Providence Row Housing Association – Self-Assessment Form 2026

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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	A complaint must be defined as: *'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.'*	Yes	PRHA Complaints Policy, Section 3 (Definition)	Section 3 of PRHA's Complaints Policy incorporates the Code compliant definition. 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: "*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'*." A copy of our current Complaints Policy is always available via our website.

1.3	A resident does not have to use the word 'complaint' for it to be treated as such. Whenever a resident expresses dissatisfaction landlords must give them the choice to make complaint. A complaint that is submitted via a third party or representative must be handled in line with the landlord's complaints policy.	Yes	PRHA Complaints Policy, Section 3 (Definition) PRHA Complaints Policy, Section 5 (Who can complain)	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**" Section 3 of our Complaints Policy further states that "*Whenever a resident expresses dissatisfaction we will offer them the choice to make a complaint*". Section 7 of our Policy affirms that complaints can be made via third parties and these will be handled in line with our Policy.
1.4	Landlords must recognise the difference between a service request and a complaint. This must be set out in their complaints policy. A service request is a request from a resident to the landlord requiring action to be taken to put something right. Service requests are not complaints, but must be recorded, monitored and reviewed regularly.	Yes	PRHA Complaints Policy, Section 3 (Definition)	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. 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*."

				All service requests are logged within our systems. High level trend information is extracted and reviewed in order to identify patterns and commonalities which may indicate that action is required in order to resolve systemic issues and improve service delivery.
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)	Section 3 of our Policy includes reference to situations where a service request may become a complaint if it is not satisfactorily addressed. 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.*"
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	Yes	PRHA Complaints Policy, Section 6 (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

	aware of how they can pursue a complaint if they wish to. Where landlords ask for wider feedback about their services, they also must provide details of how residents can complain.			passed to the appropriate team or department for follow up so that their issues can be explored and addressed. Section 6 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.

Section 2: Exclusions

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
2.1	Landlords must accept a complaint unless there is a valid reason not to do so. If landlords decide not to accept a complaint they must be able to evidence their reasoning. Each complaint must be considered on its own merits	Yes	PRHA Complaints Policy, Section 9 (Exclusions) No complaints were excluded during 2025-26 (all complaints were accepted and responded to)	During 2025-26 we did not decline to accept any complaints for any reason. We clearly set out the reasons for possible exclusion within Section 9 of our Policy. Section 9 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 choose to instruct us to take on the complaint.

2.2	A complaints policy must set out the circumstances in which a matter will not be considered as a complaint or escalated, and these circumstances must be fair and reasonable to residents. Acceptable exclusions include: • The issue giving rise to the complaint occurred over twelve months ago. • Legal proceedings have started. This is defined as details of the claim, such as the Claim Form and Particulars of Claim, having been filed at court. • Matters that have previously been considered under the complaints policy.	Yes	PRHA Complaints Policy, Section 9 (Exclusions) PRHA Complaints Policy, Section 13 (How will your complaint be handled) No complaints were declined during 2025-26 based on the time elapsed being over 12 months, or for any other reason.	Section 9 of our Policy sets out exclusions to the policy and outlines alternative routes for the resolution of the issues raised where exclusion applies. 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 reflects the required 12 months period. Section 13 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 9 of the Policy, which also apply to escalation requests. Section 13 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.

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	PRHA Complaints Policy, Section 9 (Exclusions) PRHA Complaints Policy, Section 13 (How will your complaint be handled) No complaints were declined in 2025-26	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. 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. 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	Yes	PRHA Complaints Policy, Section 9 (Exclusions) No complaints were declined in 2025-26	Section 9 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

	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.			our decision via the Ombudsman, who may then choose 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 9 (Exclusions) No complaints were excluded in 2025-26	Section 9 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	Landlords must make it easy for residents to complain by providing different channels through which they can make a complaint. Landlords must consider their duties under the Equality Act 2010 and anticipate the needs and reasonable adjustments of residents who may need to access the complaints process.	Yes	PRHA Complaints Policy, Section 12 (How you can complain) PRHA Complaints Policy, Section 11 (Accessibility)	Section 12 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. Section 11 of our Complaints Policy sets our commitment to accessibility and to making reasonable adjustments in line with the requirements of the Equality Act 2010. 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.
3.2	Residents must be able to raise their complaints in any way and with any member of staff. All staff must be aware of the complaints process and be able to pass details of the complaint to the appropriate person within the landlord.	Yes	Complaints Guidance Core briefing & awareness messaging	Complaint guidance is cascaded to all staff. 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.

