



Complaint Handling Self-Assessment: 2024

Section 1: Definition of a complaint

Code	Requirement	Compliance	Evidence	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	Section 1.7.1 of the Pine Court Housing Association (PCHA) Complaints Appeals & Feedback Policy states: Complaint – Will 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.	PCHA Complaints, Appeals & Feedback Policy updated to reflect the definition.
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	Yes	Section 1.7.1 of the PCHA Complaints Appeals & Feedback Policy. Policy Extract: For the purposes of this Policy the following definitions will apply:	Definitions are listed within PCHA Complaints, Appeals & Feedback Policy

	<p>third party or representative must be handled in line with the landlord's complaints policy.</p>		<ul style="list-style-type: none"> • Complaint – will 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’ • Appeal – will be defined as: A disagreement with a decision we have made in line with our published policies or procedures’ <p>General Appeal – this is an appeal about general service provision where a decision has been made that the customer does not agree with.</p> <p>Statutory Appeal – this is where the right to appeal is outlined in legislation or regulation – details given in Section 3.4</p> <ul style="list-style-type: none"> • Request for Service – will be defined as a request to PCHA to perform one or more of its landlord functions e.g. carrying out a repair or other function in connection with tenancy / estate management. When received, these will not be classed as complaints unless also accompanied by an expression of 	
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			<p>dissatisfaction (see definition of complaint above)</p> <ul style="list-style-type: none"> • Feedback – will be defined as ‘any method whereby customers can express their views on how PCHA delivers its services’ 	
1.4	<p>Landlords must recognise the difference between a service request and a complaint. This must be set out in their complaints policy. A service request is a request from a resident to the landlord requiring action to be taken to put something right. Service requests are not complaints, but must be recorded, monitored and reviewed regularly.</p>	Yes	<p>As above Section 1.7.1 of the PCHA Complaints, Appeals and Feedback Policy details the difference between a complaint and a request for service.</p>	
1.5	<p>A complaint must be raised when the resident expresses dissatisfaction with the response to their service request, even if the handling of the service request remains ongoing. Landlords must not stop their efforts to address the service request if the resident complains.</p>	Yes	<p>All complaints captured are recorded by the Customer Experience Team. This does not halt any efforts to address a request for service.</p> <p>Section 3.1.2 of the PCHA Complaints, Appeals & Feedback Policy states:</p> <p>Even where this is the case, PCHA will be mindful to continue all reasonable efforts to resolve the root cause of the complaint, e.g. attempting to complete outstanding repairs or remedial works.</p>	<p>The policy is accessible to Customers and Employees.</p>
1.6	<p>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</p>	Yes	<p>Outbound Survey Assistants who conduct Tenant Satisfaction Surveys, have been provided with details of how a customer can make a formal complaint if they are unhappy with a</p>	

	they wish to. Where landlords ask for wider feedback about their services, they also must provide details of how residents can complain.		service that has been provided to them. The Outbound Survey Assistants are equipped to take complaints and liaise with the Complaint Coordinator if/we raised.	
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Section 2: Exclusions

Code	Requirement	Compliance	Evidence	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	<p>Section 3.1.11 of the PCHA Complaints, Appeals and Feedback Policy states:</p> <p>PCHA will not normally investigate complaints or hear appeals that relate to matters that are found to have occurred 12 months or more before being reported, unless the customer can demonstrate extenuating circumstances.</p> <p>Similarly, PCHA will not accept escalation between Stages of the internal complaints and appeals process where 12 months or more elapses between Stages, unless extenuating circumstances can be demonstrated. If exceptions are accepted these will be at the discretion of the Director of Operations</p> <p>Section 3.1.14 - Complaints and appeals where legal proceedings have commenced.</p>	<p>It is extremely rare that PCHA refuse to log a complaint. If a complaint is refused, it is for the reasons stipulated in the policy and at the discretion of the Customer Experience Team.</p> <p>PCHA would contact customers, utilising preferred methods of contact where feasible, explaining why their complaint has not been accepted.</p>
2.2	A complaints policy must set out the circumstances in which a matter will not be considered as a complaint or escalated, and	Yes	Section 3.1.4 of the PCHA Complaints, Feedback and Appeals Policy States:	It is extremely rare that PCHA refuse to log a complaint. If a complaint is refused, it is for the

