

## Appendix A: Self-assessment form

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

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

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

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

## Section 1: Definition of a complaint

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
1.2	A complaint must be defined as: <i>'an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the landlord, its own staff, or those acting on its behalf, affecting a resident or group of residents.'</i>	Yes	Detailed in 1.3 of our complaints policy.  Detailed in our complaint leaflets available in reception and provided in all sign-up packs, as well as on our website.	All staff have had complaints training.  Our complaints policy and the Housing Ombudsman Complaint Handling Code are displayed on our website.
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 a complaint. A complaint that is submitted via a third party or representative must be handled in line with the landlord's complaints policy.	Yes	Detailed in 5.5 of our complaints policy.	All staff will listen to expressions of dissatisfaction and give the tenants choices as to whether or not they wish to make a complaint. Any complaint can also be made by a third party on the tenants behalf.
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	Detailed in 6.1 of our complaints policy.	We record service requests within our data and review and monitor these regularly. All staff have had training on this, and we use service requests to try and improve our services.
1.5	A complaint must be raised when the resident expresses dissatisfaction with the response to their service request, even if	Yes	Detailed in 6.2 of our complaints policy.	A complaint will be raised if the tenant is dissatisfied with the response to their service

	the handling of the service request remains ongoing. Landlords must not stop their efforts to address the service request if the resident complains.			request, and we will continue to address the service failure even if a complaint is 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	Detailed in 5.4 of our complaints policy.	We do not record dissatisfaction via a survey as a complaint, but staff are trained to advise the tenant how they can make a complaint if they wish to do so.

## 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	Detailed in 8.2 of our complaints policy.	If we are unable to accept a complaint we will explain to the tenant clearly, and with evidence why their complaint cannot be considered. We will also advise the tenant they can contact the Housing Ombudsman if not satisfied with our response.
2.2	A complaints policy must set out the circumstances in which a matter will not be considered as a complaint or escalated, and these circumstances must be fair and	Yes	Detailed in 8.1 of our complaints policy.	These reasons are deemed fair and reasonable.

	<p>reasonable to residents. Acceptable exclusions include:</p> <ul style="list-style-type: none"> <li>• The issue giving rise to the complaint occurred over twelve months ago.</li> <li>• 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.</li> <li>• Matters that have previously been considered under the complaints policy.</li> </ul>			
2.3	<p>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.</p>	Yes	Detailed in 5.1 & 5.2 of the complaints policy.	<p>We will accept any complaint made within 12 months of the issue occurring. Complaints made outside of the 12 months will be assessed on case-by-case basis at our discretion.</p>
2.4	<p>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.</p>	Yes	Detailed in 8.2 of the complaints policy.	<p>If we do not accept a complaint, we will explain in writing why this is, and advise the tenant that they can refer this to the Housing Ombudsman. We will take any further instruction from the Ombudsman, if necessary.</p>
2.5	<p>Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.</p>	Yes	Detailed in 5.6 of the complaint policy.	<p>Each case is dealt with individually, considering the circumstances and any vulnerabilities that the tenant may have.</p>

### 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	Detailed in section 2.2, 2.4 & 7.3 of the complaints policy.	We are open to making reasonable adjustment and can offer the policy in a variety of formats at the tenant, or their representatives request.
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	Detailed in 5.5 of the complaints policy.	All staff have had training to hear complaints and are aware any tenant or representative can raise a complaint to any staff member. This is then passed to the appropriate person.
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	Detailed in 2.1 of the complaints policy.	We welcome complaints and try to improve our services as a result, we see complaints as an opportunity for positive progress.
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	Detailed in 2.4 & 3.2 of the complaints policy.	Our complaints policy is available on our website, by email, in paper format, large print, braille, etc. We have a 2 stage complaints process in place.
3.5	The policy must explain how the landlord	Yes	This is detailed throughout our	2.5 has been added in

	will publicise details of the complaints policy, including information about the Ombudsman and this Code.		complaints policy, in particular in points 2.5 & 2.6.	accordance with changes to the 2024 code for small providers.
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	Detailed in 2.4 of the complaints policy.	This has been amended for clarity in our policy. We will happily speak to tenant's representatives.
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	This is detailed throughout our complaints policy, in particular in points 3.3 and 8.2.	This information is also in our complaint letter responses.

