



NORTHAMPTONSHIRE
PARTNERSHIP HOMES

Complaints and Feedback Policy

March 2024

Version 10

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DOCUMENT MANAGEMENT

<p><i>First Approved by: Board 10 February 2016</i> <i>Policy updated: February 2024, EMT 06.03.2024</i> <i>Next Review Date: February 2025</i> <i>Version 10</i></p>	<p>Contact Officer: Customer Service Excellence Officer</p> <p>Contact: (Responsible Person) Head of Corporate Strategy and Data Management</p>
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THIS DOCUMENT IS TO BE READ IN CONJUNCTION WITH:

1. Customer Service Strategy	5. Petitions Policy
2. NPH Service Standards	6. Complaints and Feedback Procedure (internal)
3. Compensation Policy	7. Unacceptable behaviour Policy
4. Rechargeable Repairs Policy	

REVISION HISTORY

Revision date	Summary of Changes	Version
February 2016	Updated document when agreed and signed off will replace post transfer policy document	1
September 2017	Annual Review - no amendments	2
September 2018	Clarification made on 'leaseholder' to include property and garage leaseholders	4
August 2018	Annual Review - no amendments	3
August 2019	Revised policy to include two new informal stages of call backs and quick wins for handling requests for service/information, redefined feedback definitions and include MP/Councillor Enquiries as feedback channels	5
July 2020	Annual Policy Review: Revised Policy has removed the Call backs feature as none had been reported since the policy was revised in 2019. This Policy makes the escalation request process clearer in terms of who conducts the review and the timescale. The NPH responsibilities section now includes 1) how we deal with complaints 2) when we will invoke case reviews for complex complaints and those that reach stage 2 and 3) increased opportunities to analyse lessons learnt for service improvements. An update to the MP and Councillor Enquiries process to include automatic reopening if the Councillor is unhappy with the response. Updated Complaints Feedback Form	6
December 2020 / January 2021	Policy review in response to HO Complaint Handling Code This Policy now complies with The Housing Ombudsman Complaints Handling Code (released in July 2020). We have completed The Codes Self-Assessment and published on NPH's website.	7
Aug-Sept 2022	Revised Policy amended to be compliant with revised HO complaints handling code. The main change is Implementing a 2 stage complaints process.	8
December 2023	Amendments in response to new HO Code – Removal of Stage 3 and inclusion of HoS to review Stage 2 and extension from 6 to 12 months for an issue to be brought to NPH's attention.	9
Feb-Mar 2024	Revised Policy amended to be compliant with new statutory HO Complaint Handling Code coming into force on 01.04.24. EMT review 08.03.2024.	10

1. Introduction and purpose of the policy

Northamptonshire Partnership Homes (NPH) manage over 11,300 social housing homes on behalf of West Northamptonshire Council (WNC) as an Arm's Length Management Organisation (ALMO). West Northamptonshire Council is the overall governing body for the delivery of housing services and work closely with NPH to monitor the handling of complaints to ensure a high standard of service for their residents against the Housing Ombudsman Complaint Handling Code.

The purpose of this policy is to set out a clear and easy approach for anyone wishing to give feedback about the housing services provided by NPH on behalf of WNC, be it a compliment, comment, complaint, MP/Councillor Enquiry or service request. The Policy covers those services which come under the jurisdiction of the Housing Ombudsman and the housing services within the scope of this Policy include:

- Repairs and work being carried out to your home
- Concerns about property condition
- Issues about how your tenancy is being managed
- Communal area cleaning or repairs
- Tree and grounds maintenance
- Rent payment and collection or service charges
- Leasehold services
- How reported incidents on anti-social behaviour are being managed
- Mutual exchanges
- Aids and adaptations
- A complaint you have already raised
- NPH staff or contractor behaviour
- Complaint about how a request for information has been handled

WNC provide the housing services listed below which are under the jurisdiction of the Local Government Ombudsman and are therefore not within the scope of this Policy:

- Housing applications and allocations
- Temporary accommodation
- Homelessness services and support
- Private sector housing

Complaints about the housing services provided by WNC will follow the same principles set out in this document, but they will be passed across to WNC to respond to in the first instance and processed under their Customer Compliments, Comments and Complaints Policy: www.westnorthants.gov.uk/communicating-us/comments-compliments-and-complaints

Please see section 4.4, page 11 for further information on the Ombudsman services.

2. Policy aim – listen, resolve, learn

NPH are committed to providing a quality service for its customers and work in an open and accountable way that builds the trust and respect for all our stakeholders. One of the ways in which we continue to improve our services is by listening and responding to the views of our tenants,

leaseholders, and stakeholders, and by responding actively to all types of feedback received – the customer voice.

This policy sets out NPH processes for the handling of comments, compliments, complaints, Councillor and MP Enquiries. We welcome and encourage all tenants and customers to tell us when we've got it wrong, to give us their views and opinions and to tell us when our team members do things well or go the extra mile.

The Policy specifically details NPH's Complaints Process. NPH are committed to a resolution first approach where service requests are responded to in the given timescales and where issues are raised with us and resolved quickly at the first point of contact. The Policy provides a framework to support customers through an effective complaint handling process that addresses issues and learns from them to support future prevention and service improvement.

