

Paragon Asra Housing Limited 2024 Complaints Handling Code Self-Assessment (March 2025)

Code Section	Requirement	Comply Yes/No?	Evidence, Commentary, Explanations	Owner	Deadline
Section 1: Definition of a Complaint					
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	Our Complaints Policy aligns with the required definition, ensuring all expressions of dissatisfaction, however made, are recognised as complaints. We have reinforced this understanding across teams through training and ongoing communication.		
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	<p>We have a clear complaints policy in place which sets out how we must record complaints. During the year we identified isolated instances where complaints were not always correctly recognised or appropriately handled. In response, we updated our processes, delivered targeted training across all services and directorates, and reinforced expectations through internal communications.</p> <p>A review of our first point of resolution approach within Customer Contact Services is currently underway. Throughout 2025, we will strengthen our policy and processes to provide greater clarity for staff and residents and implement measures to monitor improvements and ensure ongoing compliance with complaints handling standards.</p>	<p>Director of Business Improvement</p> <p>Head of Customer Services</p>	March 2026

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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 per 1.3, isolated inconsistencies in distinguishing service requests from complaints have been identified throughout the year. To address this, we implemented training workshops, reinforced policy expectations, and introduced monthly monitoring. Work continues to embed a consistent approach across the business.	Director of Business Improvement Head of Customer Services	March 2026
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	The Complaints Team has received training on recognising complaints even when service requests are ongoing. We identified inconsistencies in applying this, so we extended training across services and directorates. This has been reinforced through policy communication, and ongoing service requests are not paused when complaints are raised.		
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	We have updated survey landing pages to include a direct link to the complaints process and are working with the relevant teams to ensure a corporate approach to survey feedback handling.		
Section 2: Exclusions					
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 system.	Yes	Our policy clearly defines valid exclusions and how they are communicated to residents. Standardised rejection templates are used, and rejected complaints are recorded in the housing system for transparency. System reporting improvements are planned from May 2025 to enhance oversight and accountability.		

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2.2	<p>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:</p> <ul style="list-style-type: none"> • The issue giving rise to the complaint occurred over twelve months ago. • Legal proceedings have started. This is defined as details of the claim, such as the Claim Form and Particulars of Claim, having been filed at court. • Matters that have previously been considered under the complaints policy. 	Yes	Our Complaints Policy clearly sets out the circumstances in which a matter will not be considered as a complaint or escalated, ensuring fairness and reasonableness to residents. Acceptable exclusions, including those related to time limits, legal proceedings, and previously considered matters, are applied consistently. Standardised rejection templates are used, and all exclusions are recorded in the housing system for transparency. System reporting enhancements, planned for May 2025, will further strengthen oversight and accountability.		
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	Our Complaints Policy allows complaints to be raised within 12 months of the issue occurring or the resident becoming aware of it, with clear exclusions outlined. Where complaints fall outside this timeframe, discretion is applied on a case-by-case basis, considering any valid reasons for the delay. Standardised decision-making ensures fairness, and all cases are recorded for transparency. Planned system reporting enhancements from May 2025 will further support oversight and consistency.		
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	As per Section 2.1, when a complaint is not accepted, we provide residents with a clear explanation of the reasons, referencing our Complaints Policy. We now have a standardised rejection template that clearly explains what the resident can do if they disagree, including how to contact the Housing Ombudsman Service (HOS). All exclusions are recorded in the housing system for		

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			transparency. We remain committed to compliance, and if the Ombudsman determines an exclusion was unfairly applied, we are prepared to take on the complaint. Planned system reporting enhancements from May 2025 will further improve oversight.		
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Yes	We do not apply a blanket approach to excluding complaints. Each complaint is considered on its individual circumstances, ensuring fairness and flexibility in our decision-making process. Our Complaints Policy outlines the criteria for exclusions, and decisions are made based on the specific details of the case. This approach is reinforced through ongoing training, and we ensure that all exclusion decisions are transparent and well-documented in the housing system.		
Section 3: Accessibility and Awareness					
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	Residents can submit complaints via phone, website, email, letter, or in person. We also provide multi-language support through the integration of Google Translate and Reachdeck toolbar on our My PA platform, ensuring accessibility for residents who require translations. Additionally, we support residents through the complaints process by conducting impact and risk assessments and referring cases to the Complaints Business Improvement team when necessary. This approach ensures that we meet the diverse needs of our residents, including those requiring reasonable adjustments or language support.		

