

# Self-Assessment Form

This self-assessment form should be completed by the complaints officer and discussed at the landlord's governing body annually. Evidence should be included to support all statements with additional commentary as necessary. Explanations must also be provided where a mandatory 'must' requirement is not met to set out the rationale for the alternative approach adopted and why this delivers a better outcome.

## Section 1 - Definition of a complaint Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
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 organisation, its own staff, or those acting on its behalf, affecting an individual resident or group of residents.	Yes	PA Housing revised complaint approach and policy 2022 uses the Housing Ombudsman's definition of a complaint, and can be found on our website: <a href="#">Complaints Policy</a> .
1.3	The resident does not have to use the word 'complaint' for it to be treated as such. A complaint that is submitted via a third party or representative must still be handled in line with the landlord's complaints policy.	Yes	The Complaints Policy details that the complainant does not have to use the word "complaint" when expressing dissatisfaction. The policy also explains that a third party or someone acting on behalf of a resident (e.g., Councillor, MP, next of kin), may use the complaints procedure.
1.6	... if further enquiries are needed to resolve the matter, or if the resident requests it, the issue must be logged as a complaint.	Yes – further action to be implemented by end of March 23.	The Complaints policy explains that a first-time request for service or for information should not be seen as a complaint. A repeated request for the same service or information is a clear indication of a failure and the repeated request may well, therefore, take the form of a complaint. Further training is being carried out with staff to make this clearer and provide practical examples and application.
1.7	A landlord must accept a complaint unless there is a valid reason not to do so.	Yes	Complaints will be accepted unless there is a valid reason to not do so. These are detailed in Section 6 of our Complaints policy.

1.8	A complaints policy must clearly set out the circumstances in which a matter will not be considered, and these circumstances should be fair and reasonable to residents.	Yes	Section 6 in our Complaints policy outlines exclusions where a matter will not be considered. These have been reviewed by members of our Residents Complaints panel (Aug 22), as well as input from the Housing Ombudsman (Sept 22).
1.9	If a landlord decides not to accept a complaint, a detailed 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.	Yes	Where a request to use the complaints process is received and the matter is not covered under the Complaints policy (as explained in 1.8), we will write to the resident explaining why the matter is not suitable for the complaints process and the right to take that decision to the Ombudsman.

### Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
1.4	Landlords should recognise the difference between a service request, where a resident may be unhappy with a situation that they wish to have rectified, and a complaint about the service they have/have not received.	Yes – further training to be undertaken with staff by end of March 23	Section 3.2 within our Complaints policy outlines the difference between a service request and a complaint. Generally, service requests are a request for a service or for information and would be logged through our CRM system. Where there is a failure in delivering these requests, they may then progress to a complaint. Further training is being provided to customer facing colleagues to recognise the difference and act accordingly.
1.5	Survey feedback may not necessarily need to be treated as a complaint, though, where possible, the person completing the survey should be made aware of how they can pursue their dissatisfaction as a complaint if they wish to.	Yes	Our survey landing page has been updated to include information on how residents can make complaints – linking them to the PA Housing complaints section on our website.

**Section 2 - Accessibility and awareness**  
**Mandatory 'must' requirements**

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
2.1	Landlords must make it easy for residents to complain by providing different channels through which residents can make a complaint such as in person, over the telephone, in writing, by email and digitally. While the Ombudsman recognises that it may not be feasible for a landlord to use all of the potential channels, there must be more than one route of access into the complaints system.	Yes	Complaints can be made through several channels. These can be in person, through the website complaints form, the MyPA app, email, through our hubs on our phone lines, via social media and letter. Complaints regardless of how they are received will filter through to the Complaints team within Customer Experience.
2.3	Landlords must make their complaint policy available in a clear and accessible format for all residents. This will detail the number of stages involved, what will happen at each stage and the timeframes for responding.	Yes	Our website ( <a href="#">Complaints, PA Housing</a> ) and regular resident wide comms details the Complaints policy as well as the following information: <ul style="list-style-type: none"> <li>• How to raise a complaint</li> <li>• Complaints stages</li> <li>• Timeframes</li> <li>• How to escalate complaints to the Housing Ombudsman</li> <li>• The complaints handling code</li> <li>• Our self-assessment</li> <li>• Unacceptable behaviour policy</li> </ul>
2.4	Landlord websites, if they exist, must include information on how to raise a complaint. The complaints policy and process must be easy to find on the website.	Yes	As per 2.3 our website has it's own Complaints section which includes details on how to raise a complaint, giving different options.
2.5	Landlords must comply with the Equality Act 2010 and may need to adapt normal policies, procedures, or processes to accommodate an individual's needs. Landlords must satisfy themselves that their policy sets out how they will respond to reasonable adjustments requests in line with the Equality Act and that complaints handlers have had appropriate training to deal with such requests.	Yes – additional training to be completed by end of March 23	We carry out Impact Assessments to identify potential issues with changes to our policies. For example, this has been completed for the new complaints policy. We have recently created a dedicated Reasonable Adjustments policy for which the Complaints team and customer facing staff will receive the appropriate training. An EDI signposting toolkit has also been created for all staff, to ensure we have the tools to adapt to individual support needs. We carry out an annual EDI review of key services which includes complaints which are reported to our board, to ensure access to all and any further adjustments needed are made.