	<p>these circumstances must be fair and reasonable to residents. Acceptable exclusions include:</p> <ul style="list-style-type: none"> • The issue giving rise to the complaint occurred over twelve months ago. • Legal proceedings have started. This is defined as details of the claim, such as the Claim Form and Particulars of Claim, having been filed at court. • Matters that have previously been considered under the complaints policy. 		<p>PCHA will only escalate complaints when the substance of the case remains the same as Stage One. If new elements are raised, which would result in a substantially different resolution than would have been offered at Stage One, a new complaint will be opened.</p> <p>Stages One and Two of the complaints and general appeals process are also available in the cases of collective disputes.</p> <p>Stages One and Two of the complaints investigation process will be available to non-PCHA customers (third parties) but they will not be able to pursue matters further via the external complaint process outlined below (see 3.3).</p> <p>The general appeals process will be available to all parties, with whom there is a connection and associated impact in the delivery PCHA services.</p> <p>PCHA will not normally investigate complaints or hear appeals that relate to matters that are found to have occurred 12 months or more before being reported, unless the customer can demonstrate extenuating circumstances or PCHA acknowledges</p>	<p>reasons stipulated in the Policy and at the discretion of the Customer Experience Team.</p> <p>PCHA would contact customers, utilising preferred methods of contact where feasible, explaining why their complaint has not been accepted.</p>
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			<p>that there may be ongoing / unresolved issues.</p> <p>Similarly, PCHA will not accept escalation between Stages of the internal complaints and appeals process where 12 months or more elapses between Stages, unless extenuating circumstances can be demonstrated. If exceptions are accepted these will be at the discretion of the Director of Operations.</p> <p>PCHA may also choose not to accept complaints that have already been considered under the Complaints Policy unless the complainant can reasonably demonstrate that there are factors which have not previously been considered or there are extenuating circumstances why the same issue should be re-investigated.”</p>	
2.3	<p>Landlords must accept complaints referred to them within 12 months of the issue occurring or the resident becoming aware of the issue unless they are excluded on other grounds. Landlords must consider whether to apply discretion to accept complaints made outside this time limit where there are good reasons to do so.</p>	Yes	<p>Referenced in Point 2.2.</p> <p>This is detailed in the policy.</p> <p>Section 3.1.4 of the PCHA Complaints, Feedback and Appeals refers to the Director of Operations applying discretion, to accept complaints made outside of time limits.</p>	

2.4	<p>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.</p>	Yes	<p>This is detailed in the policy.</p> <p>It is extremely rare that PCHA refuse to log a complaint. If a complaint is refused, it is for the reasons stipulated in the Policy and at the discretion of the Customer Experience Team.</p> <p>PCHA would contact customer customers, utilising preferred methods of contact where feasible, explaining why their complaint has not been accepted.</p>	
2.5	<p>Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.</p>	Yes	<p>This is detailed in Section 3.1.4 of the PCHA Complaints, Appeals and Feedback Policy:</p> <p>Similarly, PCHA will not accept escalation between Stages of the internal complaints and appeals process where 12 months or more elapses between Stages, unless extenuating circumstances can be demonstrated. If exceptions are accepted these will be at the discretion of the Director of Operations.</p>	<p>The Customer Experience Team will review each case individually considering any extenuating circumstances.</p> <p>Where these are identified PCHA may decide to work outside of the Complaints, Appeals and Feedback Policy and log a Complaint for the Customer.</p>

Section 3: Accessibility and Awareness

Code	Requirement	Compliance	Evidence	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	<p>Complaints can be made to PCHA via the following methods:</p> <p>In writing Telephoning and speaking with a member of staff.</p> <p>Passing a complaint to a member of staff during a face-to-face interaction.</p> <p>Emailing PCHA via contactus@pinecourt-housing.co.uk</p> <p>Through the customer self-service application My Account.</p> <p>Engaging with Social Media platforms.</p>	<p>PCHA accepts a complaint via a variety of channels and does not knowingly put-up any barriers.</p> <p>Furthermore, PCHA will make reasonable adjustments wherever possible, for example: accept a Complaint on behalf of a customer or only contact via a preferred method of contact where practical.</p> <p>PCHA has access to a Quality and Inclusion Lead Officer, who can help guide staff in relation to the Equality Act and reasonable adjustments.</p> <p>PCHA also have a Vulnerable Persons and Reasonable Adjustments Policy written specifically to aid fair and equitable access to services.</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	Complaints can be made in a number of different ways through various channels as detailed above in Point 3.1 and stated in the Complaints, Appeals and Feedback Policy.	PCHA utilise internal systems to share information and updates relating to complaints, to inform all staff how to accept complaints, how complaints are logged, how

