

PfP's Self-Assessment against the Housing Ombudsman's Complaint Handling Code- August 2026

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	Click here to view our Complaints Handling Procedure Click here to view our Homes Plus Complaints Policy	We have adopted this complaint definition which is included in our internal policy and reflected in the complaints handling information we publish for Customers.
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 submitted via a third party or representative must be handled in line with the landlord's complaints policy.	Yes	Click here to view our Complaints Handling Procedure Click here to view our Homes Plus Complaints Policy	All expressions of dissatisfaction, however received, are handled as per our complaints policy. This includes issues raised via all channels of communication. We encourage Customers to tell us where something has gone wrong, or where they are dissatisfied with our service so that we can put it right quickly. Customers have the choice to make a stage 1 complaint, as set out in our complaints handling information. A complaint submitted via a third party or representative is handled in line with our

				complaints policy, this is set out in the policy at 7.2.
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	Click here to view our Complaints Handling Procedure Click here to view our Homes Plus Complaints Policy	We support the earliest resolution of dissatisfaction and try to resolve service requests quickly in line with the Ombudsman guidelines. Our policy and Customer facing guide reflects our approach to service requests. Our Early Resolution Team within our contact centre triage expressions of dissatisfaction. If we can resolve quickly as a service request, we will. Service requests are recorded in our system and managed by our Early Resolution Team. At any time, the Customer has the choice to progress their complaint to stage 1.
1.5	A complaint must be raised when the resident expresses dissatisfaction with the response to their service request, even if the handling of the service request remains ongoing. Landlords must not stop their efforts to address the service request if the resident complains.	Yes	Click here to view our Complaints Handling Procedure Click here to view our Homes Plus Complaints Policy	If we are unable to agree on a resolution, or the matter needs further investigation, our Customers have the choice to escalate to stage 1. A complaint raised in such a manner will not prevent, stall or impact on the service request actions needed to resolve any immediate issues.
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	Yes	This is embedded into our survey	When Customers completes a survey, they receive information about how to complain if they wish to do so. Survey results are analysed for thematic trends and effort score.

	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.			
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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	Click here to view our Complaints Handling Procedure	We comply with this and clearly state when we will not accept a complaint, within the complaints handling information we publish for Customers.
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: • 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.	Yes	Click here to view our Complaints Handling Procedure Click here to view our Homes Plus Complaints Policy	This is set out on pages 3 and 4 of the Complaints Handling Procedure we publish for Customers and in our policy at 5.3

	Matters that have previously been considered under the complaints policy.			
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	Click here to view our Complaints Handling Procedure Click here to view our Homes Plus Complaints Policy	We accept complaints within 12 months of the issue happening or the Customer becoming aware of the issue. We will apply discretion where appropriate. This is set out in Sections 5 and 6 of our policy, and the Complaints Handling Procedure we publish for Customers.
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 they 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	Click here to view our Homes Plus Complaints Policy	Section 6 of our published policy confirms our approach. If we decide not to accept a complaint, we will provide an explanation, set out the reasons why the matter is not suitable for our complaints process, and highlight the right for the Customer to take that decision to the Housing Ombudsman. The Complaints Leadership Team oversee any refusal decisions.
2.5	Landlords must not take a blanket approach to excluding complaints; they	Yes	Click here to view our Homes Plus Complaints Policy	Our policy at 6.2, confirms we will consider each complaint on its own merit

	must consider the individual circumstances of each complaint.			and be clear about any aspects of a complaint we are not responsible for. Our complaint team is trained in the triaging and assessment of complaints.
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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	Click here to view our Complaints Handling Procedure Internal Complaint Handling Record	We accept complaints through a variety of channels. Our published policy and Complaint Handling Procedure for Customers sets this out and confirms our approach, which is in line with the Equality Act 2010. A triage and assessment exercise is used to help us identify any communication preferences or reasonable adjustments, to support our Customers access the complaints process.
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	Click here to view our Complaints Handling Procedure Click here to view our Homes Plus Complaints Policy People Promises Customer Promises	Our complaints service is fully accessible to Customers and our policy at Section 8 sets out that we can accept a complaint verbally, in writing, face to face, by phone, email. From 2026, Customers can now make a complaint through

