

Providence Row Housing Association

Complaints Performance and Service Improvement Report 2024

Published June 2024

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Introduction

This Report covers our complaints handling performance along with the learning taken from complaints that were received during the period 1st April 2023 to 31st March 2024

As a landlord and a provider of supported services, we handle all service complaints from our residents and service users in accordance with a single Complaints Policy. This Policy has been designed to meet the requirements of the Housing Ombudsman's Complaints Handling Code, and is reviewed annually against the Code to ensure that any changes implemented by the Housing Ombudsman are reflected fully within our Policy.

This means that the performance information provided within this report, along with some of the learning taken from complaints received, relates to functions that are unrelated to our role as a landlord. For fairness and transparency, and to provide assurance that all service related complaints that we receive are handled in a consistent manner and in line with our published Policy, all formal service related complaints are included whether they relate to our role as a landlord or not.

For 2023-24 we received 39 complaints relating to our role as a landlord (76.5%) and 12 relating to our role as a provider of support (23.5%). Those relating to our functions as a landlord including complaints concerning repairs, housing management and estates management. Further detail in relation to the type and number of complaints received is provided throughout this report.

Our latest Annual Self-Assessment against the Code is provided as an appendix to the report. We have completed this using the revised template and Code issued by the Housing Ombudsman following the Code becoming statutory after 1st April 2024. The Self-Assessment is also available as a stand-alone document within the Complaints section of our website (www.prha.net).

Statement from the Board

From 1st April 2024 the Housing Ombudsman's Complaints Handling Code requires that each landlord's governing body must review and approve both their Annual Complaints Performance and Service Improvement Report and their Annual Self-Assessment against the Code. Our Board have reviewed both and have provided the following statement:

The members of Providence Row Housing Association's Board, and by extension Providence Row Housing Association (PRHA), are committed to providing good quality and responsive services for our residents and service users.

We welcome the Housing Ombudsman's new Compliance Framework as a means of providing further assurance that PRHA is responding to reported service failures promptly, fairly and with a consistent approach to resolving the issues raised; and for taking action where this is not the case in a manner that is transparent to our residents and service users.

Monitoring performance and seeking to apply the learning taken from complaints received (and from other feedback) in order to improve service delivery is a key component of PRHA's strategic overview. The Housing Ombudsman's Code further embeds the Board's role in the oversight of the complaints handling process to strengthen this.

There are three strands by which an organisation is required to demonstrate compliance, each of which requires review and oversight by the Board:

Compliance with the Code in Policy: PRHA's Complaints Policy has been reviewed annually against the requirements of the Complaints Handling Code by PRHA's Complaints and Compliance Team since the since the Code's introduction. With the Code becoming Statutory from 1st April this year our Policy was again fully reviewed and updated by the Team to ensure it meets the requirements of the new 2024 Code.

All changes to our Policy were taken into consideration and documented within our Annual Self-Assessment, and both the Policy and the Self-Assessment were provided to this Board for full review in line with the Compliance Framework.

We have reviewed both, and are satisfied that our published Policy is compliant with the Code. The Policy is available on our website, along with a copy of the Self-Assessment so that it may be scrutinised by our residents and by stakeholders.

Compliance with the Code in practice: The Housing Ombudsman requires not only that an organisation's policies and procedures for complaints handling are compliant with the Code, but also that that this is met in practice.

PRHA's Annual Complaints Performance and Service Improvement Report is made available to our residents and stakeholders via our website, and documents for our residents where our performance has met, and has not met, the Code in Practice. It also provides information for our residents about service delivery changes which have been made as a result of learning taken from complaints received during the year.

The Board has reviewed the Annual Report in relation to seven specific requirements for inclusion stated within the Code (detailed under the "Format and Contents" section of the Annual Report) and in relation to the information on performance and learning it provides for our residents.

We note that while the Report documents an improvement in PRHA's performance for responding to complaints within timescale, six complaints within the year were not responded to timescale meaning that in relation to this point PRHA was not compliant in practice. We note that steps were taken to address this and that since November 2023 no further complaints have been responded to outside of timescale, and that all Stage 2 responses were within timescale.

However the Board's nominated Member Responsible for Complaints (MRC) will be taking this forward with the Complaints and Compliance Team to ensure compliance in practice is fully met.

Scrutiny and challenge of PRHA's compliance by the Board: The 2024 Code places new requirements on the Board in relation to how Compliance in Policy and Compliance in Practice are scrutinised and how this is reported to our residents.

This includes the appointment of a Board Member to the Member Responsible for Complaints (MRC) role, which we have done at this May's Board meeting. It also requires the Board to review and publish a response to the Self-Assessment and the Annual Complaints Performance and Service Improvement Report. We have reviewed these and commented above under the Compliance in Policy and Compliance in Practice paragraphs.

The Code requires that within the published Annual Report, an organisation should include a copy of their Self-Assessment. The Board notes that this has been included, and that the Annual Report, the Self-Assessment, and the Board Response have been published to PRHA's website.

We would like to thank the residents who have raised issues with us via the complaints process as this helps PRHA to continually review and improve the delivery of our services.

Both the Board's response and the Self-Assessment are also available as stand-alone document via PRHA's website (www.prha.net).

The Housing Ombudsman Service

From 1st April 2024 the Housing Ombudsman has a statutory duty to monitor landlords for compliance with their Complaints Handling Code.

If you have raised a complaint with PRHA that has gone through both stages of our internal complaints procedure (Stage 1 and Stage 2) and are not happy with the response received you are able to refer your complaint formally to the Housing Ombudsman. The Ombudsman may then choose to investigate the complaint and to support you in reaching an appropriate resolution with PRHA.

However the Housing Ombudsman Service is also available to provide you with support and advice in relation to a complaint that you are making or wish to make at any point during the process. They will not be able to formally take on your complaint until after it has been through both stages of our procedure, as above, however they will still be able to discuss your concerns with you and provide you with support and guidance while you are taking your complaint forward with us. You do not have to wait for our response in order to do this.

If you wish to contact the Housing Ombudsman you can do so using the contact details below:

- Online complaint form: www.housing-ombudsman.org.uk/residents/make-a-complaint/
- 0300 111 3000
- Email: info@housing-ombudsman.org.uk
- Postal address: Housing Ombudsman Service, PO Box 1484, Unit D, Preston PR2 0ET.

You can also speak to your housing officer, key worker or service manager for advice and support on how to do this.

Format and content of the Report

This report is intended to provide residents and service users with a clear understanding of the number and type of complaints that were received during the year, how those complaints were handled (whether they were handled in compliance with our Policy and with the Code) and what changes we have made to our procedures or policies as a result of the complaints received.

It is also intended to meet the requirements of Clause 8.1 of the 2024 Complaints Handling Code. This states that landlords must produce an annual complaints performance and service improvement report for scrutiny and challenge, which must include the following information:

Code requirement	Details
a. The annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements.	Included as the final section of this report.
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;	Provided within the Complaints Handling Performance section of this report. We have not refused to accept any complaint raised during 2023-24
c. Any findings of non-compliance with this Code by the Ombudsman;	We have received no findings of non-compliance by the Ombudsman during the year 2023-24
d. The service improvements made as a result of the learning from complaints;	Provided within the Learning from Complaints section of this report
e. Any annual report about the landlord's performance from the Ombudsman;	We have received no annual report about our performance from the Ombudsman
f. Any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord	We have received no other relevant reports or publications relating to our performance from the Ombudsman

Complaint handling performance 2023-24

Formal complaints received about services within the year

51 formal complaints about PRHA services were received during the financial year 2023-24. All have been responded to.

Of these 45 were Stage 1 complaints and 6 involved an escalation to Stage 2 due to the resident not being satisfied with the response they received from us at Stage 1.

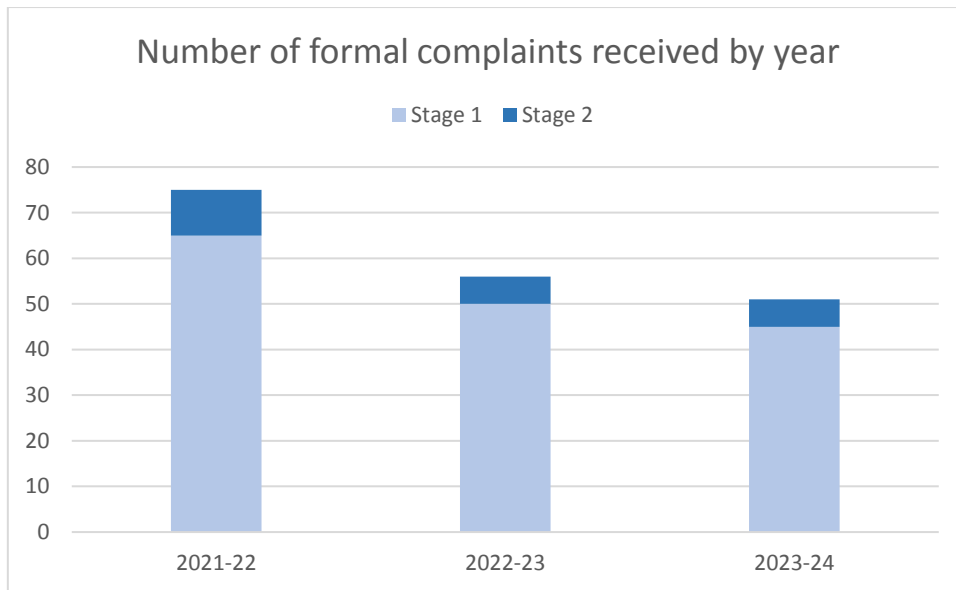
No requests to escalate a complaint to Stage 2 of our process were rejected.

