

PCH Complaint Handling Code Self-Assessment 2026

Overall position

PCH has assessed its complaint policy and practice against each provision of the Housing Ombudsman’s statutory Complaint Handling Code. Evidence includes the policy, procedures, templates, complaint records, performance information, audits, resident feedback and governance reporting.

The Housing Ombudsman reviewed PCH’s Customer Complaints and Comments Policy on 31 March 2026 and made 11 formal recommendations to clarify or strengthen the written policy. The review did not make an explicit overall finding that PCH was non-compliant with the Code. Customer Complaints and Comments Policy Version 7.1, approved by the Customer Focus Committee on 25 September 2026, addresses all 11 recommendations.

PCH also used the wider policy review to make other areas clearer, remove wording that could restrict access to the complaints process and strengthen alignment with other Code provisions. These additional amendments are distinguished from the 11 formal recommendations in the mapping below.

Following Customer Focus Committee approval, Version 7.1, this self-assessment, the annual complaints report and the governing body response will be published by 30 September 2026. Supporting procedures, templates, communications, training and monitoring arrangements will be updated by 31 December 2026.

How compliance statuses are used:

“Yes” means current arrangements evidence compliance. “Yes, subject to policy approval” means Version 7.1 contains the required wording but approval is pending. “Yes, with embedding action” means the requirement is met, with supporting arrangements being strengthened.

Housing Ombudsman formal recommendations

Ref.	Code	Theme	Version 7.1 response
HO1	2.4	Non-acceptance decisions	Add written reasons, exclusion relied on, alternative route and Ombudsman review right.

Ref.	Code	Theme	Version 7.1 response
HO2	3.7; 2.4, 6.5, 6.9, 6.16, 6.19	Ombudsman access	Make clear residents can contact the Ombudsman at any stage and include signposting in relevant correspondence.
HO3	3.5; supports 3.4	Publicising information	Set out wider publication channels, accessibility and alternative formats.
HO4	5.2, 5.3; supports 6.1	Early resolution	Confirm no Stage 0; early resolution remains within formal Stage 1 and ends with a written outcome.
HO5	5.6, 5.7; Stage 2 via 6.11	Definition, outcomes and scope	Require written acknowledgements to confirm complaint points, outcomes sought, scope and clarification.
HO6	5.9; 6.4, 6.5, 6.15, 6.16	Extended investigations	Agree and record update intervals where permitted extension periods are exceeded.
HO7	6.2; Stage 2 via 6.11	Written acknowledgement	Require written Stage 1 acknowledgement containing the complaint definition; apply equivalent wording at Stage 2.
HO8	6.6	Stage 1 response timing	Issue the response when the investigation outcome is known.
HO9	6.6, 7.3	Stage 1 actions	Record owner, date and updates; monitor actions to completion.
HO10	6.17	Stage 2 response timing	Apply the same response-timing requirement at Stage 2.
HO11	6.17, 7.3	Stage 2 actions	Apply the same action-monitoring and resident-update requirements at Stage 2.

Additional amendments from PCH's wider review

Ref.	Code	Additional amendment	What Version 7.1 adds or clarifies
A1	6.3, 6.7, 6.9	Stage 1 timescale and content	Firm 10-day requirement from acknowledgement and full required response content.
A2	6.8	New issues at Stage 1	Discuss whether to include or log separately; explain decision and avoid unreasonable delay.
A3	5.11, 6.10, 6.12	Stage 2 access	Remove one-month limit; consider late requests individually; provide Ombudsman review right if refused.
A4	6.10-6.13	Stage 2 acknowledgement	Confirm final internal stage, no detailed justification, written acknowledgement and independent reviewer.

