



Ross Walk Housing Cooperative Complaints Handling Code Self-Assessment (March 2026) by Paragon Asra Housing Limited as managing agent

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 requirement	Comply	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	1. Complaints Policy, section 2.1 2. PA Housing website 3. Operational training pack for Customer Services colleagues 4. Housing Ombudsman Service Duty to Monitor review outcome (April 2026)	Our Complaints Policy was reviewed in 2025 and externally reviewed by the Housing Ombudsman Service Duty to Monitor team in April 2026. All recommendations were adopted in full and the policy was confirmed as compliant.
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	1. Customer Services training materials 2. Wider business complaints training materials 3. Documented quality checks following transfer of telephone complaint logging to Customer Services.	Customer-facing colleagues are trained to recognise expressions of dissatisfaction and offer access to the complaints process. All third party contacts are handled in line with the policy where appropriate. Ongoing guidance is provided through the Business Partner model and dedicated support channels for colleagues.
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	1. Complaints Policy, sections 2.1 and 3.1 2. Ongoing colleague training materials 3. Complaints content included in onboarding and induction materials 4. Updated workflow design for service request and complaint handling	We reinforce our approach through training and system changes. During 2025/26 we also redesigned how we work to improve service request handling and reduce avoidable escalation.
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	Yes	1. Case reviews showing complaint logging	We log all valid complaints when raised , regardless of the status of ongoing work. Complaint

Code requirement	Comply	Evidence	Commentary / explanation
ongoing. Landlords must not stop their efforts to address the service request if the resident complains.		- alongside active service delivery 2. Customer Services quality assurance checks	responses set out both what has happened to date, and any further action planned to put things right.
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	1. Survey landing pages with direct link to the complaints process 2. TSM and wider survey process guidance 3. Pre-survey briefing and training materials for colleagues	Residents are signposted to the complaints process where appropriate, and responses are reviewed so that any issues needing formal follow-up can be referred on. Complaints Business Partners also work with relevant teams to ensure a consistent approach to survey feedback handling.

Section 2: Exclusions

Code requirement	Comply	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	1. Complaints Policy, section 4 – Exclusions 2. Case reviews and rejection decision records	Where appropriate, we may accept part of a complaint while explaining why other elements fall outside the scope of the process. We review our cases regularly to ensure we do not reject complaints wrongly.
2.2 A complaints policy must set out the circumstances in which a matter will not be considered as a complaint or escalated, and these circumstances must be fair and reasonable to residents. Acceptable exclusions include: a) The issue giving rise to the complaint occurred over twelve months ago. b) 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. c) Matters that have previously been considered under the complaints policy.	Yes	1. Complaints Policy - Section 4 2. Housing Ombudsman Service Duty to Monitor review outcome	This area was reviewed as part of the Housing Ombudsman Service Duty to Monitor process and was found to be compliant.
2.3 Landlords must accept complaints referred to them within 12 months of the issue occurring or the resident	Yes	1. Training materials	We also apply discretion where appropriate. For example, where repeated short-term repairs have

Code requirement	Comply	Evidence	Commentary / explanation
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.		2. Case reviews and complaint investigations	not resolved a wider issue, this history is taken into account in the complaint investigation.
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	1. Application of the Complaints Policy in casework 2. Complaint rejection letter templates referencing the policy and the Code 3. Standard wording including Housing Ombudsman Service contact details 4. System reporting on “not a complaint” categories from September 2025	Where we decide not to accept a complaint, we explain the reason in writing and advise the resident of their right to refer that decision to the Housing Ombudsman Service.
2.5 Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Yes	1. Case reviews 2. Guidance and training materials for colleagues	Each case is considered individually. For example, where residents contacted us following service charge increase letters, we reviewed each contact to determine whether it was a request for information, a complaint about process, or dissatisfaction requiring a formal complaint response.

Section 3: Accessibility and Awareness

Code requirement	Comply	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	1. Complaints policy 2. PA Housing website 3. Accessibility tools on My PA, including Google Translate and ReachDeck	Residents are asked to tell us about any reasonable adjustments they need, and this information is recorded where known. More vulnerable or high-risk cases may be supported directly by a Complaints Business Improvement Lead.

