Paragon Asra Housing Limited

PA Housing Complaints Policy

Reviewed March 2026

Paragon Asra Housing (PA Housing) is the managing agent for Maynard Cooperative Housing Association and Ross Walk Housing Cooperative. It is through this partnership working that the Cooperatives have adopted the PA Housing Complaints policy as complaints are managed by PA.
Where reference is made to any "executive directors" at PA Housing, this Policy will be referred to the Co-ops Management Committee

Owning manager	Director of Business Improvement
Department	Complaints and Business Improvement
Approved by	Customer Committee
Next review date	November 2028 or earlier subject to any changes in the legislative / regulatory environment

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1. Introduction

1.1 We understand that there may be instances where we fall short of people's expectations. This policy outlines how we handle complaints at Paragon Asra Housing (PA Housing). Our goal is to ensure that our actions are prompt and that our communication is clear, timely, and respectful. We strive to deliver a reliable service to all our residents and view all feedback as an opportunity to enhance our services. We see complaints as valuable feedback and are committed to using this to improve our services.

1.2 This policy should be considered in conjunction with various other PA Housing policies, including but not limited to:

- Data Protection Policy
- Compensation Policy
- Unacceptable Behaviour Policy
- Equality and Diversity Policy
- Reasonable Adjustment Policy
- Safeguarding Policy
- Antisocial Behaviour Policy

2. Definitions and scope

2.1 The Housing Ombudsman's Complaints Handling Code became statutory on 1 April 2024, meaning that landlords are obliged by law to follow its requirements. We have adjusted our complaints approach to align with the Code, adopting the Housing Ombudsman's definition of a complaint.

"An expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the organisation, its own staff, or those acting on its behalf, affecting an individual resident or group of residents."

We will establish at first point of contact whether the matter is an initial service request. A service request is defined as a request from a resident to the landlord requiring action to be taken to put something right, like reporting repairs, notifying the landlord about an incident of Antisocial Behaviour, or seeking information. Service Requests may become complaints if they are not handled properly. If this is the case, we will proceed with the complaint process while simultaneously taking any necessary actions to address immediate concerns.

2.2 A resident does not need to explicitly use the word 'complaint' for us to recognise it. They will be offered the option for us to consider the matter as a formal complaint, which will be handled in line with our Complaints Policy, including those made via a third party or representative.

2.3 The types of complaints addressed by this Policy are as follows:

- Delays in responding to an inquiry or request for information.
- Failure to deliver a service.
- Treatment or attitude exhibited by a staff member, including allegations of discrimination.
- Complaints concerning building safety.

2.4 Residents have the flexibility to raise complaints through various channels, including by telephone, via our website's online form, in-person communication, letters, and social media. Attachments like pictures or letters can be attached to webform submissions and included as additional evidence. Our website hosts a dedicated page where the Complaints Policy is publicly available, alongside the webform, information about the Ombudsman Scheme and our Annual Reports and Self-Assessment.

2.5 If a resident needs help making a complaint, we'll assist them from the first contact.

Contact details for PA Housing are as follows:

- Contact Services Team for immediate response: 0300 123 2221
- Complaints team mailbox: Complaints@pahousing.co.uk

2.6 Complaints submitted through social media will be redirected offline to ensure the protection of personal privacy.

2.7 We ensure accessibility to our services without disadvantage and make reasonable adjustments as needed, outlined in the Reasonable Adjustment Policy.

2.8 Complaints addressed to Senior Management also follow this policy and are managed by the Complaints Team.

2.9 Petition-based complaints are treated as one, with communication directed to the lead signatory. Outcome details are shared with the lead signatory for wider distribution. We will consider providing multiple copies as requested.

2.10 Complaints may come from advocates with the Resident's consent and in accordance with our third-party authorisation process.

2.11 If a resident lacks capacity under the Mental Capacity Act 2005, complaints will be accepted from a representative acting in their best interests and based on relevant consent and authority being provided, as outlined above.

2.12 Anonymous complaints undergo investigation, and outcomes are reported to our residents' forum.

2.13 For complaints relating to fire or other building safety issues concerning properties 18 metres or taller, or those with 7 storeys (or deemed high-risk for other reasons) where PA Housing serves as the Principal Accountable Person or an Accountable Person, the central complaints team conducts the initial

investigation. If necessary, relevant PA housing teams and colleagues are consulted, with the Building Safety Team kept informed. If a complaint cannot be resolved initially, it is escalated to the Building Safety team for further investigation and coordinated with the Central Complaints Team until completion.