				their portal. A complaint handling system is accessible to all Colleagues. Our internal training academy contains complaint handling modules and is part of our induction and training process for relevant Colleagues. Our People and Customer Promises, launched in 2023-24 set out our expectations for all Colleagues. Colleague events have taken place to embed these Promises in frontline services. A new e learning module is under development for all colleagues to refresh the expectations for handling of dissatisfaction and is expected to launch by the end of H1.
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	Click here to view our Complaints Handling Procedure Click here to view our Homes Plus Complaints Policy Complaints reports to Board, National Customer Group and SLT	We value and encourage Customer feedback and complaints, this is part of our Customer Promises. Complaint volumes are monitored daily via a bespoke CRM dashboard, introduced in 2025. We have seen volumes increasing

				year on year which indicates our Customers are accessing the complaints process. We are making our services more accessible too and have introduced keeping in touch visits. This means we are speaking to more Customers which helps highlight complaints that Customers may have with our service.
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	Click here to view our Complaints Handling Procedure Click here to view our Homes Plus Complaints Policy	Section 13.6 of our policy sets out our approach. We will consider requests for alternative versions of this information, such as in a different language or braille, or Customers can contact an interpreter via our website accessibility page. Our Community Housing Managers carry printed versions of the complaint handling procedure to share with Customers when required. Currently we present our publications as downloadable PDFs which don't work with assistive technologies. We are going

				to improve this facility by creating dedicated pages for publications in the near future and will be producing an easy read complaints leaflet in 26-27.
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	Click here to view our Homes Plus Complaints Policy	Our policy at Section 13 sets out that we publish our complaints policy on our website and also provide an easy to read procedural leaflet. We strengthened our policy in 24-25 by adding contact details for the Housing Ombudsman.
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	Click here to view our Complaints Handling Procedure Click here to view our Homes Plus Complaints Policy Click here to view the easy read version of our Equality, diversity and inclusion policy.	We welcome and encourage advocacy, and this includes meetings attended by advocates. We set this out in our policy within section 7. and on page 7 of our Complaint Handling Information.
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	Click here to view our Complaints Handling Procedure (sent with complaint acknowledgement)	This information is set out in our Complaint Handling Information on page 6, and our webpage advises Customers of their right to contact the Housing

			Click here to view our Make a Complaint England webpage Internal acknowledgement template	Ombudsman at any time. We strengthened our Complaint Handling Policy and procedural leaflet in 2024-25 to ensure Customers know they can access the services of the Housing Ombudsman at any time for advice and guidance. A copy of our complaints handling information is sent to Customers with the Stage 1 acknowledgement and this is reiterated in the template Stage 1 acknowledgement wording.
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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	We are resourced centrally and within business areas to handle complaints. Homes Plus Committee, Board, National Customer Group, Operational Business Review and MRC reports.	Within our Customer Hub, we have an Early Resolution team for service requests ad triage, dedicated Customer Resolution Coordinators and Senior Customer Resolution Coordinators for stage 1 and 2. In addition, four Ombudsman Caseworkers, two Data Governance Officers, data analysts and service improvement change leads sit within our Customer Hub Complaints function. Complaints insight is shared regularly with service leads, our National Customer Group, and the Group's governing body. Managing agent complaints are dealt with by the managing agent with PfP oversight and a quarterly reporting routine.

				Developments complaints are handled by the local developments team who are best placed to foster a resolution.
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	Our Customer Resolution Coordinators are fully trained and have autonomy to resolve complaints. Communication channels are in place, and complaint handlers attend regular collaboration meetings	Our complaints handling system supports a linear process with a 360-degree view of the complaint through each stage. It enables complaint handlers to set tasks and liaise with relevant service leads to support action and resolution for the Customer. A complex case group, led by our Chief Investment Officer, meets weekly to support pathways to resolutions where cases are complex or require a multi team/agency approach.
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	Our complaints team within the Customer Hub is resourced to handle and analyse complaints. Internal Academy training modules Internal induction training for Customer Resolution Coordinators	Our internal training academy software contains modules on complaint handling and these form part of induction training. All new Customer Resolution Coordinators undergo an intensive 2-week training and induction course. In 2024-25, effective complaint

			Internal Board, National Customer Group, SLT and MRC reports	handling was introduced as an objective for all relevant Colleagues. Complaints insight is shared regularly with our National Customer Group and our governing body. In 26-7 we are launching a new e-learning module for the wider organisation on the expectations for handling dissatisfaction.
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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	Click here to view our Complaints Handling Procedure Click here to view our Homes Plus Complaints Policy	We have a single complaints policy and Customer Complaint Handling Procedure on our website. This sets out how we deal with complaints and support to Customers complain. It is further supported at triage and assessment stage where we explore and identify key vulnerabilities, communication preferences or the requirement for reasonable adjustments.

