

Providence Row Housing Association

Complaints Performance and Service Improvement Report 2025

June 2025

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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 2024 to 31st March 2025.

As both a landlord and a provider of supported services Providence Row Housing Association (PRHA) handles all service-related complaints from our residents and service users under a single Complaints Policy covering all services. 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 includes complaints relating to our non-landlord functions, as well as some of the learning taken from complaints received. For fairness and transparency, and to provide assurance that all service-related complaints that we receive are handled in a consistent manner, all formal service related complaints are included whether they relate to our role as a landlord or not.

For 2024-25 we received 37 complaints relating to our role as a landlord (80.4% of complaints received) and 9 relating to our role as a provider of support (19.6%).

Those relating to our functions as a landlord including complaints concerning repairs, housing management and estates management. Further details of the type and number of complaints received during 2024-25 is provided throughout this report.

Our latest Annual Self-Assessment against the Code is provided as an appendix to this report. 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 their organisation's Annual Complaints Performance and Service Improvement Report and also 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 a good quality and responsive service for our residents and service users.

We welcome and support the Housing Ombudsman's 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. Complying with this framework will help to ensure that PRHA are taking action where this is not the case and that this is being done in a manner that is transparent to our residents and service users.

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

The Board is pleased to note that for the year 2024-25 all formal complaints raised by our residents about PRHA's services were responded to within the timescales allowed by the Housing Ombudsman's Complaints Handling Code. We acknowledge that in some cases this required the application of Code-permitted extensions in order to fully investigate and respond to those complaints. However we reaffirm PRHA's overall commitment to minimise the use of extensions in order to ensure that the issues raised by our residents are investigated and responded to as promptly as possible, so that any necessary actions that we need to undertake to put things right are not delayed.

We reaffirm PRHA's commitment to take and apply learning from complaints received (and from other forms of feedback) in order to improve service delivery. This 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.

The Housing Ombudsman's Code and compliance framework outline three strands by which an organisation is required to demonstrate their compliance with the Code, each of which requires review and oversight by the Board:

Compliance with the Code in Policy: PRHA's Complaints Policy is reviewed annually against the requirements of the Complaints Handling Code by PRHA's Complaints and Compliance Team.

There has been no amendment to the Ombudsman's Code since it was revised for 1st April 2024, which at the time led to us revising our Complaints Policy in March 2024 to ensure compliance with the revised Code.

As there have been no further changes made to the Code since that date, no changes to our Policy were made during this year's review.

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, along with our Self-Assessment against the Code. The report documents our performance in relation to complaints received over the full year, and in conjunction with our Self-Assessment will indicate where we have met, and where we have not met, the Code's requirements in practice. The performance report also provides information for our residents about any changes to service delivery that 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 the improvement in responding to complaints to timescale that was documented in our last year's report has continued, and that for the year 2024-25 all formal complaints were responded to within timescale. This represents an improvement from 88% in 2023-24 (6 formal Stage 1 complaints outside of timescale) to 100% for the current year. The Board would like to thank the teams and departments within PRHA for their work in achieving this.

The Board reaffirms PRHA's organisational commitment to maintain this performance around meeting Code-compliant response times.

Scrutiny and challenge of PRHA's compliance by the Board: The 2024 Code placed 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 included the appointment of a Board Member to the Member Responsible for Complaints (MRC) role, which was undertaken in May 2024.

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 both and commented above under the Compliance in Policy and Compliance in Practice paragraphs.

The Code requires that within the published Annual Report each 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 will all be published to PRHA's website in advance of the deadline provided by the Housing Ombudsman.

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

Since 1st April 2024 the Housing Ombudsman has had 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 and how those complaints were handled (including whether they were handled in compliance with our Policy and with the Code). In addition it outlines what changes we have made to our procedures or policies as a result of complaints received during the year.

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 & assurances
a. The annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements.	Our annual self-assessment is 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;	We have provided this within the Complaints Handling Performance section of this report. We have not refused to accept any complaint raised during 2024-25
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;	We have provided this 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 2024-25

Formal complaints received about services within the year

46 formal complaints about PRHA services were received during the financial year 2024-25. All have been responded to.

Of these 39 were Stage 1 complaints and 7 involved an escalation to Stage 2 due to the resident not being satisfied with the response they received from us at Stage 1.

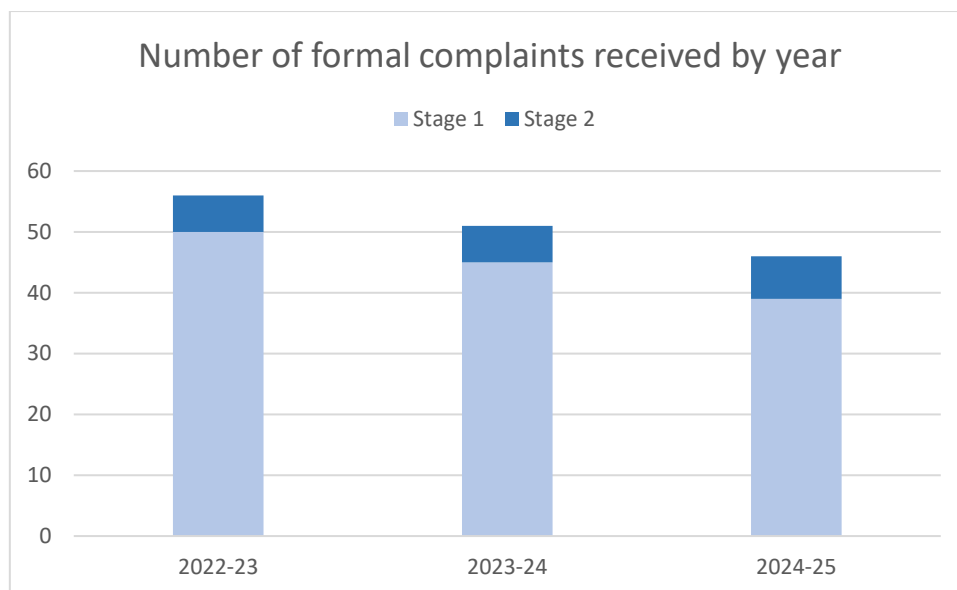
No requests to escalate a complaint to Stage 2 of our process were rejected.