Ref.	Code	Additional amendment	What Version 7.1 adds or clarifies
A5	6.14-6.19	Stage 2 response	Clarify 20-day period, response content, extensions, Ombudsman details and final referral rights.
A6	3.7, 6.19	External routes	Clarify Ombudsman and other relevant statutory or regulatory referral routes.
A7	5.13, 7.1-7.4	Compensation and remedies	Broaden remedies, remove need for separate compensation request, reflect impact and distinguish legal damages.
A8	2.1, 2.2, 2.4, 2.5, 5.1, 5.7	Claims and complaints	Separate claim and complaint processes and prevent blanket exclusion of associated service issues.
A9	5.14, 5.15	Reasonable behaviour	Use evidence-based, proportionate, reviewed restrictions without ending a complaint solely because contact is restricted.
A10	1.6; supports 3.5	Surveys	Policy V7.1, sections 3.1.4 and 8. Version 7.1 confirms that survey dissatisfaction is not automatically treated as a complaint, provides complaint signposting through surveys and wider feedback channels, and records a complaint where the resident asks PCH to do so.
A11	3.1, 3.4, 3.6, 5.10, 5.15	Equality and adjustments	Policy V7.1, sections 3.2, 3.3 and 10.2. Version 7.1 strengthens accessible complaint routes, advocacy and support, alternative formats and languages, and the recording and active review of communication needs and reasonable adjustments.
A12	2.1, 6.6, 6.17, 7.3, 8.1, 8.2, 9.1-9.7	Monitoring and governance	Specify reporting on complaints, non-acceptance, actions, remedies, satisfaction, Ombudsman activity and improvement.

1. Definition of a complaint

Code	Requirement	Comply	Evidence	Commentary / amendment reference
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	Policy V7.1, sections 3.1.1 and 3.1.3 PCH complaints webpage; Stage 1 acknowledgement, Stage 1 response, Stage 2 acknowledgement, Stage 2 response and extension templates; Pentana complaint records	PCH uses the Code definition for its services and those acting on its behalf.
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	Policy V7.1, sections 3.1.1 and 3.1.3 Complaint Logging Quick Guide; complaint quality-assurance checklist and completed review records	Dissatisfaction is recognised and authorised representatives use the same process.
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	Policy V7.1, sections 3.1.2 and 3.1.3 Operational service-request system	PCH distinguishes service requests from complaints and records service requests through the relevant operational system. Services monitor outstanding and repeat requests. Version 7.1 introduces a clearer referral process where unresolved dissatisfaction or repeat contact may need to be recorded as a complaint.
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	Policy V7.1, sections 3.1.2 and 3.1.3	The complaint and underlying service request continue in parallel.

Code	Requirement	Comply	Evidence	Commentary / amendment reference
	ongoing. Landlords must not stop their efforts to address the service request if the resident complains.		Pentana complaint records; complaint quality-assurance checklist and completed review records	
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	Policy V7.1, sections 3.1.4 and 8 Independent survey arrangements; complaints webpage	Dissatisfaction expressed through a survey is treated as feedback rather than automatically recorded as a complaint. Where consent and contact information permit, the resident is told how to make a complaint if they wish. Version 7.1 strengthens signposting in surveys and wider feedback channels. [A10]

2. Exclusions

Code	Requirement	Comply	Evidence	Commentary / amendment reference
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	Policy V7.1, section 3.1.3 Complaint non-acceptance records; complaint quality-assurance records Annual Complaints and Service Improvement Report available on the website - Complaint Handling Code Self-Assessment Complaint Handling Code Self-Assessment	PCH accepts complaints unless a valid policy exclusion applies. Decisions are considered individually, recorded with the reason and subject to review through complaint quality-assurance arrangements. Version 7.1 strengthens the information given to residents and the monitoring of complaints not accepted. [HO1; A12]
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	Yes	Policy V7.1, sections 3.1.5 and 5.1 to 5.5	Version 7.1 confirms a claim does not automatically exclude related service or complaint-handling issues. [A8]

Code	Requirement	Comply	Evidence	Commentary / amendment reference
	be fair and reasonable to residents. Acceptable exclusions include: - 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.		Complaint non-acceptance letter template and completed decisions	
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	Policy V7.1, section 3.1.3 Complaint non-acceptance records and completed decisions	Late complaints are considered individually, including circumstances and potential disadvantage.
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	Policy V7.1, section 3.1.3 Complaint non-acceptance records	Version 7.1 adds written reasons, the exclusion, alternative route and Ombudsman review right. [HO1; HO2; A8]
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Yes	Policy V7.1, sections 3.1.5 and 5.1 to 5.5 Complaint quality-assurance checklist and completed review records	Version 7.1 confirms one excluded element does not automatically exclude the whole complaint. [A8]