				Our CRC's are trained to deal with complaints on their merit and act independently, apply policy and process with discretion in order to foster the most appropriate resolution for each individual Customer.
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	Click here to view our Complaints Handling Procedure Click here to view our Homes Plus Complaints Policy	We operate a 2-stage process as set out in Section 9 of our policy. Where it is appropriate, we try to resolve matters as soon as possible as service requests. If we are unable to do this, or the Customer is not satisfied, we give Customers the choice to make a complaint.
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	Click here to view our Complaints Handling Procedure Click here to view our Homes Plus Complaints Policy	We operate a 2-stage process as set out in Section 9 of our policy.
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	Yes	Click here to view our Complaints Handling Procedure Click here to view our Homes Plus Complaints Policy	We operate a 2-stage process across all our affordable housing stock. We handle all complaints about our service centrally and have oversight of any

	expected to go through two complaints processes.			complaints made to our managing agents. They are members of The Property Ombudsman. Customers have the right to escalate to the HOS or the TPO via their preferred route. Contractors do not handle complaints.
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Yes	The Residential Management Group and Touchstone are part of the Places for People Group and handle complaints for some of our leaseholders.	Where we have managing agents in place, they are expected to handle complaints in line with the relevant Ombudsman, be that Housing Ombudsman or Property Ombudsman. This is set out in the relevant SLA. For PFP Customers, complaints are handled by managing agents in line with our central policy and The Code.
5.6	When a complaint is logged at Stage 1 or escalated to Stage 2, landlords must set out their understanding of the complaint and the outcomes the resident is seeking. The Code will refer to this as “the complaint definition”. If any aspect of the complaint is unclear, the resident must be asked for clarification.	Yes	We use standardised letter templates for acknowledgement and response for consistency. Internal Stage 1 acknowledgement template Internal Complaint Handling Record	This is set out in Section 9 of our policy. Our letter templates are embedded into our complaints handling system and are supported by a triage and assessment process to ensure the

				complaint definition is explored and clarified.
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	We use standardised letter templates for acknowledgement and response for consistency in meeting The Code	This is set out in Section 6.2 and the table in Section 9 of our policy. Our letter templates are embedded into our complaints handling system and are supported by a triage and assessment process so that it is clear to the Customer what we can investigate. Our handlers actively seek to understand the complaint definition and will routinely ask for clarity if required.
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	Click here to view our Homes Plus Complaints Policy	Our Customer Resolution Coordinators are independent from frontline services. They are trained to complete an impartial review and follow the principles of “Put it Right”, fairness, and learning from outcomes. This is set out in the foreword and body of our policy.

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	Our complaints handling system includes an extension management tool Click here to view our Complaints Handling Procedure Click here to view our Homes Plus Complaints Policy	This is set out in our policy in the table in Section 9. Our Customer Resolution Coordinators are trained in the process of extending complaints. Our complaints handling system supports the management of this. Attempts are made to contact the Customer to agree an acceptable extension. In 24-25 we introduced an internal contact cycle to set expectations for contact throughout the lifetime of a complaint.
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	Click here to view our Complaints Handling Procedure Click here to view our Homes Plus Complaints Policy	Our policy has been subject to an equality impact assessment and directly references our statutory duties. Exploration of any adjustments required is a standard part of our triage and assessment process. Close liaison with Customers throughout the process is key to our approach.

				There is a facility within our system to record disabilities, vulnerabilities or communication adjustments with the Customer's consent. These are called "alerts" and surface in our CRM to help guide Customer interactions. The alerts are reviewed annually by our Communities team.
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	Click here to view our Complaints Handling Procedure Click here to view our Homes Plus Complaints Policy	Section 6 of our policy clearly sets out at that we will accept a complaint unless there is a valid reason not to and confirms we will evidence our reasoning and advise the Customer of their right to contact the Ombudsman.
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 have a bespoke end to end complaint handling system.	Our complaint handling system is accessible to all Colleagues and supports the end-to-end process from service request to Ombudsman. It includes a document archive facility, the ability to make file notes, to set tasks and send emails. We introduced a Complaint Handling Record into the system in May

