



PPHA.

Annual Complaints
Self-Assessment



Park Properties
Housing Association
part of

 **HSPG**
INSPIRED BY YOU

Appendix A: Self-assessment form

This self-assessment form should be completed by the complaints officer and it must be reviewed and approved by the landlord's governing body at least annually.

Once approved, landlords must publish the self-assessment as part of the annual complaints performance and service improvement report on their website. The governing body's response to the report must be published alongside this.

Landlords are required to complete the self-assessment in full and support all statements with evidence, with additional commentary as necessary.

We recognise that there may be a small number of circumstances where landlords are unable to meet the requirements, for example, if they do not have a website. In these circumstances, we expect landlords to deliver the intentions of the Code in an alternative way, for example by publishing information in a public area so that it is easily accessible.

Section 1: Definition of a complaint

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
1.2	A complaint must be defined as: <i>‘an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the landlord, its own staff, or those acting on its behalf, affecting a resident or group of residents.’</i>	Yes	See attached complaints policy	When a resident expresses dissatisfaction, PPHA provide them with the choice to make a complaint. Our approach to dealing with an expression of dissatisfaction, is reflected within our complaints policy and ongoing staff training. If an expression of dissatisfaction is made through a response to a customer survey, the customer is made aware of how to raise a complaint if they wish to.
1.3	A resident does not have to use the word ‘complaint’ for it to be treated as such. Whenever a resident expresses dissatisfaction landlords must give them the choice to make complaint. A complaint that is submitted via a third party or representative must be handled in line with the landlord’s complaints policy.	Yes	See attached complaints policy	PPHA customer facing teams are made aware that customers expressing dissatisfaction must be given the choice to make a complaint. A complaint submitted via our 3 rd party partners are handled in line with our complaints policy.

1.4	Landlords must recognise the difference between a service request and a complaint. This must be set out in their complaints policy. A service request is a request from a resident to the landlord requiring action to be taken to put something right. Service requests are not complaints, but must be recorded, monitored and reviewed regularly.	Yes	See attached complaints policy	PPHA complaints policy provides clear examples of the scenarios which we will treat as a complaint, feedback and a service request. The complaints policy guides our teams to recognise the difference between a service request and a complaint.
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	See attached complaints policy	If a customer is dissatisfied with how we have handled a service request, PPHA customer facing teams are equipped to direct the customer with how to raise a complaint to address their dissatisfaction.
1.6	An expression of dissatisfaction with services made through a survey is not defined as a complaint, though wherever possible, the person completing the survey should be made aware of how they can pursue a complaint if they wish to. Where landlords ask for wider feedback about their services, they also must provide details of how residents can complain.	Yes	See attached complaints policy	PPHA customer facing teams are made aware that customers expressing dissatisfaction within a survey must be provided with guidance of how to make a complaint. This is also reflected within PPHA complaints policy.

Section 2: Exclusions

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
2.1	Landlords must accept a complaint unless there is a valid reason not to do so. If landlords decide not to accept a complaint they must be able to evidence their reasoning. Each complaint must be considered on its own merits	Yes	See attached complaints policy	PPHA's complaints policy provides clear guidance to customer facing teams to outline the limitations and exceptions of the complaints procedure. Teams can use the policy to guide the specific circumstances within which a complaint will not be accepted, along with ensuring complaints are considered on their individual merits. This is also addressed in staff training.
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:	Yes	See attached complaints policy	PPHA complaints policy clearly sets out the required circumstances in which a complaint will not be considered which reflects the guidance provided in the Regulators code.

	• 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.			
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	See attached complaints policy	PPHA complaints policy clearly guides our customer facing teams that complaints presented with 12 months of the matter arising will be considered.
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	See attached complaints policy	If PPHA decide not to accept a complaint, an explanation is provided to the resident setting out the reasons why the matter is not suitable to be considered within the complaints procedure. This guidance is provided to

				customer facing teams within the complaints policy.
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Yes	See attached complaints policy	PPHA aim to ensure that all complaints will be handled fairly being consistent in our approach, considering the facts of each case, the individuals' circumstances and listening openly without bias or prejudice regardless of background, appearance, age, beliefs or lifestyle. This approach is reflected within our complaints policy and staff training.