The table below shows the proportion of complaints that were responded to within our Policy timescales (based on the Housing Ombudsman's Code) and the proportion for which we applied an extension. Figures for the previous year are included for comparison.

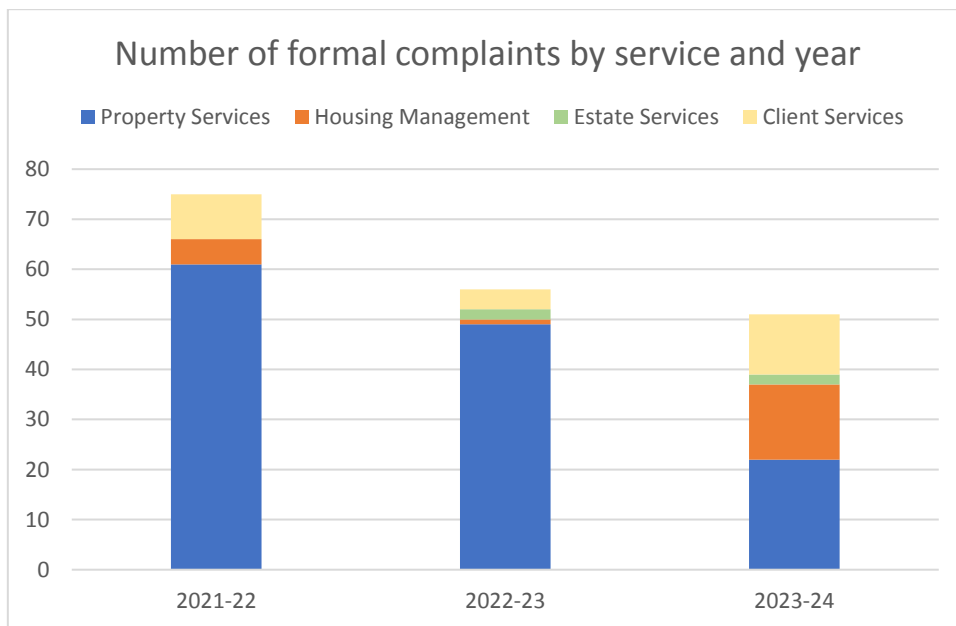
All formal complaints	2022-23	2023-24
Received	56	51
Responded to	56	51
Not yet responded to	0	0
No. responded within timescale	29	45
% responded within timescale	51.8%	88.2%
No. responses requiring an extension	23	12
% responses with an extension	41.1%	23.5%

Stage 1 formal	2022-23	2023-24
Received	50	45
Responded to	50	45
Not yet responded to	0	0
No. responded within timescale	26	39
% responded within timescale	52.0%	86.7%
No. responses requiring an extension	19	12
% responses with an extension	38.0%	26.7%

Stage 2 formal	2022-23	2023-24
Received	6	6
Responded to	6	6
Not yet responded to	0	0
No. responded within timescale	3	6
% responded within timescale	50.0%	100.0%
No. responses requiring an extension	4	0
% responses with an extension	66.7%	0.0%



Complaints received by type and department



Property Services:

At 43% (22 of 51) the highest proportion of the Stage 1 & Stage 2 complaints received in the year were primarily concerned with the service received for repairs and maintenance issues. These were investigated and responded to by our Property Services department.

While this remains high relative to other departments it is lower than the 87.5% recorded in the previous year (49 of 56 complaints received in 2022-23).

The Property Services Team's focus remains on providing a good maintenance service, and on taking appropriate action to resolve issues when complaints are received. Learning has been taken by the Property Services Team as outlined later in this report.

Within these 22 complaints the highest proportion related to dissatisfaction with delays in undertaking repairs after they had been reported. This accounted for 46% of the repairs related complaints (10 of 22).

It is common for the maintenance teams of Housing Associations to have the highest proportion of complaints received, and reflects the importance to tenants of having a well-maintained home.

Property Services: Stage 1 complaints (19)

- 10 concerning delays in starting or completing repairs once reported
- 2 concerning the repairs undertaken not resolving the reported issues
- 2 concerning pest control issues
- 1 concerning the standard of behaviour of a contractor
- 1 concerning non-attendance of a contractor (missed appointment)
- 1 concerning the standard of communication (in-house staff)
- 1 concerning damp & mould
- 1 concerning quality of repairs & issues with decant process

Property Services: Stage 2 complaints (3)

- 2 requests for escalation were made due to the resident not being satisfied with how their complaints had been handled at Stage 1 or with the conclusions reached. 1 escalation was upheld in favour of the resident due to issues being identified with how the resident had been kept informed during Stage of the 1 process. An ex-gratia payment was offered as part of the remedy at Stage 2. The other escalation was not upheld as it was determined that the new evidence presented did not change the outcome.
- 1 request for escalation was made due to the scheduled repairs put in place as part of the remedy at Stage 1 did not fully resolve the issues to the satisfaction of the resident. Further investigations of the issues were undertaken and new actions were identified and actioned as part of the Stage 2 response. The issue was resolved and the resident reported that they were satisfied.

Housing Management:

30% of the Stage 1 & Stage 2 complaints received (15 of 51) concerned housing management issues, and were investigated and responded to by our Housing Management Team.

This included 2 complaints which included both housing management and repairs related issues, for which the Housing Management Team took oversight.

The majority (9 of the 15 complaints) concerned dissatisfaction with PRHA's actions to address anti-social behaviour after it had been reported.

Housing Management: Stage 1 complaints (12)

- 9 concerning PRHA's responsiveness to resolving incidents of ASB when reported (1 of which also involved additional issues raised with repairs and rent).
- 2 concerning the standard of response and communication received from staff members
- 1 concerning quality of accommodation following decant between PRHA properties.

Housing Management: Stage 2 complaints (3)

- 2 requests for escalation due to dissatisfaction with actions taken around resolving ASB following a Stage 1 response:
1 was upheld in favour of the resident after review of the actions taken at Stage 1. New actions were agreed with the resident for resolving the ASB.
1 was partly upheld, as the source of the ASB was no longer present.
- 1 escalation relating to dissatisfaction with the amount of compensation that had been offered at Stage 1, and also the process by which the payment was to be made. The Stage 2 complaint was partially upheld due to the compensation process not being adequately explained during Stage 1 of the process, and agreement was made in relation to providing the compensation in a different manner. However the amount that had been offered was valid and it had been calculated in line with PRHA's Compensation and Ex-Gratia Payment Policy, so was unchanged.

Estates services:

4% of the formal complaints received concerned Estates Services (2 of 51). Both were at Stage 1, and both concerned the quality of cleaning in communal areas.

No Stage 2 escalation requests were made concerning Estates Services.

Client Services (supported services):

23.5% of the formal complaints received (12 of 51) concerned the support services that PRHA provides. These therefore do not relate directly to PRHA's role as a landlord, but rather to PRHA as a provider of supported services.

We investigate and respond to these complaints using the same process as for landlord services, so that consistency and fairness is maintained in relation to how we approach complaints from all of our residents and service users alike.

We have only one Complaints Policy in accordance with this, and no distinction is made.

Client services: Stage 1 complaints (12)

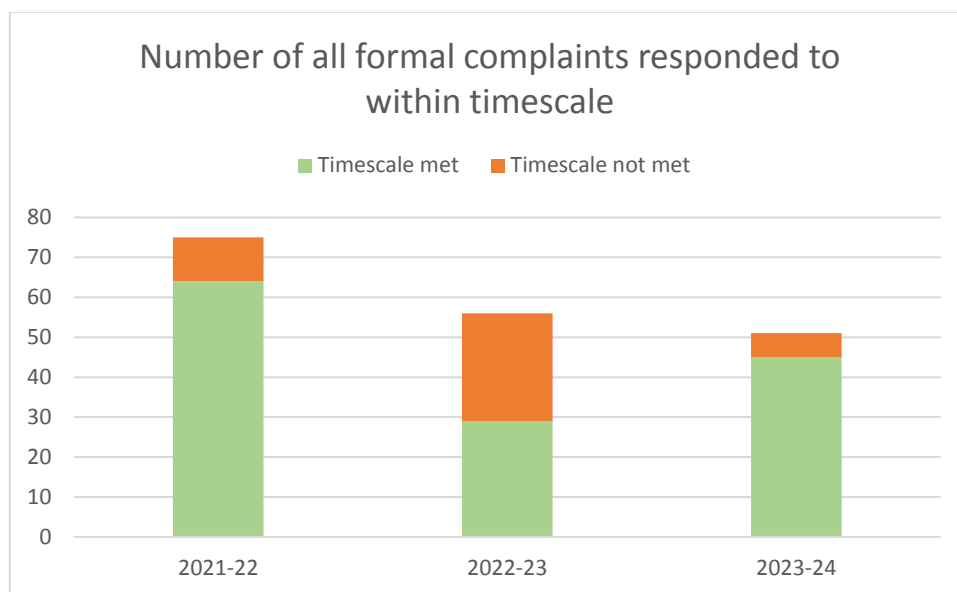
- 2 concerning the standard of catering (in supported hostels)
- 9 concerning the quality of service provided by staff members within our supported hostels (including 1 relating to agency staff)
- 1 concerning various support and repair issues

Client services: Stage 2 complaints (0)

- There were no Stage 2 escalation requests within the Client Services department.

