

Appendix 3 – Self-Assessment Form

Section 1 - Definition of a complaint

Mandatory ‘must’ requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
1.2	A complaint must be defined as: <i>‘an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the organisation, its own staff, or those acting on its behalf, affecting an individual resident or group of residents.</i>	Yes	This definition is used in our Complaints and Feedback Policy in para 3.3 - Complaints - and within our internal training processes.
1.3	The resident does not have to use the word ‘complaint’ for it to be treated as such. A complaint that is submitted via a third party or representative must still be handled in line with the landlord’s complaints policy.	Yes Yes	Para 4.1 of the Complaints and Feedback Policy sets this out - What is a Complaint? Para 4.16 of our Policy. We encourage customers to contact us in any way that is suitable for them and this may include asking a third party representative such as: <ul style="list-style-type: none"> • advice organisations • professionals such as social workers, support workers or carers • family members or friends Consent will always be sought from the customer.
1.6	... if further enquiries are needed to resolve the matter, or if the resident requests it, the issue must be logged as a complaint.	Yes	Para 4.1 of the Complaints and Feedback Policy sets this out - What is a Complaint?

1.7	A landlord must accept a complaint unless there is a valid reason not to do so.	Yes	Para 4.2 (What is not a complaint?) and 4.4 (Who can complain?) of the Complaints and Feedback Policy details who can complain and our exemptions. Each complaint is considered on its own merit and exemptions will be applied in line with other policies such as Equal Opportunities, Unreasonable Behaviour Policy and appeal processes. Within this scope we will also consider the history of issues and make a decision.
1.8	A complaints policy must clearly set out the circumstances in which a matter will not be considered, and these circumstances should be fair and reasonable to residents.	Yes	Para 4.2 the Complaints and Feedback Policy details our exemptions - What is not a complaint? .
1.9	If a landlord decides not to accept a complaint, a detailed explanation must be provided to the resident setting out the reasons why the matter is not suitable for the complaints process and the right to take that decision to the Ombudsman.	Yes	Where a decision has been made not to accept a complaint a formal written letter will be sent to the complainant detailing the reason why. A template response letter is in place. See Para 4.2 (What is not a complaint?) the Complaints and Feedback Policy.

Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
1.4	Landlords should recognise the difference between a service request , where a resident may be unhappy with a situation that they wish to have rectified, and a complaint about the service they have/have not received.	Yes	Para 3.3 of our Policy – Complaints - sets out the definition of both as per the Code. Service requests sit outside of the complaints process. Service requests are managed by our WNC Contact Centre and a call back process where the call handler is unable to respond at first point of contact (FPOC).

			<p>We have identified scenarios where service requests could/will become a complaint in all training to be clear on the distinction between a service request and a complaint.</p> <p>A Customer Liaison Group meets monthly and will include the review of scenarios to ensure requests are reviewed fairly.</p>
1.5	Survey feedback may not necessarily need to be treated as a complaint, though, where possible, the person completing the survey should be made aware of how they can pursue their dissatisfaction as a complaint if they wish to.	Yes	<p>Where issues are raised in any NPH Survey, we will follow up accordingly with the individual if they have given consent for us to contact them back.</p> <p>Feedback would be assessed to consider if the issue was a complaint, and a discussion would take place with the customer and a complaint raised as appropriate.</p>

Section 2 - Accessibility and awareness

Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
2.1	Landlords must make it easy for residents to complain by providing different channels through which residents can make a complaint such as in person, over the telephone, in writing, by email and digitally. While the Ombudsman recognises that it may not be feasible for a landlord to use all of the potential channels, there must be more than one route of access into the complaints system.	Yes	<p>A customer can contact us via a number of channels that include, but are not limited, to:</p> <ul style="list-style-type: none"> - Telephone - Email - Letter - Social media - Web form - In person