Section 3: Accessibility and Awareness

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
3.1	Landlords must make it easy for residents to complain by providing different channels through which they can make a complaint. Landlords must consider their duties under the Equality Act 2010 and anticipate the needs and	Yes	See attached complaints policy	PPHA does not place any restriction on the methods that can be used by residents to make a complaint and will accept complaints by phone, email,

	reasonable adjustments of residents who may need to access the complaints process.			or in writing. We have recently developed a new website offering an additional route for customers to access PPHA complaints procedure.
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	See attached complaints policy	PPHA staff are trained and equipped to receive and record complaints in accordance with the complaints policy and Regulator Code.
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	See attached complaints log	Complaints are monitored on a monthly basis as part of PPHA's KPI reporting. The focus is on the outcome, resolution and lessons learned as opposed to volumes raised and closed. We value feedback from our customers and learn from the complaints that we receive.
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	See attached complaints policy	Our complaints policy is available to customers in large print, braille, audio or other non-written formats and in a variety of languages upon request. The policy clearly details a two-stage process, the process which will be

				followed at each stage and timescales for response at each stage. PPHA's new customer focussed website allows customers to access the policy.
3.5	The policy must explain how the landlord will publicise details of the complaints policy, including information about the Ombudsman and this Code.			Details of the Housing Ombudsman are reflected within our complaints policy. The complaints policy along with information about the Ombudsman and this code will be included on our new website which is currently undergoing development and expected to be available by 12th August 24.
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	See attached complaints policy.	PPHA will accept a complaint from a representative acting on behalf of the customer with their permission and authorisation. Our complaints policy provides clear guidance that complaints will be accepted from advice workers, councillors, MP's friends, relative and recognised tenant panels acting on behalf of the customer with their permission.

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	See attached complaints policy	If our customer facing teams are contacting a customer to advise a complaint is not suitable for the complaints procedure or extending timescales for a complaint response, the customer is provided with the Ombudsman contact details, regardless of whether the extension is agreed with the customer. Details of how to raise a complaint with the Housing Ombudsman is also detailed within our complaint letter templates and complaints policy.
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Section 4: Complaint Handling Staff

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
4.1	Landlords must have a person or team assigned to take responsibility for complaint handling, including liaison with the Ombudsman and ensuring complaints are reported to the governing body (or equivalent). This Code will refer to that person or team as the 'complaints officer'. This role may be in addition to other duties.	Yes		PPHA have clear responsibilities for complaint handling and have a customer facing team who are responsible for liaising with all customers to acknowledge complaints, confirm timescales for responses, log on our complaints register, investigate with the appropriate service delivery team, respond to the customer and recommend lessons learned to continuously improve our services.
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		Our customer facing team have access to staff at all levels within the business to facilitate the prompt resolution of complaints. The complaints team will work with the appropriate service delivery team to investigate the complaint and liaise with the customer.

				The complaints team are responsible for logging the complaint, ensuring the customer is kept updated with the progress of the investigation and the complaint is resolved promptly and 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		See attached complaints policy and complaints log.	PPHA staff are trained and equipped to receive and record complaints, empowering resolution at any stage of the process without the need for escalation. Our complaints team have a clear process for escalation to ensure that any complaints which do escalate to Stage 2 can be investigated by an independent member of the team.