				they are processed and timescales for completion.
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	<p>Complaints to PCHA decreased from 8 combined Stage 1 and 2 complaints (22/23) to 4 combined Stage 1 and 2 complaints (23/24).</p> <p>This demonstrates PCHA's complaint process is accessible and transparent.</p> <p>Staff recognise that complaints allow PCHA to make improvements regarding the services provided.</p>	
3.4	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. The policy must also be published on the landlord's website.	Yes	<p>PCHA Complaints, Appeals and Feedback Polic details the two-stage process, what will happen at each stage, and the timeframes for responding.</p> <p>The process and policy is clear and accessible on PCHA's website. The policy also details different ways to make a complaint as detailing within Point 3.1.4</p>	
3.5	The policy must explain how the landlord will publicise details of the complaints policy,	Yes	The PCHA Complaints, Appeals and Feedback Policy refers to the publishing of the Code, and Ombudsman website on a number of occasions.	<p>Detailed in Policy:</p> <p>PCHA will also share performance information with customers that</p>

	including information about the Ombudsman and this Code.		<ul style="list-style-type: none"> • Carry out a self-assessment against the 'Housing Ombudsman's Complaint Handling Code' and report findings to Board every 12 months We publish this report and the Boards response to it on the PCHA Website. • PCHA will provide the contact details for the Housing Ombudsman on its website and in all written correspondence connected with complaints handling. • PCHA will use this information to identify issues that are common to a number of customers and detail the action taken as a result in our customer newsletters and on the website. 	are engaged though any formal involvement structures and via regular reporting on its website.
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	Reasonable adjustments are stated in Section 3.13 of the PCHA Complaints, Feedback and Appeals policy. This includes using advocates and working with support agencies when investigating complaints and seeking effective resolutions.	Every complaint acknowledgement letter advises the customer that they can appoint a representative to deal with their complaint.

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	PCHA details this information within every complaint letter sent to the customer during the complaint includes details of how to contact the Housing Ombudsman should they wish to engage with the Ombudsman about their complaint.	
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Section 4: Complaint Handling Staff

Code	Requirement	Compliance	Evidence	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	PCHA utilises the Customer Experience Service within the Sovini Group. This function includes the role of Complaints Co-ordinator.	The Customer Experience Team includes the role of Complaints Co-ordinator. The Complaints Co-ordinator logs all customer complaints within Pentana, our complaints management system. The Complaints Co-ordinator also liaises with the Ombudsman and ensures complaints are reported to the governing body (or equivalent).
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	PCHA utilises the Customer Experience Service within the Sovini Group This function includes the role of Complaints Co-ordinator.	<p>The Complaint Co-ordinator has access to staff at all levels throughout the business.</p> <p>The Complaint Co-ordinator contacts all staff members and chairs meetings with staff at all levels. The Complaint Co-ordinator continually receives training, attends appropriate webinars and conferences to ensure knowledge is always kept up to date.</p> <p>The Complaint Co-ordinator shares learning and best practice with Investigating Officers and all other front-line staff.</p>

				PCHA Complaints Co-ordinator has the autonomy and authority to assist in resolving complaints fairly.
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	<p>PCHA prioritise complaint handling and embody a culture of continuous learning.</p> <p>Specifically, learning from complaints is detailed and communicated to colleagues via Complaint Service Improvement Groups Customer and Business Transformation Forums.</p> <p>Performance and corrective actions detailed in monthly Performance Meetings</p>	<p>Customer and Business Transformation Forums:</p> <p>These meetings are to review customer feedback and encourage all service areas to learn from complaints and see them as a positive experience that adds value to our organisation.</p> <p>Performance Meetings:</p> <p>An overview of our current position is given to all managers in addition to Ombudsman information. The importance of dealing with complaints correctly is discussed along with measures implemented to improve performance, including lessons learned meetings with all service areas.</p> <p>Training is attended and delivered both internally and externally to ensure continuous improvement.</p>

Section 5: The Complaint Handling Process

Code	Requirement	Compliance	Evidence	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	PCHA Complaints, Appeals and Feedback Policy	A single transparent policy is in place for dealing with complaints.
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	PCHA Complaints, Appeals and Feedback Policy	The PCHA Complaints, Feedback & Appeals policy states there are 2 Stages. All complaints are dealt with, in accordance with the policy.
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	PCHA Complaints, Appeals and Feedback Policy	The PCHA Complaints, Feedback & Appeals comprises of 2 Stages. All complaints are dealt with, in accordance with the policy.
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	PCHA Complaints, Appeals and Feedback Policy	All PCHA customers, regardless of the complaint cause (contractor, sub-contractor etc), are taken through the 2 Stage complaint process as detailed in the PCHA Complaints, Appeals and Feedback Policy
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Yes	PCHA Complaints, Appeals and Feedback Policy	All PCHA customers, regardless of the complaint cause (contractor, sub-contractor etc), are taken through the 2 Stage complaint process as detailed in the PCHA