Responses to timescale

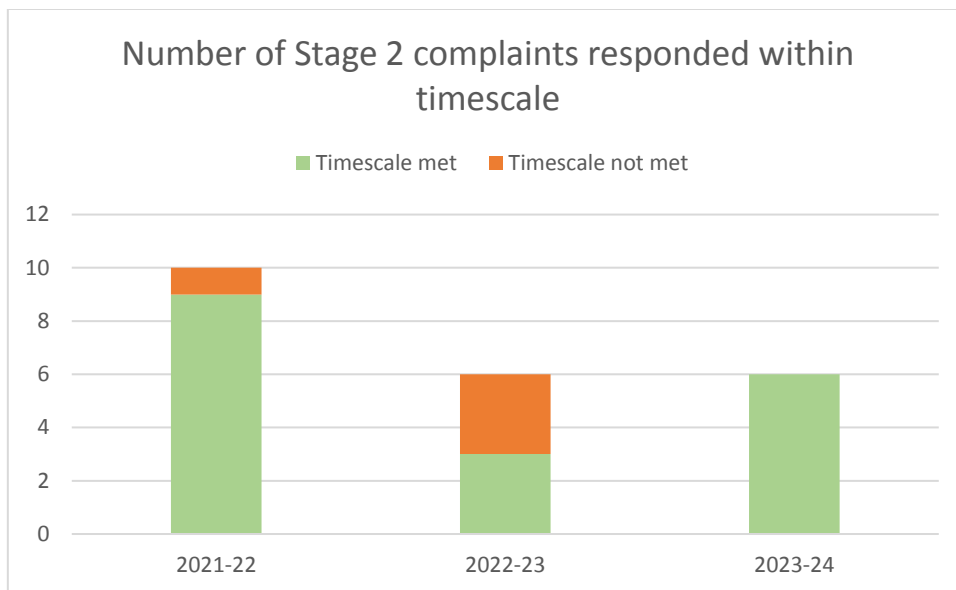
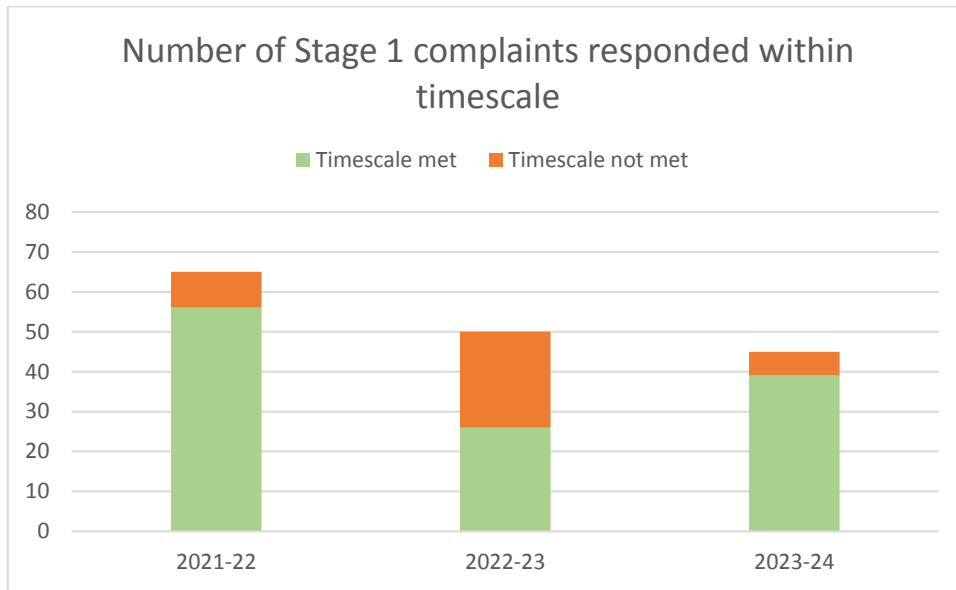
88% of the formal complaints received during the year were responded to within Policy timescales (45 of 51).



This is a marked improvement in relation to the previous year (52%, 29 of 56 for 2022-23) and reflects the extra resources allocated and the work undertaken by individual departments to improve their performance.

We still encountered some issues with ensuring responses were provided within the required timescale, particularly in the first half of the year, however all responses provided since November have been within timescale. We will continue to focus on our commitment to respond to all complaints within the stated timescales and in line with the Housing Ombudsman's Code.

All Stage 2 escalation requests were responded to within timescale.

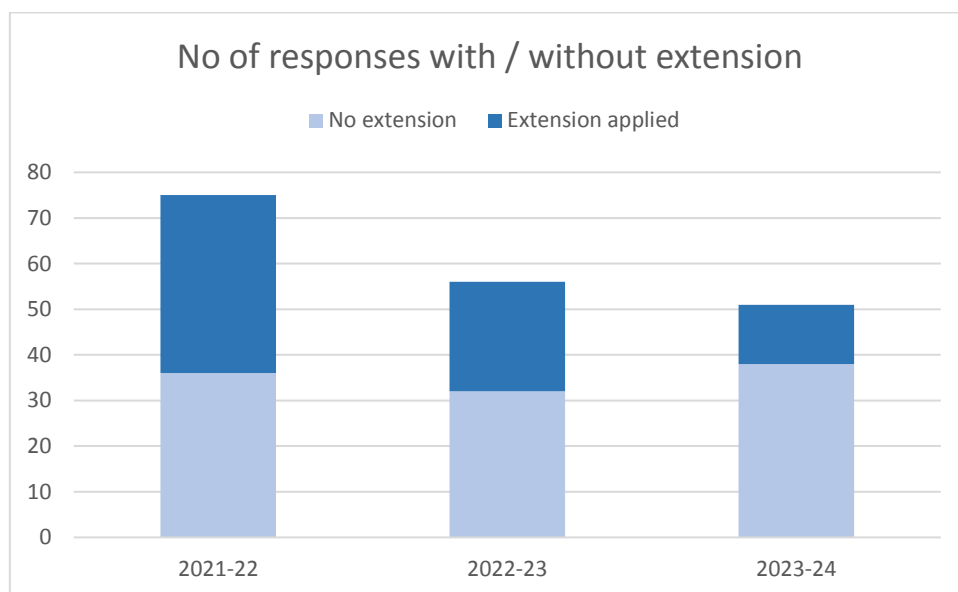


Use of extensions

We applied extensions to 12 of the 51 formal complaints received during the year (24%) in order to allow us time to fully investigate and respond to those complaints.

While the Housing Ombudsman's Code does allow for extensions to be applied where necessary and appropriate, this is a lower proportion than in previous years and indicates that departments are becoming more proficient at investigating and responding to complaints promptly and without the need for extensions to be applied.

For comparison extensions were applied to 43% of complaints last year (23 of 56) and 52% for the year before that (39 of 75).



Learning from complaints received

All of the complaints received and responded to are reviewed to identify any potential learning that can then be applied to improve our services. This includes both complaints concerning PRHA as a landlord and as a provider of supported services. Both types of learning are included in this report.

Amongst the changes made to our systems and procedures resulting from complaints and other feedback received during the year 2022-23:

- A resident at one of our supported accommodation services raised concerns about how options around their move on to independent accommodation had been communicated to them. A senior manager reviewed the issues that had been raised by the resident and recommended that the team should undertake additional training around effective communication with residents.
- A complaint concerning delays to the completion of repair works highlighted an issue with contractors being unable or having difficulty in locating appropriate parking spaces near our properties, adding to delays and causing missed appointment times. Information about parking available on site is now being sent to contractors.
- Following a site inspection after a complaint concerning the standard of communal cleaning at a resident's building, the overall standard was felt to be appropriate but additional guidance was provided to the cleaning staff in relation to some areas.
- Following an escalation of a resident's complaint to Stage 2 of our process, the senior manager providing the response confirmed to the resident that the Stage 1 response should have included more detail about the steps that had been taken during the investigation and the information that had been relied on to support their response. While this did not affect the outcome of their Stage 1 complaint, which was upheld, more detailed guidance around what information is required when responding to a complaint is being drafted. This will be cascaded to all staff with a responsibility for Investigating and responding to complaints.
- A complaint received from a resident who had recently moved into a PRHA property highlighted some issues which should have been identified and resolved during the process for signing off the void as ready to let. This was acknowledged in the response, and post-void procedures have been reviewed to prevent similar issues happening to other new residents.
- A resident at one of our supported accommodation services had complained about the menu choice for the evening meal as it contained ingredients that he could not eat. The service now regularly reviews the menu and invites residents to feedback on the food choices. This is discussed with

the Chef and is now taken into account when designing the Menu.