				Any changes to our Policy or Procedures (whether internal or reflecting changes to the Ombudsman's Code or guidance; or changes in legislation) are cascaded to all staff.
3.3	High volumes of complaints must not be seen as a negative, as they can be indicative of a well-publicised and accessible complaints process. Low complaint volumes are potentially a sign that residents are unable to complain.	Yes	PRHA Complaints Policy, Section 1 (Introduction) PRHA's Complaints Guidance	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. 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. The number of complaints received in 2025-26 (49) is broadly in line with the last few years (46 in 2024-25 and 51 in 2023-24), and all are higher than the average number of complaints received each year prior to the introduction of the code. We view this as a positive development.
3.4	Landlords must make their complaint policy available in a clear and accessible format for all residents. This will detail the	Yes	PRHA Complaints Policy PRHA website (www.prha.net)	Our Complaints Policy details the number of stages involved, what our residents can expect to happen at each stage of the process, and the

	two stage process, what will happen at each stage, and the timeframes for responding. The policy must also be published on the landlord's website.			timeframes for our response. Our Policy is available on our website for residents and the public to download (www.prha.net) and is available in hard copy on request. In addition a copy of the Policy is included with each Stage 1 complaint acknowledgement letter.
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 20 (Publicising & awareness of PRHA's Complaints Policy)	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. All awareness messaging concerning the Policy includes details of the Housing Ombudsman Service along with their contact details.
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	PRHA Complaints Policy, Section 7 (Who can complain) PRHA Complaints Policy, Section 12 (How you can complain)	Section 7 of our Policy and Section 12 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	Complaints letter templates 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)	This information is included in all letter templates within the complaints process. We have expanded this by including such information within our regular correspondence with residents (for example by including information and awareness leaflets when sending out rent statements). This includes the sending of awareness material that is provided for such use by the Housing Ombudsman. Our letters of 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. 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.

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	We have a Complaints and Compliance Coordinator in place to support teams and departments with the complaints process, and our Performance and Monitoring Team (of which the Co-ordinator is a member) collectively fulfils the overall role of "complaints officer" as outlined within the Code. This team will liaise with the Housing Ombudsman as needed. Section 12 of our Complaints Policy provides contact details for the Team. 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.
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, the Chair of the Board, and the Member Responsible for Complaints.

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	All staff as part of induction are briefed on PRHA's complaints policy, and on the importance of the complaints process for positive learning. 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. 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. Complaints are discussed as part of the regular departmental meetings, as a standing agenda item.

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 have one overarching Complaints Policy in place for complaints covered by the Housing Ombudsman's Code, which governs our complaints handling process for all residents and services users. From the current year (2026-27) we additionally have in place separate policies to handle Building Safety Complaints, Heat Network Complaints, and Data Protection Complaints. This has been done so that we meet the requirements of other recently enacted legislation (including the Building Safety Act and the Data Use and Access Act) which require organisations to have in place Policies governing the handling of such complaints in compliance with the legislation. Our overarching Complaints Policy makes it clear where a complaint may fall outside of our general Complaints Policy, and how they will be handled in line with the required legislative framework for complaints that fall within the remit of those pieces of legislation. Additionally, to provide information on

				how they may escalate their concerns if our response fails to satisfy them.
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 13.1 (How will your complaint be handled; Early & local resolution)	Section 13.1 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. Section 13 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.
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	Yes	PRHA Complaints Policy, Section 13.5 (Complaints about contractors and other third parties operating on PRHA's behalf)	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

	process set out in this Code. Residents must not be expected to go through two complaints processes.			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). This is formalised within Section 13.5 of our Complaints Policy which makes this approach clear to our tenants. Section 13.5 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.
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Yes	PRHA Complaints Policy, Section 13.5 (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	Yes	PRHA's template acknowledgement letters (Stage 1 & Stage 2) PRHA Complaints Policy,	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