2.6	Landlords must publicise the complaints policy and process, the Complaint Handling Code and the Housing Ombudsman Scheme in leaflets, posters, newsletters, online and as part of regular correspondence with residents.	Yes	Residents are advised about the complaints process through various channels, including on the website, noticeboards, the MyPA app, social media, Doorstep magazines, satisfaction surveys, from conversations with Hub and customer facing staff, in correspondence, and in housing policies etc. The Complaint Handling Code and the Housing Ombudsman service is publicised on the website. Details of the Housing Ombudsman are provided at each stage of the Complaints process.
2.7	Landlords must provide residents with contact information for the Ombudsman as part of its regular correspondence with residents.	Yes	Details of the Housing Ombudsman are provided at each stage of the Complaints process including acknowledgement. The Ombudsman's contact information is also available through our website.
2.8	Landlords must provide early advice to residents regarding their right to access the Housing Ombudsman Service throughout their complaint, not only when the landlord's complaints process is exhausted.	Yes	As per 2.7, the Housing Ombudsman details are provided to residents throughout the complaints process, including when a request is not taken on as a formal complaint.

### Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
2.2	Where a landlord has set up channels to communicate with its residents via social media, then it should expect to receive complaints via those channels. Policies should contain details of the steps that will be taken when a complaint is received via social media and how confidentiality and privacy will be maintained.	Yes – continuing to work with our Comms team to improve responses by end of April 23.	Section 4.1.2 within our Complaints policy details how complaints raised through social media platforms will be handled. Initially, any comments or public posts will be responded to in private to maintain confidentiality.

## Section 3 - Complaint handling personnel

### Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
3.1	Landlords must have a person or team assigned to take responsibility for complaint handling to ensure complaints receive the necessary attention, and that these are reported to the governing body. This Code will refer to that person or team as the "complaints officer".	Yes	We have a dedicated Customer Experience Complaints team who are responsible for complaint handling. The Complaints Team Manager reports performance to Senior Management Team & Board on a regular basis.
3.2	...the complaint handler appointed must have appropriate complaint handling skills and no conflicts of interest.	Yes – further training is ongoing through February and March 23.	All complaints handlers have received the appropriate training. They distance themselves from the investigation or involvement in any complaint in which they are directly or indirectly implicated.  Refresher training has been undertaken in January 2023 with ex Housing Ombudsman Service leads, and will be complimented by further specific training in February and March 23.

### Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
3.3	<p>Complaint handlers should:</p> <ul style="list-style-type: none"> <li>• be able to act sensitively and fairly</li> <li>• be trained to handle complaints and deal with distressed and upset residents</li> <li>• have access to staff at all levels to facilitate quick resolution of complaints</li> <li>• have the authority and autonomy to act to resolve disputes quickly and fairly.</li> </ul>	Yes	<p>The Complaints team have access to the information required to do this and have been surveyed to ensure they meet these criteria. Overall, they passed these 4 points, however 'access to staff at all levels' and 'autonomy to resolve complaints' are areas where improvements can still be made.</p> <p>The Complaints Team Manager is working with Leadership members to carry out quality checks for stage 1 responses so any blockages in resolving resident complaints can be resolved quickly. The team will be re-surveyed in 6 months to ensure progress is being made.</p>

