



NORTHAMPTON
PARTNERSHIP HOMES

Complaints and Feedback Policy

December 2023

Version 9

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DOCUMENT MANAGEMENT

<i>First Approved by: Board 10 February 2016</i> <i>Policy updated: December 2023, by EMT 29.12.2023</i> <i>Next Review Date: December 2024</i> <i>Version 9</i>	Contact Officer: Customer Service Excellence Officer Contact: (Responsible Person) Head of Corporate Strategy and Data Management
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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

1. Introduction and purpose of the Policy

Northampton Partnership Homes (NPH) provides homes which enable people to live happy and healthy lives in enriched communities. Our interactions with residents are essential for providing the services we deliver.

The purpose of this policy is to set out a clear and easy approach for anyone wishing to give feedback about our services be it a compliment, comment, complaint, or MP/Councillor Enquiry.

This policy will help us to achieve our Corporate Plan strategic objectives:

- Opportunity and access for all,
- Customer focussed housing services.

It will also help to show commitment to our values, that NPH:

- Is open and strong
- Listens and responds

2. Policy Aim

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 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 praise us when our team members do things well or go the extra mile.

The Policy specifically details NPH's Complaints Process and provides a framework to support the effective handling of complaints and prevention, alongside learning and development.

Through this Policy we will ensure that:

- ✓ We are compliant with the Housing Ombudsman 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.
- ✓ Complaints, compliments, and comments process is accessible to all.
- ✓ Compliments are shared with those involved.
- ✓ Comments are listened to, and action taken where needed.
- ✓ Making a complaint is as easy as possible.
- ✓ All customers can access our complaints service and we will provide them with support if 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 customers in reviewing our overall performance.

3. Definitions of feedback types

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

3.1 Compliments

A Compliment is defined as a customer 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, phone, email, social media, and any other way the customer can get in contact with us.

We encourage compliments as they help let us know when things are going well and what our 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 will be published anonymously using our website, newsletters and social media and may be used in publicity materials and within reception areas.

3.2 Comments

A Comment can be described as a customer 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 customer indicate they expect a reply, this should be dealt with immediately or no longer than 5 working days.

3.3 Complaints

NPH follow the Housing Ombudsman definition of a complaint as: 'an expression of dissatisfaction or concern, however made, about the standard of service, actions or lack of actions by NPH, our contract service providers, our staff or anyone else acting on our behalf, which affects an individual customer, or group of residents'.

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

- A service request is a request from a person requiring action to be taken to put something right.
- A complaint is when a person raises dissatisfaction with the response to their service request.

Section 4 of this policy outlines NPH's Complaints process in more detail.

3.4 MP and Councillor Enquiries

Customers 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 acknowledgement that the customer has given consent for us to share information about the issue being asked about, and we will disclose information relevant to the enquiry to the MP or Councillor and where appropriate the customer.

MP and Councillor Enquiries are dealt with outside of the complaints process and will be responded to as follows:

- Letters to us from an MP on behalf of a customer are investigated and replied to by our Chief Executive in writing within 5 days of receipt.
- Councillor enquiries are investigated and responded to by Team Leaders or Managers in writing within 5 working days of receipt. Where a complaint is raised by a Councillor on behalf of a complainant and a complaint is already open relating to the issue, we will respond to the Councillor to say that a complaint has been received and a full response is being responded to directly to the complainant.

A Councillor Enquiry may be registered as a complaint and follow the complaints process, if the content of the enquiry renders it appropriate to do so and a complaint relating to the same issue has not already been raised by a complainant.

4. NPH Complaints Process

Northampton 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 customers and encourage customers 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 and effectively to put things right.

4.1 What is a Complaint

For NPH a complaint is an expression of dissatisfaction or concern, however made, about the standard of service, actions, or lack of actions by NPH, our contract service providers, our staff or anyone else acting on our behalf, which affects an individual customer, 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 a customer unfairly

A customer does not have to use the word 'complaint' for an issue or service failure to be recorded as a complaint as NPH recognises the importance of reviewing and investigating where things have gone wrong so that improvements can be made, and instances are not repeated.

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.

Where issues are raised in any NPH service surveys, we will follow up accordingly with the individual 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 customer and a complaint raised as appropriate.

Complaints must be brought to our attention within 12 months of an incident or issue arising. If NPH decides not to accept a complaint, a detailed explanation will be provided to the complainant setting out the reasons why the matter is not suitable for consideration under the NPH complaints process. Complainants have the right to challenge this decision by taking their complaint to the Housing Ombudsman.

4.2 What is not a complaint?

The complaints process should not be used for customers who are requesting a review through an alternative appeal process such as:

- The termination or extension of an introductory tenancy
- The decision not to offer a further tenancy at the end of a fixed term flexible tenancy
- Allocation Appeal for banding decisions under the choice based letting scheme
- Rechargeable repairs appeal

If a complainant 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 request for service, information, or an explanation.
- Complaints that have not been brought to our attention within 6 months of an incident or issue arising, 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.
- 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 or Stage 2 if no further action can be taken by NPH.
- Cases where a customer has commenced legal proceedings (such as a disrepair claim or an insurance claim) and court papers have already been served, and the customer 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 NPH Petitions Policy.
- Issues raised by an individual 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 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 complaint 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.
- Homeless decisions, as these are considered by WNC.
- Banding decisions under the choice based letting scheme - in the first instance to appeal a decision or to notify of Change of Circumstances please email Applications.NPH.@nph.org.uk. Complaints about the handling of an application will be considered.
- 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 4.19).

