

Complaint Handling Self-Assessment: 2026-27

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 1.6.1 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's Complaints, Appeals & Feedback Policy has been reviewed and updated to align with the Housing Ombudsman Complaint Handling Code definition of a complaint. The CRM system has also been updated to include direct links to the revised policy, supporting consistent access and application by colleagues when recording and managing complaints.
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 1.6.1 of the PCHA Complaints Appeals & Feedback Policy. Policy Extract: For the purposes of this Policy the following definitions will apply:	Definitions are set out within PCHA's Complaints, Appeals & Feedback Policy. Frontline staff also receive training to ensure they recognise and accept all expressions of customer

	third party or representative must be handled in line with the landlord's complaints policy.		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. General Appeal – this is an appeal about general service provision where a decision has been made that the customer does not agree with. Statutory Appeal – this is where the right to appeal is outlined in legislation or regulation – details given in Section 3.4 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 dissatisfaction (see definition of	dissatisfaction; however, they are communicated.
--	--	--	---	--

			complaint above). All requests for service will be recorded and actioned, as appropriate Feedback – will be defined as ‘any method whereby customers can express their views on how PCHA delivers its services’	
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	As above Section 1.6.1 of the PCHA Complaints, Appeals and Feedback Policy details the difference between a complaint and a request for service. All requests for service will be recorded and actioned, as appropriate	
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	All complaints captured are recorded by the complaint handling function. This does not halt any efforts to address a request for service. Section 3.1.12.4 of the PCHA Complaints, Appeals & Feedback Policy states: 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.	The policy is available to customers and employees to ensure transparency and consistent understanding.
1.6	An expression of dissatisfaction with services made through a survey is not defined as a	Yes	Outbound Survey Assistants who conduct Tenant Satisfaction Surveys	

	complaint, though wherever possible, the person completing the survey should be made aware of how they can pursue a complaint if they wish to. Where landlords ask for wider feedback about their services, they also must provide details of how residents can complain.		have been provided with guidance on how customers can make a formal complaint if they are dissatisfied with the service they have received. They are equipped to record complaints directly and liaise with the complaint handling function where required. Where surveys are completed through digital channels, customers are also provided with a link to raise a complaint, ensuring they have clear and accessible routes to express dissatisfaction.	
--	--	--	---	--

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	Section 3.1.8 of the PCHA Complaints, Appeals and Feedback Policy states: 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 that there may be ongoing / unresolved issues. Section 3.1.10 of the PCHA Complaints, Appeals and Feedback Policy states: 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. Section 3.1.12.3 of the PCHA Complaints, Appeals and Feedback Policy states:	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 Operations Director. PCHA would contact customers, utilising their preferred methods of contact where feasible, explaining why their complaint has not been accepted.

			Only when court proceedings have commenced that PCHA may need to suspend or cease its internal investigation processes (this involves filing details of the claim, such as the Claim Form and Particulars of Claim, at court). Point 3.1.12.4 further explains: 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.	
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	Section 3.1.4.4 of the PCHA Complaints, Feedback and Appeals Policy States: 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. Stage One and Two of the complaint and general appeals process are also available in cases of collective disputes.	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 Operations Director. PCHA would contact customers, utilising their preferred methods of contact where feasible, explaining why their complaint has not been accepted.

			Stage One and Two of the complaint 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 as per point 3.3. The general appeals process will be available to all parties, with whom there is a connection and associated impact in the delivery PCHA services. 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 that there may be ongoing / unresolved issues. 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 Operations Director.	
--	--	--	---	--

			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."	
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	Referenced in Point 2.2. This is detailed in the policy. Sections 3.1.8 and 3.1.9 of the PCHA Complaints, Feedback and Appeals refers to the complaint handling function applying discretion/making exceptions, to accepting complaints made outside of time limits.	
2.4	If a landlord decides not to accept a complaint, an explanation must be provided to the resident setting out the reasons why the matter is not suitable for the complaints process and the right to take that decision to the Ombudsman. If the Ombudsman does not agree that the exclusion has been fairly applied, the Ombudsman may tell the landlord to take on the complaint.	Yes	This is detailed in the policy. 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 Operations Director. PCHA would contact customers utilising preferred methods of contact where	Where PCHA decides not to accept a complaint, the customer will be provided with a clear explanation setting out the reasons for the decision in line with exclusions detailed within the Complaints, Appeals and Feedback Policy. The customer will also be advised of their right to contact the Housing Ombudsman if they wish to

