

Housing Ombudsman Complaint Handling Code 2024: PCHA Self-Assessment (2023-24)

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

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

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

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

Section 1: Definition of a complaint

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
1.2	A complaint must be defined as: <i>'an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the landlord, its own staff, or those acting on its behalf, affecting a resident or group of residents.'</i>	Yes	Our Complaints Policy includes this definition of a Complaint with an additional broader explanation (Clause 3.1)	Our Complaints Policy was revised in 2023. A further review has been undertaken to ensure compliance with the Code in 2024.
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	Our Complaints Policy states that a resident does not have to use the word "complaint" or ask to "make a complaint". Our Complaints Leaflet confirms that complaints submitted via a third party or representative are handled in line with our Complaints Policy, provided the resident provides consent.	
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,	Yes	PCHA's Policy specifies that a complaint is not a first attempt to request a service or make an enquiry. Staff are trained to understand the difference between service requests and complaints and aim	

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	monitored and reviewed regularly.		to resolve complaints informally as soon as possible.	
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	We record dissatisfaction with a response as a complaint using the reference Complaint entries via Contact Logs on our CRM on Homemaster.	
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	<p>We treat Satisfaction Survey feedback as an opportunity to improve our services and follow up with individuals if they have expressed dissatisfaction</p> <p>Details of how to complain are on the website</p>	<p>Every resident who provided a comment in our 2023 Satisfaction Survey received a follow up call from us during which we checked whether they wished to make any complaints or had suggestions for improvements.</p> <p>We complete transactional surveys for each repair and follow up any reports of dissatisfaction to see how we can improve or address for the reason for dissatisfaction.</p>

Section 2: Exclusions

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
2.1	Landlords must accept a complaint unless there is a valid reason not to do so. If landlords decide not to accept a complaint they must be able to evidence their reasoning. Each complaint must be considered on its own merits	Yes	Exclusions are set out very clearly within our Complaints Policy and there is no blanket exclusions.	We have not rejected any matters raised by residents for consideration as complaints.
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	<p>Our Complaints Policy (3.2) states that we will not be able to deal with the following via the complaints process.</p> <ul style="list-style-type: none"> • Complaints about other residents (see 3.1.2) • Any matter which is already being (or has been) dealt with by a solicitor • Matters that are being/have been dealt with by our insurers • Complaints already being dealt with by the Ombudsman or MP • Any matter that occurred more than 12 months ago • Complaints that have already been through the process or which, in 	We have amended our policy and will now consider any matter that occurred up to 12 months ago, rather than 6 months as previously.

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
			<p>PCHA's opinion, are being pursued in an unreasonable manner</p> <ul style="list-style-type: none"> Complaints that fall outside our jurisdiction (e.g. complaints about utilities). <p>If we decide not to accept a complaint, a detailed explanation will be provided to the resident setting out the reasons why the matter is not suitable for the complaints process.</p>	
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	We have amended our Policy and will accept complaints referred within 12 months of the matter arising.	All complaints are considered on an individual basis and we will apply discretion to accept complaints made outside this time limit if appropriate.
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	Yes	If we do not accept a complaint we will provide a full explanation to the resident include information that that decision can be taken to	We have not refused to consider any matters as a complaint in 2023-24.

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	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.		the Ombudsman.	
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Yes	Every complaint is considered on an individual basis.	