Code requirement	Comply	Evidence	Commentary / explanation
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	1. Colleague access to the webform 2. Guidance for staff supporting residents to submit complaints	Colleagues can direct residents to the webform or complete it on their behalf where authorised to do so. During 2025/26 we revised our digital options, including use of webforms, to improve consistency and quality and ease of tracking.
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	1. Monthly KPI reporting 2. Year-on-year trend reporting 3. Committee and Board reporting packs	We monitor complaint volumes alongside other key metrics and provide commentary on trends through regular reporting.
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	1. Complaints Policy 2. PA Housing website complaints pages	Our Complaints Policy is published on our website. The complaints section of the website also includes the webform link, resident guidance and our Compensation and Redress Policy.
3.5 The policy must explain how the landlord will publicise details of the complaints policy, including information about the Ombudsman and this Code.	Yes	1. Complaints Policy 2. Website content 3. Letter templates	Our policy is on our website. We provide Ombudsman details in complaint templates and make copies of the policy available at reception. We are developing additional communications for noticeboards and resident publications.
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	1. Complaints Policy, sections 2.2, 2.9, 2.10 and 2.11 2. Third party authority forms 3. Lead complainant arrangements for petitions	This is addressed in our acknowledgement process and supported by standard templates. We use Authority to Disclose arrangements where required, including for MPs to meet data protection requirements.
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	1. Complaint communications templates 2. Training materials 3. Website guidance	Templates and website content are reviewed regularly to reflect any updates to Ombudsman contact details or processes.

Section 4: Complaint Handling Staff

Code requirement	Comply	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	1. Organisation chart 2. Team structure documents	In 2025, we created a Complaints Business Improvement Team, introducing dedicated roles focused on Ombudsman engagement and embedding learning from complaints into service improvement.
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	1. Meeting attendance records 2. Reporting on complaint ownership 3. Business Partnering model	Executive Directors are involved in high risk cases where appropriate and receive regular updates on outcomes and learning.
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	1. C2 to C1 improvement plan 2. Risk register	Complaint handling is recognised as a core service, with resourcing and risks actively managed through governance structures.

Section 5: The Complaint Handling Process

Code requirement	Comply	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	1. Complaints Policy	Related policies (e.g. Compensation and Redress, Unacceptable Behaviour) support delivery but do not create separate processes or routes for residents.
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	1. Complaints Policy 2. Operational training materials	We operate a clear two stage process with no informal or additional stages. Early resolution is supported through service request handling and training.
5.3 A process with more than two stages is not acceptable under any circumstances as this will make the	Yes	1. Complaint exhaustion letter template	Our system controls prevent additional stages. This ensures timely access to the Ombudsman.

Code requirement	Comply	Evidence	Commentary / explanation
complaint process unduly long and delay access to the Ombudsman.		2. NEC complaints system	
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	1. Contractor SLA's 2. Performance monitoring trackers	We retain oversight through contract management and performance monitoring.
5.5 Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Yes	1. Standard contract terms	We are strengthening this further through planned refresher guidance and clearer expectations in 2026/27.
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	1. Acknowledgement templates	Complaint acknowledgements clearly set out our understanding of the issues and desired outcomes. Residents are invited to confirm or clarify where needed.
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	1. Acknowledgement templates	We clearly set out responsibility for each issue at acknowledgement stage, including where elements fall outside our remit.
5.8 At each stage of the complaints process, complaint handlers must: a) deal with complaints on their merits, act independently, and have an open mind; b) give the resident a fair chance to set out their position; c) take measures to address any actual or perceived conflict of interest; and d) consider all relevant information and evidence carefully.	Yes	1. Complaint BP quality assurance 2. Case reviews	Complaints are assessed on their merits, with independent review and quality assurance through the Business Partner model. KPI monitoring, including upheld rates, supports consistency and fairness of decision making.
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	1. Complaint workflow 2. Case records	We have redesigned workflows to better capture and evidence ongoing communication where responses are delayed, and this is now monitored more consistently.

Code requirement	Comply	Evidence	Commentary / explanation
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	1. NEC system (person attributes)	Reasonable adjustments and vulnerabilities are recorded and reviewed through the NEC system. Colleagues are prompted to consider these in all resident interactions.
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	1. Stage 1 response templates	Residents can escalate complaints to Stage 2 unless valid exclusion criteria apply. Where complaints are not upheld, escalation is still permitted.
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	1. NEC complaints workflow	Our records include correspondence, evidence, outcomes, compensation and follow up actions, providing a clear audit trail.
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	1. Complaints Policy 2. Compensation and Redress Policy 3. Casework examples	We aim to resolve complaints at the earliest stage. Remedies can be applied at any point, with some actions completed ahead of formal responses where appropriate.
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	1. Unacceptable Behaviour Policy 2. Single Point of Contact guidance	This policy is aligned with and referenced within the complaints process.
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	1. Contact management plans	Where appropriate, we involve third parties to support fair and balanced engagement.