3. Accessibility and awareness

Code	Requirement	Comply	Evidence	Commentary / amendment reference
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	Policy V7.1, sections 3.2 and 10.2 PCH complaints webpage; accessibility tools; 2025 complaint-handling internal audit PCH website - Make a complaint (plymouthcommunityhomes.co.uk) Equality and Diversity Policy and Strategy - equality-diversity-and-inclusion-strategy-2021-2026.pdf (plymouthcommunityhomes.co.uk) InTouch resident communications - Autumn 2025 edition of InTouch resident communication (circulated September 2025) - Spotlight on Complaints	Multiple channels, formats, interpretation and advocacy are available. Version 7.1 strengthens equality and adjustment recording. [A11]
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	Policy V7.1, sections 3.2, Getting in touch Complaint Logging Quick Guide; training plan	Residents can raise a complaint through any PCH service or colleague. Staff guidance explains how to recognise dissatisfaction and refer it to the Customer Care Team for recording. Organisation-wide guidance and training will be updated as part of the Version 7.1 implementation plan.
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	Yes	Annual Complaints Performance and Service Improvement Report 2025/26; quarterly complaint performance reports to CFC and Board; Tenant Satisfaction Measure reporting	Volumes are considered alongside access, outcomes, themes and resident feedback.

Code	Requirement	Comply	Evidence	Commentary / amendment reference
	sign that residents are unable to complain.		Annual Complaints and Service Improvement Report available on the website - Complaint Handling Code Self-Assessment Complaint Handling Code Self-Assessment The minutes of both CFC and Board meetings are available on the website - Board and committees Tenant Satisfaction Measures and Performance Report are available on the website – Our performance (plymouthcommunityhomes.co.uk)	
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	Policy V7.1, sections 3.2, 3.4 and 10.2 PCH complaints webpage; March 2026 Housing Ombudsman policy review PCH website - Make a complaint (plymouthcommunityhomes.co.uk)	Version 7.1 gives a clearer two-stage process and strengthens alternative formats. [HO3; A11]
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	Policy V7.1, sections 3.2, Publicising the complaints process PCH complaints webpage; complaint-letter templates; resident communications PCH website - Make a complaint (plymouthcommunityhomes.co.uk)	Version 7.1 sets wider publication channels, including surveys and resident communications. [HO3; A10]
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	Policy V7.1, sections 3.3 and 10.2 Advocacy and representation guidance	Residents may use an authorised representative and support at meetings. [A11]

Code	Requirement	Comply	Evidence	Commentary / amendment reference
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	Policy V7.1, sections 3.2 and 3.4.3 PCH complaints webpage; Stage 1 and Stage 2 response and extension letter templates PCH website - Make a complaint (plymouthcommunityhomes.co.uk)	Version 7.1 confirms advice and support at any stage and relevant external routes. [HO2; A6]

4. Complaint-handling staff

Code	Requirement	Comply	Evidence	Commentary / amendment reference
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	Customer Care Team structure; relevant role profiles; quarterly complaint performance reports to CFC and Board The minutes of both CFC and Board meetings are available on the website - Board and committees	Customer Care Team coordinates; Head of Customer Experience is senior accountable officer.
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	Relevant role profiles; complaint-handling procedure; completed Stage 2 review records	Handlers can access evidence, challenge incomplete responses and recommend proportionate action.
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	Yes	Customer Care Team structure; complaint-handling guidance; induction and mentoring records; complaint quality-assurance checklist and completed review records; 2025 internal audit and follow-up	Complaint handling is treated as a core service. PCH has a dedicated Customer Care Team, with service supervisors and managers responsible for investigations and actions. Staff are supported through guidance, induction, mentoring, briefings and feedback from complaint audits. The 2025 internal audit gave Reasonable Assurance, and follow-up

Code	Requirement	Comply	Evidence	Commentary / amendment reference
	a core service and must be resourced to handle complaints effectively			confirmed that all four recommendations had been completed.