**Section 4 - Complaint handling principles**  
**Mandatory 'must' requirements**

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
4.1	Any decision to try and resolve a concern must be taken in agreement with the resident and a landlord's audit trail/ records should be able to demonstrate this. Landlords must ensure that efforts to resolve a resident's concerns do not obstruct access to the complaints procedure or result in any unreasonable delay. It is not appropriate to have extra named stages (such as 'stage 0' or 'pre-complaint stage') as this causes unnecessary confusion for residents. When a complaint is made, it must be acknowledged and logged at stage one of the complaints procedure within five days of receipt.	Yes	The complaints process ensures a 2 stage process only. The policy clearly outlines whereby service requests can become complaints. Complaints will be acknowledged and logged at Stage 1 of the complaints process within 5 working days of receipt. Acknowledgement will be sent to residents providing their complaint reference number.
4.2	Within the complaint acknowledgement, landlords must set out their understanding of the complaint and the outcomes the resident is seeking. If any aspect of the complaint is unclear, the resident must be asked for clarification and the full definition agreed between both parties.	Yes	From the outset of receiving a complaint we are strengthening the personal contact with residents to ensure we understand the issues. In the acknowledgement of a complaint, we cover the following points: <ul style="list-style-type: none"> <li>• Complaint stage and reference number</li> <li>• Our understanding of the complaint and the resident's desired outcome</li> <li>• When to expect a response</li> <li>• Details of the HOS / option to have a nominated rep. Residents are given the opportunity to provide any additional information or clarify any of the above points.</li> </ul>
4.6	A complaint investigation must be conducted in an impartial manner.	Yes	Complaint investigations objectively determine whether the facts of the case have been established. No complaint is investigated or responded to by a member of staff about whom the complaint has been made, or who has a conflict of interest in the matter.

4.7	<p>The complaint handler must:</p> <ul style="list-style-type: none"> <li>• deal with complaints on their merits</li> <li>• act independently and have an open mind</li> <li>• take measures to address any actual or perceived conflict of interest</li> <li>• consider all information and evidence carefully</li> <li>• keep the complaint confidential as far as possible, with information only disclosed if necessary to properly investigate the matter.</li> </ul>	Yes	<p>Complaints specialists ensure that complaints are dealt with objectively, based on the evidence and information available.</p> <p>Any conflicts of interest or potential conflicts will be flagged to the Complaints team manager and staff will be removed from the case as required. Requests for confidentiality on cases will be respected as best as possible.</p> <p>Further checks by our senior managers are carried out to ensure compliance &amp; consistency.</p>
4.11	Landlords must adhere to any reasonable arrangements agreed with residents in terms of frequency and method of communication	Yes	Our complaints process ensures any reasonable adjustments and arrangements are adhered to for our residents. This could include things such as: sending responses via letter in the post, large print format, having response letters translated.
4.12	<p>The resident, and if applicable any staff member who is the subject of the complaint, must also be given a fair chance to:</p> <ul style="list-style-type: none"> <li>• set out their position</li> <li>• comment on any adverse findings before a final decision is made.</li> </ul>	Yes	Complaints against residents or staff members will ensure that anyone subject of a complaint is interviewed to provide their account before a final decision is made.
4.13	A landlord must include in its complaints policy its timescales for a resident to request escalation of a complaint	Yes	The timeframe for escalation is set at 28 days, however this can be extended following discussion with the resident.
4.14	A landlord must not unreasonably refuse to escalate a complaint through all stages of the complaints procedure and must have clear and valid reasons for taking that course of action. Reasons for declining to escalate a complaint must be clearly set out in a landlord's complaints policy and must be the same as the reasons for not accepting a complaint.	Yes	As per 1.8, reasons for not accepting or escalating a complaint are set out within section 6 of our policy. Any decision to not escalate a complaint will be explained to the resident and they will be given the opportunity to challenge this through the Housing Ombudsman.
4.15	A full record must be kept of the complaint, any review 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 reports or surveys prepared.	Yes	All formal complaints and correspondence are logged on a central corporate complaints management system. This ensures that complaints records are fully maintained and preserved.