Section 6: Complaints Stages

1. Stage 1

Code requirement	Comply	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	1. NEC complaint workflow (impact assessment)	Complaints are triaged at point of logging to assess complexity, vulnerability and risk. A second triage takes place within service teams to determine whether early resolution is appropriate, or a full investigation is required.
6.2 Complaints must be acknowledged, defined and logged at stage 1 of the complaints procedure <u>within five working days of the complaint being received</u> .	Yes	1. Complaints Policy 2. C1 improvement plan	Performance was impacted during 2025/26 due to backlog and system transition but has recovered following backlog clearance, with improved controls now in place.
6.3 Landlords must issue a full response to stage 1 complaints <u>within 10 working days</u> of the complaint being acknowledged.	No	1. Complaints Policy 2. Performance reporting	During 2025/26 we did not consistently meet the 10 working day response timescale. This reflects a period of significant change, including backlog clearance, system transition and capacity pressures in high volume areas. Performance has improved following these changes.
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	1. Complaints Policy 2. Performance reporting	Extensions have not always been applied consistently in line with Code requirements. While residents have generally been informed of delays, further work is required to ensure extensions are agreed, clearly justified and within permitted timescales. We are addressing this through improved workflow controls and monitoring.
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	1. Operational guidance	This is embedded within guidance and templates, although consistency is being strengthened as part of wider improvements to extension handling.

Code requirement	Comply	Evidence	Commentary / explanation
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	1. NEC workflow 2. Response templates	Responses are issued once the outcome is known, with clear action plans for any outstanding work. Follow up actions are tracked within the system to ensure delivery.
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	1. Response templates 2. Training materials	Our response templates incorporate all these elements.
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	1. Complaints reporting	An increase in inflight contact reflects improved accessibility and engagement with the complaints process.
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	1. Response templates 2. Quality assurance processes	Response templates are structured to ensure all Code requirements are met. This is supported by Business Partner quality assurance and Resident Readers panel feedback on clarity and tone.

2. Stage 2

Code requirement	Comply	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	1. Complaints Policy 2. Stage 1 responses	Escalation rates are monitored to identify themes and improve Stage 1 resolution.
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	1. Complaints Policy	Acknowledgement and logging of Stage 2 complaints has improved significantly following recovery of Stage 1 logging performance, although consistency continues to be monitored.
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	1. Complaints Policy 2. Training materials	Residents are not required to provide reasons for escalation. Where possible, we seek to understand the cause of dissatisfaction to support learning and improve outcomes.
6.13 The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Yes	1. Complaint Policy 2. Complaint Allocation guidance	We use clear allocation guidance and senior oversight prior to responding.
6.14 Landlords must issue a final response to the stage 2 <u>within 20 working days</u> of the complaint being acknowledged.	No	1. Performance reporting	During 2025/26 we did not consistently meet the 20 working day response timescale. This reflects a period of significant change, including backlog clearance, system transition and capacity pressures in high volume areas. Performance has improved following these changes.
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	1. CBIT case management	Extension handling at Stage 2 has not always been fully compliant. Improvements are being implemented through clearer controls within the Complaints Business Improvement Team and strengthened oversight.
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	1. Extension communications	This is embedded within templates and guidance.

Code requirement	Comply	Evidence	Commentary / explanation
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	1. NEC workflow 2. Response templates	Responses are issued once outcomes are known, with ongoing actions tracked and communicated where required.
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	1. Response templates 2. Casework examples	All complaint points are addressed, with clear reasoning and reference to relevant policies and evidence.
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 details of how to escalate the matter to the Ombudsman Service if the individual remain dissatisfied.	Yes	1. Response templates 2. Quality assurance processes	Stage 2 responses are structured to meet Code requirements and are subject to additional senior review, typically at Director level, before issue.
6.20 Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.	Yes	1. Process documentation 2. Case examples	Senior colleagues review responses to ensure they are complete and authoritative.

Section 7: Putting things right

Code requirement	Comply	Evidence	Commentary / explanation
7.1 Where something has gone wrong a landlord must acknowledge this and set out the actions it has already taken, or intends to take, to put things right. These can include: a) Apologising;	Yes	1. Training materials 2. Tone of Voice training 3. Structured response templates	Where something has gone wrong, we acknowledge this clearly and set out what we have done, or will do, to put it right. This includes explanation, apology, corrective action and compensation where appropriate.

