**Housing Ombudsman Complaint Handling Code:**

**Self-assessment form – 15 January 2021 (Updated)**

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **Compliance with the Complaint Handling Code** | | | | **Evidence / Comments** |
| **1** | **Definition of a complaint** | **Yes** | **No** |  |
|  | Does the complaints process use the following 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*. | **YES** |  | This definition is used in Section 3.4 and 5.1 of our Policy – What is a Complaint |
|  | Does the policy have exclusions where a complaint will not be considered? | **YES** |  | Exclusions are outlined in Para 5.2, Section 5 of our Policy. Amendments to existing policy text highlighted in italics to ensure the Policy is clear on how customers will be responded to if a complaint will not be considered.  **3.3 & 5.2 What is a Complaint**  Complaints must be brought to our attention within 6 months of an incident or issue arising. *If NPH decides not to accept a complaint, a detailed explanation will be provided to the complainant setting out the reasons why the matter is not suitable for the complaints process. Complainants have the right to challenge this decision by bringing the complaint to the Ombudsman.*  **5.2 What is not a complaint?**  The complaints process should not be used for customers who are requesting a review through an alternative appeal process such as:   * The termination or extension of an introductory tenancy * The decision not to offer a further tenancy at the end of a fixed term flexible tenancy * Allocation Appeal * Rechargeable repairs appeal. However, if you are not happy with the way your appeal has been conducted, then you are entitled to submit a complaint through the complaints process.   For the purposes of this policy NPH does not define any of the following as complaints:   * A request for service, information or an explanation * Complaints that have not been brought to our attention within 6 months of an incident or issue arising * An issue that has already been resolved through our complaints process * Cases where a tenant or customer is pursuing their issue through legal proceedings such as a disrepair claim or an insurance claim * Requests for compensation * Issues raised in petitions recently or within the previous 6 months * Reports of anti-social behaviour or neighbour nuisance * Comments about our policies or policy decisions * Complaints about bodies or persons over which NPH has no control |
|  | Are these exclusions reasonable and fair to residents? | **YES** |  | Para 5.2 sets out instances where another process will review the issue raised, such as rechargeable repairs appeals, where an appeals process is in place in the first instance.  Para 5.21 sets out when a complaint may be deemed unreasonable. |
| **2** | **Accessibility** |  |  |  |
|  | Are multiple accessibility routes available for residents to make a complaint? | **YES** |  | Para 5.4 of our Policy sets out ‘Who can complain?’ and how.  Any customer wishing to make a complaint can easily do so by:   * Email to [nphcustomerfeedback@nph.org.uk](mailto:nphcustomerfeedback@nph.org.uk) or in writing to us – this way you can include as much detail as you feel necessary * Complete a feedback form <https://www.nph.org.uk/customer-feedback> * In person to the One Stop Shop at The Guildhall, St Giles Square, Northampton, NN1 1DE * By telephone on 0300 330 7003 * Social Media Platforms i.e. Facebook and Twitter |
|  | Is the complaints policy and procedure available online? | **YES** |  | Policy can be found on NPH website and there is a summary leaflet outlining NPH’s complaints process: <https://www.nph.org.uk/nph-complaints-process-2019> |
|  | Do we have a reasonable adjustments policy? | **YES** |  | **Our revised policy has been amended under para 5.16 Mediation to include the text in italics below:**  We are committed to using all possible means to resolve a complaint. This could include using mediation or arbitration as alternative ways of resolving disputes *at any stage of the process or providing reasonable adjustments to assist with a complaint.* Where appropriate, we may engage the services of an independent third party to investigate a formal complaint. NPH Complaints Panel tenant members can also be invited to support a complainant with a mediation process. We may also use the mediation stage if the Housing Ombudsman asks us to revisit a decision or case.  **Section 11 of our revised Policy has been amended to include the italic text in italics under ‘Equalities and Diversity’:**   1. **Equalities and Diversity**   NPH is committed to comply with the Equality Act 2010 and our aim is to make our complaints policy easy to use and accessible to all of our customers. We may take reasonable steps to accommodate any reasonable adjustments you may have to enable you to access this policy or receive responses to complaints in other formats and provide such assistance as you may reasonably require.  *Reasonable adjustments can include:*   * *Use of a Mediator or NPH support worker* * *Extra time to provide additional information to support a complaint* * *Use of the tenant complaint panel* * *Independent repair* * *Multiple Service Area collaboration when investigating and responding to complaints* * *Translation/Interpreter services* |