	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.		Section 13.2 (How will your complaint be handled; formal resolution)	Code and updated as necessary to maintain compliance. They therefore include the instruction for the person sending the acknowledgement to set out our understanding of the complaint and of the outcomes that the complainant is seeking in full, and also to request clarification if either is unclear. This is supported by Section 13.2 of the Policy which outlines that we will contact the complainant to confirm that our initial understanding of their complaint and the outcomes they are seeking is correct.
5.7	When a complaint is acknowledged at either stage, landlords must be clear which aspects of the complaint they are, and are not, responsible for and clarify any areas where this is not clear.	Yes	PRHA Complaints Policy, Section 13.2 (How will your complaint be handled; Formal resolution)	Section 13 of our Policy outlines what complainants can expect of us when they make a complaint, and Section 13.2 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	At each stage of the complaints process, complaint handlers must: a. deal with complaints on their merits, act independently, and	Yes	PRHA Complaints Policy, Section 13.2 (How will your complaint be handled; Formal resolution) Training & Guidance	Training and guidance is provided to reinforce the principle that complaints must be dealt with fairly, and on their own merits. The Complaints and Compliance

	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.			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. Managers assigned for complaints that are escalated to Stage 2 are independent of the department that handled the Stage 1 complaint. Section 13.2 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. Our training focuses on the importance of viewing complaints as a positive process for learning and service improvement. Learning from complaints is a priority for the organisation and learning feedback is published via our website and in annual reporting.

5.9	Where a response to a complaint will fall outside the timescales set out in this Code, the landlord must agree with the resident suitable intervals for keeping them informed about their complaint.	Yes	PRHA Complaints Policy, Section 13.2 (How will your complaint be handled; Formal resolution)	Section 13.2 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)". Section 13 of our Policy specifically refers to point 5.9 of the Code, stating that: *"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."*
5.10	Landlords must make reasonable adjustments for residents where appropriate under the Equality Act 2010. Landlords must keep a record of any reasonable adjustments agreed, as well as a record of any disabilities a resident has disclosed. Any agreed reasonable adjustments must be kept under active review.	Yes	PRHA Complaints Policy, Section 11 (Accessibility) PRHA's Reasonable Adjustments Policy	Section 11 of our Complaints Policy sets out our commitment to accessibility and to making reasonable adjustments. 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: *"We will record and monitor the reasonable adjustments that have been requested and made, this will allow us to review the services we provide and help us identify whether there are any wider steps that we can take to improve our services."*

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 13 (How will your complaint be handled); Clause 13.4 (Stage 2)	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 additional advised that they can refer our decision to the Housing Ombudsman. Clause 13.4 refers the complainant to the list of possible reasons for exclusion that is provided in Section 9 of the Policy.
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	All complaints, along with supporting correspondence and documents, are logged on our internal database management system. The importance of this is highlighted in our complaints training 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.
5.13	Landlords must have processes in place to ensure a complaint can be remedied at any stage of its complaints process. Landlords must ensure appropriate remedies can be	Yes	PRHA Complaints Policy	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. Remedies are not dependent on the

	provided at any stage of the complaints process without the need for escalation.			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. 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". 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.
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	Yes	PRHA Complaints Policy, Section 10 (Managing unacceptable behaviour) PRHA's Unacceptable Behaviour Policy	Our approach to managing and monitoring unacceptable behaviour within the complaints process is outlined in Section 10 of our Complaints Policy. This section outlines the potential circumstances under which we may choose to take action, and the types of

	keep restrictions under regular review.			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. All such restrictions put in place are subject to regular review, and are not indefinite.
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 10 (Managing unacceptable behaviour) PRHA's Unacceptable Behaviour Policy, Section 7(Equality & Diversity) & Section 12 (Reasonable adjustments)	Section 10 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. This is supported by our Unacceptable Behaviour Policy as a whole, which includes clauses around our commitment to and compliance with Equality and Diversity legislation (Section 7) and our commitment to providing appropriate reasonable adjustments (Section 12) and that these will be taken into account when determining any restrictions.