Section 3: Accessibility and Awareness

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
3.1	Landlords must make it easy for residents to complain by providing different channels through which they can make a complaint. Landlords must consider their duties under the Equality Act 2010 and anticipate the needs and reasonable adjustments of residents who may need to access the complaints process.	Yes	<p>Complaints do not have to be made in writing. Residents can complain using the following methods:</p> <ul style="list-style-type: none"> • Letter • Email (we have a dedicated email address) • Telephone • Social media • Website • Office visit • During a home visit • <p>Residents do not have to use the word complaint.</p>	<p>Staff training and induction programmes</p> <p>Our Policy confirms that we comply with the Equality Act 2010 and will adapt our process or make reasonable adjustments to accommodate an individual's needs whenever possible and reasonable.</p> <p>All staff receive Equality, Diversity and Inclusion training as part of their induction.</p>
3.2	Residents must be able to raise their complaints in any way and with any member of staff. All staff must be aware of the complaints process and be able to pass details of the complaint to the appropriate person within the landlord.	Yes	<p>As above – complaints may be made via a variety of channels.</p> <p>All staff are trained on complaints handling and understand how to pass details to appropriate person.</p>	
3.3	High volumes of complaints must not be seen as a negative, as they can be indicative of a well-publicised and accessible complaints process. Low complaint volumes are potentially a sign that residents are unable to complain.	Yes	<p>We welcome complaints and see them as an on opportunity to improve.</p> <p>Lessons learned sessions are held when we identify that things have not gone as well as they</p>	<p>We also use Insight reports published by the Ombudsman as learning tools for staff and to identify if our processes or policies need to be revised.</p>

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
			should – regardless of whether they are raised as a complaint.	
3.4	Landlords must make their complaint policy available in a clear and accessible format for all residents. This will detail the two stage process, what will happen at each stage, and the timeframes for responding. The policy must also be published on the landlord's website.	Yes	<p>We have a Complaints leaflet summarising the policy and procedural stages which is available on our Website ("Making a Complaint"). The information is included in our Resident Handbook and copies of the full policy are provided to residents</p> <p>A copy of our Policy is issued to any complainant.</p>	There is a Complaints section on our website with a complaint form and a copy of this self-assessment form. Our Complaints Leaflet outlines our policy and the process to follow and is also available on the Leaflet section within the Residents Publications section of our website.
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	Section 7 of our Policy details how we will communicate and publicise our policy. We include information about the Ombudsman service at each stage.	
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	This is specified within Section 4 of our Policy regarding the Complaints Procedure.	

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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	<p>This information is included within our Complaints Policy and within correspondence to residents as part of the complaints handling process.</p> <p>Our Policy states that we will provide early advice to residents regarding their right to access the Housing Ombudsman Service, not only at the point they have exhausted the complaints process.</p>	Every resident has been issued with our Resident Handbook which contains guidance on how to complain. Section on Website contacts information including information regarding the Ombudsman.

Section 4: Complaint Handling Staff

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
4.1	Landlords must have a person or team assigned to take responsibility for complaint handling, including liaison with the Ombudsman and ensuring complaints are reported to the governing body (or equivalent). This Code will refer to that person or team as the 'complaints officer'. This role may be in addition to other duties.	Yes	The officer responsible for complaint handling is the Head of Resident Services.	
4.2	The complaints officer must have access to staff at all levels to facilitate the prompt resolution of complaints. They must also have the authority and autonomy to act to resolve disputes promptly and fairly.	Yes	The officer responsible for Complaints Handling is the Head of Resident Services. The designated officer for any complaint has access to staff at all levels to facilitate quick resolution of complaints and has the authority and autonomy to act to resolve disputes quickly and fairly. See Section 4.1.	
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	Staff are trained to resolve complaints as swiftly as possible and encouraged to use their authority to do so. Our aim is to resolve complaints quickly and fairly and to the satisfaction of the resident concerned.	

Section 5: The Complaint Handling Process

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
5.1	Landlords must have a single policy in place for dealing with complaints covered by this Code. Residents must not be treated differently if they complain.	Yes	We have one single policy.	PCHA staff all work within PCHA's Values which include behaving with respect and integrity.
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 aim to resolve all complaints swiftly and promptly and have only 2 stages in our process.	
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 limited to 2 stages.	
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	This is specified within Section 4 of our policy.	