Section 5: The Complaint Handling Process

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
5.1	Landlords must have a single policy in place for dealing with complaints covered by this Code. Residents must	Yes	See attached complaints policy.	PPHA have a single complaints policy to ensure we are consistent and fair when investigating complaints. This policy has

	not be treated differently if they complain.			been reviewed and approved by our Board and is used as a guide for all customer facing teams when dealing with complaints. The policy is automatically reviewed whenever there is a change of statutory or regulatory provision or when other best practise information becomes available, or within 3 years.
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	See attached complaints policy	PPHA complaints policy has the recommended two stage complaints process to ensure the complaints process isn't prolonged.
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	See attached complaints policy	PPHA complaints policy has the recommended two stage complaints process to ensure the complaints process isn't prolonged.
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	Yes	See attached complaints policy and complaints log.	PPHA teams will facilitate complaint responses which are handled via a third party as part of the two-stage complaint process. We have examples of this type of

	expected to go through two complaints processes.			complaint where complaints have initially been handled by a managing agent on behalf of PPHA and the customer has been dissatisfied with the investigation or response. This complaint has then been investigated at Stage 2 by PPHA at a senior level to ensure that the complaints process was not prolonged for the customer.
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Yes	See attached complaints policy	PPHA facilitate complaint handling with 3 rd parties in line with the code.
5.6	When a complaint is logged at Stage 1 or escalated to Stage 2, landlords must set out their understanding of the complaint and the outcomes the resident is seeking. The Code will refer to this as “the complaint definition”. If any aspect of the complaint is unclear, the resident must be asked for clarification.	Yes	See complaints log	PPHA provide a definition of the complaint within the complaint response to customers and within the complaints register. This ensure that we can effectively monitor complaint types, identify trends and reflect on lessons learned.
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		PPHA clearly define which aspects of a complaint we are and are not responsible for within complaint responses. Where the complaint definition is not

				clear, we will speak with the customer usually via a telephone or MS Teams call to discuss the details of their complaint and discuss their expected outcome. Details of complaint responsibilities are recorded within our complaints register.
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	See attached complaints policy	PPHA complaints policy guides our customer facing teams to ensure complaints are dealt with effectively. Our complaints team ensure that a thorough investigation is completed with the service delivery team and the response will be dealt with by an independent person to ensure they are actioned independently.
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	See attached complaints policy and complaints register.	All complaints are acknowledged within 2 working days and the customers is informed at the outset what the deadline for response will be. We will keep customers informed if there are any anticipated delays which mean we are unable to meet this

				timescale and agree with the customer appropriate intervals for keeping them informed about their complaint.
5.10	Landlords must make reasonable adjustments for residents where appropriate under the Equality Act 2010. Landlords must keep a record of any reasonable adjustments agreed, as well as a record of any disabilities a resident has disclosed. Any agreed reasonable adjustments must be kept under active review.	Yes	See attached complaints register	PPHA records any necessary customer adjustments within the complaints register and CRM system and this information is considered when responding to customer complaints. Customers information is reviewed regularly to ensure this is kept up to date.
5.11	Landlords must not refuse to escalate a complaint through all stages of the complaints procedure unless it has valid reasons to do so. Landlords must clearly set out these reasons, and they must comply with the provisions set out in section 2 of this Code.	Yes	See attached complaints policy	PPHA's complaints policy sets out a clear two-stage process to guide teams in escalating complaints. We remove all barriers for escalating complaints to the next stage but will limit this if the expected outcome has been delivered and there is nothing further to consider. We appoint an investigating officer with no prior involvement in the complaint to review the decisions made at Stage 1. In the case where we feel it is not

				appropriate to escalate a complaint to the next stage, we will provide the customer with the Housing Ombudsman contact details.
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	See attached complaints register and example complaints folder.	PPHA record all complaints including the date received, deadlines, reason for complaint, outcome and lessons learned within our complaints register. A folder is also created for each complaint which is logged in order to store the original complaint along with any correspondence in relation to the complaint or investigation.
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	See attached complaints policy	PPHA teams are trained and equipped to receive and record complaints, empowering resolution at any stage of the complaints process without the need for escalation.
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	Yes	See attached anti-social behaviour policy	PPHA's Anti-social behaviour policy sets out our approach to dealing with nuisance and anti-social behaviour. PPHA is committed to tackling anti-