- Following a complaint received by a resident who felt unsafe at night in the service, the CCTV system was change to cover all floors of the building.
- A resident at one of hostels raised a complaint following a miscommunication that resulted in his room mistakenly being cleared by a contractor and losing some of his personal possessions. The resident received compensation to replace the lost items. Since this incident, contractors are instructed that all future requests to remove items from the building must be confirmed by both hostel staff and Property Services in writing to reduce this risk of miscommunication. In cases where the whole flat is not being cleared, staff will specify clearly which items are due for removal.
- A complaint was received from a resident regarding his bedsit and reporting that it was not in a good state and this was causing his health to suffer. During the investigation it was identified that the resident found it difficult to communicate in English and he was not aware of the process to report repairs and pest issues. The resident was provided with support for this individually. This process is also now discussed during the sign up for all new residents as per the licence agreement and included in the Welcome Pack for new residents. In cases where a resident's first language is not English, support around translation is sought from an appropriate charity and translation apps.

In addition we reviewed our systems and made underlying changes during the year to ensure that the relevant information is being recorded about the complaints that we receive and to support the effective recording of the remedies proposed, the actions scheduled as part of this, and the outcomes. We will continually review how well our systems are supporting PRHA staff to effectively handle complaints, to fully document the process, and to ensure that identifying learning is a fundamental part of this.

Providence Row Housing Association – Self-Assessment Form 2024

Published June 2024

The Housing Ombudsman requires that all Housing Associations assess their complaints handling policy and procedures annually against their Complaints Handling Code. This is to ensure that all Housing Associations are compliant with the Code and are following it in practice.

As of 1st April 2024 the Complaints Handling Code became a statutory requirement, and the Ombudsman issued a revised Code and self-assessment. We have used this revised self-assessment form for our 2024 review and have published the results below, to provide information to stakeholders on how we are meeting the requirements of the revised Housing Ombudsman's Code.

Section 1: Definition of a complaint

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
1.2	<p>A complaint must be defined as:</p> <p><i>'an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the landlord, its own staff, or those acting on its behalf, affecting a resident or group of residents.'</i></p>	Yes	PRHA Complaints Policy, Section 3 (Definition)	<p>Section 3 of PRHA's Complaints Policy incorporates the Code compliant definition.</p> <p>However as a provider of support services as well as being a landlord, we have replaced "the landlord" with "the organisation" in the definition within our Policy. This is to account for service complaints that we receive which do not fall under our function as a landlord, but which we will handle in line with our Policy:</p> <p><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></p> <p>A copy of our current Complaints Policy is always available via our website.</p>

1.3	<p>A resident does not have to use the word 'complaint' for it to be treated as such.</p> <p>Whenever a resident expresses dissatisfaction landlords must give them the choice to make complaint.</p> <p>A complaint that is submitted via a third party or representative must be handled in line with the landlord's complaints policy.</p>	Yes	<p>PRHA Complaints Policy, Section 3 (Definition)</p> <p>PRHA Complaints Policy, Section 5 (Who can complain)</p>	<p>This is included in our definition of a complaint in Section 3 of our Policy, which notes that a complaint is defined as "an expression of dissatisfaction, however made"</p> <p>We have reviewed our Complaints Policy to ensure that it meets the requirements of the revised Complaints Handling Code (2024) and we have now specifically included the following in Section 3: "Whenever a resident expresses dissatisfaction we will offer them the choice to make a complaint".</p> <p>However our standard practice has always reflected this, with the prior guidance to staff being that when a customer is expressing dissatisfaction, they should be asked if they wish to raise the matter as a formal complaint.</p> <p>Section 5 of our Policy affirms that complaints can be made via third parties and these will be handled in line with our Policy.</p>
1.4	<p>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</p>	Yes	<p>PRHA Complaints Policy, Section 3 (Definition)</p>	<p>Section 3 of our Complaints Policy sets out the definition of a complaint and of a service request. It explains the difference between a service request and a complaint, and provides an example for this.</p>

	<p>action to be taken to put something right. Service requests are not complaints, but must be recorded, monitored and reviewed regularly.</p>			<p>We have reviewed our Complaints Policy to ensure that the Policy meets the requirements of the revised Complaints Handling Code (2024) and we have now specifically included the following in Section 3 to meet this requirement: "While a service request is not a complaint, PRHA records the service requests that have been made. This is in order for us to plan and undertake the appropriate actions to address the issues raised, and allows us to monitor, review, and identify learning from them."</p> <p>All service requests are logged within our systems. High level trend information is extracted and reviewed in order to identify patterns and commonalities which may indicate that action is required in order to resolve systemic issues and improve service delivery.</p>
1.5	<p>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.</p>	Yes	PRHA Complaints Policy, Section 3 (Definition)	<p>Section 3 of our Policy includes reference to situations where a service request may become a complaint if it is not satisfactorily addressed. Following the review of our Policy to ensure that it remains complaint with the new Complaints Handling Code, we have updated this text to the following:</p> <p>"A resident does not need to wait until all proposed actions have been</p>

				undertaken, and can express their dissatisfaction with PRHA's response even if our handling of the service request remains ongoing. We will treat the original service request independently of our processes for handling their complaint, and we will not stop our efforts to address their service request while we investigate and respond to their complaint about how we have addressed their service request."
1.6	An expression of dissatisfaction with services made through a survey is not defined as a complaint, though wherever possible, the person completing the survey should be made aware of how they can pursue a complaint if they wish to. Where landlords ask for wider feedback about their services, they also must provide details of how residents can complain.	Yes	PRHA Complaints Policy, Section 4 (Other feedback – suggestions, compliments & surveys)	<p>Where a survey respondent has included feedback within their survey response relating to dissatisfaction with one or more specific issues, and has also consented for us to contact them about this, their responses and comments are passed to the appropriate team or department for follow up so that their issues can be explored and addressed.</p> <p>This has now been formalised during the 2024 review of our Policy. Section 4 (other feedback) has been amended to formalise our practices around how we address survey responses and wider feedback in the context of dissatisfaction being expressed and the potential for taking this dissatisfaction forward as a complaint, if that is the resident's wish.</p>

Section 2: Exclusions

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
2.1	<p>Landlords must accept a complaint unless there is a valid reason not to do so.</p> <p>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</p>	Yes	PRHA Complaints Policy, Section 7 (Exclusions)	<p>We clearly set out the reasons for possible exclusion within Section 7 of our Policy.</p> <p>Section 7 of our Policy states that we will consider every complaint on its own merits, and that when a decision is made not to accept a complaint the tenant will be provided with a detailed explanation for this. It informs them of their right to challenge our decision via the Ombudsman, who may then chose to instruct us to take on the complaint.</p>
2.2	<p>A complaints policy must set out the circumstances in which a matter will not be considered as a complaint or escalated, and these circumstances must be fair and reasonable to residents. Acceptable exclusions include:</p> <ul style="list-style-type: none"> • 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 	Yes	<p>PRHA Complaints Policy, Section 7 (Exclusions)</p> <p>PRHA Complaints Policy, Section 11 (How will your complaint be handled)</p>	<p>Section 7 of our Policy sets out exclusions to the policy and outlines alternative routes for the resolution of the issues raised where exclusion applies.</p> <p>Our exclusions have been drawn up with reference to the examples for acceptable reasons for exclusion as listed within the Complaints Handling Code. Following the revised Code for 2024 we have updated the time based reason for exclusion within our Policy from 6 months to 12 months.</p> <p>Section 11 of our Policy includes clauses</p>

	<p>Particulars of Claim, having been filed at court.</p> <ul style="list-style-type: none"> Matters that have previously been considered under the complaints policy. 			<p>concerning escalation to Stage 2 of our process which indicate that we would only decline to escalate a complaint in exceptional circumstances. It refers tenants to the list of possible reasons for exclusion at Stage 1 provided in Section 7 of the Policy, which also apply to escalation requests.</p> <p>Section 11 reaffirms the tenant's right to seek support and advice from the Housing Ombudsman at any time during the complaints process, and to refer any decision that we make about their complaint, including where we have excluded their complaint at Stage 1 or declined to escalate to Stage 2.</p>
2.3	<p>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.</p>	Yes	<p>PRHA Complaints Policy, Section 7 (Exclusions)</p> <p>PRHA Complaints Policy, Section 11 (How will your complaint be handled)</p>	<p>Our Policy has been aligned with the Code's revised period of 12 months for raising a complaint at Stage 1.</p> <p>Stage 1 complaints: Section 7 of our Policy specifies the 12 month period within which a complaint should be raised, but also indicates that we will consider complaints where they are outside of this limit and may choose to accept them if the circumstances warrant this.</p> <p>Escalations to Stage 2: Section 11 of our Policy specifies a 3 month period within which the escalation of a Stage 1</p>

				response should be requested following our decision at Stage 1, but also indicates that we will consider escalation requests where they are outside of this limit and may choose to accept them if the circumstances warrant this.
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	PRHA Complaints Policy, Section 7 (Exclusions)	Section 7 of our Policy states that we will consider every complaint on its own merits, and confirms that when a decision is made not to accept a complaint the tenant will be provided with a detailed explanation for this. It informs them of their right to challenge our decision via the Ombudsman, who may then chose to instruct us to take on the complaint.
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Yes	PRHA Complaints Policy, Section 7 (Exclusions)	Section 7 of our Policy states that we will consider each complaint on its own merits.