3. Our Complaint Approach

3.1 Service requests can often be addressed at the initial point of contact. Our colleagues should always attempt to assist residents and resolve any issues right away, focusing on prompt problem-solving and correction. Any resident who is dissatisfied with our response to a service request will be offered the opportunity for this to be recorded as a complaint.

3.2 For straightforward complaints that require minimal or no investigation, we aim to provide an immediate apology, explanation, or action to resolve the complaint at stage 1 on the spot.

3.3 We follow a two-stage process for complaints to ensure our residents can challenge our decisions and have them reviewed. We aim to provide regular updates, even if there's no final resolution yet, to reassure residents that we're actively addressing their concerns. We're committed to fostering a culture where all employees listen to, update on, resolve, and learn from resident complaints.

3.4 Upon receiving a complaint (which cannot be immediately resolved at stage 1) or a Stage 2 escalation request, we will acknowledge it in writing within 5 working days. The acknowledgement will clearly outline our understanding of the complaint, the outcomes the resident is seeking, and any aspects that fall outside our responsibility. If the complaint issues are unclear, we will request clarification from the residents.

Colleagues will keep residents informed where appropriate and liaise with relevant parties to address any outstanding issues promptly and effectively. If the complaint is upheld, we will provide an explanation and apology and take the necessary actions to fully resolve the issue, including compensation where appropriate.

Stage 1 - Complaint Investigation

3.5 When we first receive a complaint, we aim to agree on a resolution with the resident within 10 working days from the date of acknowledgment. For particularly complex complaints, additional time may occasionally be required. In such cases, we will explain the rationale to the residents, provide regular updates and set out the expected timescale for response. In line with the Complaints Handling Code, we will aim to limit any extension to a maximum of 10 additional working days. We will provide complainants with the Housing Ombudsman’s contact details and explain their right to seek advice when we do so.

Stage 2 Escalated Complaints

3.6 If the resident isn't satisfied with our Stage 1 decision, they can request a Stage 2 review. While we do not require them to provide a reason, we will make reasonable efforts to understand their concerns. Requests for escalation are typically accepted within 28 days, although this may be extended in exceptional circumstances. At Stage 2, the complaint will be handled by a different complaints' specialist, and higher management will review both the investigation and response.

3.7 Following a thorough investigation, a final response will be provided within 20 working days of acknowledging the complaint**.** For exceptionally complex cases, additional time may occasionally be required. In such instances, we will keep the complainant informed of the reasons for the delay and provide regular updates. In line with the Complaints Handling Code, we will aim to limit any extension to a maximum of 20 additional working days**.** If additional time is still required for exceptional legitimate reasons, as per section 5.9 of the Code we will agree suitable intervals to keep them informed. We will also provide them again with the Housing Ombudsman's contact details, explaining their rights.

3.8 For both stage 1 and stage 2 complaints a response will be issued once the outcome is determined. Any outstanding actions will be monitored to ensure full resolution, and residents will be kept informed of progress.

3.9 Where possible, with the resident's agreement, we will incorporate related issues into the response at Stage 1. Unrelated or late-stage issues will be logged separately to avoid delaying the complaint resolution. If additional matters are raised during the complaint escalation to Stage 2, these will be treated as a new Stage 1 complaint in order for this to be a fair review.

Putting Things Right

3.8 Following a complaint, we'll take the necessary steps to make things right and offer an apology if we're at fault. We value feedback as a tool for learning from our mistakes. If a complaint leads to changes in policy or service, we'll document this and regularly update our residents.

3.9 We'll consider a case resolved once we've agreed on a solution with the resident, sometimes committing to delivering a service within a specific timeframe after the formal complaint response has been issued.

3.10 We'll engage our resident groups in reviewing our complaint handling performance, incorporating feedback and lessons learned to enhance services. This ensures fairness and transparency in our complaint resolution process.

External Escalation

3.11 If all steps outlined in the Complaints policy have been exhausted and the resident remains dissatisfied with the outcome; they can request further escalation externally.