	must keep restrictions under regular review.			social behaviour (ASB), as we know that it can have a devastating impact on the lives of our customers, in the communities in which we operate. We employ a three-stage approach to dealing with ASB; prevention, swift action and working with partners to intervene. Where unacceptable behaviour is identified we respond promptly to the complaint, communicate with all parties involved explaining what behaviour is expected from our customers and if necessary issue a written warning. We may also use an acceptable behaviour agreement between the individual and PPHA which is closely monitored and reviewed and agreed intervals depending on the circumstance of the ASB.
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		In circumstances where a customer makes excessive and/or repeated unnecessary contact with PPHA team members, an

				assigned individual will make an agreement with the customer to provide any updates at an agreed interval. Details of this are recorded within our complaints register. We aim to ensure that all complaints will be handled fairly being consistent in our approach, considering the facts of each case, the individuals' circumstances and listening openly without bias or prejudice regardless of background, appearance, age, beliefs or lifestyle.
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Section 6: Complaints Stages

Stage 1

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
6.1	Landlords must have processes in place to consider which complaints can be responded to as early as possible, and which require further investigation. Landlords must consider factors such as the complexity of the complaint and whether the resident is vulnerable or at risk. Most stage 1 complaints can be resolved promptly, and an explanation, apology or resolution provided to the resident.	Yes	See complaints register	All complaints are responded to at the earliest opportunity on completion of an investigation. With more complex complaints which involve multiple parties or require more information from the customer; this is explained clearly to the customer and the timescales are agreed and recorded within the complaints register. Complaint response timescales are regularly audited to ensure we are providing customers with responses without unreasonable delay.
6.2	Complaints must be acknowledged, defined and logged at stage 1 of the complaints procedure <u>within five working days of the complaint being received</u> .	Yes	See complaints policy and complaints register.	Within the PPHA complaints policy we guide teams with how to log, define and acknowledge all complaints within 2 working days. The date the complaint was

				logged and acknowledged is recorded in our complaints register. Complaint response timescales are regularly audited to ensure we are compliant with response timescales.
6.3	Landlords must issue a full response to stage 1 complaints <u>within 10 working days</u> of the complaint being acknowledged.	Yes	See complaints policy	PPHA complaints policy specifies that a response must be issued to our customer within 10 working days of acknowledgement of the complaint, for Stage 1 complaints. If this timescale is not possible, we will agree a timescale with the customer. Complaint response timescales are regularly audited to ensure we are compliant with response timescales.
6.4	Landlords must decide whether an extension to this timescale is needed when considering the complexity of the complaint and then inform the resident of the expected timescale for response. Any extension must be no more than 10 working days without good reason, and the reason(s) must be clearly explained to the resident.	Yes	See complaints policy	If the timescale of 10 working days for a response cannot be met at Stage 1 of the complaints process; the reasons are discussed with the customer and an extension is agreed and documented within the complaints register.
6.5	When an organisation informs a resident about an extension to these	Yes	See complaints policy	If we are contacting a customer about an

	timescales, they must be provided with the contact details of the Ombudsman.			extension to a complaint response, they will be provided with the Ombudsman contact details, regardless of whether the extension has been agreed with the resident. This is reflected within our complaints policy.
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		PPHA teams are trained and equipped to respond to complaints at the earliest opportunity on completion of the investigation and ensure any outstanding actions are agreed and followed up with the customer. Complaint response timescales are regularly audited to ensure we are issuing responses to customers at the earliest opportunity within the complaints process.
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	See complaints register	PPHA's focus is to understand if something has gone wrong, to open and honest about responsibility and consider the outcome we can deliver to restore the complainant's position. On acknowledgement of the complaint our teams ensure

				that the complaint definition is confirmed with the customer and logged on our complaints register. Where the complaint definition isn't clear, this will be discussed with the customer to confirm prior to the investigation taking place. The outcomes of the investigation are included in the written response to the customer in addition to being logged on our complaints register. This process is reflected with PPHA's complaint policy. Regular auditing is in place to review complaints handling, specifically assessing whether all points within complaints have been effectively responded to and where necessary, feedback on best practice is communicated to the team and additional training put into place.
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	Yes	See complaints policy	Where residents make additional complaints during an ongoing Stage 1 complaint investigation, the points are incorporated into