4.18	Landlords must have policies and procedures in place for managing unacceptable behaviour from residents and/or their representatives when pursuing a complaint.	Yes	PA Housing has an unacceptable behaviour policy which will be used as necessary as part of the Complaints process.
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### Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
4.3	Landlords should manage residents' expectations from the outset, being clear where a desired outcome is unreasonable or unrealistic.	Yes	PA Housing's complaint forms ask residents to outline what they'd like as an outcome from the complaint. Unreasonable or unrealistic expectations are communicated through the acknowledgement at Stage 1.
4.4	A complaint should be resolved at the earliest possible opportunity, having assessed what evidence is needed to fully consider the issues, what outcome would resolve the matter for the resident and whether there are any urgent actions required.	Yes	Complaints will be resolved at the earliest possible opportunity. Where further evidence is required to investigate the matter, residents will be contacted. Similarly, any urgent actions (e.g. Health and safety concerns) will be escalated to the appropriate team.
4.5	Landlords should 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 where this is reasonable.	Yes	As explained in 1.3, a third party or someone acting on behalf of a resident (e.g., Councillor, MP, next of kin), may use the complaints procedure. Residents are reminded of this when a complaint is acknowledged.
4.8	Where a key issue of a complaint relates to the parties' legal obligations landlords should clearly set out their understanding of the obligations of both parties.	Yes	The complaints response will detail the PA Housing's legal obligations and the obligations of the resident, as well as to recommend the resident seeks their own legal advice where relevant.
4.9	Communication with the resident should not generally identify individual members of staff or contractors.	Yes	PA Housing will not identify individual members of staff or contractors, unless relevant to the case and communication is already ongoing between both parties. This will demonstrate a more personable and human approach.
4.10	Landlords should keep residents regularly updated about the progress of the investigation.	Yes –additional resources have been put in place to improve this – Feb 23	We have seen a significant increase in complaints over the last 12 months. In order to meet demand, we have taken on additional resources to assist complaints specialists and to ensure we keep residents regularly updated.

4.16	Landlords should seek feedback from residents in relation to the landlord's complaint handling as part of the drive to encourage a positive complaint and learning culture.	Yes – further work to be completed by end of June 23.	PA Housing seeks feedback in the form of a survey post closure of a complaint. Current response rate is low so we are re assessing how to obtain this information and reviewing best practice. Additionally, there is a complaints panel of residents that meets regularly to review performance and feedback.
4.17	Landlords should recognise the impact that being complained about can have on future service delivery. Landlords should ensure that staff are supported and engaged in the complaints process, including the learning that can be gained.	Yes	Lessons Learnt meetings are held with the business to discuss the findings of complaints and help identify opportunities to improve service delivery. Complaints also form a part of our customer voice model which is currently being piloted. <a href="#">Hearing the Customer Voice, PA Housing</a>
4.19	Any restrictions placed on a resident's contact due to unacceptable behaviour should be appropriate to their needs and should demonstrate regard for the provisions of the Equality Act 2010.	Yes	This unacceptable behaviour policy has undergone an equality analysis to make sure that it does not discriminate against anyone and that it is accessible to everyone.

## Section 5 - Complaint stages

### Mandatory 'must' requirements

#### Stage 1

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
5.1	Landlords must respond to the complaint <b>within 10 working days</b> of the complaint being logged. Exceptionally, landlords may provide an explanation to the resident containing a clear timeframe for when the response will be received. This should not exceed a further 10 days without good reason.	Yes	PA Housing's corporate response timescale for stage 1 complaints is 10 working days. Where this cannot be met, residents will be updated and any extension will not exceed an additional 10 days unless in exceptional circumstances.
5.5	A complaint response must be sent 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 expeditiously with regular updates provided to the resident.	Yes	Complaints responses are sent as soon as the resolution is known. Responses will contain details of follow up actions which will be tracked as required. We do not close cases on our complaint management system until the follow up works have been completed.
5.6	Landlords must address all points raised in the complaint and provide clear reasons for any decisions, referencing the relevant policy, law and good practice where appropriate.	Yes	The Stage 1 decision letter template instructs the complaints specialist to detail reasons for any decision by setting out the facts and the conclusions regarding all points raised by the complainant.