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 two years are included for comparison and to show our progress in improving our performance over that time-frame.

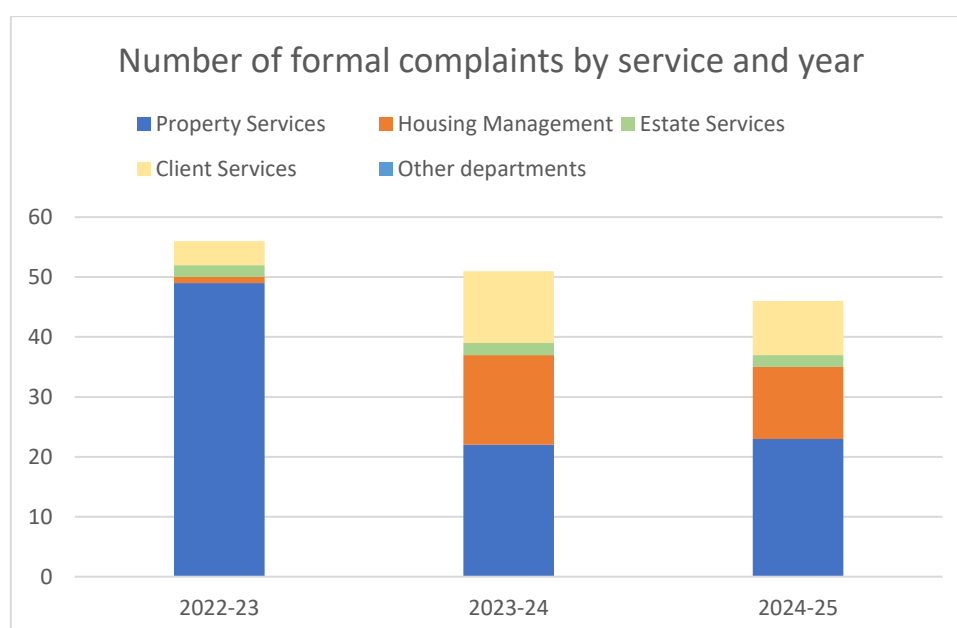
All formal complaints	2022-23	2023-24	2024-25
Received	56	51	46
Responded to	56	51	46
Not yet responded to	0	0	0
No. responded within timescale	29	45	46
% responded within timescale	51.8%	88.2%	100.0%
No. responses requiring an extension	23	12	15
% responses with an extension	41.1%	23.5%	32.6%

Stage 1 formal	2022-23	2023-24	2024-25
Received	50	45	39
Responded to	50	45	39
Not yet responded to	0	0	0
No. responded within timescale	26	39	39
% responded within timescale	52.0%	86.7%	100.0%
No. responses requiring an extension	19	12	13
% responses with an extension	38.0%	26.7%	33.3%

Stage 2 formal	2022-23	2023-24	2024-25
Received	6	6	7
Responded to	6	6	7
Not yet responded to	0	0	0
No. responded within timescale	3	6	7
% responded within timescale	50.0%	100.0%	100.0%
No. responses requiring an extension	4	0	2
% responses with an extension	66.7%	0.0%	28.6%



Complaints received by type and department



Property Services:

50% of the complaints received during 2024-25 (23 of 46) were concerned primarily with the service the resident had received after reporting repairs and maintenance issues. These were investigated and responded to by our Property Services department.

At 50% of all service-related complaints received during the year this remains high relative to other departments. However it does also represent a reduction from the much higher proportions that we saw in 2021-22 (81%) and in 2022-23 (88%).

It is also 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.

It is worth noting as background to the above that in 2021-22 PRHA undertook work in advance of the introduction of the Housing Ombudsman's Complaints Handling Code (introduced April 2022). This involved consulting our residents in relation to the Policy changes necessary under the Code and in raising awareness of our complaints procedures and of how to make a complaint. This served to increase the overall number of complaints received and it also saw an increase in the proportion of complaints relating to repairs within that overall increase.

In relation to internal issues that impacted on our performance during both of those years (2021-22 & 2022-23), there was a relatively high turnover of staff within the Property Services Team, including operatives. In conjunction with the steps taken to raise awareness of our procedures and how to make a complaint with our residents, this may contributed both to the increased number of complaints received and how well those complaints were then responded to, including whether timescales were met.

Since then the team has both become more stable and additional resources were allocated to support the team with the handling of complaints. Their focus remains on providing a good maintenance service and on taking appropriate action to resolve issues when complaints are received. Learning from the complaints received this year has been taken by the Property Services Team and is outlined later in this report.

Property Services: Stage 1 complaints (21)

- 5 concerning delays in starting or completing repairs once reported, or in delivering replacement items
- 3 concerning the repairs undertaken not resolving the underlying issues
- 5 concerning issues with heating & hot water
- 1 concerning damage to carpet from unresolved leaks
- 2 concerning pest control visits not resolving the situation with pests
- 2 concerning communication / professionalism of staff
- 2 concerning quality of accommodation
- 1 concerning out of hours response

Property Services: Stage 2 complaints (2)

- 2 resulting from dissatisfaction with the Stage 1 response concerning the length of time that had been taken to resolve issues with heating and / or hot water. In addition 1 of these related to the inadequate compensation which they felt they had been offered at Stage 1 due to the impact the delay had caused for them.