Through this Policy we will ensure that:

- ✓ We are compliant with the Housing Ombudsman's Complaint Handling Code and will publish our annual self-assessment against how we meet the Code requirements.
- ✓ We clearly define what we consider to be a compliment, comment, or complaint.
- ✓ The complaints, compliments, and comments process is accessible to all.
- ✓ Those accessing the feedback process are supported and kept informed throughout.
- ✓ Compliments are shared with those involved.
- ✓ Comments are listened to, and action taken where needed.
- ✓ Making a complaint is as simple as possible.
- ✓ All individuals can access our complaints service and we will provide them with support where needed.
- ✓ We deal with complaints and enquiries promptly, politely, and when appropriate, confidentially and keep you informed throughout the process.
- ✓ Our team members are well trained and supported to handle complaints effectively.
- ✓ We respond in the right way – for example with an explanation or an apology when we have got things wrong.
- ✓ Lessons learnt from comments, complaints and compliments are used to improve our services, and changes made to policies and/or procedures where applicable.
- ✓ We involve our tenants and customers in reviewing our overall performance and help deliver service improvements.
- ✓ Produce an annual complaints performance and service improvement report.

3. What is a Compliment, Comment or Complaint?

This policy covers all customer feedback types and the section below details what NPH considers the definitions to be for each type.

3.1 Compliments

A Compliment is defined as an individual statement of positive recognition or praise for a service or member of staff. This can be received via any form of communication such as in person, via telephone, email, social media, and any other way the individual can get in contact with us.

We encourage compliments as they let us know when things are going well and what our tenants and customers think about our services. They provide positive feedback to employees and boost morale and motivation. Compliments will be recorded centrally, acknowledged, and referred to the manager of the individual or service concerned.

Compliments may be published anonymously on our website, newsletters and social media and used in publicity materials and within reception areas.

3.2 Comments

A Comment can be described as an individual remark or personal opinion about a service that does not require any action or formal response. This could be an observation, reference, or a statement about something delivered by NPH.

Comments and suggestions for improvement will be used to inform the development and delivery of our services. Unless specifically requested, there is not an automatic assumption that a comment will be replied to. Should the individual indicate they expect a reply, the request will be acknowledged and responded to within 10 working days.

3.3 Complaints

NPH follow the Housing Ombudsman's definition of a complaint as:

'an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by NPH for the housing services delivered on behalf of the landlord WNC, its own staff, or those acting on its behalf, affecting a resident or group of residents'.

Examples of a complaint include:

- Failure to do something that should have been done
- Not meeting our service standards, policy time scales or agreed process
- Treating an individual unfairly
- Concerns about safeguarding or health and safety issues

A resident does not have to use the word 'complaint' for an issue or service failure to be considered as a complaint. Where dissatisfaction is expressed, residents will be given the choice as to whether a complaint is raised or not.

Where issues are raised in any NPH service surveys, we will follow up accordingly with the resident if they have given consent for us to contact them back. Feedback will be assessed to consider if the issue was a complaint, and a discussion will take place with the resident and a complaint raised as appropriate.

Complaints must be brought to our attention within 12 months of an incident or issue arising, however discretion will be applied to accept complaints made outside this time limit on a case-by-case basis. If NPH decides not to accept a complaint, a detailed explanation will be provided to the resident setting out the reasons why the matter is not suitable for consideration under the NPH complaints process. Residents have the right to challenge this decision by taking their complaint to the Housing Ombudsman or the Local Government and Social Care Ombudsman.

3.3.1 What is a service request?

NPH defines the difference between a service request and a complaint as:

- A service request is an initial request from a resident requiring action to be taken to put something right. For example, a request that NPH provides a service or fixes a problem when reported. Service requests are not a complaint, but will be recorded, monitored and reviewed regularly.
- A complaint is when a resident has had to contact NPH for a second time to raise dissatisfaction with the response to their service request, even if the handling of the service request remains ongoing.

Where we have been unable to resolve service requests within the timescales provided or if further enquiries are needed to resolve a matter, or if the resident requests it, we will log the issue as a complaint, even if the handling of the service request remains ongoing. We will not stop our efforts to address a service request if a resident makes a complaint.

3.3.2 Building Safety Complaints

Following the introduction of the Building Safety Act (2023), any NPH tenants that reside in high-rise buildings will have their complaints relating to building safety investigated by our Compliance Team in line with this procedure.

3.3.3 Social media complaints

All NPH social media accounts are monitored daily by our Communications Team and issues being raised through these platforms which are identified as complaints are replied to privately to maintain confidentiality and forwarded to a centralised Complaints Team to log.

3.3.4 Petitions

NPH define a petition as a document with signatures of petitioners that number over 20 in Northampton. Petitions are complaints by a group of residents about the same issue. An NPH tenant or leaseholder can submit a petition. Petitions will not be dealt with under our complaints process, but under NPH's Petition Policy.

3.4 MP and Councillor Enquiries

Residents may ask their local MP or Councillor to approach NPH with an enquiry on their behalf. If NPH are approached in this way, we will take this as an acknowledgement that the resident has given consent for us to share information about the issue being raised, and we will disclose information relevant to the enquiry to the MP or Councillor and where appropriate the resident.

MP and Councillor Enquiries are dealt with outside of the complaints process as a service request for issues reported for the first time. However, if the content of the enquiry renders it appropriate to deal with as a complaint and a previous complaint relating to the same issue has not already been raised by the individual in question, a complaint will be raised.

MP and Councillor Enquiries will be responded to as follows:

- Letters to us from an MP on behalf of an individual are investigated and replied to by our Chief Executive in writing within 5 days of receipt.
- Councillor Enquiries are investigated and responded to by a Team Leader or Manager in writing within 5 working days of receipt. Where a complaint is raised by a Councillor on behalf of a resident and a complaint is already open relating to the same issue, we will respond to the Councillor to say that a complaint has already been received and a full response will be made directly to the resident in the first instance.