5. Complaint-handling process

Code	Requirement	Comply	Evidence	Commentary / amendment reference
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	Policy V7.1, sections 3.1, 3.4 and 5	Version 7.1 keeps related service concerns in the process even where a separate claim exists. [A8]
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 O' or 'informal complaint') as this causes unnecessary confusion.	Yes	Policy V7.1, section 3.4.1 Stage 1 acknowledgement and response letter templates; Pentana complaint records	Version 7.1 makes clear early resolution is part of Stage 1. [HO4]
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	Policy V7.1, section 3.4.1 Stage 1 and Stage 2 letter templates; Pentana complaint records	Stage 1 and Stage 2 only; Stage 2 is the final internal response. [HO4]
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.	Yes	Policy V7.1, sections 1 and 3.4.1 Contractor complaint arrangements; Pentana complaint records	Complaints about contractors remain within PCH's two-stage process. PCH coordinates the response so the resident does not have to use a separate contractor complaints process.

Code	Requirement	Comply	Evidence	Commentary / amendment reference
	Residents must not be expected to go through two complaints processes.			
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Yes	Policy V7.1, sections 1 and 3.4.1 Contract management arrangements	PCH remains responsible for the final complaint response and for ensuring contractors provide the information needed for the investigation. Contractor performance, missed appointments, quality concerns and complaint learning are followed up through contract-management arrangements.
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	Policy V7.1, sections 3.4.1 and 3.4.2, Logging and acknowledgement Stage 1 and Stage 2 acknowledgement letter templates; Pentana complaint records	Written acknowledgements confirm complaint points, outcomes and scope. [HO5]
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	Policy V7.1, sections 3.4.1 and 3.4.2, Logging and acknowledgement Stage 1 and Stage 2 acknowledgement letter templates	Version 7.1 requires clear scope and an alternative route where relevant. [HO5; A8]
5.8	At each stage of the complaints process, complaint handlers must: 1. deal with complaints on their merits, act independently, and have an open mind; 2. give the resident a fair chance to set out their position; 3. take measures to address any actual or perceived	Yes	Complaint-handling training material and support; 2025 internal audit; complaint quality-assurance checklist and completed review records	Residents can explain their position; relevant evidence is considered and conflicts managed.

Code	Requirement	Comply	Evidence	Commentary / amendment reference
	conflict of interest; and 4. 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	Policy V7.1, sections 3.4.1 and 3.4.2, Extensions Stage 1 and Stage 2 extension letter templates; Pentana complaint records	Version 7.1 requires agreed and recorded update arrangements. [HO6]
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, with embedding action	Policy V7.1, sections 3.2 and 10.2 Northgate (housing management system); Pentana complaint records; reasonable-adjustment guidance and monitoring plan	PCH records disclosed disabilities, communication needs and agreed reasonable adjustments in Northgate and, where relevant, in the complaint record. Complaint handlers are expected to consider and review those adjustments while the complaint is ongoing. Version 7.1 strengthens this requirement, with system, guidance and monitoring improvements due by 31 December 2026. [A11]
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	Policy V7.1, sections 3.4.1, Escalating to Stage 2, and 6.4 Pentana complaint records	Version 7.1 removes the one-month limit and adds individual consideration and Ombudsman review rights. [A3; A9]
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	Pentana complaint records; resident and third-party correspondence; investigation records and supporting documents	Pentana holds the original complaint, date received, correspondence with the resident and relevant third parties, investigation evidence, decisions, outcomes, actions and supporting documents. Complaint correspondence and evidence are retained as part of the case record.