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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	Operational colleagues have been trained to manage Stage 1 complaints independently, and a cultural shift is underway to increase accountability across front-facing teams, supported by CEO and Board level leadership. This is being communicated through conversation sessions and internal comms. Channels.		
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	We view high volumes of complaints as a positive indicator of an accessible and well-publicised complaints process, demonstrating that residents feel empowered to voice concerns. Low complaint volumes could indicate barriers to accessing the process. This perspective is being highlighted in briefing sessions and communicated to the business through conversation sessions and Unity comms. Strategic investment is being made in resourcing the complaints service to drive improvements and positive change, with the CEO also accessible to residents.		
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	Our complaints policy is available in a clear and accessible format for all residents, detailing the two-stage process, actions at each stage, and response timeframes. The policy is published on our website for easy access. We ensure that the policy is regularly reviewed and updated, and we communicate it through various channels to maintain transparency and accessibility.		

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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	Our complaints policy includes clear guidance on how we publicise details of the policy, including information about the Ombudsman and Code. The policy is shared via our website, in communication with residents, and through internal channels to ensure wide accessibility. We also provide residents with information on how to escalate their complaints to the Ombudsman when needed, reinforcing transparency and awareness.		
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	Residents are given the opportunity to have a representative manage their complaint on their behalf and to be accompanied at any meetings with the landlord. This is captured as part of our formal acknowledgement of the complaint, using a template to ensure clarity. This has been updated to specify that Authority to Disclose (ATD) is required, particularly for MPs. Throughout this process, we ensure full compliance with GDPR guidelines while providing residents with the necessary support.		
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	We provide residents with clear information about their right to access the Ombudsman service and how they can engage with the Ombudsman regarding their complaint. This information is included in our complaints policy, shared during the complaints process, and made available on our website. Residents are informed of their right to escalate their complaint to the Ombudsman if they are dissatisfied with the resolution or progress.		
Section 4: Complaint Handling Staff					

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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	We have a dedicated Complaints Team, supported by a specific Housing Ombudsman Service team and Complaints Business Improvement Team (CBIT), to ensure a comprehensive pipeline and specialist support throughout the complaints process. The Director of Business Improvement oversees these teams, ensuring effective complaint handling, liaison with the Ombudsman, and reporting to the Board. This structure fosters accountability and enables effective management of complaint resolutions.		
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	The Complaints team has access to staff at all levels, enabling them to facilitate the prompt resolution of complaints. They are empowered with the authority and autonomy to take necessary actions to resolve disputes in a timely and fair manner. This ensures effective and efficient management of complaints, contributing to improved outcomes for residents.		
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	The Complaints Business Improvement, and Housing Ombudsman Service teams, play key roles in promoting a culture of learning, using methods such as review sessions, senior manager round tables, and workshops. These efforts have contributed to policy changes in the Tenancy Support Directorate this year. The involvement of the wider business in designing the new CRM complaints workflow further supports this approach. Additionally, complaints handling is included in the new starter induction, and from May 2025, mandatory e-learning will be implemented for all relevant		

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			staff. Ombudsman training and focused reporting has delivered a significant impact, with tangible examples of its application across the business.		
Section 5: The Complaint Handling Process					
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	We have a single, comprehensive complaints policy in place that aligns with this Code. This policy ensures that all complaints are handled consistently and fairly, without discrimination, ensuring that residents are not treated differently based on their complaints. The policy is regularly reviewed and communicated to ensure clarity and adherence 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	We prioritise early and local resolution of issues, aiming to address concerns promptly and effectively at the earliest opportunity. Our complaints process is clear and streamlined, with no extra stages such as 'stage 0' or 'informal complaints' to avoid confusion. This ensures that residents understand the process, and issues are resolved efficiently and fairly at the appropriate stage.		
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	Our complaints process is structured with two clear stages, ensuring a streamlined approach to resolution. This avoids unnecessary delays and ensures residents have timely access to the Ombudsman if needed. We are committed to resolving complaints efficiently within the defined stages to prevent undue delays and ensure fairness.		