			feasible, explaining why their complaint has not been accepted.	challenge PCHA's decision. Where the Housing Ombudsman instructs PCHA to accept the complaint, PCHA will comply with the instruction.
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Yes	This is detailed in Section 3.1.8 of the PCHA Complaints, Appeals and Feedback Policy: Similarly, Section 3.1.9, of the PCHA Complaints, Appeals and Feedback Policy 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 Operations Director.	The complaint handling function will review each case individually considering any extenuating circumstances. Where these are identified, PCHA may decide to work outside of the Complaints, Appeals and Feedback Policy and log a Complaint for the Customer.

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	Complaints can be made to PCHA by: Telephone on 0151 709 6878; In person to any PCHA staff member; by email to: contactus@pinecourt-housing.co.uk	PCHA accepts a complaint via a variety of channels and does not knowingly put-up any barriers. Furthermore, PCHA will make reasonable adjustments wherever possible, for example: accept a Complaint on behalf of a

			In writing to: Pine Court Housing Association PO Box 891 Orpington BR6 1LY as set out in section 2.2 of the policy. Engaging with Social Media platforms.	customer or only contact via a preferred method of contact where practical. PCHA has a Vulnerable Persons and Reasonable Adjustments Policy written specifically to aid fair and equitable access to services.
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 uses internal communication systems to share information and updates relating to complaints, ensuring all staff understand how to receive, record, and process complaints, including the relevant timescales for resolution. The Complaints Policy is reviewed regularly, and both staff and customers are consulted as part of the review process to ensure it remains effective, accessible, and reflects current best practice.
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	Yes	PCHA monitors complaint volumes and trends as part of its performance framework. During 2025-26 PCHA closed ten Stage 1 and Stage 2 complaints. Complaint volumes are	

	potentially a sign that residents are unable to complain.		considered alongside accessibility, customer feedback and service learning, rather than being viewed negatively. These volumes demonstrate that PCHA's complaint process is accessible and transparent. PCHA promotes a positive complaints culture, with staff recognising that complaints provide valuable insight into the customer experience and opportunities to learn, improve services, and prevent similar issues from recurring.	
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	PCHA's Complaints, Appeals and Feedback Policy provides clear information on the two-stage complaints process, detailing the actions taken at each stage and the associated response timescales. The policy is readily accessible via the PCHA website and outlines the range of methods available for customers to make a complaint, as detailed in section 3.1, ensuring complaints can be raised through channels that meet customers' needs.	

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	The PCHA Complaints, Appeals and Feedback Policy refers to the publishing of the Code, and Ombudsman website on several occasions. Carry out a self-assessment against the 'Housing Ombudsman's Complaint Handling Code' and report the findings to Board every 12 months. PCHA publishes its Complaint Handling Code self-assessment and the Board's response on its website, providing customers with visibility of our compliance with the Code and our approach to continuous improvement. PCHA provides the contact details for the Housing Ombudsman on its website and in all written correspondence connected with complaints handling. PCHA analyses complaint and feedback data to identify recurring themes, trends, and issues affecting multiple customers. Learning from complaints is used to drive service improvements, with actions taken and resulting outcomes communicated to customers through newsletters, website updates, and other appropriate communication channels.	Detailed in Policy: PCHA shares complaint handling performance information with customers through its formal customer engagement and scrutiny structures, as well as through regular reporting on its website. This ensures customers are informed about complaint performance, service improvements, and the actions taken in response to customer feedback and learning from complaints.

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 set out in sections 3.9.1 to 3.9.8 of the PCHA Complaints, Appeals and Feedback Policy. This includes using advocates and working with support agencies when investigating complaints and seeking effective resolutions.	All complaint acknowledgement correspondence informs customers of their right to appoint a representative or advocate to act on their behalf throughout the complaints process, ensuring complaints remain accessible and inclusive for all customers.
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 complaint response letters that are sent to the customer during the complaint. The letters include details of how to contact the Housing Ombudsman should they wish to engage with the Ombudsman about their complaint. This is also detailed in the policy.	