			<ul style="list-style-type: none"> - Via the Council WNC Contact Centre - Issues raised with a visiting officer e.g. Housing officer, tradesperson
2.3	Landlords must make their complaint policy available in a clear and accessible format for all residents. This will detail the number of stages involved, what will happen at each stage and the timeframes for responding.	Yes	<p>The policy is available on our website where a web tool is available that will translate and/or read documents for users.</p> <p>A leaflet summarises the process and is provided with complaint acknowledgement letters. Documents can be provided in large font. Both the Policy and Leaflet detail the stages and timeframes for responding.</p>
2.4	Landlord websites, if they exist, must include information on how to raise a complaint. The complaints policy and process must be easy to find on the website.	Yes	<p>Our website has a “Give us feedback” page which can be accessed on the homepage. The page includes information on the complaints process and policy.</p> <p>On the same page is a webform where complaints can be submitted electronically.</p>
2.5	Landlords must comply with the Equality Act 2010 and may need to adapt normal policies, procedures, or processes to accommodate an individual’s needs. Landlords must satisfy themselves that their policy sets out how they will respond to reasonable adjustments requests in line with the Equality Act and that complaints handlers have had appropriate training to deal with such requests.	Yes	<p>This is detailed in section 11 of our policy - Equalities and Diversity - and is covered in our complaint handler training.</p> <p>Reasonable adjustments can include:</p> <ul style="list-style-type: none"> • 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

			<ul style="list-style-type: none"> • Multiple Service Area collaboration when investigating and responding to complaints • Translation/Interpreter services <p>A Community Impact Assessment appends our Policy.</p>
2.6	Landlords must publicise the complaints policy and process, the Complaint Handling Code and the Housing Ombudsman Scheme in leaflets, posters, newsletters, online and as part of regular correspondence with residents.	Yes	<p>Our website includes our policy and process, the complaint handling code and the housing Ombudsman Scheme.</p> <p>Information on our process is available in our feedback leaflet which can be downloaded from our website and is also attached to our complaint acknowledgement and response letters.</p> <p>From our December edition onwards of our tenant newsletter 'Your Voice' we will include a 'Give us your feedback' info box.</p> <p>Leaflets are available in WNC Contact Centre and on NPH community bus.</p> <p>A 'Give us Feedback' poster will be put in all of our community hubs.</p>
2.7	Landlords must provide residents with contact information for the Ombudsman as part of its regular correspondence with residents.	Yes	<p>HO contact details are included in all correspondence with the customer:</p> <p>Stage 1 Complaint not accepted letter</p>

			Stage 1 Acknowledgment letter Stage 1 Response Stage 2 Response Stage 3 Response
2.8	Landlords must provide early advice to residents regarding their right to access the Housing Ombudsman Service throughout their complaint, not only when the landlord's complaints process is exhausted.	Yes	This is included in all correspondence with the customer and detailed in para 4.13 of our Policy - Housing Ombudsman . Details are included in our feedback leaflet.

Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
2.2	Where a landlord has set up channels to communicate with its residents via social media, then it should expect to receive complaints via those channels. Policies should contain details of the steps that will be taken when a complaint is received via social media and how confidentiality and privacy will be maintained.	Yes	<p>NPH's communications team monitors social media on a daily basis.</p> <p>Complaints received via social media are identified by the team and they will contact the customer privately for more information.</p> <p>The team will then forward the complaint to the central team to log, where it will then be handled confidentially via the complaints process.</p> <p>This is detailed in para 4.5.1 of our Policy - Social media complaints.</p>

Section 3 - Complaint handling personnel

Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
3.1	Landlords must have a person or team assigned to take responsibility for complaint handling to ensure complaints receive the necessary attention, and that these are reported to the governing body. This Code will refer to that person or team as the "complaints officer".	Yes	The Customer Service Excellence Officer is allocated for this role. Team Leaders and Managers in service areas are all assigned to be accountable to responding to complaints in their areas.
3.2	...the complaint handler appointed must have appropriate complaint handling skills and no conflicts of interest.	Yes	The officer is in a central corporate team and reviews complaints independent of service. Recruitment process ensures the postholder has appropriate experience and skills for the role. Team Leaders and Managers in service areas assigned to be accountable to responding to complaints in their areas are trained and will not be involved in complaint resolutions where they have been party to the service request.

Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
3.3	Complaint handlers should: <ul style="list-style-type: none"> • be able to act sensitively and fairly • be trained to handle complaints and deal with distressed and upset residents • have access to staff at all levels to facilitate quick resolution of complaints 	Yes	Training has been provided to all those involved in complaints handling and is ongoing. Stage 1 and 2 complaints are responded to by Team Leaders, Managers and Directors who have that autonomy and authority to resolve the complaint appropriately.

	<ul style="list-style-type: none"> have the authority and autonomy to act to resolve disputes quickly and fairly. 		
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Section 4 - Complaint handling principles

Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
4.1	<p>Any decision to try and resolve a concern must be taken in agreement with the resident and a landlord's audit trail/records should be able to demonstrate this.</p> <p>Landlords must ensure that efforts to resolve a resident's concerns do not obstruct access to the complaints procedure or result in any unreasonable delay.</p> <p>It is not appropriate to have extra named stages (such as 'stage 0' or 'pre-complaint stage') as this causes unnecessary confusion for residents.</p> <p>When a complaint is made, it must be acknowledged and logged at stage one of the complaints procedure within five days of receipt.</p>	Yes	<p>All contact and a summary of discussion and agreed actions are logged into the Jadu CRM system case timeline. At the point of acknowledgement, we discuss with the customer the resolution they are seeking at the same time managing expectations.</p> <p>There are no pre complaint stages in our process.</p> <p>Complaints are primarily logged by the WNC Contact Centre and NPH services will accept and acknowledge the complaint. This is processed within five days of receipt. Performance against this is monitored.</p>

4.2	<p>Within the complaint acknowledgement, landlords must set out their understanding of the complaint and the outcomes the resident is seeking.</p> <p>If any aspect of the complaint is unclear, the resident must be asked for clarification and the full definition agreed between both parties.</p>	Yes	<p>An acknowledgement letter template is in place and follows the Housing Ombudsman suggested format.</p> <p>Where clarity is needed the customer is contacted within 5 days to discuss the complaint further and to confirm issues to be addressed.</p> <p>See para 4.9 of our Policy - Acknowledging complaints.</p>
4.6	<p>A complaint investigation must be conducted in an impartial manner.</p>	Yes	<p>Stage 1 is responded to by team leaders and managers and Stage 2 is responded to by Directors who will act impartially. If there is a conflict of interest identified, another team leader/manager/director will be designated.</p> <p>Training has been provided to all complaint handlers.</p>
4.7	<p>The complaint handler must:</p> <ul style="list-style-type: none"> • deal with complaints on their merits • act independently and have an open mind • take measures to address any actual or perceived conflict of interest • consider all information and evidence carefully • keep the complaint confidential as far as possible, with information only disclosed if necessary to properly investigate the matter. 	Yes	<p>Training has been provided throughout the organisation. See Para 4.8 of our Policy - How NPH handles complaints.</p>