Code requirement	Comply	Evidence	Commentary / explanation
b) Acknowledging where things have gone wrong; c) Providing an explanation, assistance or reasons; d) Taking action if there has been delay; e) Reconsidering or changing a decision; f) Amending a record or adding a correction or addendum; g) Providing a financial remedy; h) Changing policies, procedures or practices.			Where timescales have not been met, this is recognised and reflected in the remedy offered. Our approach emphasises transparency, ownership and clarity, ensuring residents understand both what has happened and what will change. We will introduce post complaint surveys in 2026/27 to better measure whether residents feel issues have been resolved effectively.
7.2 Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Yes	1. Compensation and Redress Policy	Guidance supports a consistent and proportionate approach, including where alternative routes (e.g. insurance or personal injury claims) may be more appropriate.
7.3 The remedy offer must clearly set out what will happen and by when, in agreement with the resident where appropriate. Any remedy proposed must be followed through to completion.	Yes	1. NEC workflow (follow-up actions) 2. Response templates	Outstanding actions are tracked through the complaints system to ensure delivery, with both financial and non-financial remedies captured and monitored.
7.4 Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes	1. Compensation and Redress Policy	Our policy was reviewed and updated in line with February 2026 Ombudsman guidance.

Section 8: Self-assessment, reporting and compliance

Code requirement	Comply	Evidence	Commentary / explanation
8.1 Landlords must produce an annual complaints performance and service improvement report for scrutiny and challenge, which must include: a) the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements. b) a qualitative and quantitative analysis of the landlord's complaint handling performance. This must also include a summary of the types of complaints the landlord has refused to accept;	Yes	1. PA Housing website 2. Board and Committee records 3. Resident Assembly minutes 4. MRC engagement	Residents are engaged early through the Resident Assembly to shape content and focus areas. Governance oversight is provided throughout drafting, including regular input from the Member Responsible for Complaints (MRC), before submission to Customer Committee. Previous reports are retained to demonstrate progress year on year.

Code requirement		Comply	Evidence	Commentary / explanation
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.				
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	1. PA Housing website 2. Annual submission	We now also include a statement from the Chair of our Resident Assembly in the report.
8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	Yes	1. Self-assessment (April 2026)	We completed a full self-assessment following the 2025 restructure once the revised operating model had sufficiently embedded.
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	Yes	1. Process awareness	We will always fully cooperate with any 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	1. Business Continuity Plan	Business continuity arrangements include provisions for maintaining complaint handling during disruption. Where compliance is impacted, we would notify the Ombudsman, inform residents and set out a clear plan to return to compliance.

Section 9: Scrutiny & oversight: continuous learning and improvement

Code requirement		Comply	Evidence	Commentary / explanation
9.1	Landlords must look beyond the circumstances of the individual complaint and consider whether	Yes	1. CBIT structure	Our operating model is designed to identify root causes and drive service improvement beyond

Code requirement	Comply	Evidence	Commentary / explanation
service improvements can be made as a result of any learning from the complaint.		2. Service Improvement Panel input	individual complaints. This approach has been shaped and validated through resident scrutiny.
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	1. Learning framework 2. Lessons learned reporting 3. CBP engagement	Complaints are used as a source of insight to identify trends and inform service improvement. Learning is captured systematically and shared through the Business Partner model.
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	1. Resident Assembly reporting 2. Customer Committee updates 3. Internal communications	Involved residents inform the content selected for the annual report, designing the questions for the post-complaint survey and updates to the Resident Assembly
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	1. Role profiles	Accountability for complaint handling sits with the Director of Business Improvement, ensuring oversight of performance, risk and learning at a senior level.
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	1. MRC role description	A Member Responsible for Complaints is in place.
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	1. Monthly MRC meetings	The MRC receives regular updates on performance, risks and improvement activity through monthly engagement with the Head of Complaints Business Improvement. This has strengthened visibility of complaints performance and risk at governance level. In turn, the MRC is a member of the Customer Committee which receives regular complaints performance and insights reports, and supports the Chair of that Committee with reporting in to the main Board

Code requirement	Comply	Evidence	Commentary / explanation
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	1. Board and Committee reporting	Governance receives regular reporting on complaint volumes, outcomes, trends, Ombudsman activity and learning, alongside the annual report. Severe maladministration findings are escalated through Board briefings.
9.8 Landlords must have a standard objective in relation to complaint handling for all relevant employees or third parties that reflects the need to: a) have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments; b) take collective responsibility for any shortfalls identified through complaints, rather than blaming others; and c) act within the professional standards for engaging with complaints as set by any relevant professional body.	Yes	1. HR framework 2. Code of Conduct 3. Performance objectives	Complaint handling expectations are embedded within organisational behaviours and objectives. The Business Partner model supports teams to take collective responsibility for outcomes and use complaints to drive improvement.