				<p>Complaints, Appeals and Feedback Policy</p> <p>This means that the same dedicated Investigating Officers deal with all complaints in line with the Code.</p>
5.6	<p>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>	Yes	<p>All complaint acknowledgement template letters, state:</p> <p>Thank you for your recent contact regarding <details>. We understand that to resolve your complaint you are seeking <details>.</p> <p>This is then edited by the Investigating Officer to include the customers desired outcome as requested at point of Complaint capture.</p>	<p>All acknowledgement letters clearly acknowledge the customers desired complaint outcome as requested at point of Complaint capture.</p>
5.7	<p>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.</p>	Yes	<p>The Complaint Co-ordinator will manually change the complaint acknowledgement where applicable. This will be done when a complaint, or part of it, falls outside of PCHA’s responsibility.</p>	
5.8	<p>At each stage of the complaints process, complaint handlers must:</p> <ol style="list-style-type: none"> a. deal with complaints on their merits, act independently, and have an open mind; 	Yes	<p>PCHA Complaints, Appeals and Feedback Policy</p>	<p>As stated within section 2.3 of the PCHA Complaints, Appeals and Feedback Policy</p> <p>PCHA will ensure there are appropriate resources available to</p>

	<ul style="list-style-type: none"> 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>gather, analyse and act upon complaints, appeals and customer feedback intelligence.</p> <p>This aim will be achieved by: Ensuring staff are trained and regularly assessed in complaints, appeals and feedback handling, know how to access relevant procedures, provide prompt, consistent and direct responses to customers and take ownership of issues at the first point of contact.</p>
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	<p>Pine Court Housing Association (PCHA) Complaints, Appeals and Feedback Policy states,</p> <p>‘A full written response will be provided within Ten working days of the complaint being acknowledged (unless the investigation requires more time, in which case the customer(s) will be advised of the revised timescale). The customer(s) will receive a letter outlining PCHA’s response and any actions / timescales that will apply to remedy the complaint, if applicable’.</p> <p>In practice, where a complaint investigation or the actions required to bring about a successful resolution will extend beyond the prescribed response periods, PCHA will advise the customer</p>	<p>Where a longer timescale is required to respond to a complaint, the Investigating Officer will contact the resident to discuss why a longer period is required and to gain permission from the resident to extend the timescale of the complaint. Where permission is granted from the resident, a letter will be sent to confirm the details of the extension and all correspondence is added to Pentana, the complaints management system, to ensure a clear audit trail.</p>

			<p>of this potential delay, the likely timescale for completion and will ask the customer themselves the intervals at which contact should be made to keep them informed of progress. This may be daily or at longer intervals depending on the circumstances e.g. where manufactured parts have been ordered and a job time and date needs to be agreed with the customer for installation.</p> <p>The Complaints Policy also includes the following provision in the section headed, 'reasonable adjustments' – 'Allowing additional time for implementation of any reasonable adjustments in the complaints investigation process and response targets or for customers to respond and escalate between Stages (where specific needs are identified)'.</p> <p>This allows flexibility to work with individual customers' needs where longer response or investigation periods are required, as necessary. Where required, customers will again be given the choice of how and when they are updated on progress.</p>	
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,	Yes	Within the Complaints, Appeals and Feedback Policy PCHA have a section entitled 'Reasonable Adjustments' – (See Section 3.10). This outlines the	A Vulnerable Persons and Reasonable Adjustments Policy is in place to capture reasonable

	<p>as well as a record of any disabilities a resident has disclosed. Any agreed reasonable adjustments must be kept under active review.</p>		<p>approach to identifying any differential to service provision in the process of investigating and responding to complaints that is required due to a customer's characteristics or circumstances, encompassing disability but also any other reason why the service would need to be adjusted / additional support is required.</p> <p>In addition to this section within the Complaints Policy, PCHA have also introduced a linked but separate 'Vulnerable Persons and Reasonable Adjustments Policy'. This Policy outlines in greater detail how PCHA will identify, record and respond to individual customer needs and keep these requirements under review. This Policy encompasses all aspects of service and not just those in relation to complaints handling.</p> <p>PCHA also provides a 'Customer Portal' facility on its website where customers have the ability to update their own details in relation to characteristics including any disabilities and through regular contacts / interactions will also endeavour to keep these details updated at all times.</p>	<p>adjustments required by a customer.</p> <p>Reasonable adjustments is also detailed in Section 3.13 of the PCHA Complaints, Appeals and Feedback policy.</p>
5.11	Landlords must not refuse to escalate a complaint through all stages of the complaints	Yes	In compliance with Section 2 of the Housing Ombudsman's Complaints	Stages of the complaints process and refusal reasons are clearly