Housing Management:

After Property Services, our Housing Management Team received the highest proportion of complaints during the year.

26.1% of the Stage 1 & Stage 2 complaints received (12 of 46) concerned housing management issues. These were investigated and responded to by our Housing Management Team.

This is a slight fall from the previous year (30%) but it still reflects that the Housing Management Team provides support with a wide range of areas for our residents (from rent accounts to dealing with ASB) and as such have a wide area of responsibility in relation to complaints. They are also now responsible for more formally providing Enhanced Housing Management Services to ensure the health and wellbeing of residents who may need additional support beyond that traditionally provided by Housing Management Teams.

This means that the Housing Management Team are often dealing with complaints involving more complex issues, as well as those where the actions that are needed involve both housing management and repairs aspects which can be more complex to resolve. The Housing Management Team tend to coordinate the investigation and responses to complaints where this is the case (2 of the 12 counted under Housing Management for the current half-year specifically included repairs aspects).

Housing Management: Stage 1 complaints (8)

- 1 concerning processes around resolving ASB.
- 3 concerning staff communication / professionalism.
- 1 concerning delay with move in process after signing tenancy (from supported service to EHM site).
- 1 concerning the safety & security of the building (later escalated to Stage 2 – see below re emergency use of lifts by residents from an adjacent supported service).
- 2 concerning service charges.

Housing Management: Stage 2 complaints (4)

- 1 resulting from dissatisfaction with the Stage 1 response concerning residents from one of our supported services having emergency access to the lifts within and adjacent (non-supported) PRHA property. The resident indicated that the result of this was an increase in ASB during the periods where the emergency access was provided.
- 1 resulting from dissatisfaction with the with the Stage 1 response for a complaint concerning not being told of their arrears level / the impact this had had on an offer of a move.
- 1 resulting from dissatisfaction with the Stage 1 response concerning the cost of key fobs and the “opaque” management relationship between PRHA and the landlord of Levanter House, including their respective responsibilities.
- 1 resulting from dissatisfaction with the Stage 1 response about delays in their move from a PRHA supported service into a PRHA EHM (Enhanced Housing Management) property, after they had signed their tenancy in advance of the move.

Estates services:

4.3% of the formal complaints received concerned Estates Services (2 of 46). This is comparable to the prior year (3.9% of formal complaints, 2 of 51).

Both were at Stage 1:

- 1 concerning standard of cleaning
- 1 concerning delay in rubbish being cleared from communal area after it had been reported

No Stage 2 escalation requests were made concerning Estates Services.

Client Services (supported services):

19.6% of the formal complaints received (9 of 46) concerned the support services that PRHA provides.

These do not relate directly to PRHA's role as a landlord but 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 in our processes.

Client services: Stage 1 complaints (8)

- 2 concerning dissatisfaction with the service's response to ASB reports
- 5 concerning staff behaviour / staff support
- 1 concerning the quality of the bedding pack provided by the service on moving in

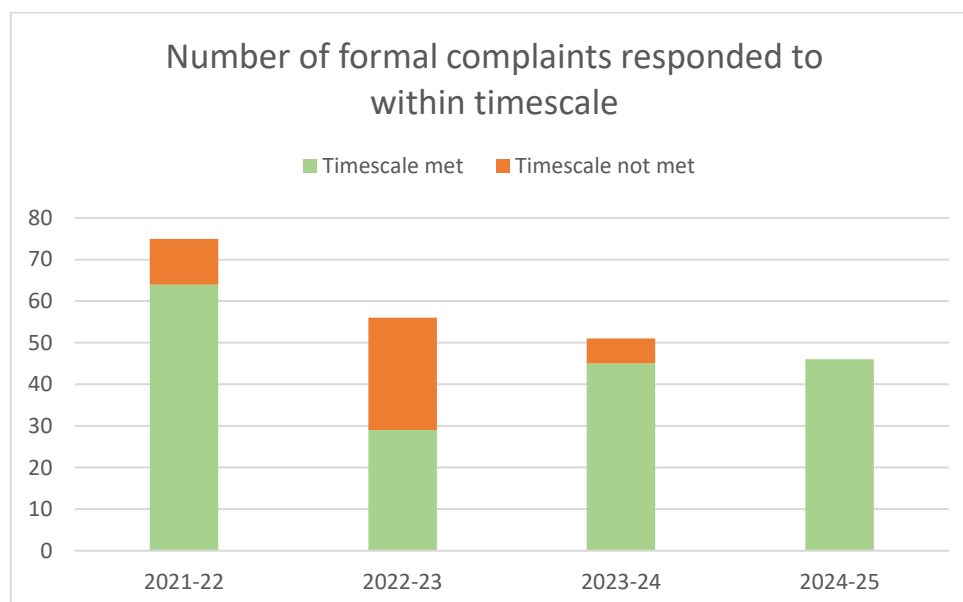
Client services: Stage 2 complaints (1)

- 1 resulting from dissatisfaction with the Stage 1 response concerning allegation of a missing parcel (which had been referred to the police as a potential criminal matter during the Stage 1 process for their complaint).