5.8	<p>Landlords must confirm the following in writing to the resident at the completion of stage one in clear, plain language:</p> <ul style="list-style-type: none"> <li>• the complaint stage</li> <li>• the decision on the complaint</li> <li>• the reasons for any decisions made</li> <li>• the details of any remedy offered to put things right</li> <li>• details of any outstanding actions</li> <li>• details of how to escalate the matter to stage two if the resident is not satisfied with the answer</li> </ul>	Yes	The Stage 1 decision letter template includes all of these required points.
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## Stage 2

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
5.9	If all or part of the complaint is not resolved to the resident's satisfaction at stage one it must be progressed to stage two of the landlord's procedure, unless an exclusion ground now applies. In instances where a landlord declines to escalate a complaint it must clearly communicate in writing its reasons for not escalating as well as the resident's right to approach the Ombudsman about its decision.	Yes	As explained in 1.8, our complaints policy sets out the circumstances in which a matter will not be considered under the complaints process. Where this discretion is exercised, the complainant will be provided with an explanation and of their right to approach the Housing Ombudsman.
5.10	On receipt of the escalation request, landlords must set out their understanding of issues outstanding and the outcomes the resident is seeking. If any aspect of the complaint is unclear, the resident must be asked for clarification and the full definition agreed between both parties.	Yes	Upon receipt of an escalation to stage 2, personal contact will be offered to ensure we understand the reasons for escalation. an acknowledgement will be sent to the complainant explaining our understanding of the issues outstanding and outcome sought. The complainant will have the opportunity to clarify any of these points.
5.11	Landlords must only escalate a complaint to stage two once it has completed stage one and at the request of the resident.	Yes	Complaints are only escalated to Stage 2 once Stage 1 has been completed.
5.12	The person considering the complaint at stage two, must not be the same person that considered the complaint at stage one.	Yes	Stage 2 will be managed by a different complaints specialist to stage 1 and investigated by management a level above that at Stage 1. Assistant Directors will approve the response before it goes out to the customer.

5.13	Landlords must respond to the stage two complaint within 20 working days of the complaint being escalated. Exceptionally, landlords may provide an explanation to the resident containing a clear timeframe for when the response will be received. This should not exceed a further 10 days without good reason.	Yes	PA Housing's corporate response timescale for stage 2 complaints is 20 working days. Where this cannot be met, residents will be updated, and any extension will not exceed an additional 10 days unless in exceptional circumstances
5.16	<p>Landlords must confirm the following in writing to the resident at the completion of stage two in clear, plain language:</p> <ul style="list-style-type: none"> <li>• the complaint stage</li> <li>• the complaint definition</li> <li>• the decision on the complaint</li> <li>• the reasons for any decisions made</li> <li>• the details of any remedy offered to put things right</li> <li>• details of any outstanding actions</li> </ul> <p>and</p> <ul style="list-style-type: none"> <li>• if the landlord has a third stage, details of how to escalate the matter to stage three</li> <li>• if this was the final stage, details of how to escalate the matter to the Housing Ombudsman Service if the resident remains dissatisfied.</li> </ul>	Yes	The Stage 2 decision letter template includes all of these required points, including how to escalate the matter to the Housing Ombudsman Service if the complainant remains dissatisfied as there is no Stage 3 as part of PA Housing's complaints process.

### Stage 3

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
5.17	Two stage landlord complaint procedures are ideal. This ensures that the complaint process is not unduly long. If landlords strongly believe a third stage is necessary, they must set out their reasons for this as part of their self-assessment. A process with more than three stages is not acceptable under any circumstances.	Yes	PA Housing operates a two-stage complaint procedure.

5.20	<p>Landlords must confirm the following in writing to the resident at the completion of stage three in clear, plain language:</p> <ul style="list-style-type: none"> <li>• the complaint stage</li> <li>• the complaint definition</li> <li>• the decision on the complaint</li> <li>• the reasons for any decisions made</li> <li>• the details of any remedy offered to put things right</li> <li>• details of any outstanding actions</li> <li>• details of how to escalate the matter to the Housing Ombudsman Service if the resident remains dissatisfied</li> </ul>	N/A	As per 5.17, PA Housing does not have a stage three in their complaints procedure.
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## Best practice 'should' requirements