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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	Any complaint response handled by a third party, such as a contractor or independent adjudicator, is fully integrated into our two-stage complaints process. We ensure that residents are not required to go through multiple complaint processes and that the third party's response is considered within the defined stages. This approach maintains clarity and consistency for residents throughout the complaint resolution process.		
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Yes	We ensure all complaints, including those involving third parties, follow the two-stage process outlined in the Code. The Code will be shared with contractors to set expectations and ensure compliance. We also aim to better manage the involvement of MPs and Councillors, as their escalations can sometimes cause confusion or deviate from the required process. Increased engagement with these authorities will help align their actions 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	At Stage 1 and Stage 2, we ensure that we clearly define the complaint by setting out our understanding of the issue and the desired outcomes the resident is seeking. If any part of the complaint is unclear, we actively seek clarification from the resident to ensure an accurate and thorough investigation.		
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	Upon acknowledging a complaint at either stage, we clearly outline the aspects of the complaint we are responsible for and specify any areas where our responsibility is unclear. If		

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			necessary, we seek further clarification to ensure transparency and prevent misunderstandings.		
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. gives the resident a fair chance to set out their position. c. takes measures to address any actual or perceived conflict of interest; and d. considers all relevant information and evidence carefully.	Yes	Complaint handlers are trained to approach complaints with impartiality and independence, ensuring they act fairly and with an open mind. Residents are given a fair opportunity to present their position, and we actively address any potential or perceived conflicts of interest. All relevant information and evidence are thoroughly considered at each stage of the complaints process to ensure a fair and transparent outcome.		
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	If a response to a complaint falls outside the expected timescales, we proactively agree with the resident on suitable intervals for providing updates. This ensures transparency and keeps the resident informed throughout the process. As part of our quality assurance, weaknesses in system control and auditing were identified this year, and appropriate actions have been taken to address them.		
5.1	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	We ensure reasonable adjustments are made for residents in line with the Equality Act 2010, where appropriate. Records are maintained for any reasonable adjustments and disabilities disclosed, with these adjustments being actively reviewed. Throughout the year, we've implemented measures to identify necessary adjustments at the start of the complaints process, including referrals to the Complaints Business Improvement Team (CBIT) for		

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			additional support when needed. Additionally, we've strengthened our documentation and record-keeping systems to ensure ongoing compliance with the Act.		
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	We ensure that complaints are escalated through all stages of the complaint's policy when appropriate. If a complaint is not escalated, we provide clear and valid reasons for this decision in line with the provisions outlined in section 2 of the Code. All decisions to refuse escalation are carefully considered, ensuring transparency and compliance with the Code's requirements.		
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	It is the responsibility of the complaints handler to ensure all complaints are fully logged, maintaining a complete timeline. This includes internal correspondence, interactions with the resident, and any supporting documentation such as surveyor reports. Over the past 12 months, we have significantly strengthened our approach and controls in this area, improving record-keeping, oversight, and compliance with the Code.		
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	We aim to resolve complaints at the earliest opportunity without the need for escalation. Our policy clearly outlines the complaints process, ensuring appropriate remedies can be applied at any stage. Over the past year, we have reinforced our approach to early resolution, empowering teams to take swift action where possible.		

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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	We have an unacceptable behaviour policy in place. Over the past 12 months, we have worked across teams to develop templates, review the policy, and ensure staff understand its application. Restrictions are evidence-based and regularly reviewed to maintain fairness and compliance.		
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	We have an Unacceptable Behaviour Policy that is regularly reviewed and aligned with the provisions of the Equality Act 2010. This year, the policy has been reviewed and updated, undergoing an Equality Impact Assessment in accordance with our policy governance framework. Any restrictions placed on contact are proportionate, evidence-based, and subject to regular review.		
Section 6: Complaints Stages					
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	Our complaints process is designed to ensure early resolution where possible while appropriately managing more complex cases. Our investment in our Neighbourhood model enhances our understanding of residents' needs, enabling a more responsive approach. A built-in risk assessment ensures that vulnerabilities and risks are identified early, with the Complaints Business Improvement Team (CBIT) continuously reviewing adjustments and processes to support complex complaints. The Complaints Team has completed training in this area, reinforcing our commitment to swift resolution once a clear plan of action is established.		