	<p>procedure unless it has valid reasons to do so. Landlords must clearly set out these reasons, and they must comply with the provisions set out in section 2 of this Code.</p>		<p>Handling Code, PCHA will not exclude complainants from escalating complaints in the internal process unless specific circumstances apply and each cases will be assessed on its merits.</p> <p>Examples of where PCHA may decide not to allow escalations include:</p> <ul style="list-style-type: none"> • Where the substance of the complaint is substantially different to that which was raised initially (this would normally result in a new and separate complaint(s) being opened) • Where 12 months or over has passed between requests for escalations • The issue has previously been investigated, a satisfactory response / resolution has been provided to the same complainant (unless it is proved that reason giving rise to the complaint still exists or the resolution was ineffective) • Where complainants are pursuing legal action against PCHA and court proceedings have commenced 	<p>stated with the PCHA Complaints, Appeals and Feedback Policy.</p>
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			In all of the above circumstances PCHA will act with flexibility and may choose to allow escalations where extenuating circumstances on behalf of the complainant can be proved. In all cases, PCHA will provide a written response to the complainant outlining the intended course of action and reasoning for taking this decision.	
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	Recorded within our internal complaint management system, Pentana.	All complaints stages and correspondence are held with the Pentana complaint management system. All Investigating Officers have sight of all correspondence regarding the complaint and log all interactions with the customer and correspondence sent, within Pentana, to ensure a clear audit trail.
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 provided at any stage of the complaints process without the need for escalation.	Yes	A resolution can and will be provided at any stage of PCHA's complaints handing process. PCHA's practice is to determine with the complainant or those acting on their behalf what they would like to see happen to bring about a successful resolution and this includes the initial point of contact where a complaint is first registered. Where it is not possible to provide the appropriate remedy / resolution at the first point of contact, PCHA will always	

			endeavour to reach this point as soon as is practically possible, without the need for complaints escalations.	
5.14	Landlords must have policies and procedures in place for managing unacceptable behaviour from residents and/or their representatives. Landlords must be able to evidence reasons for putting any restrictions in place and must keep restrictions under regular review.	Yes	<p>Alongside its 'Complaints, Appeals and Feedback Policy' PCHA operates an 'Unacceptable Behaviour Policy' which outlines the provisions it has in place for dealing with unacceptable behaviour from customers or their representatives.</p> <p>This includes behaviour which falls below the definitions and responses required for dealing with anti-social behaviour or any form of harassment or abuse.</p> <p>The Unacceptable Behaviour Policy outlines the circumstances in which PCHA will enact measures which may alter or restrict access to services, how it arrives at these decisions and how this will be kept under review.</p>	<p>As referenced within the Policy:</p> <p>Where PCHA believes complaints are being made in an unacceptable way such as persistent, vexatious or malicious complaints, it may manage the complaints outside of formal timescales and may invoke its Unacceptable Behaviour Policy.</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	To ensure the measures which are contained within the Unacceptable Behaviour Policy are proportionate, fair and in line with Equality Act requirements, a panel involving appropriately trained staff with management responsibility will convene to make any decisions /	<p>As referenced within points 3.1.5 within the policy:</p> <p>Where PCHA believes complaints are being made in an unacceptable way such as persistent, vexatious or malicious complaints, it may manage the</p>

			<p>actions to be instigated, the time periods they will apply and how they will be reviewed. This will involve an assessment of the individual characteristics and circumstances of each customer that may be subject to the provisions contained within the Policy.</p> <p>Regardless of any actions that are applied through application of this Policy, PCHA will ensure all customers maintain access to essential services at all times.</p>	<p>complaints outside of formal timescales and may invoke its Unacceptable Behaviour Policy. This may allow PCHA to liaise with external support agencies such as the Housing Ombudsman and consider the best course of action to resolve a complaint. Where this happens, PCHA will write to the complainant advising of their decision and what that means for their contact with the organisation. Where a customer has raised multiple complaints or appeals, a customer may be designated a single point of contact to ensure consistency.</p>
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Section 6: Complaints Stages

Stage 1:

Code	Requirement	Compliance	Evidence	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	PCHA's complaints are triaged by the Complaints Co-ordinator and where immediate action is required, the relevant departments are contacted to address the points quickly. E.g. if a health and safety concern or safeguarding concern is reported as part of the complaint.	
6.2	Complaints must be acknowledged, defined and logged at stage 1 of the complaint's procedure <u>within five working days of the complaint being received</u> .	Yes	PCHA's target times for acknowledging complaints received at stage 1 is Five days, as per Complaints Handling Code requirements.	All complaints are logged on Pentana within 5 working days by the Customer Experience Team. Each log details how the complaint was received and the complaint due date.
6.3	Landlords must issue a full response to stage 1 complaints <u>within 10 working days</u> of the complaint being acknowledged.	Yes	PCHA's target times for providing a full response to stage 1 complaints is within 10 working days of the complaint being acknowledged, as per Complaints Handling Code requirements.	A full response is issued to Stage 1 complaints within 10 working days of the complaint being acknowledged. Response times are illustrated within the policy.
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	Yes	Where it is necessary to extend the period for response to a complaint, PCHA will keep the complainant informed and provide a full explanation for any delay. Where it is envisaged that this delay will be substantial, PCHA will	Where a longer timescale is required to respond to a complaint the Investigating Officer will contact the resident to discuss why a longer time frame is required and to gain permission

	reason(s) must be clearly explained to the resident.		seek to reach a reasonable agreement with the complainant, the intervals and means by which they should be kept informed, where it is practical do so.	from the resident to extend the timescale of the complaint. Where permission is granted from the resident, a letter will be sent to confirm the extension and all correspondence is added to Pentana, the complaints management system to ensure a clear audit trail.
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	All PCHA's Complaint Letter templates, including those informing customers about an extension have been updated to include Housing Ombudsman 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 must still be tracked and actioned promptly with appropriate updates provided to the resident.	Yes	PCHA demonstrate this via our Complaint Handling Process.	Outstanding actions are collated and reviewed to ensure all actions have been completed in-line with what was advised in the Complaint outcome letter.
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	All PCHA complaints decisions include a breakdown of all points raised, reference internal Policies where appropriate and meet all legal requirements. A sample of anonymised complaints responses are regularly reviewed by customer representatives to ensure quality and accuracy remains high at all times and staff responding to	

			complaints have received specialist training which is periodically refreshed.	
6.8	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. 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.	Yes	<p>In compiling responses to complaints and during investigation processes, PCHA will consider all relevant and related factors and will group these together to save the customer having to make numerous individual complaints.</p> <p>Where new elements are raised, which would result in a substantially different resolution than would have been offered initially, a new complaint will be opened and the customer will be informed of all separate complaints which are logged and the reasoning behind this.</p>	
6.9	<p>Landlords must confirm the following in writing to the resident at the completion of stage 1 in clear, plain language:</p> <ol 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>At completion of Stage 1, PCHA will confirm in writing, in clear, plain language:</p> <ul style="list-style-type: none"> • the complaint stage; • the complaint definition; • the decision on the complaint; • the reasons for any decisions made; • the details of any remedy offered to put things right; • details of any outstanding actions; and 	

			details of how to escalate the matter to stage 2 if the individual is not satisfied with the response.	
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Stage 2

Code	Requirement	Compliance	Evidence	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	PCHA Complaints, Appeals and Feedback policy	As stated within the policy: If the customer(s) is not satisfied with the outcome from Stage One they may escalate their case to Stage Two. The complaint will be acknowledged, defined and logged within Five working days and customer(s) will be advised who will be investigating. The case will be reinvestigated by an alternative member staff than dealt with the complaint at Stage One.
6.11	Requests for stage 2 must be acknowledged, defined and logged at stage 2 of the complaint's procedure within five working days of the escalation request being received.	Yes	PCHA Complaints, Appeals and Feedback policy	As stated within the Policy; The complaint will be acknowledged, defined and logged within Five working days and customer(s) will be advised who will be investigating.
6.12	Residents must not be required to explain their reasons for requesting a stage 2 consideration. Landlords are expected to make reasonable	Yes	PCHA customers can escalate their complaint without providing a reason for doing so. The Investigating Officer	

	efforts to understand why a resident remains unhappy as part of its stage 2 response.		will then examine the Stage 1 complaint along with further evidence gathered at Stage 2 of the process.	
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Yes	PCHA Complaints, Appeals and Feedback policy	As stated within the Policy: The case will be reinvestigated by an alternative member staff to who dealt with the complaint at Stage One.
6.14	Landlords must issue a final response to the stage 2 within 20 working days of the complaint being acknowledged.	Yes	PCHA Complaints, Appeals and Feedback policy	As stated in the policy, After the Stage Two investigations are completed, the customer will normally receive a full reply within 20 working days of the complaint being acknowledged.
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	PCHA Complaints, Appeals and Feedback policy	A full written response will be provided (unless the investigation requires more time, in which case the customer(s) will be advised of the revised timescale). The customer(s) will receive a letter outlining PCHA's response and any actions / timescales that will apply to remedy the complaint, if applicable.
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	All PCHA Complaint letters sent to customers have been updated to include Housing Ombudsman 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.	Yes	Wherever possible, PCHA will look to provide an expedient response to all complainants detailing the actions that will be taken to bring about a	