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's complaint handling function is responsible for overseeing and supporting the effective management of complaints across the organisation. The service promotes a positive complaint handling culture, provides guidance and oversight to colleagues, and ensures complaints are managed consistently, fairly, and in line with the requirements of the Housing Ombudsman's Complaint Handling Code.	PCHA's complaint handling function provides oversight and coordination of complaint handling across the organisation. The team is responsible for ensuring complaints are appropriately recorded and monitored through the complaints management system, supporting colleagues to deliver effective complaint responses, liaising with the Housing Ombudsman Service where required, and providing regular complaint performance and learning reports to the governing body.
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's complaint handling function provides the expertise, oversight and resources necessary to support effective complaint handling. The service works collaboratively with operational teams to ensure complaints are managed fairly, lessons are learned, and opportunities for service improvement are identified and acted upon.	PCHA's complaint handling function has access to colleagues and managers at all levels across the organisation, enabling effective oversight and support of complaint handling. The team works collaboratively with service areas to facilitate the resolution of complaints, promote a positive complaint

				handling culture, and embed learning from customer feedback. The complaint handling function maintains up-to-date knowledge of complaint handling best practice through ongoing professional development, including training, webinars, and sector engagement. Learning from complaints, Ombudsman decisions, and emerging good practice is shared across the organisation to support continuous improvement and enhance complaint handling standards. The team has the authority and organisational support required to challenge processes, influence service improvements, and promote fair and effective complaint resolution for customers.
--	--	--	--	---

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	PCHA prioritise complaint handling and embody a culture of continuous learning. Specifically, learning from complaints is detailed and communicated to colleagues via Monthly Complaints Performance Meetings, Complaint Service Improvement Groups and Customer and Business Transformation Forums. Performance and corrective actions are also detailed in monthly Performance Meetings.	Customer and Business Transformation Forums: 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. Complaints Performance Meetings: Managers receive regular updates on complaint handling performance, Housing Ombudsman determinations and emerging best practice. Learning from complaints is actively promoted through performance reporting and lessons learned sessions with service areas, ensuring opportunities for improvement are identified, acted upon and embedded to enhance customer outcomes. PCHA delivers regular complaint handling training to investigating officers through both internal and external learning opportunities. This ensures staff remain knowledgeable about the Complaint Handling Code,
-----	---	-----	---	---

				complaint handling best practice, and lessons learned, supporting continuous improvement in complaint resolution and customer outcomes.
--	--	--	--	---

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	PCHA has a single, transparent and accessible policy for the management of complaints, ensuring a consistent and customer-focused approach to complaint handling across the organisation.
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	PCHA's Complaints, Feedback and Appeals Policy sets out a clear two-stage complaints process in line with the Housing Ombudsman's Complaint Handling Code. All complaints are managed consistently and fairly in accordance with the requirements of the policy, ensuring customers receive a

				transparent and effective complaints service.
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	PCHA operates a two-stage complaints process, as detailed within its Complaints, Feedback and Appeals Policy. Complaints are handled in line with the policy requirements, ensuring compliance with the Housing Ombudsman's Complaint Handling Code and providing customers with a clear and consistent route to resolution.
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	PCHA applies its two-stage complaints process to all complaints, irrespective of the service area or third-party provider involved. Complaints are investigated by PCHA Investigating Officers and handled in line with the Complaints, Appeals and Feedback Policy, ensuring accountability for complaint resolution and compliance with the Housing Ombudsman's Complaint Handling Code.
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	PCHA applies its two-stage complaints process to all complaints, irrespective of the service area or third-party

				provider involved. Complaints are investigated by PCHA Investigating Officers and handled in line with the Complaints, Appeals and Feedback Policy, ensuring accountability for complaint resolution and compliance with the Housing Ombudsman's Complaint Handling Code.
5.6	When a complaint is logged at Stage 1 or escalated to Stage 2, landlords must set out their understanding of the complaint and the outcomes the resident is seeking. The Code will refer to this as "the complaint definition". If any aspect of the complaint is unclear, the resident must be asked for clarification.	Yes	All complaint acknowledgement template letters, state: Thank you for your recent contact regarding <details>. We understand that to resolve your complaint you are seeking <details>. This is then edited by the Investigating Officer to include the customers desired outcome as requested at point of Complaint capture.	Complaint acknowledgement correspondence confirms the issues raised and records the customer's desired outcome, ensuring there is a shared understanding of the complaint and the resolution the customer is seeking from the outset of the process.
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	PCHA ensures that customers are provided with a clear understanding of the scope of their complaint from the outset. Where any aspect of a complaint is not the responsibility of PCHA, this is clearly communicated in the complaint acknowledgement, along with an explanation of what elements will be considered as part of the investigation.	