	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.			the Stage 1 response if they are related to existing complaint and if this is prior to the Stage 1 response being issued. If issues which are raised are unrelated or would unreasonably delay the response, new issues are logged as a new complaint. This process is reflected within PPHA's complaints policy.
6.9	Landlords must confirm the following in writing to the resident at the completion of stage 1 in clear, plain language: a. the complaint stage; b. the complaint definition; c. the decision on the complaint; d. the reasons for any decisions made; e. the details of any remedy offered to put things right; f. details of any outstanding actions; and g. details of how to escalate the matter to stage 2 if the individual is not satisfied with the response.	Yes	See complaints policy and PPHA letter template for stage 1	PPHA write to all customers at the completion of a stage 1 complaint investigation to confirm 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. PPHA have a letter template for complaint responses to guide this process and the

				specific details relating to the complaint are recorded in the complaints register. Complaint responses are regularly audited to ensure good quality responses are continually being submitted to our customers and to establish if there are any lessons learned which haven't been recorded. Audits also assists where additional training may be required.
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Stage 2

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
6.10	If all or part of the complaint is not resolved to the resident's satisfaction at stage 1, it must be progressed to stage 2 of the landlord's procedure. Stage 2 is the landlord's final response.	Yes	See complaints policy	If the complainant remains dissatisfied with a complaint outcome at Stage 1, they are entitled to request an escalation of their complaint to Stage 2 complaint. To enable PPHA to consider a complaint at stage 2, we request information from the complainant to understand why they remain dissatisfied, what points remain unresolved and what

				their expected outcome is. We aim to remove barriers for escalating complaints to the second stage, but may limit access if we have delivered the expected outcome and there is nothing further to be considered. In such circumstances, the Complainant will be appropriately signposted to the Housing Ombudsman. We will appoint an officer with no previous involvement in the complaint at Stage 1 to consider where any issues remain outstanding for the complainant and to review the decisions made at first stage of the complaint.
6.11	Requests for stage 2 must be acknowledged, defined and logged at stage 2 of the complaints procedure within five working days of the escalation request being received.	Yes	See complaints policy and example acknowledgement of stage 2 complaint.	If a customer is dissatisfied with the complaint response at Stage 1, we will acknowledge the Stage 2 response within 2 working days of the request being received.
6.12	Residents must not be required to explain their reasons for requesting a	Yes	See complaints policy	If the complainant remains dissatisfied with the

	stage 2 consideration. Landlords are expected to make reasonable efforts to understand why a resident remains unhappy as part of its stage 2 response.			outcome of the complaint at Stage 1 of the complaints process, they are entitled to request an escalation of their complaint to stage 2. PPHA will make all reasonable efforts to understand why a customer remains unhappy and what their desired outcome is as part of the Stage 2 investigation.
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Yes	See complaints policy	At Stage 2 of the complaints process, PPHA will appoint an investigating officer with no previous involvement in the complaint to consider where any issues remain outstanding for the complainant and to review the decisions made at stage 1. This is reflected within PPHA's complaint policy.
6.14	Landlords must issue a final response to the stage 2 <u>within 20 working days</u> of the complaint being acknowledged.	Yes	See complaints policy	PPHA aim to offer a resolution within 20 working days of a stage 2 complaint being acknowledged which is outlined within our complaints policy. The