Code	Requirement	Comply	Evidence	Commentary / amendment reference
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	Policy V7.1, sections 4.1 to 4.5 and 5.6 Putting Things Right Framework; Stage 1 and Stage 2 response templates	Version 7.1 broadens remedies and removes the need for a separate compensation request. [A7]
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	Policy V7.1, sections 6.1 to 6.4 and 10.2 Reasonable Behaviour Policy; Risk Alert policy and procedure; completed contact-restriction decisions and review records	Version 7.1 requires proportionate, time-limited and reviewed restrictions that do not end a complaint. [A9]
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	Policy V7.1, sections 6.1 to 6.4 and 10.2 Reasonable Behaviour Policy; Equality, Diversity and Inclusion arrangements; completed contact-restriction review records	Version 7.1 strengthens individual consideration, adjustments and review. [A9; A11]

6. Complaint stages

Stage 1

Code	Requirement	Comply	Evidence	Commentary / amendment reference
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	Yes	Policy V7.1, section 3.4.1 Complaint Logging Quick Guide; Pentana complaint records	Complaints are assessed at receipt for prompt resolution or fuller investigation. [HO4]

Code	Requirement	Comply	Evidence	Commentary / amendment reference
	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.			
6.2	Complaints must be acknowledged, defined and logged at stage 1 of the complaints procedure within five working days of the complaint being received.	Yes	Policy V7.1, sections 3.4.1, Logging and acknowledgement Stage 1 acknowledgement letter template; Pentana complaint records	Version 7.1 requires the written complaint definition, outcomes, scope and response date. [HO5; HO7]
6.3	Landlords must issue a full response to stage 1 complaints within 10 working days of the complaint being acknowledged.	Yes	Policy V7.1, sections 3.4.1, Stage 1 response and Stage 1 extensions Annual Complaints Performance and Service Improvement Report 2025/26; Pentana performance records Annual Complaints and Service Improvement Report available on the website - Complaint Handling Code Self-Assessment Complaint Handling Code Self-Assessment	During 2025/26, 98.8% of Stage 1 complaints were responded to within the standard response period. Eleven responses took longer than the standard period. Five had an extension agreed with the resident; the other six involved delayed logging or complex investigations across more than one service. Version 7.1 replaces wording that PCH “aims” to respond within 10 working days with a firm requirement measured from the date of acknowledgement. [A1]
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	Yes	Policy V7.1, sections 3.4.1, Stage 1 extensions Stage 1 extension letter template; Pentana complaint records	Extensions are recorded in Pentana and residents receive the reason and revised response date. Version 7.1 adds the requirement to agree and record suitable update intervals where the response exceeds the permitted extension period. [HO6]

Code	Requirement	Comply	Evidence	Commentary / amendment reference
	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	Policy V7.1, sections 3.4.1, Stage 1 extensions Stage 1 extension letter template; completed extension correspondence	Current extension correspondence provides the Ombudsman's contact details. Version 7.1 makes this requirement explicit in the policy and confirms that residents may contact the Ombudsman for advice and support at any stage. [HO2; HO6]
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	Policy V7.1, section 3.4.3 Pentana complaint records; Pentana post-complaint action tracker and overdue-action reports	Responses are not delayed; owners, dates and updates are monitored to completion. [HO8; HO9; A12]
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	Policy V7.1, sections 3.4.1, Stage 1 response Stage 1 response letter template; complaint quality-assurance checklist and completed review records	Version 7.1 lists the required decisions, reasons, evidence and action. [A1]
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	Policy V7.1, sections 3.4.1, Additional issues raised during an investigation Pentana complaint records; Complaint Logging Quick Guide	PCH explains whether the issue is included or logged separately. [A2]

Code	Requirement	Comply	Evidence	Commentary / amendment reference
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	Policy V7.1, sections 3.4.1, Stage 1 response Stage 1 response letter template; complaint quality-assurance checklist and completed review records	Version 7.1 sets out the full required Stage 1 response content and Ombudsman information. [HO2; A1]

Stage 2

Code	Requirement	Comply	Evidence	Commentary / amendment reference
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	Policy V7.1, sections 3.4.1, Escalating to Stage 2, and 3.4.2 Pentana Stage 2 complaint records	Version 7.1 removes the one-month limit and confirms Stage 2 access. [A3; A4]
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	Policy V7.1, sections 3.4.2, Logging and acknowledgement Stage 2 acknowledgement letter template; Pentana Stage 2 complaint records	Version 7.1 confirms outstanding matters, outcomes, scope, reviewer and date. [HO5; HO7; A4]