3.5 How to provide feedback

Any resident wishing to make a complaint, compliment or comment regarding NPH housing services can easily do so through any of the following ways:

- Completing an on-line feedback form at <https://www.nph.org.uk/customer-feedback>
- By telephoning NPH on 0300 330 7003
- Sending an email to nphcustomerfeedback@nph.org.uk
- Writing to us by post at Northamptonshire Partnership Homes, Complaints Team, The Guildhall, St Giles Square, Northampton, NN1 1DE
- Visiting in person to the One Stop Shop at The Guildhall, St Giles Square, Northampton, NN1 1DE
- Using Social Media Platforms i.e., Facebook and Twitter
- In person to their Housing Officer, Welfare Officer, Tenancy Compliance Officer, the NPH Community Bus or any other member of NPH staff.

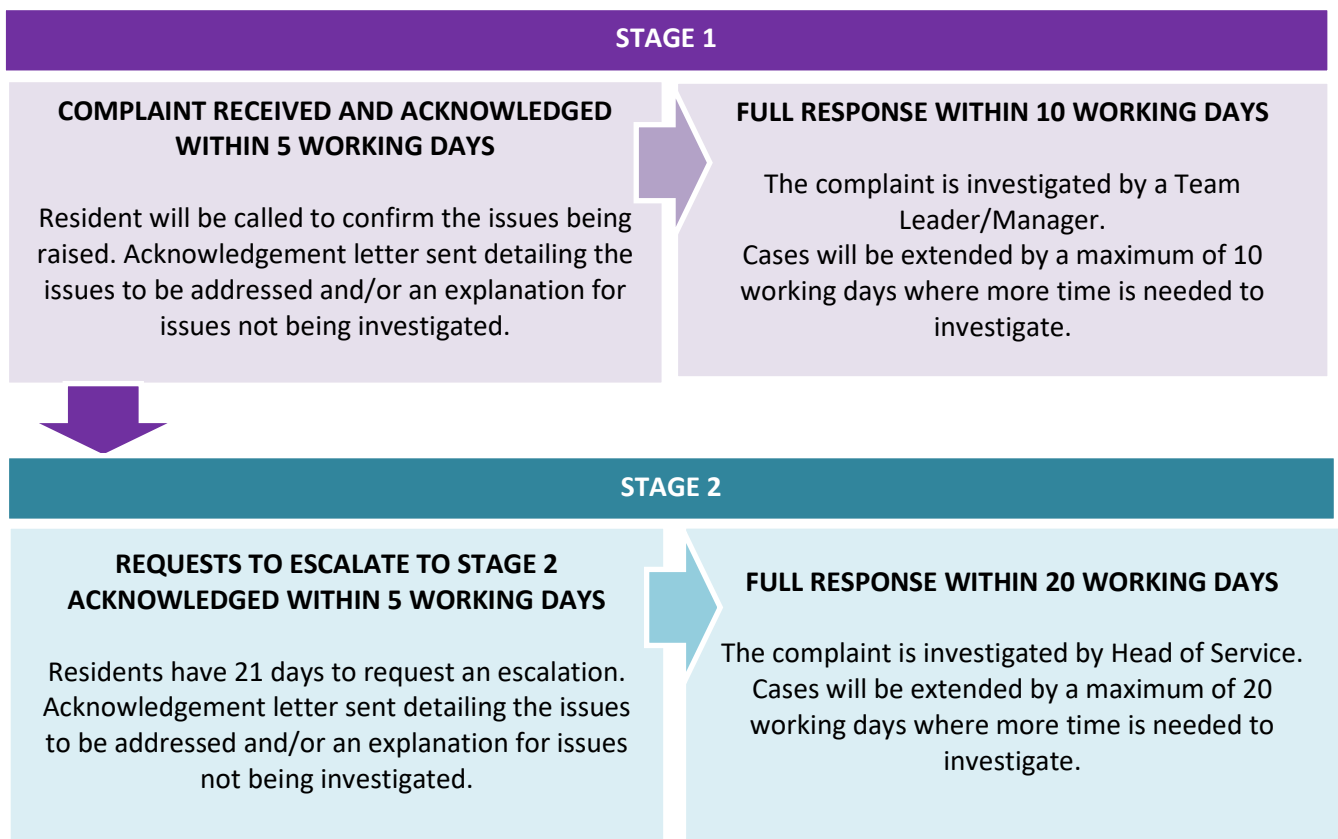
Feedback on housing services provided by WNC can be made in the following ways:

- Completing an on-line feedback form at: www.westnorthants.gov.uk/communicating-us/comments-compliments-and-complaints
- Sending an email to myfeedback@westnorthants.gov.uk
- Write to WNC at Compliments, Comments & Complaints Team, One Angel Square, Angel Street, Northampton, NN1 1ED

4. NPH Complaints Process

Northamptonshire Partnership Homes (NPH) provide high quality services to our tenants and customers, and it is our aim to provide an early resolution to prevent complaints where possible. We learn through our interactions with people and encourage residents to provide feedback and compliments on the services that NPH has provided. However, we also recognise that sometimes things do go wrong, and we need to respond quickly to resolve issues and to put things right.

NPH's complaints process has two formal stages.



Appendix 1 provides further detail on the processes and procedures in place to manage the complaint process.

4.1 What is not a complaint, and why?

The complaints process should not be used for residents who are requesting a review through an alternative appeal process such as the Rechargeable Repairs appeal process. If a resident is not happy with the way an appeal has been conducted, then they 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 new first request for service, information, or an explanation.