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Yes	See Section 4.1.5 of Policy	No complaints were referred to third parties during 2023-24
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	When we acknowledge complaints we set out our understanding of the complaint and what outcome the resident is seeking. If clarification is needed we request it.	
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	As above	
5.8	At each stage of the complaints process, complaint handlers must: <ul style="list-style-type: none"> a. deal with complaints on their merits, act independently, and have an open mind; b. give the resident a fair chance to set out their position; 	Yes	We comply with these requirements	

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	<ul style="list-style-type: none"> c. take measures to address any actual or perceived conflict of interest; and d. consider all relevant information and evidence carefully. 			
5.9	Where a response to a complaint will fall outside the timescales set out in this Code, the landlord must agree with the resident suitable intervals for keeping them informed about their complaint.	Yes	See Section 4 of our Policy.	We will always seek to get agreement to any variation of timescales or targets in our complaint handling but this is subject to the complainant engaging with this process.
5.10	Landlords must make reasonable adjustments for residents where appropriate under the Equality Act 2010. Landlords must keep a record of any reasonable adjustments agreed, as well as a record of any disabilities a resident has disclosed. Any agreed reasonable adjustments must be kept under active review.	Yes	See Section 6 of our Policy	We encourage residents to let us know if they need support in making a complaint.
5.11	Landlords must not refuse to escalate a complaint through all stages of the complaints procedure unless it has valid	Yes	We have not refused to escalate any complaints through our process. If we did so we would	

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	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.		provide a detailed explanation of the reasons for doing so. See Section 3.2 of our Policy	
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	We fully comply with this	We have a Complaints Register which details this information. We also have a Complaints folder which has copies of all documentation relating to each complaint in addition to our Case Management Logs on Homemaster.
5.13	Landlords must have processes in place to ensure a complaint can be remedied at any stage of its complaints process. Landlords must ensure appropriate remedies can be provided at any stage of the complaints process without the need for escalation.	Yes	A remedy made be offered at any stage of our process – See Section 4.5.	
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	Yes	Our Complaints Policy includes a section for this. We also have an Unacceptable Behaviour Policy in place.	

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	putting any restrictions in place and must keep restrictions under regular review.			
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	This is covered within our Unacceptable Behaviour Policy	

Section 6: Complaints Stages

Stage 1

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
6.1	Landlords must have processes in place to consider which complaints can be responded to as early as possible, and which require further investigation. Landlords must consider factors such as the complexity of the complaint and whether the resident is vulnerable or at risk. Most stage 1 complaints can be resolved promptly, and an explanation, apology or resolution provided to the resident.	Yes	Section 4.1 of our Policy sets out our aim to achieve positive resolution within two days of receiving a complaint.	
6.2	Complaints must be acknowledged, defined and logged at stage 1 of the complaints procedure <u>within two working days of the complaint being received.</u>	Yes	Our Complaints Policy sets out the timescale for responses and extensions. We achieved 100% compliance with our response targets in 2023-24.	Our response targets have been revised to meet the requirements of the 2024 Code.
6.3	Landlords must issue a full response to stage 1 complaints <u>within 10 working days</u> of the complaint being acknowledged.	Yes	Our Complaints Policy sets out the timescale for responses and extensions.	
6.4	Landlords must decide whether an extension to this timescale is needed when considering the complexity of the	Yes	This is stated within our policy	

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	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.			
6.5	When an organisation informs a resident about an extension to these timescales, they must be provided with the contact details of the Ombudsman.	Yes	See Section 4 of our Policy.	
6.6	A complaint response must be provided to the resident when the answer to the complaint is known, not when the outstanding actions required to address the issue are completed. Outstanding actions must still be tracked and actioned promptly with appropriate updates provided to the resident.	Yes	A response is sent to the resident as soon as known. Any outstanding actions are tracked and monitored to ensure timely completion.	
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	Our responses meet this requirement	

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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	This is detailed in our Policy in Section 4.1	Our Policy has been amended to reflect this. We will always aim to incorporate all aspects raised within the Stage 1 response unless it caused delay and otherwise treat the additional issue as a new complaint.
6.9	Landlords must confirm the following in writing to the resident at the completion of stage 1 in clear, plain language: <ul style="list-style-type: none"> a. the complaint stage; b. the complaint definition; c. the decision on the complaint; d. the reasons for any decisions made; e. the details of any remedy offered to put things right; f. details of any outstanding actions; and g. details of how to escalate the matter to stage 2 if the individual is not satisfied with the response. 	Yes	Our responses cover each of these expectations with the outcome notification to residents and this is set out in our Policy.	