Code	Requirement	Comply	Evidence	Commentary / amendment reference
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	Policy V7.1, sections 3.4.1, Escalating to Stage 2, and 3.4.2 Pentana Stage 2 complaint records	Lack of detailed reasons will not prevent or delay escalation. [A3; A4]
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Yes	Policy V7.1, sections 3.4.2, Stage 2 review Stage 2 complaint-handling procedure; Pentana Stage 2 complaint records	Version 7.1 restates the independence requirement. [A4]
6.14	Landlords must issue a final response to the stage 2 within 20 working days of the complaint being acknowledged.	Yes	Policy V7.1, sections 3.4.2, Stage 2 response and Stage 2 extensions Annual Complaints Performance and Service Improvement Report 2025/26 Annual Complaints and Service Improvement Report available on the website - Complaint Handling Code Self-Assessment Complaint Handling Code Self-Assessment	During 2025/26, 92% of Stage 2 complaints were responded to within the standard response period. Six responses required an extension. In each case, the extension was agreed with the resident and the reason and revised response date were recorded. Version 7.1 confirms the firm 20-working-day requirement from acknowledgement. [A5]
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	Yes	Policy V7.1, sections 3.4.2, Stage 2 extensions Stage 2 extension letter template; Pentana Stage 2 complaint records	Extensions are recorded in Pentana and residents receive the reason and revised response date. Version 7.1 adds the requirement to agree and record suitable update intervals where the response exceeds the permitted extension period. [HO6; A5]

Code	Requirement	Comply	Evidence	Commentary / amendment reference
	the reason(s) must be clearly explained to the resident.			
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	Policy V7.1, sections 3.4.2, Stage 2 extensions Stage 2 extension letter template; Pentana Stage 2 complaint records	Current extension correspondence provides the Ombudsman's contact details. Version 7.1 makes this requirement explicit in the policy and confirms that residents may contact the Ombudsman for advice and support at any stage. [HO2; HO6; A5]
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	Policy V7.1, section 3.4.3 Pentana Stage 2 complaint records; Pentana post-complaint action tracker and overdue-action reports	Response timing and action monitoring mirror Stage 1. [HO10; HO11; A12]
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	Policy V7.1, sections 3.4.2, Stage 2 response, and 3.4.3 Stage 2 response letter template; complaint quality-assurance checklist and completed review records	Version 7.1 sets required decisions, reasons and action. [A5]
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; details of any outstanding actions; and details of how to escalate the matter	Yes	Policy V7.1, sections 3.4.2, Stage 2 response, and 3.4.3 Stage 2 response letter template; complaint quality-assurance checklist and completed review records	Version 7.1 includes action, dates and Ombudsman/external referral rights. [HO2; A5; A6]

Code	Requirement	Comply	Evidence	Commentary / amendment reference
	to the Ombudsman Service if the individual remains dissatisfied.			
6.20	Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.	Yes	Policy V7.1, section 3.4.2 Stage 2 complaint-handling procedure; Pentana Stage 2 complaint records	Relevant services contribute to a coordinated independent response.

7. Putting things right

Code	Requirement	Comply	Evidence	Commentary / amendment reference
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: • 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	Policy V7.1, sections 4.1 to 4.5 and 5.6 Putting Things Right Framework; Stage 1 and Stage 2 response letter templates	Version 7.1 broadens action to put things right and compensation. [A7; A8]
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Yes	Policy V7.1, sections 4.1 to 4.5 and 5.6	Impact includes distress, inconvenience, delay, time and trouble, unmet adjustments and financial loss. [A7; A8]

Code	Requirement	Comply	Evidence	Commentary / amendment reference
			Housing Ombudsman remedies guidance; Putting Things Right Framework	
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	Policy V7.1, sections 4.1 to 4.5 and 5.6 Stage 1 and Stage 2 response letter templates; Pentana post-complaint action tracker and overdue-action reports	Complaint responses identify the action required, the responsible service and expected completion date. Outstanding actions are recorded in Pentana and monitored by the Customer Care Team, with overdue actions followed up with the relevant manager. Version 7.1 makes these arrangements explicit and requires residents to be updated until completion. [HO9; HO11; A12]
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes	Policy V7.1, sections 4.1 to 4.5 and 5.6 Putting Things Right Framework; Housing Ombudsman remedies guidance	Version 7.1 and the framework explicitly incorporate Ombudsman guidance. [A7]