- Complaints that have not been brought to our attention within 12 months of an incident or issue arising, or where it would not be possible for NPH to consider the complaint effectively and fairly, e.g. due to changes in staffing and document retention timescales. However, discretion will be applied to accept complaints made outside this time limit on a case-by-case basis.
- An issue that has already been suitably considered through our complaints process and actions have already been agreed or resolved.
- Following a determination at Stage 1 no further action can be taken by NPH.
- Cases where a resident has commenced legal proceedings (such as a disrepair claim or an insurance claim) and court papers have already been served, and the resident subsequently makes a complaint regarding the same issues as the subject of the existing court proceedings. The ability to have the complaint considered and redress offered outside of the legal process will be considered on a case-by-case basis by the Corporate Complaints Team. This approach will seek to ensure the avoidance of conflict of interest and maintain opportunities for learning and improvements to processes and policy. However, NPH **will** consider complaints where the pre-action protocol has been commenced, but court papers have not yet been served.
- Letters to us from your MP. They are looked at and replied to by our Chief Executive.
- Matters which are not related to the actions or decisions of NPH or of anybody acting on our behalf.
- Petitions as these will be responded to in line with the NPH Petitions Policy.
- Issues raised by a resident which have been raised as a petition within the last 6 months.
- Complaints about services delivered by West Northamptonshire Council (WNC), as they will be processed via their own complaint's procedure.
- Complaints about anti-social behaviour or neighbour nuisance, as these will be investigated by our ASB Team. However, dissatisfaction with the service provided after reports have been made and investigated will be considered.
- Comments about our policies or policy decisions.
- Complaints about bodies or persons over which NPH has no control.
- Complaints about a property after a Right to buy (RTB) is completed will be considered on a case-by-case basis. For example, complaints about the RTB process will be considered, but complaints about the condition of the property following sale will not as this would have been deemed as accepted at the point of completion of sale by the purchaser.
- Recharge fees for repairs - in the first instance repair recharge decision will be considered through the appeal process. Complaints about the way a recharge was handled will be considered.
- Housing related services provided by WNC, including housing applications, homeless decisions and banding decisions under the Choice Based Letting Scheme.
- Unacceptably persistent, vexatious, and unreasonable complaint requests which stop us looking into a matter or make repeated complaints about the same subject as well as contacting us many more times than is necessary to resolve a matter. In these cases, we may limit our responses or advise you that we cannot respond to you (see para 9, page 19).

Any decision to not consider a complaint under this Policy will be made by a service area manager and will consider the individual circumstances of the complaint. A response will be sent in a formal letter to the resident outlining our reasons aligning to one or more of the exemptions above and will set out the resident's right to take our decision to the relevant Ombudsman. Where possible we will

direct the resident to an alternative process, appropriate organisation, or service. An appeal on a decision can be made to the Customer Excellence Officer by emailing LetUsKnow.NPH@nph.org.uk.

4.2 Who can complain?

We define a complainant as a tenant including shared ownership tenant or leaseholder of a property who has exercised the right to buy, licensee of a traveller's site pitch, tenant of a garage, stakeholder or any person who receives a service from NPH. Any member of the public can make a complaint to NPH.

Any individual 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 they give consent to speak with us on their behalf. However, legal representatives such as solicitors are not accepted by NPH.

4.3 Anonymous complaints

Anonymous complaints will be recorded as a complaint and the issues being raised will be investigated and action taken as appropriate. However, the complainant would need to make themselves known to NPH to receive a formal response.

4.4 The Housing Ombudsman and Local Government and Social Care Ombudsman

Residents can access advice and support from the Housing Ombudsman at any time in the complaint handling process, and not just at the point where they have exhausted the complaints process.

If you have already complained to NPH and you remain unhappy then you will be advised about how to contact the right Ombudsman service to consider your complaint, as some Housing complaints are regulated by the Housing Ombudsman Service, and some are regulated by the Local Government and Social Care Ombudsman.

You can find more information about the services that are covered by each Ombudsman on their websites: www.lgo.org.uk/make-a-complaint/fact-sheets/housing/which-ombudsman-for-complaints-about-social-housing

The contact information for the Housing Ombudsman and the Local Government and Social Care Ombudsman is provided in all our written correspondence at each stage of the complaints process to afford complainants the opportunity to engage with dispute support advisors at any stage. The Housing Ombudsman Service and the Local Government Social Care Ombudsman can assist individuals throughout the life of a complaint with the relevant Ombudsman's dispute support advisors.

The Housing Ombudsman can be contacted on:

- www.housing-ombudsman.org.uk
- Telephone: 0300 111 3000 (9.15am-5.15pm: Mon, Thurs, Fri or 9.15am-1.15pm: Tues, Weds)
- By post: Housing Ombudsman Service, PO Box 152, Liverpool, L33 7WQ

The Local Government and Social Care Ombudsman can be contacted on:

- www.lgo.org.uk
- Telephone: 0300 061 0614 (10am-1:00pm: Mon, Tues, Thurs, Fri or 1:00pm to 4:00pm: Weds)
- By post: Local Government and Social Care Ombudsman, PO Box 4771, Coventry, CV4 0EH

4.5 Legal and regulatory compliance

NPH operate this policy with due regard to all relevant legislation, regulation, and good practice.

4.5.1 Housing Ombudsman's Complaint Handling Code

The Policy complies with the Housing Ombudsman's Complaint Handling Code, which is statutory under the Housing Ombudsman's powers in the Housing Act 1996, as amended by the Social Housing (Regulation) Act 2023.