Stage 2

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
6.10	If all or part of the complaint is not resolved to the resident's satisfaction at stage 1, it must be progressed to stage 2 of the landlord's procedure. Stage 2 is the landlord's final response.	Yes	Our Policy reflects this and complaints responses in 2023-24 demonstrate our compliance.	
6.11	Requests for stage 2 must be acknowledged, defined and logged at stage 2 of the complaints procedure within five working days of the escalation request being received.	Yes	Our Policy complies with this requirement.	Our Policy has been updated to reflect this requirement.
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	Whilst residents are not required to explain their reasons for requesting a Stage 2 review, we will ask what resolution is being sought as part of our review.	
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Yes	A different officer (or if appropriate a Board member) considers the complaint at Stage 2.	
6.14	Landlords must issue a final response to the stage 2 <u>within 20 working days</u> of the complaint being acknowledged.	Yes	Timescale are set out in our Policy and we delivered responses within the required timescales for all complaints in 2023-24.	

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
6.15	Landlords must decide whether an extension to this timescale is needed when considering the complexity of the complaint and then inform the resident of the expected timescale for response. Any extension must be no more than 20 working days without good reason, and the reason(s) must be clearly explained to the resident.	Yes	Our Policy is that we will not normally exceed the target response of 20 working days beyond a further 10 working days without good reason.	If an extension is required we would seek to agree this with the complainant.
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	This is confirmed in our Policy – See Section 4.	
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	We comply with this requirement. We will issue a complaint response and if there is additional action required such as completion of repairs, we will monitor and track these to ensure they are completed.	
6.18	Landlords must address all points raised in the complaint definition and provide clear reasons for any decisions, referencing the relevant policy, law and good practice where appropriate.	Yes	We provide comprehensive responses to items raised within complaints and this is demonstrated within our outcome letters.	

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
6.19	<p>Landlords must confirm the following in writing to the resident at the completion of stage 2 in clear, plain language:</p> <ul style="list-style-type: none"> a. the complaint stage; b. the complaint definition; c. the decision on the complaint; d. the reasons for any decisions made; e. the details of any remedy offered to put things right; f. details of any outstanding actions; and g. details of how to escalate the matter to the Ombudsman Service if the individual remains dissatisfied. 	Yes	<p>We provide the information required.</p> <p>Details of how to escalate the matter to the Housing Ombudsman Service if dissatisfied are provided at conclusion of Stage 2.</p>	
6.20	<p>Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.</p>	Yes	<p>We comply with this requirement. All relevant staff are involved in investigations and reviews and of the outcomes and any follow up actions required.</p>	

Section 7: Putting things right

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
7.1	<p>Where something has gone wrong a landlord must acknowledge this and set out the actions it has already taken, or intends to take, to put things right. These can include:</p> <ul style="list-style-type: none"> • Apologising; • Acknowledging where things have gone wrong; • Providing an explanation, assistance or reasons; • Taking action if there has been delay; • Reconsidering or changing a decision; • Amending a record or adding a correction or addendum; • Providing a financial remedy; • Changing policies, procedures or practices. 	Yes	<p>Our ethos is to acknowledge when things go wrong or could have been handled better, and to identify and implement what can be done to rectify this and improve. This is reflected in our responses to residents.</p>	
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Yes	Our Complaints Policy sets out our approach to compensation and redress. We are careful to manage expectations throughout the complaints process.	
7.3	The remedy offer must clearly set out what will happen and by when, in agreement with the resident where	Yes	We track agreed actions to ensure they have been fully completed.	