				2024, which captures the complaint investigation and upgraded this to an inbuilt triage, and investigation tool in 2025.
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	Click here to view our Complaints Handling Procedure Click here to view our Homes Plus Complaints Policy	Our policy is designed to encourage swift resolution. Our Customer Resolution Coordinators are trained to focus on achieving resolutions for Customers as early as possible.
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	Click here to view our Homes Plus Complaints Policy	Our policy is to deal with complaints on their merit. We make it clear in our policy in Section 23, that any unreasonable behaviour will be addressed in line with our Customer Behaviour Policy. Before the policy is enforced, we take steps to complete an equality impact assessment to better understand Customer needs and ensure full accessibility. On implementation of the policy, it is shared with the Customer, and they have the right to a review.
5.15	Any restrictions placed on contact due to unacceptable behaviour must be	Yes	Click here to view our Homes Plus Complaints Policy	Before action is taken in line with our behaviour policy,

	proportionate and demonstrate regard for the provisions of the Equality Act 2010.			we complete an equality impact assessment.
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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	Click here to view our Complaints Handling Procedure Click here to view our Homes Plus Complaints Policy	Our policy is designed to foster swift resolutions. We try to resolve service requests quickly. We identify the best route for resolve via a triage and assessment process and will escalate to Stage 1 where this is required or requested.
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	Click here to view our Complaints Handling Procedure Click here to view our Homes Plus Complaints Policy	If a service request cannot be resolved to the Customer's satisfaction, we aim to log as a Stage 1 complaint within 5 days of being requested, as set out in our policy in the table at Section 9. We have experienced higher volumes than we had planned for during 2025-26 meaning not all complaints were acknowledged within the SLA. We have continued

				to invest in our complaint handling service and recently grown the team. This means we will be compliant with the code and our Customers will receive the service they would expect.
6.3	Landlords must issue a full response to stage 1 complaints <u>within 10 working days</u> of the complaint being acknowledged.	Yes	Click here to view our Complaints Handling Procedure Click here to view our Homes Plus Complaints Policy Routine insight reports and collaboration meetings with service leads.	Our policy, in the table at Section 9, states that we will respond within 10 days to all Stage 1 complaints. In 25/26 we introduced a scorecard for each handler to monitor performance and are continuing to flex internal resource to help facilitate quicker outcomes and reduce the need for extensions to complaint handling timescales.
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	Click here to view our Complaints Handling Procedure Click here to view our Homes Plus Complaints Policy	As part of the process, attempts are made to contact the Customer to agree an extension where required, to explain the reason for the extension, and to provide contact details for the Housing Ombudsman. This is found in our policy in Section 9,

				and Complaint Handling Procedure for Customers.
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	Click here to view our Complaints Handling Procedure Click here to view our Homes Plus Complaints Policy	This is found in Section 9 of our policy and Complaint Handling Procedure for Customers and there is an extension template letter embedded into the complaint handling system.
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	Click here to view our Homes Plus Complaints Policy Internal CRM system task tracking function	The outcome of a complaint is communicated to the Customer upon completion as set out in our policy. Our Service Watch team (SW), introduced in 2025, is responsible for tracking post closure actions and liaising with Colleagues and Customers on service delivery. Our complaints handling system has a task function where post complaint actions are logged and expeditiously tracked by the SW team.
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	Click here to view our Complaints Handling Procedure Click here to view our Homes Plus Complaints Policy Internal template response letter	This process is guided by template complaint response letters designed to ensure The Code is met and every element of the complaint is answered. We capture the definition and the resolution

				the Customer is seeking through our triage and assessment process. Our approach is set out in our policy and procedure.
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	Click here to view our Complaints Handling Procedure Click here to view our Homes Plus Complaints Policy Internal Stage 1 and 2 training	This is found in our policy at Section 10.4 and complaint handling information to Customers. It forms part of the training for our Customer Resolution Coordinators. We allow scope widening at stage 1 however our policy sets out we will not add additional elements at stage 2. This is because we want to ensure all complaint elements follow a fair, two stage process as per requirements of The Code.
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	Yes	Internal template letters	The template we use for communicating a Stage 1 outcome includes the required information. We have strengthened our Customer Complaint information and policy to give more information about the handling and outcome of a complaint at Section 11 and 12.