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6.2	Complaints must be acknowledged, defined and logged at stage 1 of the complaint's procedure within five working days of the complaint being received.	No	<p>Our complaints policy and supporting operating procedures fully comply with the Code. Our performance through the year has not though met the threshold of being materially compliant.</p> <p>At times this year, complaints were not consistently acknowledged and logged within the required five working days. We recognise this as a key area for continued focus, improvement, and close monitoring. In response, we are reviewing both our complaint lodging process and first point of resolution approaches to enhance the resident experience and ensure compliance with the five-day acknowledgement standard.</p> <p>This work will continue throughout 2025 and is supported by the planned integration of our complaints management system into our central Customer Management system (NEC) from May 2025, which will enable more robust tracking, reporting, and oversight. In the interim, we have kept residents and stakeholders informed through targeted website communications and ad hoc service updates.</p>	<p>Director of Business Improvement</p> <p>Head of Customer Services</p>	March 2026
6.3	Landlords must issue a full response to stage 1 complaints within 10 working days of the complaint being acknowledged.	No	<p>Our complaints policy and supporting operating procedures fully comply with the Code. Our performance through the year has not though met the threshold of being materially compliant.</p> <p>We recognise that issuing full responses to Stage 1 complaints within 10 working days remains an area for improvement. Root cause analysis has been undertaken to identify</p>	Director of Business Improvement	March 2026

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			barriers, and we are actively working to improve response times. To address this, we are reviewing the complaints culture, operational processes, and systems across the business, ensuring appropriate resources and best practices are in place to enhance efficiency and compliance.		
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.	No	<p>Our complaints policy and supporting operating procedures fully comply with the Code. Our performance through the year has not though met the threshold of being materially compliant.</p> <p>While we have strengthened controls in this area, we continue to review and monitor performance to ensure consistency and compliance. During the year, our quality assurance checks identified inconsistencies in how extensions were being managed. Although extensions were granted appropriately, we did not always provide residents with a clear revised response date, resulting in a lack of clarity in some cases.</p> <p>To address this, we have introduced tighter controls, including a mechanism to restrict who can amend target dates, ensuring greater accountability. A standardised template has also been implemented to ensure residents receive clear and consistent information in line with policy requirements. These improvements were informed by an external audit we commissioned to assess our controls and governance, as well as feedback from our resident Service Improvement Panel (SIP).</p>	Director of Business Improvement	March 2026

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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.	No	As noted in 6.4, we identified inconsistency in the year in how extensions are communicated to residents.	Director of Business Improvement	March 2026
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	We issue complaint responses once the plan of action is known but acknowledge some inconsistencies, contributing to extensions. Some residents prefer responses only after all actions are completed, reflecting a need for greater trust. We remain committed to improving this and, from May 2025, CRM integration will enhance tracking, ownership, and communication. We will continue working positively with residents to strengthen confidence in our approach.		
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	We ensure that all points raised in the complaint definition are addressed, providing clear reasons for decisions with references to relevant policies, laws, and good practices where appropriate. A structured checklist format is used in complaint response letters to ensure completeness, and where possible, a phone call is made to the resident before issuing the final response. Additionally, a 5% sample of Stage 1 responses undergoes monthly quality assurance checks, and all Stage 2 responses are reviewed by a director to maintain consistency and accuracy.		

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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	We incorporate related issues into the Stage 1 response where possible, with the resident's agreement. Unrelated or late-stage issues are logged separately to avoid delays. This may result in concurrent complaints for the same resident.		
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	Our complaint letter templates include all necessary details and have been fully audited and reviewed this year. They provide a clear structure for the team and have been successfully implemented across business teams.		
Section 6: Complaints Stages - Stage 2					
6.1	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	We identified weaknesses and inconsistencies in escalating complaints to Stage 2 during the year. However, we have now strengthened controls to ensure compliance and timely progression.		
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	No	Our complaints policy and supporting operating procedures fully comply with the Code. Our performance through the year has not though met the threshold of being materially compliant. We have not consistently met this timescale over the past year. Where we failed, we	Director of Business Improvement	March 2026

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			acknowledged this to residents and addressed it in the complaint response. The Complaints Team has been briefed, and this requirement is now included in the Stage 2 checklist to ensure compliance. We are continuing to monitor performance closely to drive consistency and improve service delivery.		
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	Where residents are unclear, we document our efforts to understand their reasons for escalation. We have also observed an increase in residents explicitly escalating to access the Ombudsman Service, often making clear this is with a financial motivation.		
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Yes	Stage 2 complaints are reviewed by a different person than at Stage 1 to ensure impartiality.		
6.14	Landlords must issue a final response to the stage 2 within 20 working days of the complaint being acknowledged.	No	<p>Our complaints policy and supporting operating procedures fully comply with the Code. Our performance through the year has not though met the threshold of being materially compliant.</p> <p>While we have made progress in 2024, we recognise the need for ongoing improvements to ensure we consistently meet this deadline. To address this, we are committed to working closely with all areas of the business to enhance our processes and improve compliance.</p> <p>Throughout 2025, we will rigorously assess our performance in this area, conducting regular quality reviews to identify opportunities for further improvement. Our aim is to ensure that</p>	Director of Business Improvement	March 2026