|  | Do we regularly advise residents about our complaints process? | **YES** |  | Our Policy is published on the website with a summary leaflet.  The summary leaflet is included in our Stage 1 and 2 letter responses so that the complainant knows the process.  We will review the inclusion of adding the Complaints Policy summary leaflet to the tenant Sign Up pack so tenants are aware of the process from the outset. |
| **3** | **Complaints team and process** |  |  |  |
|  | Is there a complaint officer or equivalent in post? | **YES** |  | There are designated officers within each service area to handle complaints and the Data Management Officer (DMO) who oversees the complaints process. |
|  | Does the complaint officer have autonomy to resolve complaints? | **YES** |  | Paras 5.8 Quick Wins and 5.9 Formal Complaints within the policy sets out who is responsible at each stage of the complaint.  The DMO has an independent role to review requests for escalation and provide clear guidance to service areas regarding all complaint responses made. |
|  | Does the complaint officer have authority to compel engagement from other departments to resolve disputes? | **YES** |  | The DMO, who oversees the policy and its implementation, works closely with officers to resolve issues by providing and issuing action/guidance, and can arrange multi service area collaboration and case study reviews. |
|  | If there is a third stage to the complaint’s procedure are residents involved in the decision making? | **YES** |  | Previously, NPH initiated a formal third stage which involved the Tenants Complaints Panel at stage 3. NPH values the involvement of the Panel in the process which has provided valuable tenant input to resolve complaints locally when, on the rare occasions, a complaint has escalated to Stage 3. In the last two years the Panel has only been used once, so NPH are confident that a Stage 3 will continue to only be used in rare, often more complex, cases.  Under the proposed revised policy, the Panel will still be offered once formal Stage 1 and 2 complaints have reached the end as an **optional** Stage 3 mediation. Complainants who take up this offer will be fully involved in discussions regarding their issue and final decisions aimed at resolving their complaint collectively. It is also proposed that a complainant may have the discretion to call upon the Tenants Complaints Panel members at any stage of the process to encourage involvement to help resolve disputes and to act as support / mediator where a complainant requires support. |
|  | Is any third stage optional for residents? | **YES** |  | Stage 3 will be offered to complainants as an optional stage which they have the discretion to take up or not. In addition to Stage 3, complainants can seek help and support from our Tenant Complaints Panel members to help resolve their issue at any time. |
|  | Does the final stage response set out residents’ right to refer the matter to the Housing Ombudsman Service? | **YES** |  | The Housing Ombudsman Service is referred to in all the letters that are sent to complainants at all stages of the complaints process. |
|  | Do we keep a record of complaint correspondence including correspondence from the resident? | **YES** |  | The complaint retains the same reference number from the Quick Win stage through to Stage 2 if applicable and all records and correspondence are contained within this complaint. NPH use JADU CRM as a case management system to log actions, letters and other relevant correspondence per case. |
|  | At what stage are most complaints resolved? |  |  | The Quick Win Informal Stage resolves most cases.  For the period April to October 2020, of the 404 quick wins raised, 40 were escalated to a formal Stage 1 complaint.  Of the 40 complaints at Stage 1, 4 were escalated to Stage 2. |
| **4** | **Communication** |  |  |  |
|  | Are residents kept informed and updated during the complaints process? | **YES** |  | Complaints are acknowledged within 2 working days, which includes contact with the complainant to discuss and understand fully the issues and to outline what action will be taken to resolve it.  Extended SLA’s are agreed with the complainant if more time is needed to resolve the complaint fully. |