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
	appropriate. Any remedy proposed must be followed through to completion.			
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes	We consider the Ombudsman's guidance when considering remedies.	We have a Compensation Policy which sets out matters for consideration when considering compensation and other remedies available when we have not performed as well as we should have or in the event of service failure. This Policy was reviewed in 2023.

Section 8: Self-assessment, reporting and compliance

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
8.1	<p>Landlords must produce an annual complaints performance and service improvement report for scrutiny and challenge, which must include:</p> <ul style="list-style-type: none"> a. the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements. b. a qualitative and quantitative analysis of the landlord's complaint handling performance. This must also include a summary of the types of complaints the landlord has refused to accept; c. any findings of non-compliance with this Code by the Ombudsman; d. the service improvements made as a result of the learning from complaints; e. any annual report about the landlord's performance from the Ombudsman; and f. any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord. 	Yes	<p>We provide an annual complaints performance report to the Board.</p> <p>We also provide reports on service improvements throughout the year including Lessons Learned reviews.</p> <p>Our annual report to the Board covers all the areas required by the Code.</p> <p>The Board reviewed our Self Assessment of compliance with the code on 18 June 2024.</p>	
8.2	The annual complaints performance and service improvement report must be	Yes	We publish our annual self assessment of compliance with	

	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.		the Code. From 2024 we will also publish the annual complaints and service improvement report on the Complaints section of our Website, alongside the Board's response to the report.	
8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	Yes	We will consider whether it is appropriate to carry out a new self-assessment after we take on the new management contract with LB Bromley.	
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	Yes	Noted – this has not arisen in 2023/24. No complaints have been referred to the Ombudsman.	
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	This has not arisen during 2023-24.	

Section 9: Scrutiny & oversight: continuous learning and improvement

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
9.1	Landlords must look beyond the circumstances of the individual complaint and consider whether service improvements can be made as a result of any learning from the complaint.	Yes	We see every complaint or report of service failure as an opportunity to improve our services. This includes considering our we can improve our processes or communication.	
9.2	A positive complaint handling culture is integral to the effectiveness with which landlords resolve disputes. Landlords must use complaints as a source of intelligence to identify issues and introduce positive changes in service delivery.	Yes	We consider whether any policy changes are needed as part of our review of every complaint.	
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	We hold regular performance improvement meetings with our staff team during which we share improvements. All staff are encouraged to propose improvements. We are share our learning with residents via our Newsletters. We are setting our a new Partnership Board and its members will play a key role in scrutinising our complaints handling.	We seek feedback on our complaint handling as part of our Satisfaction Survey.

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	Our Head of Resident Services is our lead office for complaint handling and the role includes these responsibilities.	
9.5	In addition to this a member of the governing body (or equivalent) must be appointed to have lead responsibility for complaints to support a positive complaint handling culture. This person is referred to as the Member Responsible for Complaints ('the MRC').	Yes	The Chairperson of the Board is our Member Responsible for Complaints.	
9.6	The MRC will be responsible for ensuring the governing body receives regular information on complaints that provides insight on the landlord's complaint handling performance. This person must have access to suitable information and staff to perform this role and report on their findings.	Yes	The MRC's responsibilities are set out in our Policy and meet these expectations within the Code.	
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;	Yes	This information is provided within Operations Reports to the Board. Section 4.1.2 of our Policy details the responsibilities of the MRC.	

	<ul style="list-style-type: none"> 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. 			
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. have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments; b. take collective responsibility for any shortfalls identified through complaints, rather than blaming others; and c. act within the professional standards for engaging with complaints as set by any relevant professional body. 	Yes	<p>Our aim is to provide the best standard of service for all our residents, and we welcome suggestions, comments and views on how to improve the services we offer.</p> <p>All staff operate within PCHA's Vision and Values statement which reflect these requirements.</p>	