#### 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	Detailed in 3.7 of the complaints policy.	The Director of Assets / Deputy Chief Executive is the Complaints Officer for PHA Homes, supported by the Head of Services who will deal with all complaints in the first instance.
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 officer has access to all staff at all levels to resolve complaints – evidenced by our internal CRM system.	The complaints officer has the authority to speak to any staff member of staff to obtain the necessary information to aid the prompt resolution of complaints.

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	We are learning from complaints as evidenced in our annual complaint learning outcomes. We see complaints as positive opportunity – see 2.3 of the policy.	All staff have had complaints handling training. We are a small organisation, and we can all be customer facing.

### 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	There is only one complaints policy within the organisation. Residents are treated equally as detailed in 1.2 of the complaints policy.	We comply with the Equality Act 2010 and the Consumer Standards.
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	Detailed in section 3 of the complaints policy.	There are only 2 stages (stage 1 & 2) to our complaints process, there are no stage 0 or informal stages.
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	As above.	As above.
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	Yes	Detailed in 5.7 of the complaints policy.	If a complaint required a response from a 3 <sup>rd</sup> party, it would be part of the landlord investigation and response, not a separate process and

	must not be expected to go through two complaints processes.			would comply with the code.
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Yes	As above.	As above.
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	Detailed in appendix 1 and 2 of our complaint handling procedure.	Our complaint handling procedure is also available via our website. This is detailed in our standard complaint letter templates, which are from the Ombudsman framework. If something is unclear, we would ask for clarification.
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	Responsibilities are detailed in various resident documents.	Landlord responsibilities are predominantly detailed in the tenancy agreement, but we make it clear and refer to the necessary documentation when responding to the complaint, detailing which areas we would have responsibility for.
5.8	At each stage of the complaints process, complaint handlers must: <ul style="list-style-type: none"> <li>a. deal with complaints on their merits, act independently, and have an open mind;</li> <li>b. give the resident a fair chance to set out their position;</li> <li>c. take measures to address any actual or perceived conflict of interest; and</li> <li>d. consider all relevant information and evidence carefully.</li> </ul>	Yes	Detailed in 3.4 of the complaints policy.	Added to the complaints policy for evidence and accountability.



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	Detailed in 3.3 of the complaints policy.	Added to the complaints policy for evidence and accountability.
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	Detailed in point 2.2 & 2.4 of the complaints policy.	Added to the complaints policy for evidence and accountability.
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	Detailed in point 3.6 in our complaints policy.	Exclusions referred to in point 5.7 of the self-assessment. Compliant with section 2 of the Code.
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 record each complaint, including dates and any correspondence with the tenant and other parties on our data management system. Surveys would be kept on our property folders which are linked to our data management system.	We have added a section for 'outcome from complaint' (we already had learning included).
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	Yes	Detailed in 9.5 of our complaints policy.	Includes detail of possible remedies to resolve complaints at any stage.

	process without the need for escalation.			
5.14	Landlords must have policies and procedures in place for managing unacceptable behaviour from residents and/or their representatives. Landlords must be able to evidence reasons for putting any restrictions in place and must keep restrictions under regular review.	Yes	Detailed in section 7 of the complaints policy.	Details restrictions and unreasonable or unacceptable behaviours.
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 detailed in our complaints policy under 7.3.	Restrictions would be proportionate based on the Equality Act 2010 and individual circumstances.

## 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	Detailed in 3.3 of the complaints policy.	Our aim is to resolve stage 1 complaints promptly, and within 10 working days. If this is not possible, we would contact the tenant to discuss this with them further and agree a new timescale.
6.2	Complaints must be acknowledged, defined and logged at stage 1 of the complaints procedure <b>within five working</b>	Yes	Detailed in 3.1 of the complaints policy.	Stage 1 complaints are logged and acknowledged on our database, and with the tenant,

	<b><u>days of the complaint being received.</u></b>			within 5 days of the complaint being received.
6.3	Landlords must issue a full response to stage 1 complaints <b><u>within 10 working days</u></b> of the complaint being acknowledged.	Yes	Detailed in 3.2 of the complaints policy.	We usually resolve stage 1 complaints within 10 working days of the complaint being acknowledged.
6.4	Landlords must decide whether an extension to this timescale is needed when considering the complexity of the complaint and then inform the resident of the expected timescale for response. Any extension must be no more than 10 working days without good reason, and the reason(s) must be clearly explained to the resident.	Yes	Detailed in 3.3 of the complaints policy.	If the above is not possible, we would contact the tenant to discuss this with them further and agree a new timescale.
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	Detailed in point 3.3 of the complaint policy.	Added into policy for evidence purposes.
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	Detailed in point 3.4 of the complaint policy.	Added into policy for evidence purposes.
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	Detailed in point 3.4 of the complaint policy.	Added into policy for evidence purposes.
6.8	Where residents raise additional	Yes	Detailed in 3.5 of the complaint	Added into policy for clarity.