	g. details of how to escalate the matter to stage 2 if the individual is not satisfied with the response.			
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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	Click here to view our Complaints Handling Procedure Click here to view our Homes Plus Complaints Policy	The template we use for communicating a Stage 1 outcome includes information on how to escalate a complaint to Stage 2. Our approach is set out in our Complaints Handling Procedure for Customers.
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	Click here to view our Complaints Handling Procedure Click here to view our Homes Plus Complaints Policy Internal complaint insight reports	This is a standard part of the process and is set out in our policy in Section 9 table, and Complaints Handling Procedure. During 2025-26 we experienced higher volumes than we had planned for meaning not all complaints were acknowledged within the SLA. We continued to invest in our complaint service and have recently grown the team to handle the increased demand. This

				means we will be compliant with the Code and our Customers will receive the service they would expect.
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	Click here to view our Complaints Handling Procedure	When a complaint is escalated to stage 2, contact is made with the Customer if further clarification is required. Our approach is set out in our Complaints Handling Procedure for Customers. We recently updated our policy to clarify the Customer does not need to explain their reason for escalation.
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Yes	Internal process of assignment	It is a standard part of our process for stage 2 escalations to go to a senior complaint handler and this is set out in our policy at section 9.
6.14	Landlords must issue a final response to the stage 2 <u>within 20 working days</u> of the complaint being acknowledged.	Yes	Click here to view our Complaints Handling Procedure Click here to view our Homes Plus Complaints Policy Annual Complaints and Service Improvement Report	The timescales are set out within our complaint handling policy in Section 9 table. Our Customer Resolution Coordinators work to code timescales. We monitor performance against these timescales by individual handler and as a

				whole, this is a key performance indicator which is reported internally.
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	Click here to view our Complaints Handling Procedure Click here to view our Homes Plus Complaints Policy	As part of the process, attempts are made to contact the Customer to explain why an extension is required, and to provide contact details for the Housing Ombudsman. This is found in our policy and complaint handling information for Customers.
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	Click here to view our Complaints Handling Procedure Click here to view our Homes Plus Complaints Policy	This is outlined in our policy and Complaint Handling Information for Customers and forms part of our template letter suite.
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	Click here to view our Homes Plus Complaints Policy	The outcome of a complaint is communicated to the Customer upon completion as set out in our policy. Our Service Watch team (SW), introduced in 2025, is responsible for tracking post closure actions and liaising with Colleagues and Customers on service delivery. Our complaints

				handling system has a task function where post complaint actions are logged and expeditiously tracked by the SW team.
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	Click here to view our Complaints Handling Procedure Click here to view our Homes Plus Complaints Policy Internal template response letter	This process is followed through template complaint response letters which can be amended to meet the needs to any specific Customer. Our complaint handlers capture the definition in our complaints handling system. Our approach is set out in our policy.
6.19	Landlords must confirm the following in writing to the resident at the completion of stage 2 in clear, plain language: - the complaint stage; - the complaint definition; - the decision on the complaint; - the reasons for any decisions made; - the details of any remedy offered to put things right; - details of any outstanding actions; and - details of how to escalate the matter to the Ombudsman Service if the individual remains dissatisfied.	Yes	Click here to view our Complaints Handling Procedure Click here to view our Homes Plus Complaints Policy	The template we use for communicating a Stage 2 outcome includes the required information. In 25-26 we reviewed our suite of template letters.

6.20	Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.	Yes	Click here to view our Complaints Handling Procedure Click here to view our Homes Plus Complaints Policy	Our Stage 2 review process engenders collaboration from relevant service areas. In 2024-25, we introduced quality audit sessions in complaint handling. A complex case group, led by our CRO, meets weekly to support pathways to resolutions where cases are complex or require a multi team/agency approach.