### Stage 1

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
5.2	If an extension beyond 20 working days is required to enable the landlord to respond to the complaint fully, this should be agreed by both parties.	Yes	If it is not possible to provide the complainant with a full response within the target timeframe, an agreement to a timeframe will be agreed with the customer.
5.3	Where agreement over an extension period cannot be reached, landlords should provide the Housing Ombudsman's contact details so the resident can challenge the landlord's plan for responding and/or the proposed timeliness of a landlord's response.	Yes	Where an agreement over an extension cannot be reached, the Housing Ombudsman's details will be provided to the resident.
5.4	Where the problem is a recurring issue, the landlord should consider any older reports as part of the background to the complaint if this will help to resolve the issue for the resident.	Yes	Background information, including older reports, are considered during the complaint investigation as relevant, including any relevant information from our CRM system.
5.7	Where residents raise additional complaints during the investigation, these should be incorporated into the stage one response if they are relevant and the stage one response has not been issued. Where the stage one response has been issued, or it would unreasonably delay the response, the complaint should be logged as a new complaint.	Yes	Any additional complaints of a similar nature will be incorporated in the Stage 1 response unless they would unreasonably delay the response. Any new complaints unrelated to the original complaint will be logged separately as a new complaint.

## Stage 2

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
5.14	If an extension beyond 10 working days is required to enable the landlord to respond to the complaint fully, this should be agreed by both parties.	Yes	Any extension to the complaint response will be agreed upon by both parties.
5.15	Where agreement over an extension period cannot be reached, landlords should provide the Housing Ombudsman's contact details so the resident can challenge the landlord's plan for responding and/or the proposed timeliness of a landlord's response.	Yes	Where an agreement over an extension cannot be reached, the Housing Ombudsman's details will be provided to the resident.

## Stage 3

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
5.18	Complaints should only go to a third stage if the resident has actively requested a third stage review of their complaint. Where a third stage is in place and has been requested, landlords must respond to the stage three complaint <b>within 20 working days</b> of the complaint being escalated. Additional time will only be justified if related to convening a panel. An explanation and a date for when the stage three response will be received should be provided to the resident.	N/A	As per 5.17, PA Housing does not have a stage three in their complaints procedure.
5.19	Where agreement over an extension period cannot be reached, landlords should provide the Housing Ombudsman's contact details so the resident can challenge the landlord's plan for responding and/or the proposed timeliness of a landlord's response.	N/A	As per 5.17, PA Housing does not have a stage three in their complaints procedure.

## Section 6 - Putting things right

### Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
6.1	Effective dispute resolution requires a process designed to resolve complaints. 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.	Yes	Resolution of complaints will be made clear in response letters. This could be in the form of any of the following: <ul style="list-style-type: none"> <li>• an apology where appropriate;</li> <li>• an explanation of the events or policy concerned;</li> <li>• agreeing to change a decision or action;</li> <li>• agreeing to put right a mistake or the consequences of a mistake</li> <li>• Sharing lessons learnt to prevent the situation from reoccurring.</li> </ul>
6.2	Any remedy offered must reflect the extent of any service failures and the level of detriment caused to the resident as a result. A landlord must carefully manage the expectations of residents and not promise anything that cannot be delivered or would cause unfairness to other residents.	Yes- further work to be completed by end of March 23.	Any remedy offered will be in line with our compensation policy, taking in to account the level of impact caused. Expectations are managed from the outset of the complaints process at the Acknowledgement stage. Our Compensation policy is currently being reviewed in light of recent Housing Ombudsman recommendations and due to be completed by end of March 23.
6.5	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	The remedy will be stated clearly in complaints response letters, the complaint record will remain open until actions are completed and monitored through our complaint management system by the Complaint Specialists.
6.6	In awarding compensation, a landlord must consider whether any statutory payments are due, if any quantifiable losses have been incurred, the time and trouble a resident has been put to as well as any distress and inconvenience caused.	Yes	Any statutory payments will be covered as part of any offer of redress. Compensation is reviewed based on individual circumstances and impact to the customer. Our current policy has a framework for assessing compensation and consistency. The policy is due to be reviewed by March 2023.

## Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
6.3	Landlords should look beyond the circumstances of the individual complaint and consider whether anything needs to be 'put right' in terms of process or systems to the benefit of all residents.	Yes	As part of the investigation process of a complaint, managers are to seek opportunities to improve services to avoid similar future complaints and enhance the customer experience. Examples of these are currently included in our annual report and will be included in our "you said we did" section of our website. <a href="#">Hearing the Customer Voice, PA Housing</a> (At bottom of the page)
6.7	In some cases, a resident may have a legal entitlement to redress. The landlord should still offer a resolution where possible, obtaining legal advice as to how any offer of resolution should be worded.	Yes	Any legal redress will be offered in line with our compensation policy. Where required, legal advice will be sought.