The Housing Ombudsman's Complaint Handling Code sets out the requirements for Landlords to comply with to allow them to respond to complaints effectively and fairly. NPH acts on behalf of the landlord West Northamptonshire Council to deliver the housing services listed above. A copy of the Housing Ombudsman's Complaint Handling Code can be found at: <https://www.housing-ombudsman.org.uk/landlords-info/complaint-handling-code/complaint-handling-code-2024/>.

This policy complies with the Housing Ombudsman's Complaint Handling Code and acts as a guide for residents setting out what they can and should expect from NPH when they complain, and to ensure that complaints are resolved promptly, politely, and fairly.

If NPH is unable to comply with the Complaint Handling Code due to exceptional circumstances, such as a cyber incident, we will inform the Housing Ombudsman, provide information to customers who may be affected, and publish this information on our website at www.nph.org.uk, as well as provide a timescale for returning to compliance with the Code.

4.5.2 The Regulator for Social Housing Consumer Standards

The Policy complies with The Regulator for Social Housing (RSH) Consumer Standards and achieving the Tenant Involvement and Empowerment Standard by:

- Adopting an approach to complaints that is clear, simple, accessible and publicised.
- Ensuring that complaints are resolved promptly, politely, and fairly in line with the required timescales for Stage 1 and 2 complaints, which are reported to the RSH as the Tenant Satisfaction Measures
- Providing accessible information on:
 - how tenants can make a complaint about their registered provider
 - the complaints policy and complaints handling process
 - what tenants can do if they are dissatisfied with the outcome of a complaint or how a complaint was handled, and;

- information on type of complaints received and how they have learnt from complaints to continuously improve services.

4.5.3 Confidentiality and Data Protection

In accordance with the Data Protection Act 2018 (DPA) and The General Data Protection Regulation (GDPR), NPH will maintain confidentiality of all personal information, and not disclose it outside of NPH, or anyone working on our behalf without the express permission of the complainant. All NPH processes involving personal data complies with DPA and GPDR.

4.5.4 Equalities and Diversity

NPH is committed to complying with the Equality Act 2010 and our aim is to make this policy easy to use and accessible to all our residents. 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. Any reasonable adjustments agreed with a residents will be recorded and kept under active review during the complaints process.

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 where appropriate and in agreement with NPH
- Multiple Service Area collaboration when investigating and responding to complaints
- To be represented and/or accompanied at meetings with us where consent is given
- Translation/Interpreter services

If you would like a version of this document in large print, or another language, please call 0300 330 7003.

4.6 Monitoring the policy and learning from feedback

The Housing Ombudsman require NPH to produce and publish an Annual Complaints Performance and Service Improvement Report for scrutiny and challenge which includes a self-assessment against The Complaint Handling Code which is published on our website at: <https://www.nph.org.uk/ho-self-assessment/>. The full Annual Complaints Performance and Service Improvement Report along with the governing body's response will also published on our website annually.

As landlord West Northamptonshire Council are the governing body with regards to the oversight of complaint handling compliance. NPH regularly updates the Member Responsible for Complaints (MRC) within the governing body (the Cabinet Portfolio Holder for Housing) and NPH's Complaints Champion Board Member on our complaint performance including the volume, categories and outcomes of complaints, any arising issues or trends, the outcome of any Ombudsman investigations and an Annual Complaints Performance and Service Improvement Report.

Complaint information is also reported monthly to NPHs Executive and Senior Management Teams and quarterly to our Operations and Resources Committee and NPH Board.

We recognise that compliments, comments, and complaints provide a valuable source of information to help us improve our services. We will ensure that our feedback service is working by:

- Monitoring and reporting our performance including the number of compliments, comments, complaints, and MP/Councillor Enquiries received and performance against target response times.
- Displaying performance information on our website and in our newsletter 'Your Voice'.
- Testing the satisfaction of customers with our complaints service.
- Analysing the types of complaints we receive across all our service areas.
- Tracking lessons learned from complaints and using this information to change and improve services.

4.7 Publishing the Policy

This Policy will be publicised on NPH Website under 'Give Us Feedback' (www.nph.org.uk/give-us-feedback). Information on the policy and the feedback process is shared with all new tenants at sign up and publicised in our newsletter.

4.8 Consultation and customer involvement

There are two aspects to how residents can be involved in NPH complaint handling. Firstly, we recognise the importance of working in partnership with residents to develop and continuously improve our services. As such, we will consult with residents on the content and operation of this policy and involve them in reviewing and learning from complaints and use this information to improve services. We will achieve this through our active resident engagement channels, such as the Resident Advisory Panel and user groups and sharing the Annual Complaints Performance and Service Improvement Report. NPH will conduct transactional customer surveys, which will include questions regarding complaint handling experience and outcomes.

APPENDIX 1 - NPH Complaints Process and Procedures

The table below provides further detail on NPH's complaint process and the actions at each stage.