Section 3: Accessibility and Awareness

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
3.1	<p>Landlords must make it easy for residents to complain by providing different channels through which they can make a complaint.</p> <p>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.</p>	Yes	<p>PRHA Complaints Policy, Section 10 (How you can complain)</p> <p>PRHA Complaints Policy, Section 9 (Accessibility)</p>	<p>Section 10 of our Policy 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.</p> <p>Section 9 of our Complaints Policy sets our commitment to accessibility and to making reasonable adjustments in line with the requirements of the Equality Act 2010.</p> <p>For each complaint we will consider the individual circumstances of the resident, including any requirements that are necessary in order to fairly and appropriately support them with their engagement in the process.</p>
3.2	<p>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.</p>	Yes	<p>Complaints Guidance</p> <p>Core briefing & awareness messaging</p>	<p>Complaints guidance is cascaded to all staff.</p> <p>Awareness messaging is included in Core Briefing that complaints should be escalated to the appropriate line manager within a department, or directly to the Complaints and Compliance Team.</p>

3.3	<p>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.</p>		<p>PRHA Complaints Policy, Section 1 (Introduction)</p> <p>PRHA's Complaints Guidance</p>	<p>Both our Complaints Policy (Section 1) and our general guidance around complaints handling for staff emphasise to staff that receiving complaints is a positive for the organisation.</p> <p>Following the publication of the first Housing Ombudsman's Code, and the consultation and awareness messaging that PRHA undertook at that point and since, the number of complaints received each year has been higher than the average number per year from before the Code.</p> <p>While the number received has fallen back from the very high peak within that first year of the Code, it remains higher than pre-Code which we take as a positive development.</p>
3.4	<p>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.</p> <p>The policy must also be published on the landlord's website.</p>	Yes	<p>PRHA Complaints Policy</p> <p>PRHA website (www.prha.net)</p>	<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 of the Policy is included with each Stage 1 complaint acknowledgement letter.</p>

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	PRHA Complaints Policy, Section 19 (Publicising & awareness of PRHA's Complaints Policy)	<p>A section concerning how PRHA will regularly publicise our Complaints Policy has been added following the requirements of the Complaints Handling Code 2024.</p> <p>All awareness messaging concerning the Policy will include details of the Housing Ombudsman Service along with their contact details.</p>
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	<p>PRHA Complaints Policy, Section 5 (Who can complain)</p> <p>PRHA Complaints Policy, Section 10 (How you can complain)</p>	Section 5 of our Policy and Section 10 of our Policy both include confirmation that residents can have a complaint raised on their behalf by a third party, and be supported during the complaints process by a third party advocating on their behalf.
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	<p>Complaints letter templates</p> <p>Awareness material relating to the Ombudsman sent out both as part of the complaints process, and generally to all tenants to raise awareness on a regular basis (e.g. inclusion of leaflets when sending out rent statements)</p>	<p>This information is included in all letter templates within the complaints process. We have expanded this by including such information within our regular correspondence with residents (for example by including information and awareness leaflets when sending out rent statements). This includes the sending of awareness material that is provided for such use by the Housing Ombudsman.</p> <p>Our letter templates (for acknowledgement and at Stage 1 &</p>

				<p>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.</p> <p>Our Stage 2 response templates additionally inform tenants of their right to formally refer our response to the Housing Ombudsman if they are not satisfied with our response.</p>
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Section 4: Complaint Handling Staff

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
4.1	Landlords must have a person or team assigned to take responsibility for complaint handling, including liaison with the Ombudsman and ensuring complaints are reported to the governing body (or equivalent). This Code will refer to that person or team as the 'complaints officer'. This role may be in addition to other duties.	Yes	The complaints process is overseen by our Performance & Monitoring Team, who collectively fulfil the role of "complaints officer" as outlined in the Code	<p>We have a Complaints and Compliance Coordinator in place to support teams and departments with the complaints process, and overall our Performance and Monitoring Team (of which the Coordinator is a member) collectively fulfils the role of "complaints officer" as outlined within the Code. This team will liaise with the Housing Ombudsman as needed.</p> <p>Section 10 of our Complaints Policy provides contact details for the Team.</p> <p>Our SLT and governing board receive</p>

				reports from our Performance and Monitoring Team, including quarterly KPIs and more detailed six monthly reports on performance and learning.
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	Departmental roles and responsibilities	The complaints and compliance team have a direct line of communication with the Chief Executive and the Chair of the Board. This structure has been in place for a number of years in relation to Data Protection issues, and from 1 st of April 2024 this has been extended to the complaints process.
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	induction, training & awareness messaging	<p>All staff as part of induction are briefed on PRHA's complaints policy, and on the importance of the complaints process for positive learning.</p> <p>Staff involved directly in the complaints process undergo more specialist training with external providers in order to enhance their professional development.</p> <p>Staff are referred to the Housing Ombudsman's website and the resources available in relation to complaint handling and dispute resolution.</p> <p>Complaints are discussed as part of the regular departmental meetings, as a standing agenda item.</p>

				Core briefing and supervisions are used to emphasize the importance of complaints and of learning from complaints.
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Section 5: The Complaint Handling Process

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
5.1	Landlords must have a single policy in place for dealing with complaints covered by this Code. Residents must not be treated differently if they complain.	Yes	PRHA Complaints Policy	We only have one Complaints Policy in place, which governs our complaints handling process for all residents and services users.
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	PRHA Complaints Policy, Section 11.1 (How will your complaint be handled; Early & local resolution)	<p>Section 11.1 of our Policy sets out the potential for the 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 that the resident has the right to request that their complaint is handled formally at any point so that there is undue no delay.</p> <p>Section 11 specifies that in such circumstances we retain a record of their concerns, their agreement to attempt early and local resolution, and the actions & outcomes achieved.</p>

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	PRHA Complaints Policy	Our Complaints Policy has only two stages, in line with the Complaints Handling Code.
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	PRHA Complaints Policy, Section 11.5 (Complaints about contractors and other third parties operating on PRHA's behalf)	<p>PRHA's practice in relation to this has always been that where a complaint concerns dissatisfaction with third parties who are acting on behalf of PRHA, the responsibility for investigating and responding to the complaint remains with PRHA. We would not expect the third party to investigate and respond separately and without PRHA's input as the primary relationship is between the tenant and PRHA as the landlord (or service provider).</p> <p>This has now been formalised with the addition of Section 11.5 to our Complaints Policy which makes this clear to our tenants.</p> <p>Section 11.5 notes that we may ask the third party organisation to undertake their own investigation and to report their findings (including any actions take or proposed to be taken) to PRHA. We will then review their response and any proposed actions for inclusion in PRHA's formal response to the tenant.</p>

5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.		PRHA Complaints Policy, Section 11.5 (Complaints about contractors and other third parties operating on PRHA's behalf)	As noted above, PRHA retains the responsibility for investigating and responding to complaints concerning third parties who are operating on PRHA's behalf, and as such will ensure that the complaint is handled in accordance with the Code.
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.		PRHA's template acknowledgement letters (Stage 1 & Stage 2) PRHA Complaints Policy, Section 11.2 (How will your complaint be handled; formal resolution)	Our standard acknowledgement templates were updated to fully comply with the Housing Ombudsman's Code when first published, and have since been reviewed following each revision of the Code and updated as necessary to maintain compliance. They therefore include the instruction for the person sending the acknowledgement to set out our understanding of the complaint and of the outcomes that the complainant is seeking in full, and also to request clarification if either is unclear. This is supported by Section 11.2 of the Policy which outlines that we will contact the complainant to confirm that our initial understanding of their complaint and the outcomes they are seeking is correct.
5.7	When a complaint is acknowledged at either stage, landlords must be clear which aspects of the complaint they	Yes	PRHA Complaints Policy, Section 11.2 (How will your complaint be handled; Formal resolution)	Section 11 of our Policy outlines what complainants can expect of us when they make a complaint, and Section 11.2 has been updated to include the

	are, and are not, responsible for and clarify any areas where this is not clear.			provision that we will be clear in relation to which parts of a complaint we are and are not responsible for resolving.
5.8	<p>At each stage of the complaints process, complaint handlers must:</p> <ul style="list-style-type: none"> 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. 		<p>PRHA Complaints Policy, Section 11.2 (How will your complaint be handled; Formal resolution)</p> <p>Training & Guidance</p>	<p>Training and guidance is provided to reinforce the principle that complaints must be dealt with fairly, and on their own merits.</p> <p>The Complaints and Compliance Coordinator is independent of other teams and departments and is available to provide support and guidance for the investigating officer or manager at Stage 1.</p> <p>Managers assigned for complaints that are escalated to Stage 2 are independent of the department that handled the Stage 1 complaint.</p> <p>Section 11.2 of our Policy outlines what residents can expect of us when they make a complaint. This includes: discussing with the resident their concerns and the outcomes they are seeking; discussing the actions and remedies that are being proposed to resolve the issues; and providing the opportunity for the resident to raise any questions or concerns they may have with the remedy being offered and the decisions made.</p>