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			we not only meet this timescale consistently but also continue to improve the experience for residents. We are committed to providing timely, transparent, and high-quality responses and will continue to monitor our progress throughout the year to uphold these standards, more consistently.		
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.	No	Our review this year identified historic failings in this area due to system and process gaps. We have since implemented substantial improvements, including strengthened controls and validation exercises to ensure compliance. An audit also highlighted that our policy did not previously specify the maximum extension period, this has now been clarified. While extensions were granted, we did not always provide a clear response date, leaving residents uncertain. To address this, a template has been introduced to ensure residents receive clear expectations on response times. We are continuing to monitor performance closely to drive consistency and improve service delivery.	Director of Business Improvement	March 2026
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	Our internal review identified that, earlier in the year, this was not consistently standardised. To address this, we have introduced a new extension template that includes the Housing Ombudsman's contact details. These details are now consistently provided at key stages of the process, including service requests, extension notifications, and formal responses. We continue to monitor performance closely to ensure consistency and uphold service standards.		

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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	Complaints responses are now issued once a clear plan of action is in place, rather than waiting for all actions to be completed - particularly important for multi-issue complaints with differing resolution timescales. We are working to communicate this more clearly to residents, in line with compliance requirements. Outstanding actions are tracked in ReACT, our standalone complaints management system. From May 2025, integration with NEC, our primary housing and customer management system, will introduce stronger controls, improving consistency and oversight.		
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 points raised in the complaint are addressed through checklists and Stage 2 reviews before letters are sent out. The introduction of the complaint investigation matrix this year has significantly improved response quality, particularly in terms of policy compliance. We continue to monitor performance closely to ensure consistency and uphold service standards.		
6.2	Landlords must confirm the following in writing to the resident at the completion of stage 2 in clear, plain language: a. the complaint stage. b. the complaint definition. c. the decision on the complaint. d. the reasons for any decisions made. e. the details of any remedy offered to put things right. f. details of any outstanding actions; and g. details of how to escalate the matter to the Ombudsman Service if the individual remains dissatisfied.	Yes	Our complaints letter templates provide clear structure, ensuring the response addresses all required elements at Stage 2, including the complaint stage, definition, decision, reasons for decisions, remedy offered, outstanding actions, and escalation details for the Ombudsman Service. We continue to monitor performance closely to ensure consistency and uphold service standards.		

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6.2	Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.	Yes	Stage 2 responses are signed off by the relevant senior staff members, ensuring the involvement of all necessary personnel. Complaints are escalated as needed to achieve a resolution.		
Section 7: Putting Things Right					
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: <ul style="list-style-type: none"> • Apologising. • Acknowledging where things have gone wrong. • Providing an explanation, assistance or reasons. • Taking action if there has been delay. • Reconsidering or changing a decision. • Amending a record or adding a correction or addendum. • Providing a financial remedy. • Changing policies, procedures or practices. 	Yes	Complaints responses address these points as appropriate based on the investigation, including apologies, acknowledgments of issues, explanations, actions for delays, reconsidering decisions, amending records, providing financial remedies, or updating policies and procedures.		
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Yes	The impact on the resident is considered when determining any redress, in line with the Compensation Policy, ensuring remedies reflect the identified fault.		
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.	No	Complaint cases will record required actions, which are then shared with the relevant business areas for delivery. However, determinations have highlighted inconsistencies, particularly in tracking and	Director of Business Improvement	March 2026