Responses to timescale

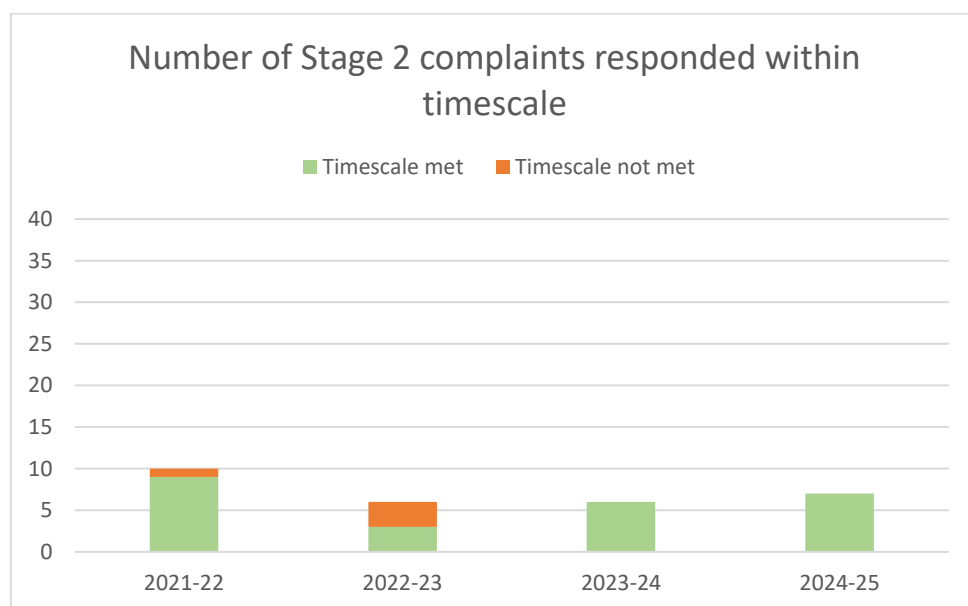
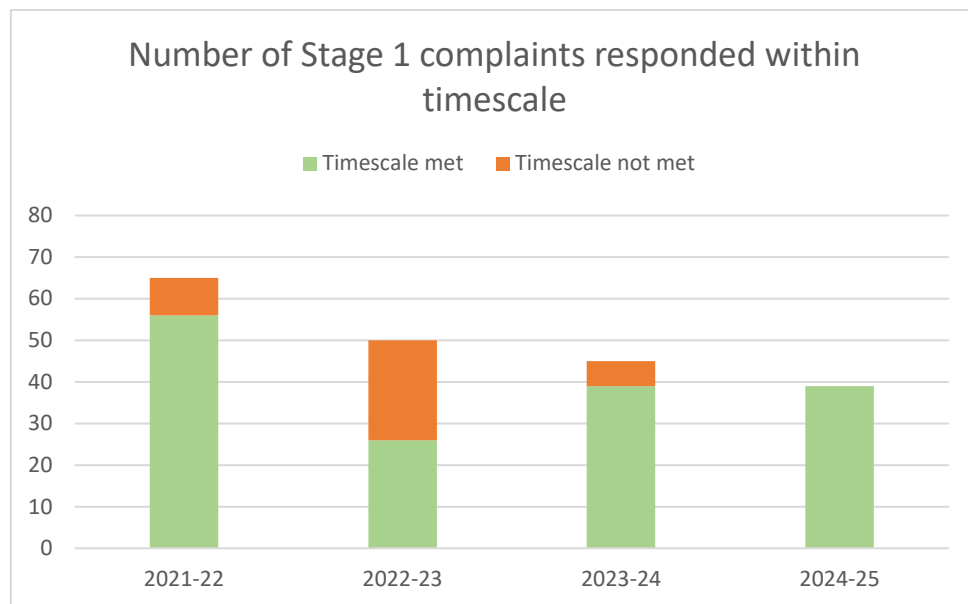
100% of the formal complaints received during the year were responded to within Policy timescales (46 of 46).

This is the first year that we have achieved this target since the introduction of the Code in April 2022, and reflects the work undertaken by each department to achieve compliance. Additional resources to support the departments in doing this were allocated in April 2023 and have been maintained since then.



We will continue to monitor performance closely so that we maintain our “compliance in practice”.

Broken down into Stage 1 and Stage 2 individually the figures are as follows:

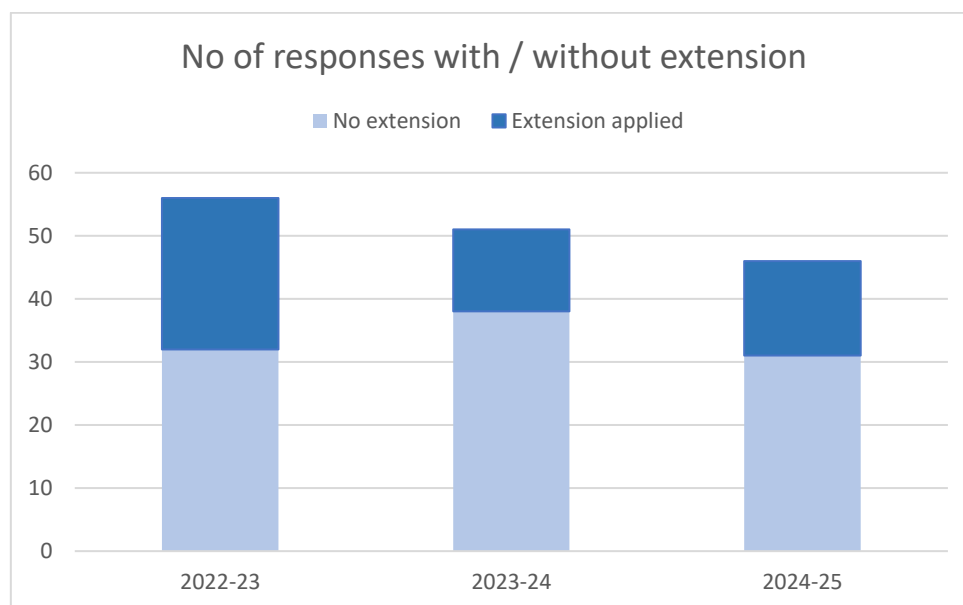


Use of extensions

We applied extensions to 13 of the 46 formal complaints received during 2024-25 (33%) in order to allow us time to fully investigate and respond to those complaints.