				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.
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	PRHA Complaints Policy, Section 11.2 (How will your complaint be handled; Formal resolution)	<p>Section 11.2 of our Policy confirms that we will generally “Adhere to any arrangements made around how we communicate with you, and on what frequency (both while we are investigating your complaint and during any follow on actions as part of the remedy offered)”.</p> <p>We have now amended this to specifically refer to point 5.9 of the Code, and inserted the following into Section 11 of our Policy: <i>“In the circumstances where our response to a complaint has fallen outside of the timescales set out in this Policy and in the Housing Ombudsman’s Complaints Handling Code, we will agree with the resident suitable intervals for keeping them informed about their complaint.”</i></p>
5.10	Landlords must make reasonable adjustments for residents where appropriate under the Equality Act 2010.	Yes	<p>PRHA Complaints Policy, Section 9 (Accessibility)</p> <p>PRHA's Reasonable Adjustments Policy</p>	<p>Section 9 of our Complaints Policy sets out our commitment to accessibility and to making reasonable adjustments.</p> <p>Our Reasonable Adjustments Policy</p>

	<p>Landlords must keep a record of any reasonable adjustments agreed, as well as a record of any disabilities a resident has disclosed.</p> <p>Any agreed reasonable adjustments must be kept under active review.</p>			<p>confirms that we will keep a record of reasonable adjustments requested and agreed, in order to review and monitor. Section 7 states: <i>"We will record and monitor the reasonable adjustments that have been requested and made, this will allow us to review the services we provide and help us identify whether there are any wider steps that we can take to improve our services."</i></p> <p>Appropriate training has been delivered to the Property Services Maintenance Manager and Administrators, and our Complaints and Compliance Coordinator. New staff with a responsibility for complaints handling will be trained as part of their induction.</p>
5.11	<p>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.</p>	Yes	<p>PRHA Complaints Policy, Section 11 (How will your complaint be handled); Clause 11.4 (Stage 2)</p>	<p>Section 11 of our Complaints Policy confirms that in the exceptional circumstance where we decline to escalate a complaint, the tenant will be provided with a full explanation for this. They are additionally advised that they can refer our decision to the Housing Ombudsman.</p> <p>Clause 11.4 refers the complainant to the list of possible reasons for exclusion that is provided in Section 7 of the Policy.</p>

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	PRHA Complaints Policy	<p>All complaints, along with supporting correspondence and documents, are logged on our internal database management system.</p> <p>The importance of this is highlighted in our complaints training and in the guidance that is issued to all managers and all staff who have a role in administering or investigating complaints received by their department.</p>
5.13	<p>Landlords must have processes in place to ensure a complaint can be remedied at any stage of its complaints process.</p> <p>Landlords must ensure appropriate remedies can be provided at any stage of the complaints process without the need for escalation.</p>	Yes	PRHA Complaints Policy	<p>Our Complaints Policy focuses on responding to complaints quickly and fairly, and on agreeing actions that need to be undertaken to provide appropriate remedy for the tenant.</p> <p>Remedies are not dependent on the completion of our formal complaints process and where we can provide remedy immediately we will do so while the complaints process itself is still ongoing. Some actions may need to be scheduled after the response, and will continue to progress these and provide updates to the tenant as appropriate without the need for escalation.</p> <p>Our Policy also allows for early and local resolution where this is appropriate and agreed with the resident, as a means of immediately addressing the tenant's</p>

				<p>concerns without the need for entering our formal complaints process. This does not form part of our formal complaints process, and is not an “informal stage”.</p> <p>For complaints which enter our formal procedure our Policy, guidance to staff, and training, stress the importance of investigating, responding and offering remedy for the resident without unwarranted delay.</p>
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	<p>PRHA Complaints Policy, Section 8 (Managing unacceptable behaviour)</p> <p>PRHA's Unacceptable Behaviour Policy</p>	<p>Our approach to managing and monitoring unacceptable behaviour within the complaints process is outlined in Section 8 of our Complaints Policy.</p> <p>This section outlines the potential circumstances under which we may choose to take action, and the types of action that we may take. It refers tenants to our wider Unacceptable Behaviour Policy, which will be provided to any tenant for whom we are introducing restrictions, along with formal notification or our reasons under the Policy for doing so.</p> <p>All such restrictions put in place are subject to regular review, and are not indefinite.</p>
5.15	Any restrictions placed on contact due to unacceptable behaviour must be	Yes	PRHA Complaints Policy, Section 8 (Managing unacceptable behaviour)	Section 8 of our Policy outlines the potential justifications for placing restrictions on a resident's contact due

	<p>proportionate and demonstrate regard for the provisions of the Equality Act 2010.</p>		<p>PRHA's Unacceptable Behaviour Policy, Section 7 (Equality & Diversity) & Section 12 (Reasonable adjustments)</p>	<p>to unacceptable behaviour we will ensure that those restrictions are appropriate to their needs. It confirms that all decisions taken around restricting communication will have due regard for the individual circumstances of the resident and of the provisions of the Equality Act 2010.</p> <p>This is supported by our Unacceptable Behaviour Policy as a whole, which includes clauses around our commitment to and compliance with Equality and Diversity legislation (Section 7) and our commitment to providing appropriate reasonable adjustments (Section 12) and that these will be taken into account when determining any restrictions.</p>
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Section 6: Complaints Stages

Stage 1

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
6.1	<p>Landlords must have processes in place to consider which complaints can be responded to as early as possible, and which require further investigation.</p> <p>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.</p>	Yes	<p>PRHA Complaints Policy</p> <p>Reasonable Adjustments Policy</p>	<p>Our policy supports the early and local resolution of issues that have been raised, and all complaints are considered on their merits. This includes fully reviewing the complaint and where there is complexity this is taken into account. We seek to investigate and respond within the Code's timescales in all instances.</p> <p>The potential vulnerability of the resident is taken into account in this process, in line with our Complaints Policy and with our Reasonable Adjustments Policy</p>
6.2	<p>Complaints must be acknowledged, defined and logged at stage 1 of the complaints procedure <u>within five working days of the complaint being received.</u></p>	Yes	<p>PRHA Complaints Policy, Section 11.3 (How will your complaint be handled; Stage 1)</p>	<p>Our Policy requires all Stage 1 complaints to be acknowledged within five working days of receipt.</p>
6.3	<p>Landlords must issue a full response to stage 1 complaints <u>within 10 working days</u> of the complaint being acknowledged.</p>	No	<p>PRHA Complaints Policy, Section 11.3 (How will your complaint be handled; Stage 1)</p>	<p>Performance: We have reported this as being non-compliant due to 6 complaints having been responded to outside of the required timescale.</p>

			<p>Performance data 2023-24: 51 formal Stage 1 complaints were received during the year, of which 45 were responded to within the required timescale (88% met). This is an improvement on 52% recorded in the previous year, within which we experienced resourcing issues and high staff turnover levels in our Property Services team.</p> <p>Note: these figures are based on the Complaints Policy which was current during the year 2023-24. This took the Code's requirements that "Landlords must respond to the complaint within 10 working days of the complaint being logged" to mean it should be responded to within 10 days of being received (and not within 10 days of being acknowledged as has been clarified in the 2024 Code). We have kept our figures</p>	<p>While our Policy and Procedures (and our guidance for staff) are compliant in that they include the requirement for all responses to meet the timescales outlined by the Code, as this was not achieved in performance this is counted as non-compliance with this point.</p> <p>No complaint has been responded to outside of timescale since November, and we will continue to focus on this as a priority.</p> <p>Policy & Procedures: Following the clarification and change in wording of the 2024 Complaints Handling Code in relation to timescales, we have amended our Complaints Policy to align our deadline for providing a Stage 1 responses to 10 working days from the date a complaint has been acknowledged (previously we counted this from date of receipt, not date of acknowledgement).</p> <p>We have accordingly clarified in our Policy that this gives a maximum of 15 working days for a response to be provided, depending on the date of the acknowledgement (i.e. up to five working days to acknowledge, and then 10 working days from the date of acknowledgement to respond)</p>
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			<p>based on the Policy that was current for 2023-24, so our performance is based on the shorter timescale that it contained (within 10 days of receipt).</p>	<p>The Policy leaves scope for an extension to be applied where there are clear reasons doing so. 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>Our performance figures (Evidence column) shows progress relative to the previous year and we will continue to work towards ensuring that all departments meet with the requirement for responding within the Code's timescales.</p> <p>Four of the six Stage 1 complaints that were outside of timescale were received in the first 6 months of 2023-24 (April to September). The last two were received in October, with no subsequent Stage 1 complaints failing to meet the deadline for response.</p>
6.4	<p>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</p>	Yes	<p>PRHA Complaints Policy, Section 12 (Extension to deadlines)</p> <p>PRHA's complaints template letters (Stage 1 extension template)</p> <p>Performance data 2023-24:</p>	<p>Section 12 of our Policy governs the circumstances within which extensions may be applied, and refers to the consideration of the individual circumstances and complexity of a complaint when we make any decision to extend.</p> <p>It specifies that these should not be</p>