4.11	Landlords must adhere to any reasonable arrangements agreed with residents in terms of frequency and method of communication	Yes	<p>Each complaint will be handled on its own merit, and we make adaptations or arrangements in line with our Equal opportunity policy and /or in line with the needs of the customer.</p> <p>At the point of logging a complaint the customers preferred method of contact is requested. Where we have been made aware of availability restrictions these are recorded and adhered to where possible.</p>
4.12	<p>The resident, and if applicable any staff member who is the subject of the complaint, must also be given a fair chance to:</p> <ul style="list-style-type: none"> • set out their position • comment on any adverse findings before a final decision is made. 	Yes	We have a designated complaint category for staff behaviour. As part of the investigation, staff are interviewed to provide their version of events. Where further action is to be considered, this will be discussed with the staff member before a final decision is made.
4.13	A landlord must include in its complaints policy its timescales for a resident to request escalation of a complaint	Yes	<p>See section 4.12 of our Policy - Requests to escalate complaints between stages.</p> <p>Requests to escalate a complaint to the next stage must be made within 28 days of receiving our response.</p> <p>When an escalation request is received it is considered within 3 working days. Our Policy exemptions will apply.</p>
4.14	A landlord must not unreasonably refuse to escalate a complaint through all stages of the complaints procedure and must have clear and valid reasons for taking that course of action. Reasons for declining to escalate a complaint	Yes	Escalation requests are reviewed independently of the service area by the Customer Service Excellence Officer within 3 days of receipt.

	must be clearly set out in a landlord's complaints policy and must be the same as the reasons for not accepting a complaint.		Where an escalation is non-qualifying a formal written response detailing the reasons for declining will be sent to the complainant.
4.15	A full record must be kept of the complaint, any review and the outcomes at each stage. This must include the original complaint and the date received, all correspondence with the resident, correspondence with other parties and any reports or surveys prepared.	Yes	All cases are managed on Jadu CRM with all contacts recorded to the case timeline and letter correspondence attached. At the point of logging a complaint in Jadu it includes the original complaint and the date received on the timeline
4.18	Landlords must have policies and procedures in place for managing unacceptable behaviour from residents and/or their representatives when pursuing a complaint.	Yes	An Unacceptable Behaviour Policy is in place. Para 4.19 - Unreasonable Behaviour - of our Policy also addresses this.

Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
4.3	Landlords should manage residents' expectations from the outset, being clear where a desired outcome is unreasonable or unrealistic	Yes	This will be done by the complaint handler when a) initial contact with the customer is made at the point of acknowledgement if further clarification of the issues raised is required and; b) during the investigation stage.
4.4	A complaint should be resolved at the earliest possible opportunity, having assessed what evidence is needed to fully consider the issues, what outcome would resolve the matter for the resident and whether there are any urgent actions required.	Yes	Each complaint will be assessed on merit. We aim to resolve all complaints at the earliest point without delay. There may be times when a complaint needs extra time for resolution, and this will be agreed with the customer. The customer will be kept informed regularly throughout the process through the agreed contact method.

4.5	Landlords should give residents the opportunity to have a representative deal with their complaint on their behalf, and to be represented or accompanied at any meeting with the landlord where this is reasonable.	Yes	Para 4.16 of our Policy covers third party representation. Consent will be confirmed where third parties contact us on behalf of a complainant. The following Reasonable adjustments are included in section 11 of the Policy: <ul style="list-style-type: none"> • Use of a Mediator or NPH support worker • Extra time to provide additional information to support a complaint • Use of the Tenant Complaint Panel • To be represented and /or accompanied at meetings with us • Translation/Interpreter services
4.8	Where a key issue of a complaint relates to the parties' legal obligations landlords should clearly set out their understanding of the obligations of both parties.	Yes	Where legal obligations apply, they will be considered in formal responses.
4.9	Communication with the resident should not generally identify individual members of staff or contractors.	Yes	Staff responding to complaints have been trained to avoid identifying individual members of staff or contractors in conversation and written responses. Prompts in letter templates remind staff to avoid this where possible and to use job titles where appropriate.
4.10	Landlords should keep residents regularly updated about the progress of the investigation.	Yes	All complaint handlers have received training which includes the need to keep residents regularly updated about progress within agreed timescales and via preferred methods of contact.
4.16	Landlords should seek feedback from residents in relation to the landlord's complaint handling as part of the drive to encourage a positive complaint and	Yes	Once a complaint is closed a Satisfaction Survey is sent out to seek feedback on the handling and outcome of the process.