8. Self-assessment, reporting and compliance

Code	Requirement	Comply	Evidence	Commentary / amendment reference
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	Yes	Policy V7.1, sections 11.2 to 11.4 Annual Complaints Performance and Service Improvement Report 2025/26; self-assessment; governing body response; HOS landlord performance report; HOS policy review	PCH's Annual Complaints Performance and Service Improvement Report includes quantitative and qualitative performance analysis, the number and types of complaints not accepted, learning and service improvements, Ombudsman determinations, the Ombudsman's landlord performance report and relevant wider publications. The HOS has not identified an explicit overall finding of Code non-compliance in the March 2026 policy review; the review made 11 recommendations to clarify or strengthen the written policy. The self-assessment

Code	Requirement	Comply	Evidence	Commentary / amendment reference
	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.		Annual Complaints and Service Improvement Report available on the website - Complaint Handling Code Self-Assessment Complaint Handling Code Self-Assessment	and governing body response are published alongside the report. [A12]
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 section of its website relating to complaints. The governing body's response to the report must be published alongside this.	Yes	Policy V7.1, sections 11.2 to 11.4 Annual report; self-assessment; governing body response; CFC Efficient Decision; PCH complaints webpage Annual Complaints and Service Improvement Report available on the website - Complaint Handling Code Self-Assessment Complaint Handling Code Self-Assessment	The Customer Focus Committee will consider the self-assessment, annual report and governing body response through an Efficient Decision. Following approval, the documents and Version 7.1 will be published together on PCH's complaints webpage by 30 September 2026. The Board will receive assurance through the agreed governance route. [A12]
8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	Yes	Policy V7.1, sections 11.2 to 11.4	PCH will reassess after a material complaint-handling change.

Code	Requirement	Comply	Evidence	Commentary / amendment reference
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	Yes	Policy V7.1, sections 11.2 to 11.4 Housing Ombudsman determinations and recommendations tracker; self-assessment review process	PCH will update and monitor resulting policy or practice changes.
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	Policy V7.1, sections 11.2 to 11.4 Business Continuity Plan; incident-response and resident-communications arrangements	Arrangements include notification, resident communication and a return timetable.

9. Scrutiny, oversight and continuous improvement

Code	Requirement	Comply	Evidence	Commentary / amendment reference
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	Policy V7.1, sections 11.1 to 11.4 Annual complaints report; complaint-learning reports; service performance; Better Repairs Programme; Housing Ombudsman determinations and recommendations tracker Annual Complaints and Service Improvement Report available on the website - Complaint Handling Code Self-Assessment Complaint	PCH reviews complaint themes alongside service performance, resident feedback, audits and Ombudsman findings. Learning during 2025/26 informed the Better Repairs Programme, action tracking, communication improvements, contractor checks and review of complex repairs and damp and mould cases. [A12]

Code	Requirement	Comply	Evidence	Commentary / amendment reference
			Handling Code Self-Assessment	
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, with embedding action	Policy V7.1, sections 11.1 to 11.4 Complaint audits; manager briefings; complaint-learning reports; EMT, CFC and Board reports; Version 7.1 training plan The minutes of both CFC and Board meetings are available on the website - Board and committees	Complaint performance and learning are reviewed by services, the Executive Management Team, Customer Focus Committee and Board. Complaint audits, guidance, manager briefings and learning reviews reinforce collective responsibility for resolving complaints and acting on identified failures. Version 7.1 training will further strengthen complaint recognition, ownership and learning.
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	Policy V7.1, sections 11.1 to 11.4 Annual complaints report; resident communications; CFC and Board reports Annual Complaints and Service Improvement Report available on the website - Complaint Handling Code Self-Assessment The minutes of both CFC and Board meetings are available on the website - Board and committees	PCH reports complaint performance, learning and service improvements through the annual complaints report, resident communications and reports to Customer Focus Committee and Board. PCH recognises that residents were not directly involved in drafting the 2026 assessment and will strengthen resident involvement in reviewing complaint learning. [A12]
9.4	Landlords must appoint a suitably senior lead person as accountable for their complaint handling. This person must assess any themes or	Yes	Policy V7.1, sections 11.1 to 11.4	The Head of Customer Experience is the senior accountable officer. The role reviews complaint trends, serious risks, resident feedback and Ombudsman findings, identifies policies or services