<p>Stage 1 - Acknowledgement</p>	<ul style="list-style-type: none"> • When a new complaint is received, it will be accepted, logged, and acknowledged in writing at Stage 1 within 5 working days of receipt. • The complainant will be contacted within the 5 working days to ensure all concerns are clearly understood and to clarify any aspects of the complaint that may be unclear. • A formal written acknowledgement letter will be sent to the complainant outlining the basis of which the complaint will be investigated (the complaint definition), and the desired resolution required by the complainant. • The acknowledgement will be used to explain the complaints procedure, to get a full understanding of the issues and the resolution sought, confirm the timescales for response and to establish if there are any barriers or reasonable adjustments that need to be made to assist the complainant throughout the process.
<p>Stage 1 Response</p>	<ul style="list-style-type: none"> • A Stage 1 complaint will be investigated and responded to by a Team Leader and/or Manager. • The Complaint Handler will do all they can to resolve the complaint and respond to the complainant within 10 working days of the complaint being acknowledged. • For more complex complaints the response can be extended for a further 10 working days with the complainant being kept informed and the reason(s) for the extension being clearly explained. The complainant will also be provided with the contact details of the relevant Ombudsman if an extension is needed. • A complaint response will be sent to the complainant when the answer to the complaint is known, not when any outstanding actions required to address the issue, are completed. • Outstanding actions will be tracked and actioned expeditiously with regular updates provided to the complainant.
<p>Requests to escalate to Stage 2</p>	<ul style="list-style-type: none"> • A complaint can only be escalated to Stage 2 once it has completed Stage 1 and at the request of the complainant. • If a resident is not satisfied with all or part of the response they receive at Stage 1 of our complaints process, they can request an escalation of their complaint to Stage 2. • Requests to escalate a complaint to Stage 2 must be made by the resident within 21 days of receiving the Stage 1 response and will be acknowledged within 5 working days of receipt of the escalation request. • A resident does not need to explain their reasons for requesting an escalation of their complaint. It will be progressed to Stage 2 upon their request unless a valid exclusion ground applies. Where a decision is

	<p>made not to escalate a complaint to Stage 2, we will clearly explain the reasons in a formal written response to the resident.</p> <ul style="list-style-type: none"> • At this stage, if any aspect of the complaint is unclear, we may ask the complainant for clarification. The acknowledgment will set out our understanding of any outstanding issues and the outcome the complainant is seeking.
Stage 2 Response	<ul style="list-style-type: none"> • A Stage 2 complaint will be reviewed by a Head of Service and/or Director, who will review the handling and findings of the complaint at Stage 1. • A final response including a review of the adequacy of the Stage 1 investigation plus any outstanding issues that have not been addressed or fully investigated will be sent to the complainant within 20 working days of the Stage 2 complaint being acknowledged. • For more complex complaints the response can be extended for a further 20 working days with the complainant being kept informed and the reason(s) for the extension being clearly explained. The complainant will also be provided with the contact details of the relevant Ombudsman if an extension is needed. • A complaint response will be sent to the complainant when the answer to the complaint is known, not when any outstanding actions required to address the issue, are completed. • Outstanding actions will be tracked and actioned expeditiously with regular updates provided to the complainant.

1. How NPH handles complaints.

All complaint investigations will be conducted in an impartial manner working in conjunction with appropriate Managers, Team Leaders, Heads of Service and/or Directors, seeking sufficient reliable information so that fair and appropriate findings and recommendations can be made.

To ensure fairness, consistency in process and procedures, our investigation and assessment of the issue will include:

- Dealing with the complaint on its own merits.
- Speaking to the complainant directly (using their preferred contact method) to ensure a full understanding of their complaint.
- Establishing what evidence is needed to fully consider the issues.
- Acting independently and having an open mind.
- Taking measures to address any conflict of interest.
- Keeping the complaint confidential as far as possible, with information only disclosed if necessary to properly investigate the matter.
- Considering all information and evidence carefully.
- Considering what outcome would resolve the matter for the complainant.

This policy allows NPH to exercise discretion in how we respond to a complaint. This discretion is used only when appropriate and the complainant will be provided with clear explanations when this approach is used. Discretion can be applied by Managers and Team Leaders at Stage 1, and Heads of Service and Directors at Stage 2.

If a resident raises additional issues during the investigation that are related to the original complaint, these will be incorporated into the Stage 1 response if it has not been provided. However, if the Stage 1 response has already been provided and the new areas of complaint are unrelated to the complaint already under investigation, the new issue(s) raised will be logged as a new complaint and begin the process from the beginning.

If the resident declines to engage in any stage of the complaints process, a written response will be sent to the resident setting out the actions we have attempted to take to resolve the issues raised within the complaint and allowing the resident to request an escalation of their complaint if they feel it has not been dealt with adequately.

The Customer Excellence Officer oversees the Policy to ensure that complaint resolution and discretion approaches are applied fairly.

2. Appropriate remedy

Complaints can be resolved in a number of ways. Any remedy offered will reflect the extent of any and all service failures, and the level of detriment caused to the resident as a result. These shall include:

- acknowledging where things have gone wrong
- providing an explanation, assistance, or reasons
- apologising
- taking action if there has been a delay
- reconsidering or changing a decision
- amending a record or adding a correction or addendum
- providing a financial remedy
- changing policies, procedures, or practices

Factors that will be considered in formulating a remedy will include, but are not limited to the:

- length of time that a situation has been ongoing
- frequency with which something has occurred
- severity of any service failure or omission
- number of different failures
- cumulative impact on the resident
- resident's circumstances or vulnerabilities

When offering a remedy, we will set out what will happen and by when, in agreement with the resident where appropriate. Any remedy proposed will be monitored through to completion and will take into account the guidance issued by the Housing Ombudsman.

In awarding compensation, NPH will consider whether any statutory payments are due, if any quantifiable losses have been incurred as well as the time and trouble a complainant has been put to as well as any distress and inconvenience caused.