	learning culture.		
4.17	Landlords should recognise the impact that being complained about can have on future service delivery. Landlords should ensure that staff are supported and engaged in the complaints process, including the learning that can be gained	Yes	<p>There is risk of reputational damage when handling complaints. Effective complaint handling can reduce or eliminate this risk. When complaints are handled in an efficient way the organisation is able to learn and provide the right support and service to its customers.</p> <p>At the point of complaint closure, officers are prompted to capture lessons learnt. Lessons learnt are reported each month to our Executive Management Team, quarterly to our Operations and Resource Committee and Annually to NPH Board. We publish complaint data and lesson learnt on our website quarterly.</p>
4.19	Any restrictions placed on a resident's contact due to unacceptable behaviour should be appropriate to their needs and should demonstrate regard for the provisions of the Equality Act 2010.	Yes	<p>NPH have in place an Unacceptable Behaviour Policy.</p> <p>Before any restrictions are considered, Managers and Officers consider the situation and the needs of that resident before taking the appropriate actions. All SPOC request, arrangements and restrictions are discussed with the Customer Excellence Officer and restriction timescales monitored. Complaints raised by someone under a SPOC will need to be raised through their designated point of contact person. There may be instances where a SPOC includes a restriction on contact regarding repeated calls about the same issue. Any restrictions are carefully considered in review meetings.</p>

Section 5 - Complaint stages

Mandatory 'must' requirements Stage 1

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
5.1	Landlords must respond to the complaint <u>within 10 working days</u> of the complaint being logged. Exceptionally, landlords may provide an explanation to the resident containing a clear timeframe for when the response will be received. This should not exceed a further 10 days without good reason.	Yes	Stage 1 complaints are responded to in 10 working days once they have been logged, accepted and acknowledged. Acknowledgement letters include a response date. For more complex complaints the response can be extended for a further 10 days with the customer being kept informed.
5.5	A complaint response must be sent to the resident when the answer to the complaint is known, not when the outstanding actions required to address the issue, are completed. Outstanding actions must still be tracked and actioned expeditiously with regular updates provided to the resident.	Yes	Complaint responses will include any outstanding actions and dates where they have been agreed. Actions will be tracked, and the customer informed through to completion.
5.6	Landlords must address all points raised in the complaint and provide clear reasons for any decisions, referencing the relevant policy, law and good practice where appropriate.	Yes	Stage 1-3 response letter templates prompt to include all the complaint issues raised and included in the acknowledgement letter to ensure all points are addressed. The template also includes a prompt to address policy, law and good practice this where relevant.
5.8	Landlords must confirm the following in writing to the resident at the completion of stage one in clear, plain language:	Yes	Letter templates are in place for all stages and include all of the points required.
	<ul style="list-style-type: none"> the complaint stage 		

	<ul style="list-style-type: none"> • the decision on the complaint • the reasons for any decisions made • the details of any remedy offered to put things right • details of any outstanding actions • details of how to escalate the matter to stage two if the resident is not satisfied with the answer 		
5.9	<p>If all or part of the complaint is not resolved to the resident's satisfaction at stage one it must be progressed to stage two of the landlord's procedure unless an exclusion ground now applies.</p> <p>In instances where a landlord declines to escalate a complaint it must clearly communicate in writing its reasons for not escalating as well as the resident's right to approach the Ombudsman about its decision.</p>	Yes	Para 4.12 of our Policy - Requests to escalate complaints between stages - covers this and is written into our process in para 4.7 - NPH Complaint stages .
5.10	On receipt of the escalation request, landlords must set out their understanding of issues outstanding and the outcomes the resident is seeking. If any aspect of the complaint is unclear, the resident must be asked for clarification and the full definition agreed between both parties.	Yes	The Customer Service Excellence Officer reviews all escalation requests at all stages independent of the service area involved. The Officer will contact the complainant to discuss their outstanding issues following a response. They will review the case and liaise with internal services if further information is required and make a decision against the Policy exemptions and uphold/not uphold the request.