	reason(s) must be clearly explained to the resident.		<p>Extensions were used for 13 Stage 1 complaints in the year. 8 of these were for the standard 10 working days, with 5 being extended by 20 working days (as permissible under the 2023 Code where there was good reason).</p> <p>No extensions beyond 20 working days (and which would have required the agreement of the tenant) were utilised.</p>	<p>longer than 10 working days without good reason. It states that we will inform the resident of the reasons where we take a decision to extend the response deadline for their complaint.</p> <p>We have removed the clause around extensions beyond 20 working days with agreement from the tenant from our Policy, as it no longer appears in the revised 2024 Code.</p>
6.5	When an organisation informs a resident about an extension to these timescales, they must be provided with the contact details of the Ombudsman.	Yes	<p>PRHA Complaints Policy, Section 12 (Extension to deadlines)</p> <p>PRHA's complaints template letters (Stage 1 extension template)</p>	<p>Section 12 of our Policy has been updated to comply with the 2024 Code and to state that we will in all cases provide the tenant with the contact details of the Housing Ombudsman when we make any decision to extend a complaint.</p> <p>We have additionally updated our extension letter templates to include those contact details.</p>
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	Yes	<p>PRHA Complaints Policy, Section 11.2 (How will your complaint be handled; formal resolution)</p> <p>PRHA's template response letters.</p>	<p>Section 11.2 of our Policy outlines what complainants can expect of us when they make a complaint. This includes making clear the distinction between the initial response (which must be provided within the Policy and Code timescales) and where there are</p>

	must still be tracked and actioned promptly with appropriate updates provided to the resident.			<p>ongoing actions scheduled or offered in order to fully resolve the issues raised.</p> <p>Section 11 confirms that where there are follow on actions scheduled or offered, these will be tracked and regular updates provided to the resident until all actions have been completed.</p> <p>This is supported by PRHA's complaint response template letters, of which two versions are available: one for where the actions required to address the issues raised have been fully concluded; and one for where ongoing actions are offered or scheduled.</p> <p>The latter template refers to the requirements around ongoing communication until the actions have been resolved.</p>
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	<p>PRHA Complaints Policy, Section 11 (How will your complaint be handled)</p> <p>PRHA's template response letters.</p>	This is addressed under Section 11 of our Policy, and is included in our template response letters.
6.8	Where residents raise additional complaints during the investigation, these must be incorporated into the stage 1 response if they are related and	Yes	PRHA Complaints Policy, Section 11.2 (How will your complaint be handled; Formal resolution)	This is detailed in Section 11.2 of our Complaints Policy, concerning how we take forward additional issues raised during the complaints process.

	<p>the stage 1 response has not been issued.</p> <p>Where the stage 1 response has been issued, the new issues are unrelated to the issues already being investigated or it would unreasonably delay the response, the new issues must be logged as a new complaint.</p>			<p>We have updated this section to include the clarification that “new issues unrelated to the issues already being investigated” will be treated as a new complaint, in line with the revised 2024 Code.</p>
6.9	<p>Landlords must confirm the following in writing to the resident at the completion of stage 1 in clear, plain language:</p> <ul style="list-style-type: none"> 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	<p>PRHA Complaints Policy, Section 11.3 (How will your complaint be handled; Stage 1)</p> <p>PRHA's template response letters.</p>	<p>This is addressed under Section 11.3 of our Policy, and is included in our template response letters</p>

Stage 2

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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	PRHA Complaints Policy, Section 11.4 (How will your complaint be handled; Stage 2) PRHA template response letters	The escalation process is laid out in Section 11.4 of our Policy, and information concerning how to escalate a complaint to Stage 2 forms part of our standard Stage 1 response letter templates. Section 11.4 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
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	PRHA Complaints Policy, Section 11.4 (How will your complaint be handled; Stage 2)	Section 11.4 of our Policy confirms that formal acknowledgement will be sent within 5 working days of the request for escalation.
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	PRHA Complaints Policy, Section 11.4 (How will your complaint be handled; Stage 2)	Our Policy has been updated to reflect this change in the Complaints Handling Code. Section 11.4 (covering Stage 2 of the process) now has the following: "While we will seek to discuss with you the reasons that you are dissatisfied with the Stage 1 response as this will help us to address those reasons and provide appropriate remedy, you will not be

				required to explain your reasons for requesting a stage 2 consideration. In line with the Housing Ombudsman's Complaints Handling Code, we will make reasonable efforts to understand why you are unhappy with our Stage 1 response as part of our investigation and Stage 2 response."
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Yes	PRHA Complaints Policy, Section 11.4 (How will your complaint be handled; Stage 2)	This is detailed in Section 11.4 of our Complaints Policy.
6.14	Landlords must issue a final response to the stage 2 <u>within 20 working days</u> of the complaint being acknowledged.	Yes	PRHA Complaints Policy, Section 11.4 (How will your complaint be handled; Stage 2) Performance data 2023-24: 6 request for escalation to Stage 2 were received during the year. All were accepted, and all were responded to within the required timescale. None required an extension to be applied, so all were within 20 working days.	Following the clarification and change in wording of the 2024 Complaints Handling Code in relation to timescales, we have amended our Complaints Policy to align our deadline for providing a Stage 2 responses to 20 working days from the date a complaint has been acknowledged (previously we counted this from date of receipt, not date of acknowledgement). We have accordingly clarified in our Policy that this gives a maximum of 25 working days for a response to be provided, depending on the date of the acknowledgement (i.e. up to five working days to acknowledge, and then 20 working days from the date of acknowledgement to respond at Stage 2)

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	<p>PRHA Complaints Policy, Section 12 (Extension to deadlines)</p> <p>PRHA's complaints template letters (Stage 2 extension template)</p> <p>Performance data 2023-24: 6 requests for escalation to Stage 2 were received during the year. None required an extension to be applied, and all were responded to within 20 working days from receipt.</p>	<p>Section 12 of our Policy governs the circumstances within which extensions may be applied, and refers to the consideration of the individual circumstances and complexity of a complaint when we make any decision to extend.</p> <p>It specifies that these should not be longer than 20 working days without good reason. It states that we will inform the resident of the reasons where we take a decision to extend the response deadline for their complaint.</p>
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	<p>PRHA Complaints Policy, Section 12 (Extension to deadlines)</p> <p>PRHA's complaints template letters (Stage 2 extension template)</p>	<p>Section 12 of our Policy has been updated to comply with the 2024 Code and to state that we will in all cases provide the tenant with the contact details of the Housing Ombudsman when we make any decision to extend a complaint.</p> <p>We have additionally updated our extension letter templates to include those contact details.</p>
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	Yes	<p>PRHA Complaints Policy, Section 11.2 (How will your complaint be handled; Formal resolution)</p> <p>PRHA's template response</p>	Section 11.2 of our Policy outlines what complainants can expect of us when they make a complaint. This includes making clear the distinction between the initial response (which must be provided within the Policy and Code

	completed. Outstanding actions must still be tracked and actioned promptly with appropriate updates provided to the resident.		letters.	<p>timescales) and where there are ongoing actions scheduled or offered in order to fully resolve the issues raised.</p> <p>Section 11 confirms that where there are follow on actions scheduled or offered, these will be tracked and regular updates provided to the resident until all actions have been completed.</p> <p>This is supported by PRHA's Stage 2 complaint response template letters, of which two versions are available: one for where the actions required to address the issues raised have been fully concluded; and one for where ongoing actions are offered or scheduled.</p> <p>The latter template refers to the requirements around ongoing communication until the actions have been resolved.</p>
6.18	Landlords must address all points raised in the complaint definition and provide clear reasons for any decisions, referencing the relevant policy, law and good practice where appropriate.	Yes	<p>PRHA Complaints Policy, Section 11 (How will your complaint be handled)</p> <p>PRHA's template response letters.</p>	This is addressed under Section 11 of our Policy, and is included in our template response letters.
6.19	Landlords must confirm the following in writing to the resident at the completion of stage 2 in clear, plain language:	Yes	PRHA Complaints Policy, Section 11.4 (How will your complaint be handled; Stage 2)	This is addressed under Section 11.4 of our Policy, and is included in our Stage 2 template response letters.