				deadline for response is also monitored via our complaints register and complaints team calendar. These timescales are reflected within PPHA's complaint policy and are audited regularly to ensure compliance.
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	See complaints policy	PPHA will aim to respond to all stage 2 complaints within a 20-working day timescale. If there are any anticipated delays such as the complexity of the complaint, we will contact the customer to agree an extension to the complaint response. They are also provided with the Housing Ombudsman contact details regardless of whether the extension is agreed. Complaint deadline extensions are approved by a senior member of the team to ensure there is good reason for the extension, and are recorded within the complaints register.
6.16	When an organisation informs a resident about an extension to these	Yes	See complaints policy	When a customer is contacted regarding an

	timescales, they must be provided with the contact details of the Ombudsman.			extension to a complaint response, they are provided with the Housing Ombudsman contact details. This is reflected within PPHA's complaints policy.
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	See complaints policy	PPHA teams are trained and equipped to respond to customer complaints at the earliest opportunity on completion of the investigation and ensure any outstanding actions are agreed and followed up with the customer. Regular audits ensure timescales are being adhered to and actions are being appropriately completed.
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	See complaints policy	Our focus with customer complaints is to understand if something has gone wrong, be open and honest about responsibility and consider the outcome we can deliver to restore the complainant's position. On acknowledgement of a complaint, our teams ensure that the complaint definition is confirmed with the

				customer and logged on our complaints register. Where the complaint definition isn't clear this will be discussed with the customer to confirm prior to the investigation commencing. The outcomes are then included in the written response to the customer, in addition to being logged on our complaints register. Regular auditing is in place to review complaints handling, specifically assessing whether all points within complaints have been effectively responded to and good practise, policy and law is being adhered to.
6.19	Landlords must confirm the following in writing to the resident at the completion of stage 2 in clear, plain language: a. the complaint stage; b. the complaint definition; c. the decision on the complaint; d. the reasons for any decisions made; e. the details of any remedy offered to put things right; f. details of any outstanding actions; and		See complaints policy	PPHA write to all customers at the completion of a stage 1 complaint investigation to confirm 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

	g. details of how to escalate the matter to the Ombudsman Service if the individual remains dissatisfied.			details of how to escalate the matter to stage 2 if the individual is not satisfied with the response. PPHA have a letter template for complaint responses to guide this process and the specific details relating to the complaint are recorded in the complaints register. Complaint responses are regularly audited to ensure good quality responses are continually being submitted to our customers and in order to establish if there are any lessons learned which haven't been recorded or potentially where additional training is required.
6.20	Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.	Yes	See complaints policy	At stage 2 we appoint an officer with no previous involvement at a senior level within the organisation to consider where any issues remain outstanding for the complainant and to review the decisions made at stage 1. This process is reflected within PPHA's complaint policy.

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Section 7: Putting things right

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
7.1	Where something has gone wrong a landlord must acknowledge this and set out the actions it has already taken, or intends to take, to put things right. These can include: • Apologising; • Acknowledging where things have gone wrong; • Providing an explanation, assistance or reasons; • Taking action if there has been delay; • Reconsidering or changing a decision; • Amending a record or adding a correction or addendum; • Providing a financial remedy; • Changing policies, procedures or practices.	Yes	See complaints policy	Putting things right: Our focus with customer complaints is to understand if something has gone wrong, be open and honest about responsibility, consider the outcome we can deliver to restore the complainant's position. Where this cannot be done, PPHA may use the Compensation Policy to offer redress; offering redress will also include offering an apology and rebuilding of the landlord tenant relationship. Learning from outcomes: We are committed to making sure we let customers know we have been listening to their feedback and we will let individuals know what changes have been made

				to services or procedures as a result of their complaint. We will share learning from all complaints with our wider customer base and through tenant panels. Where we have been unable to make suggested changes, we will give an explanation why.
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Yes	See complaints policy	We aim to ensure that all complaints are handled fairly being consistent in our approach, considering the facts of each case, the individuals' circumstances and listening openly without bias or prejudice regardless of background, appearance, age, beliefs or lifestyle. PPHA teams are appropriately trained to follow the guidance within the complaints policy and assess complaints on their individual merit, offering remedies which reflect any fault identified. Outcomes and remedies are also logged within the complaints register and are regularly audited to ensure best