			Escalations are reviewed within 3 working days. However, if additional information is requested of the complainant by the Customer Service Excellence Officer, an additional 7 working days will be provided to do so.
5.11	Landlords must only escalate a complaint to stage two once it has completed stage one and at the request of the resident.	Yes	Para 4.7 of the Policy - NPH Complaint stages - detailing the staged process includes this statement.
5.12	The person considering the complaint at stage two, must not be the same person that considered the complaint at stage one.	Yes	The process allows for complaints to be responded to via the internal hierarchal structure. Team leaders and manager respond at Stage 1 and Directors respond at Stage 2
5.13	Landlords must respond to the stage two complaint <u>within 20 working days</u> of the complaint being escalated. Exceptionally, landlords may provide an explanation to the resident containing a clear timeframe for when the response will be received. This should not exceed a further 10 days without good reason.	Yes	Para 4.7 of the Policy - NPH Complaint stages - states Stage 2 is 20 working days. For more complex complaints the response can be extended for a further 10 days with the customer being kept informed.

5.16	<p>Landlords must confirm the following in writing to the resident at the completion of stage two in clear, plain language: the complaint stage</p> <ul style="list-style-type: none"> • the complaint definition • the decision on the complaint • the reasons for any decisions made • the details of any remedy offered to put things right • details of any outstanding actions and • if the landlord has a third stage, details of how to escalate the matter to stage three • if this was the final stage, details of how to escalate the matter to the Housing Ombudsman Service if the resident remains dissatisfied. 	Yes	Our Stage 2 letter response template includes all of these requirements.
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Stage 3

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
5.17	Two stage landlord complaint procedures are ideal. This ensures that the complaint process is not unduly long. If landlords strongly believe a third stage is necessary, they must set out their reasons for this as part of their self-assessment. A process with more than three stages is not acceptable under any circumstances.	Yes	Our Policy is a three-stage process, where Stage 3 is an optional Complaint Panel. To date there have been four Complaint Panels and the tenant adjudication and involvement has supported the resolution of those complaints. Tenant involvement also supports the RSH and Social Housing White Paper resident involvement in dispute resolution and service delivery improvements.

5.20	Landlords must confirm the following in writing to the resident at the completion of stage three in clear, plain language: <ul style="list-style-type: none"> the complaint stage 	yes	Our Stage 3 letter response template includes all of the requirements.
	<ul style="list-style-type: none"> the complaint definition the decision on the complaint the reasons for any decisions made the details of any remedy offered to put things right details of any outstanding actions details of how to escalate the matter to the Housing Ombudsman Service if the resident remains dissatisfied 	Yes	

Best practice 'should' requirements Stage 1

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
5.2	If an extension beyond 10 working days is required to enable the landlord to respond to the complaint fully, this should be agreed by both parties.	Yes	Para 4.11 of our Policy - Extending Time Limits for Complaints
5.3	Where agreement over an extension period cannot be reached, landlords should provide the Housing Ombudsman's contact details so the resident can challenge the landlord's plan for responding and/or the proposed timeliness of a landlord's response.	Yes	Para 4.11 of our Policy - Extending Time Limits for Complaints . The HO contact details are given with all written correspondence. If an agreed extension is not possible, we will refer the complainant to the HO.

5.4	Where the problem is a recurring issue, the landlord should consider any older reports as part of the background to the complaint if this will help to resolve the issue for the resident.	Yes	It is standard practice that complaint handlers review the history on the case and any related issues.
5.7	Where residents raise additional complaints during the investigation, these should be incorporated into the stage one response if they are relevant and the stage one response has not been issued. Where the stage one response has been issued, or it would unreasonably delay the response, the complaint should be logged as a new complaint.	Yes	The resident will have the opportunity to raise additional related complaints after the complaint has been acknowledged. We would then assess if the additional complaints can still be considered within the timescales or an extended timescale or if a new stage 1 should be raised. Para 4.9 of our Policy addresses this - Acknowledging complaints.