The Housing Ombudsman's Code allows for extensions to be applied where necessary and appropriate, however we do try to minimise their use and respond within the default initial timescales of the Code wherever possible to ensure that we provide a prompt response to our residents.

At 33% this is reduced relative to the 43% evident in the first year after the Code was introduced (2022-23) when our teams and departments were still adjusting to the revised and shortened timescales for responding to complaints under the Code. It is slightly above the figure for 2023-24 (24%, 12 of 51 complaints received) but it is felt still indicates that departments have become more proficient at investigating and responding to complaints promptly and without the need for extensions to be applied.



Learning from complaints received

Complaints received and responded to are reviewed by the relevant department or team 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 therefore included in this report.

Amongst the changes made to our systems and procedures resulting from complaints and other feedback received during the year 2023-24:

- A complaint was received from a resident who had reported no hot water in their flat and had received no follow up. The hot water repair was logged with Property Services and the Heating Engineer was booked to attend. However the Engineer attended a different flat in error and closed the complaint due to non-access. This was not communicated to Property Services. Following this investigation, an urgent request was made for the Heating Engineer to attend and an apology was issued. Communication standards have been reinforced with the Property Services team and Contractors to ensure works are carried out in a timely manner and follow ups are made on repairs that raised.
- A resident had reported that the light in their living room was not working and a routine (28 days) repair order was raised to the in-house operative to attend. The operative attended but had to pass the works on to an electrical contractor as further works were required to be carried out. The external electrical contractor completed the works within the 28 days working period from the day the works were passed on to him. The resident raised a complaint that they had no other light source while waiting for this repair to be attended. The complaint was upheld and residents will be provided with an alternative light source while waiting for their repair to be completed. Compensation was also awarded under the Compensation Policy for partial room loss.
- A complaint concerning the condition of the flooring in the communal areas of their building was raised as the resident felt it had deteriorated to the point it made the building unsafe. The flooring was due to be replaced under major works. This highlighted the importance of planned works being communicated to residents so they are made aware of works planned to be undertaken.

- A resident at one of our general needs properties had raised a complaint regarding the arrangements for residents in the supported accommodation next door to use their lift when theirs was out of action, and highlighted Health & Safety and Anti-Social Behaviour concerns. The current arrangements were reviewed and the following actions were put in place:
 - Controlled access to the lift - limited to only those in need.
 - Enhanced patrols by the guards on site.
 - Taking quick, targeted and effective enforcement action where particular residents are identified as persistently causing anti-social behaviour.
 - Regular review of the arrangements in place.
 - Notification to be given in advance for the general needs residents, in situations where this is possible.
- A resident escalated their complaint to Stage 2 as they had not been contacted by the Investigating Manager to discuss their Stage 1 complaint and felt unsupported and upset by the lack of human contact. As part of our Complaints Process, the Complaints and Compliance Team will be sending out reminders and guidance to staff on the importance of contacting residents to discuss their concerns to achieve satisfactory resolutions.
- Following a complaint raised about washing being stolen from the laundry room, the staff team refreshed the Rights and Responsibilities document given to residents, making it clear that clothes left in the laundry are at the owner's own risk – and although staff can lock the laundry room doors, staff are unable to monitor the laundry. Signage has also been put up in the laundries to this effect.
- A resident in our supported accommodation raised a complaint regarding a bedbug infestation, which they attributed to the fact their carpet had not been replaced previously. Carpets are being changed to laminate flooring when properties are void, in order to lessen the risk of infestation. Pest control continue to visit monthly. Health & safety checks in all flats are now recording Clutter Rating which will lead to support being offered around clearances, as clutter is a risk factor in infestations.

- A resident in our supported accommodation was not happy with the response she had received when reporting Anti-Social Behaviour (ASB) – noise nuisance. The resident who was identified as the cause of the ASB was moved to the back of the building to reduce the risk and the gates at the back of the building meant there would be no access at night. This helped to reduce the cause of the issue. The service reviewed and updated their ASB procedure and reminded all staff to follow up on ASB swiftly via the Council, the police and warnings to residents involved.
- A complaint was received from a resident about repeated visits from Contractors regarding his heating and that there was no follow up. The delay was caused by the heating contractor sourcing replacement heaters. Following the complaint, Property services team will ensure reports of all properties with overdue repairs are reviewed each week. All such cases are to be escalated to senior management for determination and cases where there is a significant impact on the resident or household member are to be prioritised. A hot water and heating procedure is being drafted. Property services have sent information to residents with low surface heaters which are specifically designed to prevent surface temperatures from exceeding 43°C, making them safer and will measure the ambient temperature of rooms.
- A resident at one of our General Needs properties had raised a complaint regarding a leak that occurred in the early hours of the morning and they had called the PRHA on call and left a message but no one got back to them. It was acknowledged that the resident's call was not answered as expected, and was recognize that this was unacceptable for an emergency service. To address the issue additional internal measures to prevent this from happening have been put in place:
 - Reviewing on-call protocols with staff to ensure full compliance.
 - Implementing improved monitoring to confirm availability and responsiveness.
 - Exploring backup procedures to ensure emergency calls are always answered in a timely manner.