Section 6: Complaints Stages

Stage 1 complaints

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
6.1	Landlords must have processes in place to consider which complaints can be responded to as early as possible, and which require further investigation. Landlords must consider factors such as the complexity of the complaint and whether the resident is vulnerable or at risk. Most stage 1 complaints can be resolved promptly, and an explanation, apology or resolution provided to the resident.	Yes	PRHA Complaints Policy Reasonable Adjustments Policy During 2025-26 our departments resolved issues raised by 10 residents via the early and local resolution processes permitted under the Code. 39 of the 49 complaints dealt with under our formal processes were investigated and responded to without the requirement of an extension (80%). This is an improvement on the 67% for last year (31 out of 46).	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. 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. 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
6.2	Complaints must be acknowledged, defined and logged at stage 1 of the complaints procedure **within five working days of the complaint being received**.	Yes	PRHA Complaints Policy, Section 13.3 (How will your complaint be handled; Stage 1)	Our Policy requires all Stage 1 complaints to be acknowledged within five working days of receipt.

6.3	Landlords must issue a full response to stage 1 complaints **within 10 working days** of the complaint being acknowledged.	Yes	PRHA Complaints Policy, Section 13.3 (How will your complaint be handled; Stage 1) 41 formal Stage 1 complaints were received during the year, all of which were responded to within timescale (100%). This sustains the improvement we made during 2024-25 (also 100%) which compared with 88% for the year before that, 2023-24. Note: complaints extensions were applied at Stage 1 in 8 cases in order to fully investigate and respond. We have counted these as compliant as the extensions were in line with the Code's requirements. This is a reduction on the 13 cases where we applied an extension to Stage 1 complaints in 2024-25.	All 41 Stage 1 complaints were responded to with timescales (80% without an extension being applied, 20% with an extension applied). The Policy leaves scope for an extension to be applied where there are clear reasons doing so. Section 14 of our Policy 'Extension to deadlines' states that where applied this should not exceed a further 10 days without good reason. Our performance figure (Evidence column) shows sustained progress and we will continue to closely monitor our performance going forwards to ensure that all departments maintain the 100% achieved in the last two financial years.

6.4	Landlords must decide whether an extension to this timescale is needed when considering the complexity of the complaint and then inform the resident of the expected timescale for response. Any extension must be no more than 10 working days without good reason, and the reason(s) must be clearly explained to the resident.	Yes	PRHA Complaints Policy, Section 14 (Extension to deadlines) PRHA's complaints template letters (Stage 1 extension template) Extensions were used for 8 Stage 1 complaints in the year. All 8 were for the standard 10 working days. No extensions beyond 20 working days were utilised.	Section 14 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. 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.
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	PRHA Complaints Policy, Section 14 (Extension to deadlines) PRHA's complaints template letters (Stage 1 extension template)	Section 14 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. Our template extension letters include the Ombudsman's contact details.
6.6	A complaint response must be provided to the resident when the answer to the complaint is known, not when the outstanding actions required to address the issue are completed. Outstanding actions	Yes	PRHA Complaints Policy, Section 13.2 (How will your complaint be handled; formal resolution) PRHA's template response letters.	Section 13.2 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

	must still be tracked and actioned promptly with appropriate updates provided to the resident.			ongoing actions scheduled or offered in order to fully resolve the issues raised. Section 13 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. 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. The latter template refers to the requirements around ongoing communication until the actions have been resolved.
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	PRHA Complaints Policy, Section 13 (How will your complaint be handled) PRHA's template response letters.	This is addressed under Section 13 of our Policy, and is included in our template response letters.
6.8	Where residents raise additional complaints during the investigation, these must be incorporated into the stage 1	Yes	PRHA Complaints Policy, Section 13.2 (How will your complaint be handled; Formal resolution)	This is detailed in Section 13.2 of our Complaints Policy, concerning how we take forward additional issues raised during the complaints process.

	response if they are related and the stage 1 response has not been issued. Where the stage 1 response has been issued, the new issues are unrelated to the issues already being investigated or it would unreasonably delay the response, the new issues must be logged as a new complaint.			This section includes the clarification that when raised, "new issues unrelated to the issues already being investigated" are treated as a new complaint, in line with the revised 2024 Code.
6.9	Landlords must confirm the following in writing to the resident at the completion of stage 1 in clear, plain language: a. the complaint stage; b. the complaint definition; c. the decision on the complaint; d. the reasons for any decisions made; e. the details of any remedy offered to put things right; f. details of any outstanding actions; and g. details of how to escalate the matter to stage 2 if the individual is not satisfied with the response.	Yes	PRHA Complaints Policy, Section 13.3 (How will your complaint be handled; Stage 1) PRHA's template response letters.	This is addressed under Section 13.3 of our Policy, and points a. to g. of this clause are referenced in our template response letters