5.8	At each stage of the complaints process, complaint handlers must: a. deal with complaints on their merits, act independently, and have an open mind. b. give the resident a fair chance to set out their position. c. take measures to address any actual or perceived conflict of interest; and d. consider all relevant information and evidence carefully.	Yes	PCHA Complaints, Appeals and Feedback Policy	As stated within section 2.3.1 of the PCHA Complaints, Appeals and Feedback Policy: PCHA will ensure there are appropriate resources available to gather, analyse and act upon complaints, appeals and customer feedback intelligence. 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.
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	Pine Court Housing Association (PCHA) Complaints, Appeals and Feedback Policy states, ‘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	In exceptional circumstances where additional time is required to complete a complaint investigation, PCHA contacts the customer to explain the reasons for the delay, provide regular updates, and confirm a revised response timescale in line with the Housing Ombudsman’s Complaint Handling Code.

			actions / timescales that will apply to remedy the complaint, if applicable’. In practice, where a complaints investigation or the actions required to bring about a successful resolution will extend beyond the prescribed response periods, PCHA will advise the customer 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 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. 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)’. 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.	
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	Within the Complaints, Appeals and Feedback Policy PCHA have a section entitled 'Reasonable Adjustments' – (See sections 3.9.1 to 3.9.8). This outlines the 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. 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.	PCHA has arrangements in place to identify and implement reasonable adjustments for customers who require additional support. These arrangements are detailed within the Vulnerable Persons and Reasonable Adjustments Policy and are reinforced within the Complaints, Appeals and Feedback Policy to ensure the complaints process remains accessible and inclusive. Reasonable adjustments are detailed in sections 3.9.1 to 3.9.8 of the PCHA Complaints, Appeals and Feedback Policy.
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.	Yes	In compliance with Section 2 of the Housing Ombudsman's Complaints Handling Code, PCHA will not exclude	The Complaints, Appeals and Feedback Policy clearly outlines the stages of the complaints

	Landlords must clearly set out these reasons, and they must comply with the provisions set out in section 2 of this Code.		complainants from escalating complaints in the internal process unless specific circumstances apply and each case will be assessed on its merits. Examples of where PCHA may decide not to allow escalations include: • 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 In all the above circumstances PCHA will act with flexibility and may choose to allow escalations where extenuating	process and any circumstances where a complaint may not be accepted, ensuring a transparent and consistent approach to complaint handling.
--	---	--	---	--

			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 stages of the complaint process and associated correspondence are managed through PCHA's complaint management system, Pentana. The system provides a centralised record of complaints, enabling Investigating Officers to access relevant information, track progress and maintain a complete audit trail. Information, evidence and specialist input from service areas across the organisation are recorded within Pentana, ensuring complaints are fully informed, appropriately investigated and supported by accurate and comprehensive records.
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	Yes	A resolution can and will be provided at any stage of PCHA's complaints handling 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	

	at any stage of the complaints process without the need for escalation.		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	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. This includes behaviour which falls below the definitions and responses required for dealing with anti-social behaviour or any form of harassment or abuse. 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.	As referenced within the Policy: 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.
5.15	Any restrictions placed on contact due to unacceptable behaviour must be proportionate	Yes	To ensure the measures which are contained within the Unacceptable	As referenced within points 3.1.4.1-3.1.4.3 within the policy:

	and demonstrate regard for the provisions of the Equality Act 2010.		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 / 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. Regardless of any actions that are applied though application of this Policy, PCHA will ensure all customers always maintain access to essential services.	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. 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.
--	---	--	---	---