PRHA's Code Self-Assessment 2025

Published June 2025

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. On 1st April 2024 complying with the Code became a statutory requirement.

We have used the Housing Ombudsman's Self-Assessment template to assess our compliance and have made it available to stakeholders via our website.

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 we are 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>Section 3 of our Complaints Policy further states that "Whenever a resident expresses dissatisfaction we will offer them the choice to make a 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.</p> <p>A service request is a request from a resident to the landlord requiring action to be taken to put something right.</p> <p>Service requests are not complaints, but must be recorded, monitored and reviewed regularly.</p>	Yes	PRHA Complaints Policy, Section 3 (Definition)	<p>Section 3 of our Complaints Policy sets out the definitions 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>Section 3 to states that: "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</p>

				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.
1.5	A complaint must be raised when the resident expresses dissatisfaction with the response to their service request, even if the handling of the service request remains ongoing. Landlords must not stop their efforts to address the service request if the resident complains.	Yes	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.</p> <p>Our Policy includes the following within Section 3: "A resident does not need to wait until all proposed actions have been 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."</p>
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	Yes	PRHA Complaints Policy, Section 4 (Other feedback – suggestions, compliments & surveys)	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

	landlords ask for wider feedback about their services, they also must provide details of how residents can complain.			<p>issues can be explored and addressed.</p> <p>Section 4 of our Policy (other feedback) was amended at the point the Code became statutory to formalise our practices around how we address survey responses and wider feedback in the context of dissatisfaction being expressed; and of the potential for taking this dissatisfaction forward as a complaint if that is the resident's wish.</p>
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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	<p>PRHA Complaints Policy, Section 7 (Exclusions)</p> <p>No complaints were excluded during 2024-25 (all complaints were accepted and responded to)</p>	<p>During 2024-25 we did not decline to accept any complaints for any reason.</p> <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 	Yes	<p>PRHA Complaints Policy, Section 7 (Exclusions)</p> <p>PRHA Complaints Policy, Section 11 (How will your complaint be handled)</p> <p>No complaints were declined during 2024-25 based on the time elapsed being over 12 months, or for any other reason.</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 list was drawn up with reference to the examples for acceptable reasons for exclusion provided within the Complaints Handling Code. Our timescales for potential exclusion are also based on the April 2024 Code and reflect required 12 months period.</p>

	<p>details of the claim, such as the Claim Form and 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>Section 11 of our Policy includes clauses 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	Landlords must accept complaints referred to them within 12 months of the issue occurring or the resident becoming aware of the issue, unless they are excluded on other grounds. Landlords must consider whether to apply discretion to accept complaints made outside this time limit where there are good reasons to do so.	Yes	<p>PRHA Complaints Policy, Section 7 (Exclusions)</p> <p>PRHA Complaints Policy, Section 11 (How will your complaint be handled)</p> <p>No complaints were declined in 2024-25</p>	<p>In March 2024 our Policy was aligned with the 2024 Code's revised period of 12 months for raising a complaint at Stage 1. This remains in place.</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>

				Escalations to Stage 2: Section 11 of our Policy specifies a 3 month period within which the escalation of a Stage 1 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) No complaints were declined in 2024-25	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) No complaints were excluded in 2024-25	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 out 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	Residents must be able to raise their complaints in any way and with any member of staff. All staff must be aware of the complaints process and be able to pass details of the complaint to the appropriate person within the landlord.	Yes	<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	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.		PRHA Complaints Policy, Section 1 (Introduction) PRHA's Complaints Guidance	<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>This is a message that is reinforced with department managers within our processes for the regular review of complaints to identify learning points, focusing on the positive aspects of service improvement resulting from feedback received.</p> <p>While the number of complaints received in 2024-25 was a slight reduction on the prior year (from 51 to 46) it remains higher than the average number of complaints received each year prior to the introduction of the Code. We view this 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	PRHA Complaints Policy PRHA website (www.prha.net)	<p>Our Complaints Policy details the number of stages involved, what our residents can expect to happen at each stage of the process, 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.</p> <p>In addition a copy of the Policy is</p>

				included with each Stage 1 complaint acknowledgement letter.
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 was added in March 2024 to meet the requirements of the revised Complaints Handling Code issued for 1st April 2024.</p> <p>All awareness messaging concerning the Policy includes 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.</p> <p>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</p>

				<p>Ombudsman.</p> <p>Our letter acknowledgement and response letters 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 Co-ordinator 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 reports from our Performance and Monitoring Team, including quarterly KPIs and more detailed six monthly reports on performance and learning.</p>
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 it was 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 in complaint processes are referred to the resources available on the Housing Ombudsman's website in relation to complaint handling and dispute resolution.</p> <p>Guidance documentation relating to our complaints processes are provided to all staff. Core briefing and supervisions are used to emphasize the importance of complaints and of learning from complaints.</p> <p>Complaints are discussed as part of the regular departmental meetings, as a standing agenda item.</p>
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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 is formalised within Section 11.5 of our Complaints Policy which makes this approach 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.		<p>PRHA's template acknowledgement letters (Stage 1 & Stage 2)</p> <p>PRHA Complaints Policy, Section 11.2 (How will your complaint be handled; formal resolution)</p>	<p>Our standard acknowledgement templates were updated to fully comply with the Housing Ombudsman's Code when first published, and are reviewed following any revisions made to the Code and updated as necessary to maintain compliance.</p> <p>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.</p> <p>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.</p>
5.7	When a complaint is acknowledged at either stage, landlords must be clear which aspects of the complaint they are, and are not, responsible for and clarify any areas where this is not clear.	Yes	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 includes the provision that in these circumstances we will be clear with the resident 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> <p>Our training focuses on the importance of viewing complaints as a positive process for learning and service improvement. Learning from complaints</p>
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				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>Section 11 of our Policy specifically refers to point 5.9 of the Code, stating that: <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	<p>Landlords must make reasonable adjustments for residents where appropriate under the Equality Act 2010.</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>	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 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</i></p>