Stage 2

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
5.14	If an extension beyond 10 working days is required to enable the landlord to respond to the complaint fully, this should be agreed by both parties.	yes	Para 4.11 of our Policy - Extending Time Limits for Complaints
5.15	Where agreement over an extension period cannot be reached, landlords should provide the Housing Ombudsman's contact details so the resident can challenge the landlord's plan for responding and/or the proposed timeliness of a landlord's response	yes	Para 4.11 of our Policy - Extending Time Limits for Complaints. The HO contact details are given with all written correspondence. If an agreed extension is not possible, we will refer the complainant to the HO.

Stage 3

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
5.18	Complaints should only go to a third stage if the resident has actively requested a third stage review of their complaint. Where a third stage is in place and has been requested, landlords must respond to the stage three complaint <u>within 20 working days</u> of the complaint being escalated. Additional time will only be justified if related to convening a panel. An explanation and a date for when the stage three response will be received should be provided to the resident.	Yes	<p>Our Stage 3 is optional. A Complaint Panel hearing date will be offered within 20 working days of escalation.</p> <p>The resident will be informed of the process and a case information pack will be distributed 5 days before Panel meeting date.</p> <p>The Panel will respond within 10 working days after the meeting is convened.</p> <p>The resident will be kept informed throughout the process.</p>
5.19	Where agreement over an extension period cannot be reached, landlords should provide the Housing Ombudsman's contact details so the resident can challenge the landlord's plan for responding and/or the proposed timeliness of a landlord's response.	Yes	Para 4.11 of our Policy - Extending Time Limits for Complaints . The HO contact details are given with all written correspondence. If an agreed extension is not possible, we will refer the complainant to the HO.

Section 6 - Putting things right

Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
6.1	Effective dispute resolution requires a process designed to resolve complaints.	Yes	Our complaint handling training and letter response templates ensure that the issues raised are resolved and that where something has gone this is acknowledged and

	Where something has gone wrong a landlord must acknowledge this and set out the actions it has already taken, or intends to take, to put things right.		an apology given. Letter templates include the actions to be taken or already taken to address the issues and to put things right.
6.2	Any remedy offered must reflect the extent of any service failures and the level of detriment caused to the resident as a result. A landlord must carefully manage the expectations of residents and not promise anything that cannot be delivered or would cause unfairness to other residents.	Yes	Para 4.10 of our Policy sets this out - Appropriate remedy
6.5	The remedy offer must clearly set out what will happen and by when, in agreement with the resident where appropriate. Any remedy proposed must be followed through to completion.	Yes	Our letter response templates include a remedy section. Complaint owners are responsible for following up agreed actions.
6.6	In awarding compensation, a landlord must consider whether any statutory payments are due, if any quantifiable losses have been incurred, the time and trouble a resident has been put to as well as any distress and inconvenience caused.	Yes	NPH Compensation Policy covers this. The Policy is currently under review.

Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
6.3	Landlords should look beyond the circumstances of the individual complaint and consider whether anything needs to be 'put right' in terms of process or systems to the benefit of all residents.	Yes	At the point of complaint closure, officers are prompted to capture lessons learnt. Lessons learnt are reported each month to our Executive Management Team, quarterly to our Operations and Resource Committee and Annually to NPH Board. We publish complaint data and lesson learnt

			on our website quarterly. Through this we identify where processes or systems need to be amended for the wider benefit of all.
6.7	In some cases, a resident may have a legal entitlement to redress. The landlord should still offer a resolution where possible, obtaining legal advice as to how any offer of resolution should be worded.	Yes	Cases where a customer has commenced legal proceedings, such as a disrepair claim or an insurance claim (or where proceedings may be likely) and the customer makes a complaint regarding the same issues as the subject of 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.