3.12 The resident has the option to contact the Housing Ombudsman Service, although typically, the Ombudsman will advise on the Resident exhausting the organisation's Complaints Policy first. The Housing Ombudsman Service is independent, impartial, and free. The Ombudsman will assess if the complaint falls within its scope.

The Housing Ombudsman Service contact details are as follows:

- 0300 111 3000
- Housing Ombudsman Service, PO Box 1484, Unit D, Preston, PR2 0ET
- info@housing-ombudsman.org.uk
- https://www.housing-ombudsman.org.uk/

3.13 For disputes concerning leases, long leaseholders, shared owners, and freeholders' advice can be sought from The Leasehold Advisory Service

- 020 7832 2500
- info@lease-advice.org.uk
- www.lease-advice.org.uk

3.4 Leaseholders can also appeal to the First-tier Tribunal (Property Chambers) to resolve complaints related to Service Charges and lease agreement terms. This Tribunal, specialised in property disputes, operates independently of the Government and can be accessed through the gov.uk website: www.gov.uk/housing-tribunals

4. Exclusions

4.1 In some cases, certain issues won't be treated as complaints and won't go through our complaints procedure. These include:

- Initial requests for services, like reporting repairs, or Antisocial Behaviour, or seeking information, which may become complaints if not handled properly.
- Insurance claims or appeals related to property damage or personal injury against PA Housing.
- Matters already resolved through our Complaints Policy or another appeals process.
- Cases already in legal proceedings or once the pre-action protocol has been exhausted and legal papers have been served.
- Complaints about incidents which either took place, or which the resident became aware of, more than twelve months previously, with exceptions considered on a case-by-case basis. The test for reasonableness of these

considerations will be whether there is sufficient evidence supporting our ability to investigate.

- Disputes concerning PA Housing policy wording– however this feedback will be , noted for future policy reviews.
- Complaints about property transfers or allocations will only be considered if our policy wasn't correctly followed or if the complaint pertains to the service rendered.
- In rare cases, we may need to enact the Unacceptable Behaviour Policy whilst we investigate a complaint. We'll transparently communicate the reasons behind this decision, plus details on any sanctions to be applied, adhering to the guidelines set out in our Unacceptable Behaviour Policy. If another exclusion applies, such as a matter which has been investigated before, or legal proceedings have commenced, the exclusion may be made on that basis.

5. Complaint Rejections

5.1 In such cases referred to in 4 above, or if a stage 1 complaint is not eligible for Stage 2 escalation, we'll notify the resident, explaining why their matter didn't meet our complaint handling criteria. We'll also provide them with information about the Housing Ombudsman if they want to challenge this decision. If the Ombudsman disagrees with the exclusion, they may direct us to handle the complaint or escalate it to stage 2.

5.2 Staff will ensure a smooth referral and handover of complaints to relevant internal teams and specialists, where necessary.

6. Data Protection

6.1 PA Housing's Data Protection Policy details how staff must handle personal information. Additionally, staff undergo training in this area. If residents have concerns or are dissatisfied with how we've managed their personal information throughout our complaints process, they can consult our Resident Privacy Notice on our website, contact our Data Protection Officer (DPO), or notify the Information Commissioner’s Office (ICO).

7. Training

7.1 We'll conduct induction and refresher training for all relevant staff to ensure they understand the Complaints Policy and our commitment to maintaining excellent service delivery standards and meeting targets. Additionally, all managers will receive specialised training to equip them with the skills and knowledge needed to adhere to this Policy.

8. Equality, Diversity, and Inclusion

8.1 This policy aligns with our broader commitment to equality, diversity, and inclusion by supporting vulnerable individuals and fostering inclusive communities.

8.2 We ensure accessibility and provide support for all residents throughout the complaints process. We are dedicated to ensuring that our complaints procedure is accessible and user-friendly for all our residents, aligning with our legal obligations outlined in the Equality Act 2010. If a resident requires assistance in submitting their complaint in writing, they can inform us.

8.3 We will make reasonable adjustments for residents where appropriate under the Equality Act 2010. We will keep a record of any reasonable adjustments agreed, as well as a record of any disabilities a resident has disclosed. Any reasonable adjustments agreed will be kept under active review.