				practise is being implemented.
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	See complaints policy	Within PPHA's complaint responses to customers, we clearly set out the outcome of the complaint and any agreed remedy or actions. Any outstanding actions are discussed and agreed with the customer and followed through to completion. Regular audits will review remedies and actions to ensure they have been appropriately communicated and followed through to completion.
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes	See complaints policy	PPHA complaint policy has been developed paying regard to examples of best practice and guidance issued by the Housing Ombudsman code. There will be an automatic review of the complaints policy whenever there is a change of statutory or regulatory provisions or when other Best Practice information becomes available that will impact on the policy.

Section 8: Putting things right

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
8.1	Landlords must produce an annual complaints performance and service improvement report for scrutiny and challenge, which must include: a. the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements. b. a qualitative and quantitative analysis of the landlord's complaint handling performance. This must also include a summary of the types of complaints the landlord has refused to accept; c. any findings of non-compliance with this Code by the Ombudsman; d. the service improvements made as a result of the learning from complaints; e. any annual report about the landlord's performance from the Ombudsman; and f. any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord.	Yes	Completed annual self-assessment Complaints register	PPHA are committed to producing annual complaints performance reports for scrutiny including this self-assessment against the complaints code of conduct. A qualitative and quantitative review of complaints is undertaken to assess the quality of complaint handling in addition to lessons learned and service improvements which have been implemented, as shown in our complaints register. Any findings of non-compliance highlighted during these assessments will be reported to the Ombudsman.

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		These reports will be submitted and published on the PPHA website.
8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.			This will be carried out if these changes occur.
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.			This will be carried out if this there is an Ombudsman investigation.
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.			This will be carried out if PPHA is unable to comply with the Code due to exceptional circumstances.

Section 9: Scrutiny & oversight: continuous learning and improvement

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
9.1	Landlords must look beyond the circumstances of the individual complaint and consider whether service improvements can be made as a result of any learning from the complaint.	Yes	Complaints register	PPHA are committed to learning from the outcome of complaints received from customers. We make sure we let customers know we have listened to their feedback and update them with the changes that have been made to services or procedures as a result of their complaint. We share learning from all complaints with customers through tenant panels, via our website and within annual customer reports. Where we are unable to make suggested changes, we will provide an explanation explaining the reasons. This is captured with PPHA's complaint policy. Our complaints register also captures lessons learned in response to each complaint

				and regular audits ensure these are implemented.
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		PPHA's complaints are regularly audited to review any themes, identify any wider operational issues and ensure lessons learned and service improvements are implemented.
9.3	Accountability and transparency are also integral to a positive complaint handling culture. Landlords must report back on wider learning and improvements from complaints to stakeholders, such as residents' panels, staff and relevant committees.	Yes		PPHA provide monthly reporting to the senior leadership team, investors and Board members which incorporates a review of the complaints raised and closed within the given month. Wider learnings are also be made available resident panels and staff.
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		PPHA have an appointed Head of service to lead complaint handling. This individual is responsible for reviewing all complaints on a monthly basis to provide reports to stakeholders. Auditing is also completed regularly to assess themes, identify any issues, and implement any changes to policy which may be necessary in response to

				changes to best practise or ombudsman guidance.
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		The Group Housing and Support Director is appointed to have lead responsibility for complaints and to promote a positive complaint handling culture. The Group Housing and Support Director is also an executive member of the PPHA Board.
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		The Group Housing and Support Director receives regular insight into complaint handling performance and the PPHA Board reports include a section on complaint handling performance.
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	Yes		Complaints reports are produced on a monthly basis and provided to PPHA Board quarterly.

	progress made in complying with orders related to severe maladministration findings; and d. annual complaints performance and service improvement report.			
9.8	Landlords must have a standard objective in relation to complaint handling for all relevant employees or third parties that reflects the need to: a. have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments; 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.	Yes	See attached complaints policy	All colleagues and stakeholders are required to follow the PPHA complaints policy.