Section 7 - Continuous learning and improvement

Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
7.2	Accountability and transparency are integral to a positive complaint handling culture. Landlords must report back on wider learning and improvements from complaints in their annual report and more frequently to their residents, staff and scrutiny panels.	Yes	At the point of complaint closure, officers are prompted to capture lessons learnt. Lessons learnt are reported each month to our Executive Management Team, quarterly to our Operations and Resource Committee and Annually to NPH Board. We publish complaint data and lesson learnt on our website quarterly.

			The tenant Complaints Panel meet every quarter and have the opportunity to respond or comment on the data provided.
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Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
7.3	A member of the governing body should be appointed to have lead responsibility for complaints to support a positive complaint handling culture. This role will be responsible for ensuring the governing body receives regular information on complaints that provides insight to the governing body on the landlord's complaint handling performance.	Yes	NPH is the ALMO for WNC, our governing body. As part of our contractual management agreement complaint information will be shared quarterly on performance and trends.
7.4	As a minimum, governing bodies should receive: <ul style="list-style-type: none"> Regular updates on the volume, categories and outcome of complaints, alongside complaint handling performance including compliance with the Ombudsman's orders Regular reviews of issues and trends arising from complaint handling, 	yes	NPH is the ALMO for WNC, our governing body. As part of our contractual management agreement complaint information will be shared quarterly on performance and trends. We provide an Annual Report and a copy of our self-assessment a part of the governance framework. Operational governance arrangements consider individual complaint outcomes where applicable.

	<ul style="list-style-type: none"> • The annual performance report produced by the Ombudsman, where applicable • Individual complaint outcomes where necessary, including where the Ombudsman made findings of severe maladministration or referrals to regulatory bodies. • The implementation of management responses should be tracked to ensure they are delivered to agreed timescales. • The annual self-assessment against the Complaint Handling Code for scrutiny and challenge. 		<p>WNC are the registered landlord with the Housing Ombudsman and receive the annual performance reports direct.</p>
<p>7.5</p>	<p>Any themes or trends should be assessed by senior management to identify potential systemic issues, serious risks or policies and procedures that require revision. They should also be used to inform staff and contractor training.</p>	<p>Yes</p>	<p>At the point of complaint closure, officers are prompted to capture lessons learnt. Lessons learnt are reported each month to our Executive Management Team (EMT), quarterly to our Operations and Resource Committee and Annually to NPH Board. We publish complaint data and lesson learnt on our website quarterly. This process highlights wider issues, and these are discussed and addressed at EMT.</p>

7.6	<p>Landlords should have a standard objective in relation to complaint handling for all employees that reflects the need to:</p> <ul style="list-style-type: none"> • have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments • take collective responsibility for any shortfalls identified through complaints rather than blaming others • act within the Professional Standards for engaging with complaints as set by the Chartered Institute of Housing. 	Yes	<p>Our complaint process is embedded across all service areas with designated complaint handlers and one central coordinating role. This ensures we have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments</p> <p>Corporate training has been provided to the wider organisation to imbed a positive complaint handling culture at all levels. An ICS Customer Service training programme has been rolled out corporately as part of a wider Customer Service Programme.</p>
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Section 8 - Self-assessment and compliance

Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
8.1	Landlords must carry out an annual self-assessment against the Code to ensure their complaint handling remains in line with its requirements.	Yes	The self-assessment will be completed every year including an annual review of the complaints policy. The self-assessment is published on our website.
8.2	Landlords must also carry out a self-assessment following a significant restructure and/or change in procedures.	Yes	The self-assessment will be reviewed following any changes to the complaints policy.

8.3	<p>Following each self-assessment, a landlord must:</p> <ul style="list-style-type: none"> • report the outcome of their self-assessment to their governing body. In the case of local authorities, self-assessment outcomes should be reported to elected members • publish the outcome of their assessment on their website if they have one, or otherwise make accessible to residents • include the self-assessment in their annual report section on complaints handling performance 	<p>Yes</p>	<p>The self-assessment will be completed every year and shared with our governing body, WNC. The self-assessment is published on our website.</p>
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