Stage 2 complaints

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 13.4 (How will your complaint be handled; Stage 2) PRHA template response letters All 8 requests from residents to escalate their complaint were accepted, investigated and responded to.	The escalation process is laid out in Section 13.4 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 13.4 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 complaint procedure within five working days of the escalation request being received.	Yes	PRHA Complaints Policy, Section 13.4 (How will your complaint be handled; Stage 2)	Section 13.4 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 13.4 (How will your complaint be handled; Stage 2)	Our Policy was updated in March 2024 to reflect this change in the Complaints Handling Code. Annual reviews since then have retained this change. Section 13.4 (covering Stage 2 of the process) states 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 13.4 (How will your complaint be handled; Stage 2)	This is detailed in Section 13.4 of our Complaints Policy. All Stage 2 complaints received in 2025-26 were investigated and responded to by a different individual than the one undertaking the Stage 1 investigation. In 5 cases this was by an individual from a different department or team; in 3 cases this was by a senior manager who had oversight of the department or team.
6.14	Landlords must issue a final response to the stage 2 **within 20 working days** of the complaint being acknowledged.	Yes	PRHA Complaints Policy, Section 13.4 (How will your complaint be handled; Stage 2) 8 requests for escalation to Stage 2 were received during the year. All were	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

			accepted, and all were responded to within the required timescale. 6 were responded to without the requirement for an extension. 2 had a standard extension of 20 working days applied.	this from date of receipt, not date of acknowledgement).
6.15	Landlords must decide whether an extension to this timescale is needed when considering the complexity of the complaint and then inform the resident of the expected timescale for response. Any extension must be no more than 20 working days without good reason, and the reason(s) must be clearly explained to the resident.	Yes	PRHA Complaints Policy, Section 14 (Extension to deadlines) PRHA's complaints template letters (Stage 2 extension template) 8 requests for escalation to Stage 2 were received during the year. 6 were responded to without an extension being required (57%), and for 2 an extension of 20 working days was applied (25%).	Section 14 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. 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.
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	PRHA Complaints Policy, Section 12 (Extension to deadlines) PRHA's complaints template letters (Stage 2 extension	Section 14 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

			template)	decision to extend a complaint. We additionally updated our extension letter templates to include those contact details.
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	PRHA Complaints Policy, Section 13.2 (How will your complaint be handled; Formal resolution) PRHA's template response letters.	Section 13.2 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. Section 13 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. 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.

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	PRHA Complaints Policy, Section 13 (How will your complaint be handled) PRHA's template response letters.	This is addressed under Section 13 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: 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 13.4 (How will your complaint be handled; Stage 2) PRHA's template response letters.	This is addressed under Section 13.4 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 13.4 (How will your complaint be handled; Stage 2)	Section 13.4 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	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: • 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	PRHA Complaints Policy, Section 17 (Appropriate remedy) PRHA's template response letters.	Section 17 of our Policy confirms that we will acknowledge where something has gone wrong, and offer an apology. Section 17 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 or addendum" (previously just listed in our Policy as "Amending a record"). 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).
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Yes	PRHA Complaints Policy, Section 17 (Appropriate remedy) PRHA Compensation & Ex-Gratia Payment Policy	Section 17 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 17 (Appropriate remedy)	Section 17 of our Policy contains these conditions. They are also set out in our template response letter. Cases which have been responded to but which have ongoing actions are kept open on our system until all those actions are confirmed to have been completed.
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes	PRHA Complaints Policy, Section 17 (Appropriate remedy)	Section 17 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	Landlords must produce an annual complaints performance and service improvement report for scrutiny and challenge, which must include: a. the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements. b. a qualitative and quantitative analysis of the landlord's complaint handling performance. This must also include a summary of the types of complaints the landlord has refused to accept; c. any findings of non-compliance with this Code by the Ombudsman; d. the service improvements made as a result of the learning from complaints; e. any annual report about the landlord's performance from the Ombudsman; and f. any other relevant reports or	Yes	PRHA's Annual Complaints Performance & Learning Report PRHA's Annual Self-Assessment	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 for that year and going forwards. 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. We published our first "Annual Complaints Performance & Learning Report" on our website in June 2024, and we have retained this format for our annual reports since that date. The 2026 Report will be made available on our website as required. We have received no findings of non-compliance, or other relevant reports relating to us as a landlord, from the Housing Ombudsman.