	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.		policy	
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"> <li>a. the complaint stage;</li> <li>b. the complaint definition;</li> <li>c. the decision on the complaint;</li> <li>d. the reasons for any decisions made;</li> <li>e. the details of any remedy offered to put things right;</li> <li>f. details of any outstanding actions; and</li> <li>g. details of how to escalate the matter to stage 2 if the individual is not satisfied with the response.</li> </ul>	Yes	Detailed in appendix 1 of the complaint's procedure (available on our website)– stage 1 letter response includes all information required.	Details of any outstanding actions has been added for compliance purposes.

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	Detailed in 3.2 of the complaints policy.	A 2-stage process is in place and any stage 1 complaint that is not resolved to the resident's satisfaction is escalated to stage 2 at their request.

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	Detailed in 3.2 of the complaints policy.	Stage 2 complaints are also logged and acknowledged on our data management system within 5 working days.
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	Detailed in 3.2 of the complaints policy and the option to escalate the complaint is included in the stage 1 complaint response letter (appendix A of complaints procedure).	Added to complaints policy for clarity.
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Yes	Detailed in 3.2 of the complaints policy.	Stage 1 complaints are dealt with by the Head of Services. Stage 2 complaints are dealt with by the Director / CEO.
6.14	Landlords must issue a final response to the stage 2 <b><u>within 20 working days</u></b> of the complaint being acknowledged.	Yes	Detailed in 3.2 of the complaints policy.	We always aim to issue a final response within 20 days of the complaint being acknowledged.
6.15	Landlords must decide whether an extension to this timescale is needed when considering the complexity of the complaint and then inform the resident of the expected timescale for response. Any extension must be no more than 20 working days without good reason, and the reason(s) must be clearly explained to the resident.	Yes	Detailed in 3.3 of the complaints policy.	We would liaise with the tenant in terms of revised time scales, and this would not be any longer than an additional 20 working days without good reason.
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	Detailed in 3.3 of the complaints policy.	The tenant would be provided with the Ombudsman's details should we require additional time to resolve the complaint.
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	Yes	Detailed in 3.4 of the complaints policy.	We would aim to resolve any outstanding actions as promptly as possible to resolve the complaint.

	issue are completed. Outstanding actions must still be tracked and actioned promptly with appropriate updates provided to the resident.			
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	Detailed in 3.4 of the complaints policy	All points are addressed with clear reason and referring to the necessary guidance / requirement.
6.19	Landlords must confirm the following in writing to the resident at the completion of stage 2 in clear, plain language: a. the complaint stage; b. the complaint definition; c. the decision on the complaint; d. the reasons for any decisions made; e. the details of any remedy offered to put things right; f. details of any outstanding actions; and g. details of how to escalate the matter to the Ombudsman Service if the individual remains dissatisfied.	Yes	Detailed in appendix 2 of the complaint's procedure – stage 2 letter response and includes all points required.	Details of any outstanding actions has been added for compliance purposes.
6.20	Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.	Yes	Detailed in 3.3 of the complaints policy.	Stage 2 is the final response and involves all necessary staff members.

## Section 7: Putting things right

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
7.1	Where something has gone wrong a landlord must acknowledge this and set out	Yes	Detailed in template complaint response letters in our complaints	We would try to resolve the issue with one of the remedies

	<p>the actions it has already taken, or intends to take, to put things right. These can include:</p> <ul style="list-style-type: none"> <li>• Apologising;</li> <li>• Acknowledging where things have gone wrong;</li> <li>• Providing an explanation, assistance or reasons;</li> <li>• Taking action if there has been delay;</li> <li>• Reconsidering or changing a decision;</li> <li>• Amending a record or adding a correction or addendum;</li> <li>• Providing a financial remedy;</li> <li>• Changing policies, procedures or practices.</li> </ul>		<p>procedure (appendix 1 &amp; 2) and includes examples listed.</p>	<p>provided by the Ombudsman.</p>
7.2	<p>Any remedy offered must reflect the impact on the resident as a result of any fault identified.</p>	<p>Yes</p>	<p>Detailed in 9.2 of the complaints policy and in the complaint letter responses in the complaints procedure.</p>	<p>Added for clarity.</p>
7.3	<p>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.</p>	<p>Yes</p>	<p>Detailed in 9.3 of the complaints policy.</p>	<p>Added for clarity.</p>
7.4	<p>Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.</p>	<p>Yes</p>	<p>We are aware of the guidance issued by the Ombudsman for deciding appropriate remedies - <a href="https://www.housing-ombudsman.org.uk">Guidance on remedies   Housing Ombudsman (housing-ombudsman.org.uk)</a>.</p>	<p>We would try to resolve the issue with one of the remedies provided by the Ombudsman.</p>