## Section 7 - Continuous learning and improvement

### Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
7.2	Accountability and transparency are integral to a positive complaint handling culture. Landlords must report back on wider learning and improvements from complaints in their annual report and more frequently to their residents, staff and scrutiny panels.	Yes	Wider learning and improvement from complaints are reported in the PA Housing Annual Report, along with more frequent updates to tenants through our Customer Voice programme of work, Complaints Panel meetings, Scrutiny and Doorstep magazine.

## Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
7.3	A member of the governing body should be appointed to have lead responsibility for complaints to support a positive complaint handling culture. This role will be responsible for ensuring the governing body receives regular information on complaints that provides insight to the governing body on the landlord's complaint handling performance.	Yes	A board member has been appointed to have lead responsibility for complaints and supporting a positive complaint handling culture at PA. An induction programme has taken place and regular meetings set up.

7.4	<p>As a minimum, governing bodies should receive:</p> <ul style="list-style-type: none"> <li>• Regular updates on the volume, categories and outcome of complaints, alongside complaint handling performance including compliance with the Ombudsman's orders</li> <li>• Regular reviews of issues and trends arising from complaint handling,</li> <li>• The annual performance report produced by the Ombudsman, where applicable</li> <li>• Individual complaint outcomes where necessary, including where the Ombudsman made findings of severe maladministration or referrals to regulatory bodies. The implementation of management responses should be tracked to ensure they are delivered to agreed timescales. The annual self-assessment against the Complaint Handling Code for scrutiny and challenge.</li> </ul>	Yes	<p>Regular updates are provided to relevant stakeholders and the Board:</p> <ul style="list-style-type: none"> <li>• Monthly KPI performance on complaints performance and volumes</li> <li>• Monthly report on Housing Ombudsman cases</li> <li>• Reports on severe maladministration determinations.</li> <li>• 6 monthly review on trends, issues and lessons learnt etc.</li> </ul>
7.5	<p>Any themes or trends should be assessed by senior management to identify potential systemic issues, serious risks or policies and procedures that require revision. They should also be used to inform staff and contractor training.</p>	Yes	<p>Lessons Learnt are recorded from complaints and discussed by senior management. Any issues are highlighted in monthly KPI report. Insights from our Customer Voice packs are reviewed, as well as specific learnings from Housing Ombudsman cases.</p>
7.6	<p>Landlords should have a standard objective in relation to complaint handling for all employees that reflects the need to:</p> <ul style="list-style-type: none"> <li>• have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments</li> <li>• take collective responsibility for any shortfalls identified through complaints rather than blaming others</li> <li>• act within the Professional Standards for engaging with complaints as set by the Chartered Institute of Housing.</li> </ul>	Yes	<p>As part of our Performance Review Process, a standard objective has been implemented to support a collaborative approach towards complaint handling. This focuses on ensuring responses are provided on time and complaints insights are used to learn lessons and improve services.</p>

## Section 8 - Self-assessment and compliance

### Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
8.1	Landlords must carry out an annual self-assessment against the Code to ensure their complaint handling remains in line with its requirements.	Yes	This self assessment has been completed following changes to the Ombudsman's complaint handling code and an updated Complaints Policy for PA Housing and was reviewed with customers from our complaints panel.
8.2	Landlords must also carry out a self-assessment following a significant restructure and/or change in procedures.	Yes	Any change in circumstances such as those listed will result in a self-assessment.
8.3	<p>Following each self-assessment, a landlord must:</p> <ul style="list-style-type: none"> <li>report the outcome of their self-assessment to their governing body. In the case of local authorities, self-assessment outcomes should be reported to elected members</li> <li>publish the outcome of their assessment on their website if they have one, or otherwise make accessible to residents</li> <li>include the self-assessment in their annual report section on complaints handling performance</li> </ul>	Yes	<p>This self-assessment is being reported to our Governing body in February 2023.</p> <p>The self-assessment will be published on the PA Housing website, under the complaints section. The self-assessment will be included in the annual report for 2022-23.</p>