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 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;	Yes	Click here to view our Complaints Handling Procedure Click here to view our Homes Plus Complaints Policy	Our Customer Resolution Coordinators work independently from the frontline business and are trained to seek opportunities for improvement. Template letters set out the required elements, and our complaint handling system has the capacity to log potential service improvements. Root cause analysis is completed, and service improvement opportunities

	- Amending a record or adding a correction or addendum; - Providing a financial remedy; - Changing policies, procedures or practices.			are shared with leads and tracked through to completion via our Business Excellence Change Forums.
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Yes	Internal Complaint handling Record Internal Compensation Policy	Training for Colleagues on complaint handling covers the need to ensure remedies offered are fair and proportionate and in line with the Ombudsman's published remedies guidance. Our internal complaint handling record sets out the requirement to consider the full scale of impact and our compensation policy is aligned with the Ombudsman's guidance.
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	Internal Compensation Policy Internal template letters	All remedy actions are set out in our response letters and agreed with our Customers where appropriate, actions are tracked by our Service Watch team.
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes	Internal Compensation Policy	Our compensation policy is aligned with the Ombudsman remedies guidance for a fair

				assessment of any redress due, based on scale of impact.
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Section 8: Self-assessment, reporting and compliance

Code provision	Code requirement	Comply: Yes / No	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; c. any findings of non-compliance with this Code by the Ombudsman; d. the service improvements made as a result of the learning from complaints; e. any annual report about the landlord's performance from the Ombudsman; and f. any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord.	Yes	Click here to view Annual Complaints Performance and Service Improvement Report	Our annual report was published on 30 September 2025 and contains all the required elements. The Ombudsman completed a compliance review of our policy and self-assessment and made 11 recommendations, which were actioned and completed by October 2025. Two annual submissions will be prepared 26/27- 1 for PfP, and 1 for Origin Housing.

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	Click here to view Annual Complaints Performance and Service Improvement Report	An annual report was published on 30 September 2025 for PfP, and Origin Homes and the reports contain all the required elements.
8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	Yes	Completed in August 2026, published on website and provided to Duty to Monitor team	Where mergers take place, we commit to complete a new self-assessment within 12 weeks of that merger. This self-assessment was reviewed and updated in August 2026, post-merger with Origin Homes in April 2026 and reviewed again in August 2026.
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	Yes		We do this as and when requested and are compliant with all current and previous Ombudsman Orders with no CHFO's being issued in 25-26.
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	N/A		Should there be a reportable incident we will follow the prescribed guidance.

	must provide a timescale for returning to compliance with the Code.			
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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	Click here to view PfP's Annual Complaints Performance and Service Improvement Report	Our complaint handling system can capture potential service improvements. Final root cause analysis is completed, and service improvement opportunities are shared with leads and tracked through to completion. Details of service improvements are outlined in our annual complaints handling and service improvement report. Our Business Excellence team drive change through localised change forums. In addition, there is a monthly "Customer Story" shared with our Because Community Matters Council to analyse cases where there is significant learning to be reflected on and actioned.

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	Click here to view PfP's Annual Complaints Performance and Service Improvement Report Click here to view PfP's Complaint Handling Policy Internal reports to MRC, SLT, NCG and Board Internal reports to service leads	Our approach is set out in our policy. Root cause analysis undertaken to identify any systemic issues or Customer pain points is undertaken regularly and shared with service leads. Opportunities for improvement are captured and tracked. Wider opportunities form part of insight for change programmes. Our new Service Improvement Group launched in Q1 2025-26 and being refreshed for 26-7 brings together survey, complaint, and Ombudsman insight into one space with action planning for improvement.
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	Click here to view PfP's Annual Complaints Performance and Service Improvement Report Internal reports to MRC, SLT, NCG and Board Internal reports to service leads	Our National Customer Group, Board, Homes Plus Committee, Service Leads and Colleagues receive regular complaints insight. In 26-27, we plan to further strengthen this with quarterly updates to our website on service improvements.

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	Internal Customer Hub risk map Internal report to SLT	Regular complaints insight is shared with the Managing Director of Customer Hub as the accountable person. A Customer Hub Risk Map is in place and regularly reviewed. Service improvements are reviewed by the Managing Director monthly.
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	Scott Black, Chief Operating Officer, is the Member Responsible for Complaints	We are compliant with this requirement.
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	Report to MRC and Board Routine meetings with MRC	Routine meetings are in place with the Complaints Leadership Team to provide complaints insight to the MRC. This is presented at quarterly meetings of the governing body.
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,	Yes		Routine meetings are in place with the Complaints Leadership Team to provide complaints insight to the MRC. This is presented at

	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.			quarterly meetings of the governing body.
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	Internal Objectives Customer Promises People Promises	In 2024-25, a standard objective for complaint handling was set for all relevant Colleagues, in line with our Customer and People Promises. In 26-7 a new e-learning module is under development for the wider business to ensure all colleagues are clear on the regulatory expectations and their role in handling dissatisfaction.