	Any agreed reasonable adjustments must be kept under active review.			<i>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>
5.11	Landlords must not refuse to escalate a complaint through all stages of the complaints procedure unless it has valid reasons to do so. Landlords must clearly set out these reasons, and they must comply with the provisions set out in section 2 of this Code.	Yes	PRHA Complaints Policy, Section 11 (How will your complaint be handled); Clause 11.4 (Stage 2)	<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 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>
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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	PRHA Complaints Policy, Section 8 (Managing unacceptable behaviour) PRHA's Unacceptable Behaviour Policy	<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 proportionate and demonstrate regard for the provisions of the Equality Act 2010.	Yes	PRHA Complaints Policy, Section 8 (Managing unacceptable behaviour) PRHA's Unacceptable Behaviour Policy, Section 7 (Equality & Diversity) & Section 12 (Reasonable adjustments)	<p>Section 8 of our Policy outlines the potential justifications for placing restrictions on a resident's contact due 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</p>

				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.
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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>During 2024-25 our departments resolved issues raised by 11 residents via the early and local resolution processes permitted under the Code.</p> <p>31 of the 46 complaints dealt with under our formal processes were investigated and responded to without the requirement of an extension (67%).</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>Code-compliant extension periods are utilised to allow full investigation of complex cases, but our focus remains on providing responses within the default timescales of the Code whenever possible.</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	Landlords must issue a full response to stage 1 complaints <u>within 10 working days</u> of the complaint being acknowledged.	Yes	<p>PRHA Complaints Policy, Section 11.3 (How will your complaint be handled; Stage 1)</p> <p>39 formal Stage 1 complaints were received during the year, all of which were responded to within timescale (100%). This is an improvement on the 88% recorded in the previous year (which we reported then as being non-compliant in practice).</p> <p>Note: for 13 of the Stage 1 complaints extensions were applied in order to fully investigate and respond. We have counted these as compliant as the extensions were in line with the Code's requirements.</p>	<p>All 39 Stage 1 complaints were responded to with timescales (67% without an extension being applied, 33% with an extension being applied).</p> <p>Our Complaints Policy was amended in March 2024 to align it with the clarification issued alongside the April 2024 Code that the deadline for providing a Stage 1 response was 10 working days from the date a complaint has been acknowledged (and not from date of receipt which had been the case in our Policy until that point).</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 figure (Evidence column) shows progress relative to the previous year and we will continue to closely monitor our performance going forwards to ensure that all departments maintain the 100% achieved in 2024-25.</p>
6.4	Landlords must decide whether an extension to this timescale is needed when considering the complexity of the complaint and	Yes	PRHA Complaints Policy, Section 12 (Extension to deadlines)	Section 12 of our Policy governs the circumstances within which extensions may be applied, and refers to the consideration of the individual

	<p>then inform the resident of the expected timescale for response.</p> <p>Any extension must be no more than 10 working days without good reason, and the reason(s) must be clearly explained to the resident.</p>		<p>PRHA's complaints template letters (Stage 1 extension template)</p> <p>Extensions were used for 13 Stage 1 complaints in the year. 11 of these were for the standard 10 working days, with 2 being extended by 20 working days (as permissible where there is good reason).</p> <p>No extensions beyond 20 working days were utilised.</p>	<p>circumstances and complexity of a complaint when we make any decision to extend.</p> <p>It specifies that these should not be 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>
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 states 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>Our template extension letters include the Ombudsman's 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 must still be tracked and actioned promptly with appropriate updates provided	Yes	<p>PRHA Complaints Policy, Section 11.2 (How will your complaint be handled; formal resolution)</p> <p>PRHA's template response letters.</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 ongoing actions scheduled or offered in order to fully resolve the issues raised.

	to the resident.			<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	<p>Where residents raise additional complaints during the investigation, these must be incorporated into the stage 1 response if they are related and the stage 1 response has not been issued.</p> <p>Where the stage 1 response has</p>	Yes	PRHA Complaints Policy, Section 11.2 (How will your complaint be handled; Formal resolution)	<p>This is detailed in Section 11.2 of our Complaints Policy, concerning how we take forward additional issues raised during the complaints process.</p> <p>This section includes the clarification that "new issues unrelated to the issues already being investigated" will be</p>

	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.			treated as a new complaint, in line with the revised 2024 Code.
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>	This is addressed under Section 11.3 of our Policy, and points a. to g. of this clause are referenced in our template response letters

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 All 7 requests from residents to escalate their complaint were accepted, investigated and responded to.	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 was updated in March 2024 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)	<p>This is detailed in Section 11.4 of our Complaints Policy.</p> <p>All Stage 2 complaints received in 2024-25 were investigated and responded to by a different individual. In 3 cases this was by an individual from a different department or team; in 4 cases this was by a senior manager who had oversight of the department or team.</p>
6.14	Landlords must issue a final response to the stage 2 <u>within 20 working days</u> of the complaint being acknowledged.	Yes	<p>PRHA Complaints Policy, Section 11.4 (How will your complaint be handled; Stage 2)</p> <p>7 requests for escalation to Stage 2 were received during the year. All were accepted, and all were responded to within the required timescale.</p> <p>5 were responded to without the requirement for</p>	<p>Following the clarification and change in wording of the 1st April 2024 Complaints Handling Code in relation to timescales, we amended our Complaints Policy to align our deadline for 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).</p>

			an extension. 2 had an extension of 10 working days applied.	
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>7 requests for escalation to Stage 2 were received during the year. 5 were responded to without an extension being required (71%) and for 2 an extension of 10 working days was applied (29%).</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 was updated in March 2024 to comply with the 1st April 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 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 completed. Outstanding actions must still be tracked and actioned promptly with appropriate updates provided to the resident.	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 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. 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 which reference points a. to g. of this clause.