Code	Requirement	Comply	Evidence	Commentary / amendment reference
	trends to identify potential systemic issues, serious risks, or policies and procedures that require revision.		Head of Customer Experience role profile; complaint trend and risk reports; Housing Ombudsman determinations and recommendations tracker	requiring change and reports resulting actions through the governance arrangements.
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	Policy V7.1, sections 11.3 and 11.4 Customer Focus Committee terms of reference; Board complaint reporting The minutes of both CFC and Board meetings are available on the website - Board and committees, this link also includes access to CFC terms of reference	The CFC Chair is PCH's MRC.
9.6	The MRC will be responsible for ensuring the governing body receives regular information on complaints that provides insight on the landlord's complaint handling performance. This person must have access to suitable information and staff to perform this role and report on their findings.	Yes	Policy V7.1, sections 11.3 and 11.4 Quarterly complaint performance reports to CFC and Board; MRC updates; annual complaints report The minutes of both CFC and Board meetings are available on the website - Board and committees Annual Complaints and Service Improvement Report available on the website - Complaint Handling Code Self-Assessment Complaint	The MRC can request evidence and report assurance and risks to Board. [A12]

Code	Requirement	Comply	Evidence	Commentary / amendment reference
			Handling Code Self-Assessment	
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, with governance improvement	Policy V7.1, sections 11.2 to 11.4 Quarterly complaint performance reports to CFC and Board; Housing Ombudsman determinations and recommendations tracker; annual report The minutes of both CFC and Board meetings are available on the website - Board and committees Annual Complaints and Service Improvement Report available on the website - Complaint Handling Code Self-Assessment Complaint Handling Code Self-Assessment	The MRC and governing body receive complaint volumes, categories, outcomes, response performance, emerging themes, Ombudsman determinations, orders and the annual report. Version 7.1 strengthens reporting on complaints not accepted, overdue complaint actions, remedies, evidence of service improvement and progress on Ombudsman recommendations. [A12]
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	Partially compliant, action in progress	PCH values and role expectations; relevant role profiles; contractor arrangements; V7.1 training and implementation plan	PCH's values, role expectations and contractor arrangements already support collaboration, collective responsibility and professional complaint handling. However, PCH is strengthening the evidence that a consistent complaint-handling objective is explicitly applied to all relevant employees and third parties. Updated objectives, role expectations, contractor requirements and training evidence will be completed by 31 December 2026.

Code	Requirement	Comply	Evidence	Commentary / amendment reference
	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.			

Implementation plan

Policy approval and publication by 30 September 2026

- Version 7.1 approved, effective and published.
- Self-assessment, annual report and governing body response approved and published.
- Response to all 11 formal recommendations and wider-review amendments recorded.

Operational implementation by 31 December 2026

- Procedures, process maps, acknowledgements, response and extension templates and resident information updated.
- Reasonable-adjustment, outstanding-action and Ombudsman-tracking arrangements updated.
- Putting Things Right guidance, claims referral arrangements, staff guidance and contractor expectations updated.
- Relevant training commenced and evidence retained.
- A consistent complaint-handling objective is explicitly applied and evidenced for all relevant employees and third parties by 31 December 2026.

Monitoring and assurance

Customer Focus Committee will receive progress updates until all actions are complete and evidenced. Policy approval and publication are distinct from the supporting implementation actions.

Assurance conclusion

PCH's operational arrangements provide substantial evidence of compliance. Version 7.1, approved by the Customer Focus Committee on 25 September 2026, addresses the policy-wording gaps identified by the Housing Ombudsman and records the additional improvements made through the wider review. Provision 9.8 remains partially compliant while PCH completes and evidences a consistent complaint-handling objective for all relevant employees and third parties by 31 December 2026. Progress will continue to be monitored until all approval and implementation actions are evidenced as complete.