	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 1st April 2024 Code, we updated our processes in order to include a response from the Board in our published Annual Report for 2024. We continue to do so for all subsequent annual reports. The Board reviews the performance and learning report annually, and a Board Statement is then 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	Yes	Not required so far	We would comply with these requirements in the event that we experienced a cyber or other incident

	as a cyber incident, they must inform the Ombudsman, provide information to residents who may be affected, and publish this on their website. Landlords must provide a timescale for returning to compliance with the Code.			which would render us unable to remain in compliance with the Code.

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. The results of this review are published in the Annual Complaints and Learning Report.
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	Yes	Annual Complaints Performance and Learning Report	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

	positive changes in service delivery.			Review Reports that are provided for Residents. 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. Our training and guidance focuses on the importance of viewing complaints as a positive process for learning and service improvement.
9.3	Accountability and transparency are also integral to a positive complaint handling culture. Landlords must report back on wider learning and improvements from complaints to stakeholders, such as residents' panels, staff and relevant committees.	Yes	Annual Complaints Performance and Learning Report Resident Scrutiny (via RAP – Residents Advisory Panel) SLT & Board – Quarterly KPIs	We report learning from complaints to all stakeholders via our 6 monthly Complaints Review Reports for Residents and annually via our Annual Complaints Performance and Learning Report (first published in June 2024 to meet the requirements of the revised Code). We provide quarterly KPI data on complaints to our Senior Leadership Team (SLT) and the Board. Feedback relating to complaints and complaints performance is provided at our regular Corporate Leaders Group (comprising senior managers and key operational managers, covering all departments).

				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.
9.4	Landlords must appoint a suitably senior lead person as accountable for their complaint handling. This person must assess any themes or trends to identify potential systemic issues, serious risks, or policies and procedures that require revision.	Yes		Our Chief Executive has oversight of complaints. Performance and learning reports are provided to the Board and to PRHA's Operational Scrutiny Group.
9.5	In addition to this a member of the governing body (or equivalent) must be appointed to have lead responsibility for complaints to support a positive complaint handling culture. This person is referred to as the Member Responsible for Complaints ('the MRC').	Yes	Board's Governance Terms of Reference	Since 2024 a Board member who sits on our Operational Scrutiny Group (OSG), which meets with residents, has been in place as the Member Responsible for Complaints (MRC)
9.6	The MRC will be responsible for ensuring the governing body receives regular information on complaints that provides insight	Yes	Board's Governance Terms of Reference	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

	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.			data needed in order to meet the requirements for Board level assurances around complaints and learning. 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.
9.7	As a minimum, the MRC and the governing body (or equivalent) must receive: a. regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance; b. regular reviews of issues and trends arising from complaint handling; c. regular updates on the outcomes of the Ombudsman's investigations and progress made in complying with orders related to severe maladministration findings; and d. annual complaints performance and service	Yes	PRHA Complaints Policy PRHA's Performance Monitoring framework	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. Our current quarterly and annual reporting framework: • 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

	improvement report.			(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. Our Annual Self-Assessment and the Annual Performance and Learning Report is reviewed by the Board, and their response to these ae published on our website as a Board Statement in line with the 2024 Code.
9.8	Landlords must have a standard objective in relation to complaint handling for all relevant employees or third parties that reflects the need to: a. have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments;	Yes		The key objectives of fairness, putting things right and learning from outcomes are regularly promoted at strategic and operational meetings within PRHA. Working collaboratively to positively resolve complaints, acknowledge and respond to shortfalls, and to provide a consistent and fair approach to complaint handling are key themes of this.

	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.			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.