|  | Are residents informed of the landlord’s position and given a chance to respond and challenge any area of dispute before the final decision? | **YES** |  | Currently our policy is that when a full response is given, complainants are given 28 days to respond to our decision and provide reasons why they feel we have not resolved their complaint adequately.  Our policy has been amended to state that for formal complaints, complaint handlers must discuss the action they are taking and ensure it resolves all aspects of the complaint before a final decision is made and a formal letter sent at Stage 1 and 2 to close the complaint. |
|  | Are all complaints acknowledged and logged within five days? | **YES** |  | Complaints are logged by NBC Contact Centre on behalf of NPH into JADU CRM. Complaints made by telephone are logged straight away. Complaints received by email are logged within 48 hours. If we have a tenant’s email address, the JADU system automatically acknowledges the complaint when it has been logged and provides the reference number.  Complaints are also acknowledged with contact by the service area within 2 working days to provide details of who will be dealing with the complaint, to gather any further information to support the complaint if necessary and to confirm the SLA date. |
|  | Are residents advised of how to escalate at the end of each stage? | **YES** |  | The escalation process forms part of the formal response letters. |
|  | What proportion of complaints are resolved at stage one?  **NOTE NPH’s process**   1. **Informal Quick Win** 2. **Formal Stage 1** 3. **Formal Stage 2** 4. **Optional Stage 3** |  |  | Stage 1 of NPHs process is the informal Quick Win. For the period April to October 2020, of the 404 quick wins raised, 40 were escalated to a formal Stage 1 complaint. |
|  | What proportion of complaints are resolved at stage two? |  |  | For the period April to October 2020, of the 40 complaints at Stage 1, 4 were escalated to Stage 2. |
|  | What proportion of complaint responses are sent within Code timescales? |  |  | The following Data is for April to October 2020:   * Quick wins:   81% of complaints were responded to on time (5 working days) 19% were completed outside of the SLA.  Quick win (with extension)  Only 10 cases had an extension of time applied   * Stage one   Just over three quarters of complaints (78%) were responded to within the SLA – 10 working days for Stage 1 complaints  Stage one (with extension)  There were 5 cases that had an extension of time applied   * Stage two   There were 4 complaints closed at Stage 2, for which they were all responded to within the SLA of 10 working days |
|  | Where timescales have been extended did we have good reason? | **YES** |  | Complaint handlers must agree the extension of time with the complainant and explain the reason for the requirement. |
|  | Where timescales have been extended did we keep the resident informed? | **YES** |  | Complaint handlers must agree the extension of time with the complainant, the action being taken and keep them informed. |
|  | What proportion of complaints do we resolve to residents’ satisfaction? |  |  | A Satisfaction survey was sent out with all Stage 1 and 2 complaints. We have reviewed the survey with our Tenant Complaints Panel regarding the questions and design of the survey. The survey will now come from the Panel asking for feedback. The new survey is to be rolled out in the new year. |
| **5** | **Cooperation with Housing Ombudsman Service** |  |  |  |
|  | Were all requests for evidence responded to within 15 days? | **YES** |  | The DMO responds to all requests. |
|  | Where the timescale was extended did we keep the Ombudsman informed? | **N/A** |  | No extension requests required. |
| **6** | **Fairness in complaint handling** |  |  |  |
|  | Are residents able to complain via a representative throughout? | **YES** |  | **Para 5.4 of our policy includes:** Any tenant or customer with vulnerabilities or who would like help to make a complaint can have the support of an advocate at any stage of the process. For example, a friend, relative or professional whom you confirm you are happy to speak with us on your behalf. However, legal representatives such as solicitors are not accepted by NPH.  **Para 5.18 of our policy, ‘Third-Party Reporting’, includes:** Complainants may wish to have a third-party act on their behalf. A third-party is any person or organisation acting on behalf of or making enquiries for the complainant. For example, third parties may include:   * 1. advice organisations   2. professionals such as social workers, support workers or carers   3. family members or friends   Legal representatives such as solicitors are not accepted by NPH. Where a third-party is helping a complainant with their complaint, we need written consent to that effect. Where we have this authority, we will endeavour to take all possible steps to keep the third-party informed of progress on the complaint. NPH are unable to respond to complaints until a Letter of Authority is received. |