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 complaint handling function undertakes an initial assessment of all complaints to identify any urgent risks or actions required. Where complaints raise health and safety, safeguarding, or other time-sensitive concerns, these are immediately escalated to the appropriate service area to ensure prompt intervention and customer safety, independent of the formal complaint investigation.	PCHA Investigating Officers seek to resolve complaints at the earliest opportunity, providing prompt and fair outcomes for customers. Where appropriate, this may include an explanation, an apology, immediate corrective action, or another suitable resolution aimed at addressing the issues raised and improving the customer's experience.
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 One is Five working days, as per Complaints Handling Code requirements.	All complaints are logged on Pentana within five working days by the complaint handling function. Each complaint 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	Yes	Where it is necessary to extend the period for response to a complaint, PCHA will keep the complainant	In exceptional circumstances where additional time is required to complete a complaint

	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.		informed and provide a full explanation for any delay. Where it is envisaged that this delay will be substantial, PCHA will 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.	investigation, PCHA contacts the customer to explain the reasons for the delay, provide regular updates, and confirm a revised response timescale in line with the Housing Ombudsman's Complaint Handling Code.
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 complaint letter templates 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	Complaint responses clearly address each aspect of the complaint and explain the outcome reached, supported by relevant evidence, policy references and legislative or regulatory requirements where appropriate. Responses are structured to ensure customers understand how decisions have been made and the reasons for those decisions. To maintain quality and consistency, anonymised complaint responses are subject to regular quality assurance and	

			scrutiny. Customer representatives review sample responses to provide feedback on clarity, fairness and customer focus, while colleagues responsible for investigating and responding to complaints receive regular training and refresher sessions to ensure complaint handling standards remain high and aligned with best practice.	
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	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. 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.	
6.9	Landlords must confirm the following in writing to the resident at the completion of stage 1 in clear, plain language: - the complaint stage. - the complaint definition. - the decision on the complaint. - the reasons for any decisions made.	Yes	At completion of Stage 1, PCHA will confirm in writing, in clear, plain language: - the complaint stage. - the complaint definition. - the decision on the complaint.	

	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.		- the reasons for any decisions made. - the details of any remedy offered to put things right. - details of any outstanding actions. - details of how to escalate the matter to stage 2 if the individual is not satisfied with the response.	
--	---	--	--	--

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 has been assigned as the Investigating Officer for their complaint. The case will be reviewed by an alternative member of 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 efforts to understand why a resident remains unhappy as part of its stage 2 response.	Yes	PCHA customers can escalate their complaint without providing a reason for doing so. The Investigating Officer will then examine the Stage One complaint along with further evidence gathered at Stage Two 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 <u>within 20 working days</u> 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. Outstanding actions must still be tracked and actioned promptly with appropriate updates provided to the resident.	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 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 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 / has 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: - 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 the Ombudsman Service if the individual remains dissatisfied.	Yes	At the completion of Stage Two, PCHA will confirm the following in writing, in clear, plain language: - 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 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 Two, 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 the 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	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 a 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	PCHA Complaint handling process, letters and PCHA Complaints, Appeals and Feedback policy.	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. Remedial actions are discussed with relevant departments and addressed through Lessons Learned meetings with teams throughout the business. 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.

7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Yes	Each complaint is assessed on its own merits, with consideration given to the individual circumstances of the customer and the impact of any identified service failure. PCHA's Complaints, Appeals and Feedback Policy and Compensation Policy support the provision of fair and proportionate remedies, including apologies, corrective actions and compensation where appropriate, taking account of distress, inconvenience and any evidenced financial loss.	
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	PCHA ensures that complaint responses clearly set out any actions required to achieve the agreed resolution, together with associated timescales or target completion dates where these are known. Where an exact timescale cannot be confirmed, customers are provided with the best available information and kept informed of progress, changes, and significant developments throughout the resolution process. All outstanding actions arising from complaints are monitored and tracked through to completion to ensure commitments are delivered and resolutions are fully implemented.	