	<ul style="list-style-type: none"> 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. 		PRHA's template response letters.	
6.20	Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.	Yes	PRHA Complaints Policy, Section 11.4 (How will your complaint be handled; Stage 2)	Section 11.4 of our Complaints Policy has been updated to include this new provision of the Housing Ombudsman's Code (2024).

Section 7: Putting things right

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
7.1	Where something has gone wrong a landlord must acknowledge this and set out the actions it has already taken, or intends to take, to put things right. These can include:	Yes	<p>PRHA Complaints Policy, Section 15 (Appropriate remedy)</p> <p>PRHA's template response letters.</p>	Section 15 of our Policy confirms that we will acknowledge where something has gone wrong, and offer an apology. The section also refers to the remaining requirements of Section 7.1 of the 2024 Housing Ombudsman's Code, including

	<ul style="list-style-type: none"> • Apologising; • Acknowledging where things have gone wrong; • Providing an explanation, assistance or reasons; • Taking action if there has been delay; • Reconsidering or changing a decision; • Amending a record or adding a correction or addendum; • Providing a financial remedy; • Changing policies, procedures or practices. 			<p>an updated reference to "Amending a record or adding a correction of addendum" (previously just listed in our Policy as "Amending a record").</p> <p>These are also included as part of our standard template response letters as options that may be relevant (and will be referred to if so).</p>
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Yes	<p>PRHA Complaints Policy, Section 15 (Appropriate remedy)</p> <p>PRHA Compensation & Ex-Gratia Payment Policy</p>	<p>Section 15 of our Complaints Policy specifies that any remedy offered will be reflective of the extent of the service failure and will take into account the level of detriment to the resident.</p> <p>This is mirrored in our Compensation and Ex-Gratia Payment Policy, which allows for discretionary payment to be offered based on the impact caused by the service failure, and also to take into account the resident's individual circumstances.</p>
7.3	The remedy offer must clearly set out what will happen and by when, in agreement with the	Yes	PRHA Complaints Policy, Section 15 (Appropriate remedy)	Section 15 of our Policy contains these conditions. They are also set out in our template response letter.

	resident where appropriate. Any remedy proposed must be followed through to completion.			Cases which have been responded to but which have ongoing actions are kept open on our system until all those actions are confirmed to have been completed.
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes	PRHA Complaints Policy, Section 15 (Appropriate remedy)	Section 15 of our Complaints Policy has been updated to incorporate some advice and guidance for staff around assessing the appropriateness of remedies, which refers directly to guidance that has been issued by the Housing Ombudsman. We will be expanding on this to draft and publish an internal Remedies Policy to provide more detailed information to staff. This will be regularly reviewed against guidance issued by the Housing Ombudsman.

Section 8: Self-assessment, reporting and compliance

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
8.1	<p>Landlords must produce an annual complaints performance and service improvement report for scrutiny and challenge, which must include:</p> <ul style="list-style-type: none"> g. the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements. h. 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; i. any findings of non-compliance with this Code by the Ombudsman; j. the service improvements made as a result of the learning from complaints; k. any annual report about the landlord's performance from the Ombudsman; and l. any other relevant reports or 	Yes	<p>PRHA's Annual Complaints Performance & Learning Report</p> <p>PRHA's Annual Self-Assessment</p>	<p>Annually we have published the Performance and Learning Report and our Self-Assessment on our website, for residents and stakeholders. This previously included the qualitative and quantitative analysis (point 8.1b) and learning (point 8.1d).</p> <p>Since the introduction of the Code we have had no findings of non-compliance, or other relevant reports relating to us as a landlord, from the Housing Ombudsman.</p> <p>In line with the 2024 Housing Ombudsman's Code we have updated the format and process for our annual reporting, and will be publishing the revised version which incorporates the requirements of Section 8.1 of the Code.</p> <p>This will include positive confirmation where one or more requirement is not applicable (i.e. where we have received no reports or findings from the Housing Ombudsman for that year).</p>

	publications produced by the Ombudsman in relation to the work of the landlord.			
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	PRHA website (complaints section) PRHA's Annual Complaints Performance & Learning Report PRHA's Annual Self-Assessment	Annually we have published the Performance and Learning Report and our Self-Assessment on our website, for residents and stakeholders. However while the Report was reviewed by our Board prior to publication each year, as response from the Board was not also published. In line with the 2024 Code we have updated this process and a response from the Board in relation to the Report will be published alongside it on our website.
8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	Yes	Not required so far	We would undertake this following any significant restructure or change in our procedures, but have had no restructure or change in procedures since the introduction of the Code.
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	Yes	Not required so far	We would comply with this request, and meet the timescales provided by the Housing Ombudsman. Since the introduction of the Code we have had no request, nor has an investigation by the Housing Ombudsman been initiated.
8.5	If a landlord is unable to comply with the Code due to	Yes	Not required so far	We would comply with these requirements in the event that we

	<p>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.</p> <p>Landlords must provide a timescale for returning to compliance with the Code.</p>			<p>experienced a cyber or other incident which would render us unable to remain in compliance with the Code.</p>
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Section 9: Scrutiny & oversight: continuous learning and improvement

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
9.1	Landlords must look beyond the circumstances of the individual complaint and consider whether service improvements can be made as a result of any learning from the complaint.	Yes	Annual Performance and Learning Report	Each complaint is reviewed for learning and to identify whether service level improvements can be implemented which would benefit our residents and / or reduce the risk of similar service failures from occurring in the future.
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	Annual Performance and Learning Report	<p>Learning from complaints is a priority for the organisation, and to date the learning from complaints has been published on our website via our 6 monthly Complaints Review Reports for Residents. This will now be incorporated into the required format of the Annual Performance and Learning Report.</p> <p>We send out post-response feedback forms to those who have made a</p>

				<p>complaint, and our Annual Satisfaction Survey includes a section on satisfaction with our complaints process.</p> <p>Our training and guidance focuses on the importance of viewing complaints as a positive process for learning and service improvement.</p>
9.3	<p>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.</p>	Yes	<p>Annual Performance and Learning Report</p> <p>Resident Scrutiny Panel (SUAP – Service Users Advisory Panel)</p> <p>SLT & Board – Quarterly KPIs</p>	<p>We report learning from complaints to all stakeholders via our 6 monthly Complaints Review Reports for Residents. This will now be incorporated into the required format of the Annual Performance and Learning Report.</p> <p>We provide quarterly KPIs for our Senior Leadership Team and the Board. Feedback relating to complaints and complaints performance is provided at our regular Corporate Leaders Group (comprising senior managers and key operational managers, covering all departments).</p> <p>We meet with staff and residents (via our Service User Advisory Panel) to discuss learning from complaints and performance.</p> <p>The review of complaints and learning is a standard agenda item for department and team meetings, and we are continually reviewing our processes</p>

				around effectively capturing and sharing our learning from complaints, internally and with stakeholders
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 Chief Executive has oversight of complaints, and performance and learning reports are provided to the Board and to PRHA's Operational Scrutiny Group.
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	Board's Governance Terms of Reference	<p>A Board member who sits on our Operational Scrutiny Group (OSG), which meets with residents, was appointed to the MRC role at our May Board Meeting (tbc).</p> <p>A Role Description has been drafted to outline the role and responsibilities for the Board member undertaking the MRC position.</p>
9.6	The MRC will be responsible for ensuring the governing body receives regular information on complaints that provides insight on the landlord's complaint handling performance. This person must have access to suitable information and staff to perform this role and report on their findings.	Yes	Board's Governance Terms of Reference	<p>The OSG Board member assigned this responsibility will liaise with the Complaints and Compliance Team in relation to the nature and scope of the data that they will need in order to fulfil this function.</p> <p>Through requests from the Board we provide full data on complaints performance four times a year (via KPIs). Annually we provide a complaints report.</p>

9.7	<p>As a minimum, the MRC and the governing body (or equivalent) must receive:</p> <ol style="list-style-type: none"> 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	<p>PRHA Complaints Policy</p> <p>PRHA's Performance Monitoring framework</p>	<p>Performance against complaints KPIs is reported quarterly to the Board, with relevant commentary provided on issues and trends. The MRC will take a lead in relation to this.</p> <p>Our Quarterly and Annual reporting:</p> <ul style="list-style-type: none"> • Provides information on the number, category and outcome of complaints alongside key performance indicators (percentage responded to timescale etc.). • Informs the SLT 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 and the</p>
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				Annual Performance and Learning Report is reviewed by the Board, and their response to these will now be published on our website in line with the 2024 Code.
9.8	<p>Landlords must have a standard objective in relation to complaint handling for all relevant employees or third parties that reflects the need to:</p> <ul style="list-style-type: none"> 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. 			<p>The key objectives of fairness, putting things right and learning from outcomes are regularly promoted at strategic and operational meetings within PRHA.</p> <p>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>