|  | If advice was given, was this accurate and easy to understand? | **YES** |  |  |
|  | How many cases did we refuse to escalate?  What was the reason for the refusal? |  |  | We do not currently provide a report on the number of refusals to requests for escalations. We will include this is future reporting from 1 January 2020.  Cases are only refused if it is determined that we have adequately dealt with all the issues raised at either the Quick Win or Stage 1 of the complaint. Complainants are given the opportunity to advise us what we have not dealt with at the previous stage and what their desired outcome is. |
|  | Did we explain our decision to the resident? | **YES** |  | Refusal letters clearly identify the issues raised (as confirmed by the complainant) and whether these issues have been dealt with and explained in our response. |
| **7** | **Outcomes and remedies** |  |  |  |
|  | Where something has gone wrong, are we taking appropriate steps to put things right? | **YES** |  | As detailed above in section 4, most of our informal Quick Wins are resolved at that stage. Of the 404 quick wins raised in April-October 2020, 40 were escalated to a formal Stage 1 complaint.  Para 5.11 of our Policy now includes a specific section on appropriate remedies and factors that should considered to resolve a complaint as per para 5.5 of the Code. |
| **8** | **Continuous learning and improvement** |  |  |  |
|  | What improvements have we made as a result of learning from complaints? |  |  | Our Policy has been amended for points of clarity and our complaint handling processes reviewed. For example, we have included acknowledging all complaints received within 2 working days and that any extended SLA times are agreed with the complainant.  We will be introducing Case Reviews for all Stage 2 complaints to more robustly review and capture lessons learnt.  Service area improvements where working practices and policies have been amended. |
|  | How do we share these lessons with:   1. residents? 2. the board/governing body? 3. In the Annual Report? |  |  | 1. In our final response letters, we will include the lessons learnt from the case and what we will change as a result of it as required. In 2021 will be making quarterly updates on our website about complaint numbers, trends and lessons learnt. 2. Board and Committee receive quarterly reports and lessons learnt will be included. 3. An annual report on complaints received in the year, trends and key lessons learnt will be produced and published annually via our website. A complaints page detailing numbers and trends is under development with our comms team. |
|  | Has the Code made a difference to how we respond to complaints? | **YES** |  | We will amend areas of our Policy to meet the standard required. Culturally, the new code will assist continuously ensuring high standards of responses are maintained and that a customer first approach to complaint handling is embedded. |
|  | What changes have we made? |  |  | * Reasonable adjustments section has been added into the policy. * Stage 3 will now be optional. The Tenants Complaints Panel will now be offered as an optional mediation stage and members of the Panel can be involved at any stage of the process to offer support and help to a complainant. * Amending our policy to state that for formal complaints, complaint handlers must discuss the action they are taking and ensure it resolves all aspects of the complaint before a final decision is made and a formal letter sent at Stage 1 and 2 to close the complaint. * Amending our policy to specifically include a section on appropriate remedies and factors that should considered to resolve a complaint as per para 5.5 of the Code. * We will actively capture lessons learnt in weekly meetings to review complaints. * Introducing quarterly updates on our website about complaint numbers, trends and lessons learnt. * Implementing Case Reviews of all complaints that have been escalated to Stage 2 to fully review root cause and lessons learnt. * We will log escalation request refusals more formally and include in reporting. * Ongoing training of staff involved with handling complaints. * Roll out a new Complaint Handling Satisfaction Survey from the Tenants Complaints Panel from 1 January 2020. |

|  |  |  |
| --- | --- | --- |
|  | **Lead Officer name** | Santina Chambers |
|  | **Job Title** | Data Management Officer |
|  | **Signature** | cid:image003.jpg@01D53E49.B98BA890 |
|  | **Date** | **15/01/2021 (UPDATED)** |