3. Extending Time Limits for Complaints

We aim to complete our investigation into all complaints received about our service within the timescales set out above. However, in a limited number of cases, it may be necessary to extend the timescales to ensure we have all the information necessary to appropriately deal with the complaint. If this is the case, we will keep you informed of any progress with the investigation in the timescales and frequency agreed with you, the reasons for the delay, inform you of next steps and the new expected timescale for response. Extensions will not exceed a further 10 working days (at Stage 1) or 20 working days (at Stage 2) without good reason.

4. Mediation

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. We may also use the mediation stage if the relevant Ombudsman asks us to revisit a decision or case.

5. Contractor complaints

We will ensure our contractors are aware of this policy and the Housing Ombudsman's Complaint Handling Code, and when they are tasked with investigating complaints on behalf of NPH they must provide information in line with the two-stage process and timescales set out in this policy (see para 4.7). If an NPH contractor sub-contracts work packages it is their responsibility to ensure the policy is cascaded through the supply chain.

6. Third-Party Representation

Residents may wish to have a third-party/representative act on their behalf. A third-party/representative is any person or organisation acting on behalf of or making enquiries for the resident. For example, may include:

- advice organisations
- professionals such as social workers, support workers or carers
- family members or friends

Exemptions that apply are:

- Letters to us from your MP. They are looked at and replied to by our Chief Executive.
- When a complaint is raised by a Councillor on behalf of a resident and the complaint is already open. In this instance we will notify the Councillor that a complaint has already been received and is being responded to. The primary response will then be sent to the resident.

Where a third-party is helping a resident with their complaint, we will require 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 commence the complaints process until a Letter of Authority is received and the complaint investigation will be put on hold until consent is received.

7. Lessons Learnt and Internal Case Reviews

For complex cases or where a complaint has reached Stage 2 of the complaints process, the case may be subject to an internal Case Review with the Directors and all staff involved in dealing with the complaint. The review will examine the complaint at each stage to determine how the case was dealt with and what lessons should be learnt from the exercise. Agreed actions and outcomes will be formally recorded and implemented.

The lessons learnt from all complaints will be discussed and reviewed within service area team meetings. The Directors and Heads of Service will take steps to improve the services we provide and our internal processes. This review process is used to identify any themes or trends, learning from complaints to revise policies and procedures, and to train staff and contractors and to improve communication and record-keeping.

8. Complainant Responsibilities

To assist us in dealing with a complaint quickly and effectively, we will require the complainant to:

- Provide us with full details of their complaint, why and how they believe NPH have failed and what action they would like to see taken to resolve the issue.
- Tell us if they have any individual needs that will require additional support from the start of the process and help us when dealing with their complaint.
- Inform us of their current contact details and update us if their contact details change.
- Respond to us in a timely manner when we ask for more information and engage fully with the complaints process.
- Provide written consent if they would like a third party to act on their behalf.
- Pursue their complaint in a reasonable way and be respectful to our employees and contractors.
- Allow response times to be met before contacting us about the progress of their complaint.

9. Unreasonable Behaviour

NPH recognises that residents may exert pressure on NPH service areas and/or contractors when making a complaint, as they believe that they may have failed in their delivery of service to them. Such pressure may be persistent, but in most cases, this is accepted as reasonable if conducted with respect and fair treatment.

However, NPH will not accept unreasonable behaviour and unfair treatment of employees or contractors. When contact becomes unreasonable in nature, we may consider the use of restrictions and as a last resort exclusion where all options to assist the resident have been met. NPH's Unacceptable Behaviour Policy and Specific Point of Contact Policy will apply.

NPH will treat a complainant as unreasonable if:

- The complaint is pursued in an inappropriate manner e.g., vexatious complaints, not allowing reasonable time for investigation, review and resolution, and sending the complaint to multiple departments. We reserve the right to determine whether a complaint is inappropriate based upon each individual case and circumstance.
- The complainant is abusive, insulting, or aggressive towards employees, contractors, or other customers.
- If NPH believe the complainant has previously made and/or continually raises the same complaint, which has been responded to and closed.
- Where necessary, as a result of investigations, it is decided that the complaint is without merit or substance - reasons will be provided as to how this decision has been arrived at.
- The complainant makes an excessive number of complaints which are deemed to be vexatious.
- The complainant places unreasonable demands on NPH in terms of the amount of information they want from us or the nature and scale of service they expect.

If we consider a complainant to be unreasonable, we may close a complaint and not allow the complainant to take their complaint to Stage 2 of the complaints process. When this happens, we will clearly explain the reasons why and how the individual can contact the relevant Ombudsman. We may also limit the means by which the individual can communicate with us. If the complainant does not agree with our determination of a complaint being inappropriate, they can raise a separate complaint to appeal the decision, which will be reviewed by the designated complaints officer.

COMMUNITY IMPACT ASSESSMENT

1. About your review

Name of the project, strategy, policy, process or service under review:				
NPH Complaints and Feedback Policy				
Is the project, strategy, policy, process or service:		CURRENT	REVISED ✓	NEW
Which customer groups will be impacted? <i>Detail if specific customer groups or areas are impacted e.g. Tenants in Spring Fields area, tenants with young families, tenants on Housing Benefits etc</i>	CURRENT TENANTS ✓	CURRENT LEASEHOLDERS ✓	STAFF ✓	OTHERS (name) Designated persons, Housing Ombudsman MP and Councillors Private residents
<p>Summary of the project, new or revised strategy, policy, process or service:</p> <p>The CIA was first assessed when the Housing Ombudsman released a Complaints Handling Code in July 2020. This Policy (version 10) has been reviewed with the publication of a revised Code in February 2024 and the new statutory link to the Regulator for Social Housing to be fully compliant with the Code by 1 April 2024.</p> <p>The Policy acts as a guide for residents setting out what they can and should expect from NPH when they complain, and to ensure that complaints are resolved promptly, politely and fairly.</p>				

CIA carried out by:		
Lead officer: Customer Excellence Officer Staff:	Residents: External stakeholders: Other:	
Document Management		
Approved by: EMT Date of first approval: September 2022	Last review date: March 2024 Next review date: March 2025 Version: 4	Contact Officer: Customer Excellence Officer Service area: Strategy & Data Management

2. Relevant Equality Monitoring Data

Use this section to give as much information as possible about helpful customer data. Think about: customer profiling, complaints, compliments, satisfaction surveys and census data.