Code Section	Requirement	Comply Yes/No?	Evidence, Commentary, Explanations	Owner	Deadline
			managing complaint resolutions and follow-on actions. Repairs remain our highest driver of complaints, as is common across the sector, often involving follow-on works that extend beyond the initial response. These works, along with those in other service areas, are impacted by variables like contractor and third-party agency interdependencies, which can create additional barriers. To address this, we are enhancing tracking systems and improving team coordination for more effective resolution. Focused reviews of complaint resolution across all service areas, including repairs, will be a key focus in 2025, with ongoing monitoring to ensure consistency and uphold service standards.		
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes	HOS guidance will always be considered when deciding on remedies.		
Section 8: Self-Assessment, Reporting and Compliance					
8.1	<p>8.1 Landlords must produce an annual complaints performance and service improvement report for scrutiny and challenge, which must include:</p> <p>a) the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements.</p> <p>b) a qualitative and quantitative analysis of the landlord's complaint handling performance. This must also include a summary of the types of complaints the landlord has refused to accept.</p> <p>c) any findings of non-compliance with this Code by the Ombudsman.</p>	Yes	<p>An annual complaints performance and service improvement report will be submitted to the Customer Committee in May 2025.</p> <p>This will include a self-assessment against the Code, a qualitative and quantitative analysis of complaint handling performance, findings of non-compliance by the Ombudsman, service improvements from complaints learning, and any relevant reports from the Ombudsman.</p>		

Code Section	Requirement	Comply Yes/No?	Evidence, Commentary, Explanations	Owner	Deadline
	<p>d) the service improvements made as a result of the learning from complaints.</p> <p>e) any annual report about the landlord's performance from the Ombudsman.</p> <p>and</p> <p>f) any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord.</p>				
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	PA's Board will publish its response alongside the annual complaint's performance and service improvement report on 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	A self-assessment will be carried out following any significant restructure, merger, or change in procedures. We will define 'significant' as any restructure requiring consultation, and this assessment will take place annually or more frequently if needed.		
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	Yes	The self-assessment will be reviewed and updated as needed following 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.	Yes	The process has been noted, and Business Continuity Planning includes provisions for addressing a cyber incident or other systemic failures that may impact compliance with the Code. In such cases, the Ombudsman will be informed, affected residents will be notified, and the information will be published on the website, along with a timescale for returning to compliance.		

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Section 9: Scrutiny & Oversight: Continuous Learning and Improvement					
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.	No	While significant improvements have been made over the past year, consistency remains a challenge. Moving into 2025-26, we are committed to further developing our systems and processes to ensure standardised and consistent approaches. We will continue to monitor performance rigorously to drive consistency and uphold service standards.	Director of Business Improvement	March 2026
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.	No	As per point 9.1, better analysis of insights from complaints will drive improvements in service delivery and compliance in 2025-26.	Director of Business Improvement	March 2026
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	Learning from complaints is a key focus, with continuous enhancement across all communication channels, forums, and meetings to drive business improvement. In 2024, we commissioned an external audit and a resident SIP of complaints. Insights are shared through committees, the Annual Report, and regular performance reports to ensure accountability and progress.		
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	The Director of Business Improvement is the accountable lead for complaint handling, responsible for assessing themes, trends, systemic issues, and areas requiring policy or procedural revisions.		
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	Yes	Kim Francis from the governing body is the appointed Member Responsible for Complaints (MRC), supporting a positive complaint handling culture.		

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	complaint handling culture. This person is referred to as the Member Responsible for Complaints ('the MRC')				
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 MRC has access to relevant staff and information to ensure the governing body receives regular insights into 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 progress made in complying with orders related to severe maladministration findings; and d. annual complaints performance and service improvement report.	Yes	The Board receives monthly complaints updates via the KPI pack, including volumes, trends, and commentary. Severe Maladministration findings and the annual complaints performance and service improvement report are also shared.		

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9.8	<p>Landlords must have a standard objective in relation to complaint handling for all relevant employees or third parties that reflects the need to:</p> <ul style="list-style-type: none"> a. has a collaborative and cooperative approach towards resolving complaints, working with colleagues across teams and departments. b. takes 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	<p>This year, we have enhanced both individual and corporate objectives to ensure a stronger organisational focus on complaint handling and a clear understanding of complaint standards across all relevant roles. These objectives now explicitly reflect the principles of collaborative working, shared accountability, and professional standards that are essential to effective complaint resolution.</p> <p>Colleagues are expected to work cooperatively across teams to resolve complaints, take collective responsibility for identified service failings, and engage with residents and colleagues in line with professional standards. These expectations are embedded within our performance framework and are regularly reinforced through training, one-to-one discussions, and team-based learning.</p>		