## Section 8: Putting things right

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"> <li>a. the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements.</li> <li>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;</li> <li>c. any findings of non-compliance with this Code by the Ombudsman;</li> <li>d. the service improvements made as a result of the learning from complaints;</li> <li>e. any annual report about the landlord's performance from the Ombudsman; and</li> <li>f. any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord.</li> </ul>	Yes	<p>Detailed in 10.4 of the complaints policy, we will produce;</p> <ul style="list-style-type: none"> <li>a. the annual self-assessment</li> <li>b. an analysis of performance including a summary of the types of complaints the landlord has refused to accept</li> <li>c. any findings of noncompliance with the code</li> <li>d. service improvements made as a result of learning from complaints</li> <li>e. an annual report about the landlords performance from the ombudsman</li> <li>f. any other relevant reports of publications.</li> </ul>	<p>Added to policy to reflect new 2024 code from 1<sup>st</sup> April</p>
8.2	<p>The annual complaints performance and service improvement report must be reported to the landlord's governing body (or equivalent) and published on the section of its website relating to complaints. The governing body's response to the report must be published</p>	Yes	<p>Detailed in 10.4 of the complaints policy.</p>	<p>Added to policy – not required to submit data before 1<sup>st</sup> April 2024.</p>



	alongside this.			
8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	Yes	Detailed in 10.5 of the complaints policy.	Added to the policy for clarity.
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	Yes	Detailed in 10.5 of the complaints policy.	Added to the policy for clarity.
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	Detailed in 2.6 of the complaints policy.	Added to the policy for clarity.

### 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	Detailed in 9.4 of the complaints policy.	Added for clarity.
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	Detailed in 2.3 of the complaints policy.	We try to encourage complaints as a positive way to improve our services for our tenants.
9.3	Accountability and transparency are also integral to a positive complaint handling culture. Landlords must report back on	Yes	Detailed in 10.3 of the complaints policy.	We report to our Board, Tenant Engagement Panel, staff on a quarterly basis.

	wider learning and improvements from complaints to stakeholders, such as residents' panels, staff and relevant committees.			
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	Detailed in 10.1 of the complaints policy.	The Director of Assets / deputy Chief Executive is the appointee and now named in the policy for clarity. The Head of Services is the first point of contact for any complaints.
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	Detailed in point 10.6 of the complaints policy	PHA Homes resident Board member and Tenant Engagement Panel member is nominated as the MRC for PHA Homes
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	Detailed in Point 10.7 of the complaints policy	The MRC will be provided with all complaints related data and performance information and will have access to relevant staff members to enable them to fulfil the role.
9.7	As a minimum, the MRC and the governing body (or equivalent) must receive: <ul style="list-style-type: none"> <li>a. regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance;</li> <li>b. regular reviews of issues and trends arising from complaint handling;</li> <li>c. regular updates on the outcomes of the Ombudsman's investigations and</li> </ul>	Yes	Detailed in point 10.4 & 10.8 of the complaints policy	The MRC and governing body (Board) receive quarterly reports on complaint volumes, categories, outcomes and performance. They also receive reports of any complaints that have been referred to the Housing Ombudsman and outcomes /

	<p>progress made in complying with orders related to severe maladministration findings; and</p> <p>d. annual complaints performance and service improvement report.</p>			<p>findings from the Housing Ombudsman. Annual complaints performance is reviewed and discussed by Board members.</p>
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> <p>a. have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments;</p> <p>b. take collective responsibility for any shortfalls identified through complaints, rather than blaming others; and</p> <p>c. act within the professional standards for engaging with complaints as set by any relevant professional body.</p>	Yes	Detailed in 2.3 of the complaints policy.	Added to the policy for clarity.