	Outstanding actions must still be tracked and actioned promptly with appropriate updates provided to the resident.		resolution. Even when a full response has been provided, PCHA will monitor the situation until such time as all actions that are required have been completed, to ensure the resolution is satisfactory. PCHA will ensure customers are kept informed of all significant developments in a timely fashion.	
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	All our internal Complaints Investigating Officers are trained to provide detailed written responses to customer complaints, addressing each issue raised individually. This will include if an element of a complaint has been upheld or not upheld, the actions that will be /have taken place to bring about a resolution (including timescales), the reason behind each decision and where appropriate an apology for the inconvenience caused.	
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;	Yes	At the completion of Stage 2, PCHA will confirm the following in writing, in clear, plain language: <ul style="list-style-type: none">• the complaint stage;• the complaint definition;• the decision on the complaint;• the reasons for any decisions made;	

	<p>f. details of any outstanding actions; and</p> <p>g. details of how to escalate the matter to the Ombudsman Service if the individual remains dissatisfied.</p>		<ul style="list-style-type: none"> the details of any remedy offered to put things right; details of any outstanding actions; and details of how to escalate the matter to the Ombudsman Service if the individual remains dissatisfied. 	
6.20	Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.	Yes	When issuing a response at Stage 2, PCHA will ensure that appropriate staff have been informed and are aware of any actions that are required to bring about a resolution. This will include ability to authorise works / levels of expenditure that may be required, as necessary.	

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; 	Yes	PCHA Complaint handling process, letters and PCHA Complaints, Appeals and Feedback policy.	<p>All complaint closure letters address all sections as set out within the code. Remedies are tracked and reported upon to address common themes which may arise.</p> <p>Remedial actions are discussed with relevant departments and addressed through Lessons Learned meetings with teams throughout the business.</p>

	<ul style="list-style-type: none"> Amending a record or adding a correction or addendum; Providing a financial remedy; Changing policies, procedures or practices. 			<p>As referenced in point 4.5 of the policy: If staff become aware that there are problems with the effective operation of the Policy or the procedures that support it, they should complete a 'change request' within the PCHA document management system and these will be incorporated into the Policy / procedural review process.</p>
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Yes	Each complaints case is viewed on its merits and consideration will be given to the specific characteristics and circumstances of the customer(s) concerned. This will include an assessment on the levels of distress / inconvenience that are caused through any service failure alongside any out-of-pocket expenses they may have incurred. In addition to our 'Complaints, Appeals and Feedback Policy', we also operate a 'Compensation Policy' which includes flexibility to offer gestures of goodwill to compensate for any distress caused as well as compensation payments for quantifiable amounts for loss or damage, that have been proven to be caused by our actions or failure to act.	
7.3	The remedy offer must clearly set out what will happen and by when, in agreement with the	Yes	PCHA will ensure all responses to complaints include a projected timeline	

	resident where appropriate. Any remedy proposed must be followed through to completion.		and details of all actions that are required to bring about a successful resolution. Where it is not possible to provide an exact timeline for all actions, best estimates will be provided and the customer will be kept informed of any changes or significant developments as soon as is practical.	
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes	As well as closely following the Housing Ombudsman advice on 'compensation policies', PCHA will fully comply with any determinations by the Housing Ombudsman where a compensation element is recommended. PCHA also closely monitor published service failure / maladministration findings to ensure our compensation payments are commensurate with those paid out by the sector at large.	The Housing Ombudsman compensation guidelines have been added to Pentana (internal complaint management system) to ensure consistency with compensation payments offered by Investigating Officers.

Section 8: Putting things right

Code	Requirement	Compliance	Evidence	Explanation
8.1	Landlords must produce an annual complaints performance and service improvement report for scrutiny and challenge, which must include:	Yes	Annual Self-Assessment to be completed and published PCHA's on website.	