7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes	PCHA's approach to remedies and compensation is guided by the Housing Ombudsman's Complaint Handling Code, the Ombudsman's guidance on remedies, and PCHA's Compensation Policy. Where service failures are identified, appropriate remedies are offered that are proportionate to the impact experienced by the customer. PCHA fully complies with Housing Ombudsman orders and recommendations and regularly reviews Ombudsman determinations, sector learning and emerging best practice to ensure compensation awards and other remedies remain fair, consistent and aligned with recognised standards.	PCHA determines remedies and compensation in line with its Compensation Policy, the Housing Ombudsman's Complaint Handling Code, and the Housing Ombudsman's guidance on remedies and compensation. To promote consistency, fairness and transparency, PCHA has developed a Compensation Calculator which is aligned to the Ombudsman's remedies guidance and supports the assessment of factors such as service failure, loss of amenity, distress and inconvenience, and customer vulnerability. Compensation awards are considered on a case-by-case basis, taking account of the individual circumstances and impact experienced by the customer. PCHA also reviews Housing Ombudsman determinations, sector learning and emerging best practice to ensure remedies remain proportionate, customer-focused and compliant with current expectations
-----	--	-----	--	---

--	--	--	--	--

Section 8: Self-assessment, reporting and compliance

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: 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 publications produced by the Ombudsman in relation to the work of the landlord.	Yes	Annual Self-Assessment to be completed and published on PCHA website. Annual Complaints Performance and Board Report.	
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	Annual Complaints Performance and Service Improvement Report uploaded to website as PCHA Complaints and Customer Insight Report.	Board's response to the report is uploaded to the section of the website relating to complaints.

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. PCHA regularly reviews its complaints-related policies and procedures to ensure they remain effective, accessible and aligned with the Housing Ombudsman's Complaint Handling Code, legislative requirements and sector best practice. Where significant changes are proposed or identified, a full review is undertaken, and customers and colleagues are consulted as appropriate to help shape and improve the approach to complaint handling.	
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.

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	PCHA utilise a Customer Experience Lead to conduct end-to-end audits of complaints and identify lessons learned including learning from root cause analysis. Complaint trends, learning and improvement actions are reviewed through PCHA governance and performance arrangements to support continuous improvement.	
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	PCHA promotes a positive complaint handling culture and uses complaints as a source of intelligence to identify learning, recurring themes and opportunities for service improvement. Complaint trends, learning and improvement actions are reviewed through PCHA governance and performance arrangements to support continuous 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	Yes	Year-end and Mid-year Complaints Performance Reports are presented to PCHA Board. Additionally, PCHA Board review quarterly performance updates	

	stakeholders, such as residents' panels, staff and relevant committees.		and associated improvements actions where complaint performance is Scrutinised. PCHA host quarterly Service Review Group Meetings with involved customers, giving residents the chance to scrutinise our Service Offers and Performance, including Complaints and the opportunity to challenge Service Area leads and associated improvement actions.	
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 Operations Director 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	PCHA appoints a Board Member as its Member Responsible for Complaints, described in section 2.1 of the policy as the designated Complaints Champion.	
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	Yes	PCHA appoints a Board Member as its Member Responsible for Complaints, described in section 2.1 of the policy as the designated Complaints Champion. This person has access to suitable	

	information and staff to perform this role and report on their findings.		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: a. regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance. b. regular reviews of issues and trends arising from complaint handling. c. regular updates on the outcomes of the Ombudsman's investigations and progress made in complying with orders related to severe maladministration findings; and d. annual complaints performance and service improvement report.	Yes	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 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. Additionally, PCHA Board review quarterly performance updates and associated improvements actions where complaint performance is Scrutinised.	
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,	Yes	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	

	working with colleagues across teams and departments. b. take collective responsibility for any shortfalls identified through complaints, rather than blaming others; and c. act within the professional standards for engaging with complaints as set by any relevant professional body.		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'. We have taken a number of steps to work towards implementing the draft requirements of the 'Competency and Conduct Standard' of the Regulatory 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. In addition, PCHA is embedding the principles of the National Housing Federation (NHF) Code of Conduct across the organisation to further strengthen professional standards and customer-focused service delivery. The Code sets clear expectations in relation to integrity, accountability, respect, openness and professionalism, and applies to all colleagues involved in delivering services to customers. PCHA will also adopt the principles of the	
--	--	--	---	--

			Code within its customer involvement and scrutiny arrangements, ensuring involved customers are supported to work collaboratively, constructively and respectfully when influencing services, reviewing performance and scrutinising organisational decision-making.	
--	--	--	--	--