Equality Data Monitoring		
What internal equality data do you use to monitor this policy?	Internal or external data?	Engagement?
Tenant profile by protected characteristics to review if those accessing the complaints process mirrors our tenant base and to see if any customer groups are not	Census data overlays for our geographical area	Tenant complaints panel to be replaced with wider resident involvement and review of complaints data via the Resident Advisory Panel.
Currently complaint data in JADU cannot be linked up easily to Open Housing tenant data for granular analysis on the people accessing the complaints process. The new JADU workflow includes adding on the Tenant/Person reference to logged complaint where applicable to allow the person profile data to be linked up and analysed.	JADU complaint data and Open Housing customer profile data overlays	Tenants to scrutinise the Policy itself to ensure it is clearly explains the process and is accessible to all.
Monthly and quarterly reports that include trend analysis of repeat issues		
Satisfaction and complaints handling survey for all closed complaints to be reviewed by diversity strands	Customer satisfaction survey results	

3. Analysis of Impact on Equality

The Public Sector Equality Duty requires us to eliminate discrimination, advance equality of opportunity and foster good relationships with protected groups. Consider how this project, strategy, policy or service review will achieve these aims.

Protected Characteristics	Which groups would be affected	Impact (Positive/Negative/Neutral)	Risks	Mitigations / Recommendations
Race and ethnicity	Yes	Positive impact as the Policy recognises reasonable adjustments and support as required and sets out a framework for ensuring a fair, equitable and accessible service through which no-one is at detriment under the protected characteristics.	Fair and equitable access to the complaint process for all groups	JADU complaint cases linked to Open Housing tenant data for granular analysis on the people accessing the complaints process. Customer satisfaction surveys that can be analysed by the characteristics
Disability	Yes			
Sex	Yes			
Age	Yes			
Religion or Belief	Yes			
Gender Reassignment	Yes			
Sexual Orientation	Yes			
Pregnancy and Maternity	Yes			
Marriage and Civil Partnership	Yes			
Evidence Base: (Evidence used / likelihood / size of impact)				
How certain are you about the assessment of each potential impact, and what evidence have you used to arrive at the decision?				
E.g. Data – population trends data, census data, service data. Research – national, regional, local research. Engagement/Consultation – with partners, the public, the voluntary sector.				

4. Analysis of Impact on Well-being

Well-being – Use this section to determine how the project, strategy, policy, process or service will impact on a customer’s health and wellbeing, and whether the proposal will impact on the demands for, or access to our services.

Category Area	Which groups could be affected	Impact:	Risks	Mitigations / Recommendations
Mental Health and Wellbeing	All Complainants	Negative	Complaints regarding your home or your community can be very stressful to your homelife or your mental wellbeing.	Clear communication Keeping the residents updated Responding to the complaint within the timescales
Healthy Lifestyles				
Accidents and Falls Prevention				
Access to referral of other services/partners				
Independent Living				
Safeguarding				
Other				

Evidence Base: Evidence used / likelihood / size of impact)

How certain are you about the assessment of each potential impact, and what evidence have you used to arrive at the decision?

E.g. Data – population trends data, census data, service data. Research – national, regional, local research. Engagement/Consultation – with partners, the public, the voluntary sector.

5. Analysis of Impact on Community

Use the following template to highlight the impacts of your proposal on each of the following categories: The Economy, the Environment, and Localities/Communities.

Community Impact Assessment – A Community Impact Assessment (CIA) helps us make sure our policies, strategies and projects do not discriminate against anyone in respect of disability, gender and racial equality.			
Impact and groups that could be affected	Impact (Positive, neutral, negative)	Risks	Mitigations / Recommendations
Impact to the Economy:	Neutral	None	
Impact to the Environment:	Positive	None	Customer complaints may highlight environment issues that NPH can then resolve
Impact to localities / communities: <ul style="list-style-type: none"> <i>E.g. disadvantaged groups, for example, carers, veterans, and military staff, homeless, rurality, low income etc.</i> 	Neutral	None	Customer complaints may highlight local community issues that NPH can then resolve
Other:			
Evidence Base: (Evidence used / likelihood / size of impact) How certain are you about the assessment of each potential impact, and what evidence have you used to arrive at the decision? E.g. Data – population trends data, census data, service data. Research – national, regional, local research. Engagement/Consultation – with partners, the public, the voluntary sector.			

6. Taking action

A Community Impact Assessment cannot be signed off until negative outcomes are addressed. What actions you have taken or plan to take to remove and/or reduce negative outcomes?

Actions identified from CIA	Target completion date	Responsible Officer	Is this action identified in any other monitoring framework?	Comments
None				

7. Assessment Review and Sign Off

Assessment Review completed by: Customer Excellence Officer
Comments:
No negative impacts identified. Policy provides a framework for customers to raise issues with NPH.
Next review date: March 2025