	<p>a. the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements.</p> <p>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;</p> <p>c. any findings of non-compliance with this Code by the Ombudsman;</p> <p>d. the service improvements made as a result of the learning from complaints;</p> <p>e. any annual report about the landlord's performance from the Ombudsman; and</p> <p>f. any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord.</p>		Annual Complaints Performance and Board Report.	
8.2	<p>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.</p>	Yes	Annual Complaints Performance and Service Improvement Report uploaded to website as PCHA Complaints Year-end Report.	<p>The Governing Body's response is as follows:</p> <p>The Board acknowledge a significant increase in Complaints across the Sector and support the heightened Regulatory focus on quality, assurance and accountability. The Board is pleased with the level of detail and scrutiny provided within the Year-end Complaints Report. The improvement measures, both implemented and identified help to ensure continuous learning, understanding</p>

				of customer perception and priorities, and focus on root cause analysis to enhance Customer Experience. Our customers are valued and help to shape and improve the services we deliver.
8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	Yes	PCHA will carry out a full review of all relevant policies and procedures whenever major change occurs or is proposed and would seek to involve its customers in this process, where appropriate.	
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	Yes	To ensure our self-assessment acts as a means of constant improvement and is not just a static document we would be willing to revisit and amend this based on any adverse findings following Ombudsman investigations. This would include any changes to process or learning that we would adopt to ensure any mistakes or service failure do not reoccur.	
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 may be affected, and publish this on their website Landlords must provide a timescale for returning to compliance with the Code.	Yes	PCHA has in place contingency plans which are tested and kept under regular review to ensure all relevant parties are informed of any significant break in service availability. The plans include alternative methods of service delivery that can be enacted to ensure continuity and are designed to ensure normal service delivery is resumed at the earliest possible opportunity.	In the event we are unable to comply to the code in exceptional circumstances PCHA's Marketing and Communications Business Continuity Plan and Infrastructure Business Continuity Plan would be implemented to ensure that services were resumed for customers as soon as possible.

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Section 9: Scrutiny & oversight: continuous learning and improvement

Code	Requirement	Compliance	Evidence	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	<p>PCHA utilise the Group's Quality and Assurance Co-ordinator to conduct end-to-end audits of complaints, identify lessons learned including learning from root cause analysis.</p> <p>PCHA have a Service Improvement working group dedicated to complaints to identify improvements and learning to help ensure continuous improvement.</p>	
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	<p>PCHA utilise the Group's Quality and Assurance Co-ordinator to conduct end-to-end audits of complaints, identify lessons learned including learning from root cause analysis.</p> <p>PCHA have a Service Improvement working group dedicated to complaints to identify improvements and learning to help ensure continuous improvement.</p>	
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	Yes	Annual Complaints Performance Reports are presented to PCHA Board. Additionally, the report is shared with involved tenants via the Customer	

	stakeholders, such as residents' panels, staff and relevant committees.		Empowerment Panel and published on our Website for all other 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	PCHA's Director of Operations is responsible for compliance against the Housing Ombudsman Complaint Handling Code.	
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	Steve Gow, PCHA Board Member is appointed to the Board as the Member Responsible for Complaints.	
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	Steve Gow, PCHA Board Member is appointed to the Board as the Member Responsible for Complaints. This person has access to suitable information and staff to perform this role and report on their findings.	
9.7	As a minimum, the MRC and the governing body (or equivalent) must receive: <ul style="list-style-type: none"> a. regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance; b. regular reviews of issues and trends arising from complaint handling; c. regular updates on the outcomes of the Ombudsman's investigations and progress 	Yes	Year-end and Mid-year Complaints Performance Reports are presented to PCHA Board. The Complaints Performance Reports include regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance. They also include regular reviews of issues and trends arising	

	<p>made in complying with orders related to severe maladministration findings; and</p> <p>d. annual complaints performance and service improvement report.</p>		<p>from complaint handling, regular updates on the outcomes of the Ombudsman’s investigations and progress made in complying with orders related to severe maladministration findings; and annual complaints performance and service improvement report.</p> <p>Additionally, PCHA Board review quarterly performance updates and associated improvements actions where complaint performance is Scrutinised.</p>	
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> <p>a. have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments;</p> <p>b. take collective responsibility for any shortfalls identified through complaints, rather than blaming others; and</p> <p>c. act within the professional standards for engaging with complaints as set by any relevant professional body.</p>	Yes	<p>The opening Four clauses of our ‘Complaints, Appeals and Feedback Policy’ (1.1 – 1.4) set out what we want to achieve through operation of the Policy and our approach to complaints in general. This includes commitments to ‘meeting or exceeding customer expectations’, ‘continuously improving’, ‘acting quickly and learning from mistakes’, ‘keeping customers informed of actions’, ‘realising we don’t always get things right’ and ‘ensuring fairness in service delivery’.</p> <p>We have taken a number of steps to work towards implementing the draft requirements of the ‘Competency and Conduct Standard’ of the Regulatory</p>	

			framework for social housing providers, ahead of its official commencement date. This includes a developing a Code of Conduct applicable to all staff that encourages respect for customers and professional behaviours in all interactions and areas of service delivery.	
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