8.4 You can request a reasonable adjustment from us through the point of contact you are communicating with or by contacting Resident Services on telephone 0300 1232221. Examples of the assistance we can offer include providing information in alternative formats, adapting our communication methods, and allowing additional time for a complaint to be raised with us.

8.5 We will ensure that a policy specific Equality Impact Assessment has been completed and undertake continual analysis of the protected characteristics of residents to identify any negative effects and inform future processes and service improvements.

9. Safeguarding

9.1 If we receive a complaint related to safeguarding, we will adhere to the procedures outlined in our Safeguarding Policy to address it. Our detailed procedures align with local safeguarding information sharing protocols. The Executive Director of Transformation serves as the safeguarding lead and is responsible for reporting the information.

10 Unacceptable Behaviour

10.1 We will not tolerate threatening, abusive, or violent behaviour to our staff. As noted in our Unacceptable Behaviour Policy, in extreme cases such as physical violence or harassment towards our staff, actions could include involving the police, taking legal action and ending direct contact with the Resident.

10.2 In line with the Housing Ombudsman Service's Guidance on Managing Unacceptable Behaviour, we recognise that Residents have a right to raise concerns, but some behaviours can be deemed unreasonable or unacceptable. This includes, but is not limited to, repeatedly raising the same issues after they have been resolved, imposing unreasonable demands or deadlines on staff, excessive or disproportionate communication across multiple channels, and using aggressive, abusive, or derogatory language.

10.3 To ensure a fair and effective complaints process for all parties, we may take proportionate measures such as limiting the frequency and method of communication or appointing a single point of contact. Our aim is to maintain

constructive, respectful, and productive engagement while protecting the wellbeing of our staff and the integrity of the complaints process.

11. Monitoring and Reporting

11.1 We record all complaints, regularly track our progress in addressing them, and evaluate our performance against set targets. We internally assess our performance at PA Housing and compare it against industry standards. We provide regular reports to our Executive and Senior Management Teams, and the Board, outlining complaint performance including volumes, trends and outcomes, Housing Ombudsman Service enquiries, lessons learned, service improvement recommendations, and policy adjustments resulting from feedback received through complaints.

11.2 Furthermore, our complaints service undergoes internal audits to ensure its effectiveness.

11.3 We will transparently report on our complaints performance and how feedback from complaints has contributed to service improvements on a quarterly basis to our engaged residents. This will enable them to hold us accountable and suggest improvements. Additionally, we will publish monthly updates on complaints performance to our residents on our website.

11.4 We will complete an annual review of Complaints Performance and Service improvement in accordance with the Complaints Handling Code, which will include our self-assessment against the Code. This will be shared with our Governing Board and submitted to the Housing Ombudsman as well as being published on our website alongside the Complaints Policy itself.

11.5 We will further publicise this Policy by sharing it with Neighbourhood Co-ordinators and Resident Champions so that information can be given in communities, we will have hard copies of the policy available in our reception / office sites. Signposting to the website information will also be included where possible in magazines, newsletters or other such resident facing communications.

12. Legislation

12.1 The key pieces of legislation aligned to this policy are the:

- Social Housing (Regulation) Act 2023
- Housing Act 1985, 1988, 1996 and 2004
- Localism Act 2011
- Landlord and Tenant Act 1985 as amended by the Commonhold and Leasehold Reform Act 2002
- Equality Act 2010
- Data Protection Act 2018
- Building Safety Act 2022

12.2 Further information can be found in ‘The charter for social housing residents:

social housing white paper', which sets out the actions the government will take to ensure that residents in social housing are safe, are listened to, live in good quality homes, and have access to redress when things go wrong:

www.gov.uk/government/publications/thecharterforsocialhousingresidentssocialhousi ngwhitepaper

