord must consider whether any statutory payments are due, if any quantifiable losses have been incurred, the time and trouble a resident has been put to as well as any distress and inconvenience caused.	Yes	Section 16 'Appropriate Remedy' of our Complaints Policy includes this, and it is detailed in more depths in our Compensation and Ex-gratia Payment Policy and Procedure.

Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
6.3	Landlords should look beyond the circumstances of the individual complaint and consider whether anything needs to be 'put right' in terms of process or systems to the benefit of all residents.	Yes	We review our complaints for learning and make changes to our procedures to reflect these where appropriate.
6.7	In some cases, a resident may have a legal entitlement to redress. The landlord should still offer a resolution where possible, obtaining legal advice as to how any offer of resolution should be worded.	Yes	<p>Where there are legal entitlements to redress, or a case is related to an ongoing legal matter, this involves discussion with our Director of Operations or our Assistant Director for Resident Services and legal advice is sought as necessary.</p> <p>Wherever possible we will attempt to resolve the issues raised without the need for legal action.</p>

Section 7 - Continuous learning and improvement

Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
7.2	Accountability and transparency are integral to a positive complaint handling culture. Landlords must report back on wider learning and improvements from complaints in their annual report and more frequently to their residents, staff and scrutiny panels.	Yes	<p>We report learning from complaints to all stakeholders via our Annual Review of Complaints Report, which is uploaded to our website. We provide more frequent internal reports to our resident scrutiny group as well as to our SMT and Board. We are looking to establish a more frequent reporting cycle via our website.</p> <p>We meet with staff and residents (via our Service User Advisory Panel) to discuss both learning from complaints and improvements to the complaints process.</p>

Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
7.3	A member of the governing body should be appointed to have lead responsibility for complaints to support a positive complaint handling culture. This role will be responsible for ensuring the governing body receives regular information on complaints that provides insight to the governing body on the landlord's complaint handling performance.	Yes	<p>Our Chief Executive has oversight of complaints, and reports are provided to the Board and to PRHA's Operational Scrutiny Group. The Chair of the Operational Scrutiny Group, with responsibility for complaint handling performance, is a Board member.</p> <p>Complaint handling performance is reported as part of the quarterly KPI reporting.</p>

<p>7.4</p>	<p>As a minimum, governing bodies should receive:</p> <ul style="list-style-type: none"> • Regular updates on the volume, categories and outcome of complaints, alongside complaint handling performance including compliance with the Ombudsman’s orders • Regular reviews of issues and trends arising from complaint handling, • The annual performance report produced by the Ombudsman, where applicable • Individual complaint outcomes where necessary, including where the Ombudsman made findings of severe maladministration or referrals to regulatory bodies. The implementation of management responses should be tracked to ensure they are delivered to agreed timescales. • The annual self-assessment against the Complaint Handling Code for scrutiny and challenge. 	<p>Yes</p>	<p>Performance against key complaints performance indicators is reported quarterly to the Board, with commentary provided on issues and trends.</p> <p>Our Quarterly and Annual reporting:</p> <ul style="list-style-type: none"> • Provides information on the volume, category and outcome of complaints alongside key performance indicators (percentage responded to timescale etc.). • Informs the SMT and the Board in relation to trends and current issues, and of the organisational learning from complaints (including any changes to processes or procedures made as a result). • Refers to the Ombudsman’s reports and guidance where applicable. • Provides more detailed information on specific complaints where necessary and appropriate, in relation to service failures and the action being taken to put things right for residents and prevent any recurrence. . <p>Our Annual Self-Assessment is reviewed by the Board.</p>
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<p>7.5</p>	<p>Any themes or trends should be assessed by senior management to identify potential systemic issues, serious risks or policies and procedures that require revision. They should also be used to inform staff and contractor training.</p>	<p>Yes</p>	<p>We review all complaints for learning, and part of this involves reporting to and discussions with senior management. This would involve the identification of systemic issues and serious risks, along with policies and procedures which may require amendment to address those, and the identification of additional or refresher training for staff.</p> <p>We do not input into contractor training, but we expect contractors to take into account issues raised in complaints in relation to their performance as part of this and will monitor contractor performance to ensure any required changes have been undertaken.</p>
<p>7.6</p>	<p>Landlords should have a standard objective in relation to complaint handling for all employees that reflects the need to:</p> <ul style="list-style-type: none"> • have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments • 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. 	<p>Yes</p>	<p>The key objectives of fairness, putting things right and learning from outcomes are regularly promoted at strategic and operational meetings within PRHA. Working collaboratively to positively resolve complaints, acknowledge and respond to shortfalls, and to provide a consistent and fair approach to complaint handling are key themes of this.</p> <p>Our Code of Conduct requires that all staff must treat residents fairly and with respect, listen to residents' concerns and respond in line with PRHA's standards and with the Complaints Policy.</p> <p>We are additionally reviewing the Professional Standards from the CIH for inclusion in our internal procedures and awareness material, and for incorporation into training.</p>

Section 8 - Self-assessment and compliance

Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
8.1	Landlords must carry out an annual self-assessment against the Code to ensure their complaint handling remains in line with its requirements.	Yes	Our first self-assessment was undertaken in March 2021, in time for the start of the new Housing Ombudsman's Complaints Handling Code, and our second assessment was published in September 2022. This self-assessment covers the year 2022-23 and we will continue to review our performance using the self-assessment tool annually, publishing it on our website.
8.2	Landlords must also carry out a self-assessment following a significant restructure and/or change in procedures.	Yes	We would undertake this following any significant restructure or change in our procedures, but have had no restructure or change in procedures since the date of the last self-assessment (September 2022).
8.3	Following each self-assessment, a landlord must: <ul style="list-style-type: none"> report the outcome of their self-assessment to their governing body. In the case of local authorities, self- assessment outcomes should be reported to elected members publish the outcome of their assessment on their website if they have one, or otherwise make accessible to residents include the self-assessment in their annual report section on complaints handling performance 	Yes	Our self-assessment is reported to the Board for review, and it is published on our website. It is available on the website along with our annual report on complaints for residents.