6.19	Landlords must confirm the following in writing to the resident at the completion of stage 2 in clear, plain language: <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. 	Yes	PRHA Complaints Policy, Section 11.4 (How will your complaint be handled; Stage 2) PRHA's template response letters.	This is addressed under Section 11.4 of our Policy, and is included in our Stage 2 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 was updated in March 2024 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	<p>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:</p> <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. 	Yes	<p>PRHA Complaints Policy, Section 15 (Appropriate remedy)</p> <p>PRHA's template response letters.</p>	<p>Section 15 of our Policy confirms that we will acknowledge where something has gone wrong, and offer an apology.</p> <p>The section also refers to the remaining requirements of Section 7.1 of the 2024 Housing Ombudsman's Code, including 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>	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.

				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.
7.3	The remedy offer must clearly set out what will happen and by when, in agreement with the resident where appropriate. Any remedy proposed must be followed through to completion.	Yes	PRHA Complaints Policy, Section 15 (Appropriate remedy)	<p>Section 15 of our Policy contains these conditions. They are also set out in our template response letter.</p> <p>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.</p>
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 incorporates advice and guidance for staff around assessing the appropriateness of remedies, and refers directly to guidance that has been 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>In line with the April 2024 Housing Ombudsman's Code we updated the format of our annual complaints report to meet the requirements of this section. This includes a positive confirmation where one or more requirements of this clause are not applicable – e.g. where we have received no reports or findings from the Housing Ombudsman within the year).</p> <p>We published our first “Annual Complaints Performance & Learning Report” on our website in June 2024, and we have retained this format for our 2025 Report. The 2025 Report will be made available on our website as required.</p> <p>We have received no findings of non-compliance, or other relevant reports relating to us as a landlord, from the Housing Ombudsman.</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	In line with the 1 st April 2024 Code we updated our processes in order to include a response from the Board in our published Annual Report. The first such report was published in June 2024, and our 2025 Report has also been reviewed by the Board and a Board Statement provided alongside the Report.
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 exceptional circumstances, such as a cyber incident, they must inform the Ombudsman, provide information to residents who	Yes	Not required so far	We would comply with these requirements in the event that we experienced a cyber or other incident which would render us unable to remain in compliance with the Code.

	<p>may be affected, and publish this on their website.</p> <p>Landlords must provide a timescale for returning to 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 Complaints 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 Complaints Performance and Learning Report	<p>Learning from complaints is a priority for the organisation. Our learning from complaints is published on our website annually (in compliance with the requirement for an annual Complaints Performance and Learning Report) but also via our 6 monthly Complaints Review Reports that are provided for Residents.</p> <p>We send out post-response feedback forms to those who have made a 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	Accountability and transparency are also integral to a positive complaint handling culture.	Yes	Annual Complaints Performance and Learning Report	We report learning from complaints to all stakeholders via our 6 monthly Complaints Review Reports for Residents

	Landlords must report back on wider learning and improvements from complaints to stakeholders, such as residents' panels, staff and relevant committees.		Resident Scrutiny (via RAP – Residents Advisory Panel) SLT & Board – Quarterly KPIs	<p>and annually via our Annual Complaints Performance and Learning Report (first published in June 2024 to meet the requirements of the revised Code).</p> <p>We provide quarterly KPI data on complaints to our Senior Leadership Team (SLT) and the Board.</p> <p>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 Resident Advisory Panel) to discuss learning from complaints and performance. The review of complaints and learning is a standard agenda item for department and team meetings, and we are continually reviewing our processes around effectively capturing and sharing our learning from complaints, internally and with stakeholders</p>
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	Yes		Our Chief Executive has oversight of complaints. Performance and learning reports are provided to the Board and to PRHA's Operational Scrutiny Group.

	risks, or policies and procedures that require revision.			
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	A Board member who sits on our Operational Scrutiny Group (OSG), which meets with residents, was appointed to the MRC position during 2024.
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 the MRC role met with the Complaints and Compliance Team in January 2025 in relation to the nature and scope of the data needed in order to meet the requirements for Board level assurances around complaints and learning.</p> <p>This will build on the existing provision of performance and learning data to the Board, including quarterly via KPIs and annually via the Complaints Performance and Learning report.</p>
9.7	<p>As a minimum, the MRC and the governing body (or equivalent) must receive:</p> <p>a. regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance;</p>	Yes	<p>PRHA Complaints Policy</p> <p>PRHA's Performance Monitoring framework</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 the additional reporting required in order to appropriately provide Board level assurances around PRHA's culture and performance in relation to complaints.

	<p>b. regular reviews of issues and trends arising from complaint handling;</p> <p>c. regular updates on the outcomes of the Ombudsman's investigations and progress made in complying with orders related to severe maladministration findings; and</p> <p>d. annual complaints performance and service improvement report.</p>			<p>Our current quarterly and annual reporting framework:</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 Annual Performance and Learning Report is reviewed by the Board, and their response to these are published on</p>
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				our website as a Board Statement 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>