13. Audit Log

Date of change	Who updated	Details of change
26 March 2021	Derek Crook	This document details PA Housing's new Complaints Management Policy, taking into account the Housing Ombudsman's (HOS) complaint handling code. **Key changes:** Use of the HOS definition of a complaint Removal of the process details – these have been included in a separate procedure. Details the two stage complaint process, and the stage 0 service request designed to prevent issues escalating into complaints. Response times for a Stage 2 complaint changed from 10 days to 15 days. Provision of more detail on reasonable adjustments and access to complaints, including referrals from solicitors if acting on behalf of a Resident. Enhances the lessons learnt and role of residents in terms of helping us to learn from issues and taking steps to improve services. Timescale for accepting complaints changed from 12 months to 6 months.
23 March 2021	Resident Complaint Panel	Positive feedback about new complaint approach and confirmation that PA are focusing on the right things.
26 July 2022	Resident Complaint Panel	Introduced the current Policy and briefed residents on the revised HOS Complaint Handling Code. We gained their feedback on the way forward and areas to consider for the revised policy This included the changes to how long we take to acknowledge and log a complaint, the Exclusions for when we do not raise a complaint and the change to the time to respond to a stage 2 complaint.
24 August 2022	Housing Ombudsman	Sought advice and guidance from the HOS on our Exclusions. Our Policy has been updated accordingly.

08 September 2022	Mohammed Umerji	This document details PA Housing's updated Complaints Management Policy, taking into account the Housing Ombudsman's (HOS) updated complaint handling code (April 22). **Key changes:** Use of the HOS definition of a complaint. Removing Stage 0 and introducing Service Request designed to prevent issues escalating into complaints. Response times for a Stage 2 complaint changed from 15 days to 20 days as per the HOS revised Handling Code. **Clearer expectations on complaint exclusions around ASB issues** Clarified how and when complaints can be referred to the HOS throughout the complaints process. Included details on how PA Housing will deal with complaints made publicly through Social Media platforms. Removed details around the localism act 2011, as from October 1, 2022, the Ombudsman will remove the democratic filter' process. Updated the Safeguarding lead details.
February 2023	Mohammed Umerji	Following feedback from the Housing Ombudsman Service, additional clarity provided on how exclusions are also relevant at Stage 2 of the complaints process.
May 2024	Mohammed Umerji / Kimberley Ellis	Clarity added on how the Complaints Policy will comply with the Building Safety Act 2022 • Safeguarding lead details updated • Clarity on exceptions involving legal claims following guidance from the Housing Ombudsman Service. In line with the Housing Ombudsman Service's updated Code, the policy has been updated to include: • Duration of accepting a complaint extending from 6 months to 12 months Details of where the policy and Housing Ombudsman Service details are published
October 2024	Kimberley Ellis	The complaints policy was updated to specify acknowledgment and response timescales for Stage 2 escalations. An acknowledgment will be sent within 5 working days of receipt, and a response will be provided within 20 working days from the acknowledgment date.

March 2025	Kimberley Ellis	**Para 3.5** - Stage 1 Complaints: Extensions are limited to a maximum of 10 additional working days under the Complaints Handling Code. If the Resident disagrees, the response will be issued within the initial timeframe, with Ombudsman details provided. **Para 3.8** - Stage 2 Complaints: Extensions are limited to a maximum of 20 additional working days. If the Resident disagrees, the response will be issued within the initial timeframe, with Ombudsman details provided. **Para 3.12** - Housing Ombudsman Website Link: Updated due to incorrect details.
June 2025	Kimberley Ellis	**Para 10.2 – 10.3 -** Unacceptable Behaviour Update**:** Added new clause aligned with Housing Ombudsman Service's Guidance on Managing Unacceptable Behaviour. Clarifies examples of unreasonable behaviour, including repeated complaints on resolved issues, excessive communication, and abusive language. Introduces potential measures such as communication restrictions and single point of contact to ensure a fair and effective complaints process and to protect staff wellbeing.
September 2025	Anna Henderson	Minor wording changes made to clarify various sections following review by the Housing Ombudsman Service's Duty to Monitor team.
March 2026	Anna Henderson	**2.1 – updated the definition of a service request** **3.1 and 3.2 – Clarified that there are no additional stages to the complaint, and that any 'on the spot' resolutions will be treated as Stage 1 complaints.** **3.5 and 3.7 – Wording updated in respect of any required extensions to the Code defined timescales at Stage 1 and Stage 2.** **3.9 – Explicitly stated that new issues raised during escalation to Stage 2 will be treated as new stage 1 complaints.** **4.1 – Reference to 'landlord responsibilities' removed, the approach to managing complaints in line with the Unacceptable Behaviour Policy clarified, and detail added where residents may have more recently become aware of an incident which itself occurred outside the normal 12 month timeframe for consideration under this Policy.**

		11.5 – Section added to include ways in which we will publicise this Policy.