Any decision to not consider a complaint under this Policy will be made by a service area manager. A response will be sent in a formal letter to the complainant outlining our reasons aligning to one or more of the exemptions above. Where possible we will direct the complainant to an alternative process, appropriate organisation, or service. An appeal on a decision can be made to the Customer Service Excellence Officer by emailing LetUsKnow.NPH@nph.org.uk.

4.3 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 individuals 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.

4.4 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 garage, stakeholder or any person who receives a service from NPH.

Any member of the public can make a complaint to NPH. However, only a tenant, including shared ownership tenants or leaseholder of a property who has exercised the right to buy, licensee of a traveller's site pitch or tenant of garage have full access to all identified stages of the Complaints Policy, and can progress their complaint to Stage 2 of NPH complaints process and beyond through external recognised bodies.

For other customers, the complaints process will stop at the end of Stage 1.

Any customer with vulnerabilities or who would like help to make a complaint can have the support of an advocate at any stage of the process. For example, a friend, relative or professional whom they confirm they are happy to speak with us on their behalf. However, legal representatives such as solicitors are not accepted by NPH.

4.5 How to make a complaint

Any customer wishing to make a complaint 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
- Emailing to nphcustomerfeedback@nph.org.uk
- Writing to us by post: Northampton 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

4.5.1 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 the Customer Service Excellence Officer to log.

4.6 Anonymous complaints

Anonymous complaints will be recorded as a complaint and the issues being raised will be considered. To be able to reply to the complaint further the complainant would need to make themselves known to NPH.

4.7 NPH Complaint stages

NPH's complaints process has two formal stages.

Acknowledge	<ul style="list-style-type: none">Following the receipt of a complaint it will be logged, accepted, and acknowledged within 5 working days.
Stage 1 Resolution	<ul style="list-style-type: none">A complaint will be investigated and responded to by Team leader or Manager.The Team leader/manager will do all they can to resolve a complaint and respond to the complainant within 10 working days.For more complex complaints the response can be extended for a further 10 days with the complainant being kept informed.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 resident.Requests to escalate to Stage 2 to be made within 28 days of Stage 1 response.If all or part of the complaint is not resolved to the complainant's satisfaction at Stage 1 it will be progressed to Stage 2 unless an exclusion ground applies.A complaint will only be considered for escalation to Stage 2 once it has completed Stage 1 and at the request of the resident.
Stage 2 Review	<ul style="list-style-type: none">A Stage 2 complaint will be reviewed by a Head of Service or Director, who will review the handling and findings of the complaint at Stage 1.Any outstanding issues that have not been addressed or fully investigated will receive a full response to the complainant within 20 working days.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 resident.

4.8 How NPH handles complaints

All complaint investigations will be conducted in an impartial manner, 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.
- 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.
- Keep 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 at Stage 1, and Heads of Service and Directors at Stage 2.

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

4.9 Acknowledging complaints

When a complaint is received, it will be accepted, logged, and acknowledged within 5 working days. The complainant will be contacted within the 5 working days to ensure all concerns are clearly understood. A formal written acknowledgement letter will be sent to the complainant outlining the basis of which the complaint will be investigated, and the desired resolution required by the complainant. The acknowledgement will be used to explain the procedure, to get a full understanding of the issue/complaint 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.

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

The complainant will have the opportunity to raise additional complaints during the investigation if they are relevant 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 will be raised.

4.10 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
- providing a financial remedy
- changing policies, procedures, or practices
- mediation

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
- the number of different failures
- cumulative impact on the customer
- a customer's circumstances or vulnerabilities

When offering a remedy, we will set out what will happen and by when, in agreement with the complainant where appropriate. Any remedy proposed will be monitored through to completion.

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.

4.11 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 time limit to ensure we have all the information necessary to appropriately deal with it. If this is the case, we will keep you informed of 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 should not exceed a further 10 working days without good reason and be agreed with the complainant.

If an extension beyond 10 working days (at Stage 1) or 20 working days (at Stage 2) is required to enable the landlord to respond to the complaint fully, this should be agreed by both parties.

Where agreement over an extension period cannot be reached, the complainant will be referred to the Housing Ombudsman to help mediate on our proposed plan/timescales for responding.

4.12 Requests to escalate complaints between stages

If a complainant is not satisfied with the response they receive at Stage 1 of our complaints process, they can request an escalation of their complaint to the next stage. Requests to escalate a complaint to the next stage must be made within 28 days of receiving our response. It should be noted that escalation of a complaint is not automatic. If all or part of the complaint is not resolved to the complainant's satisfaction at Stage 1 it will be progressed to Stage 2 unless an exclusion ground applies.

In instances where we decline to escalate a complaint this will be clearly communicated in writing with the reasons for not escalating as well as the complainant's right to approach the relevant Ombudsman about our decision.

All requests of this nature will be assessed by the Customer Service Excellence Officer, who will review how the original complaint was handled, establish if all relevant issues raised had been appropriately covered in our response and to consider if any exemptions apply. The Customer Service Excellence Officer will advise the complainant within 5 working days of the outcome of their request to escalate. If the complainant does not provide sufficient additional information in the first instance or should the Customer Service Excellence Officer require additional time to carry out the review, either party will be provided with an additional 7 working days in which to do so. Where a decision is made not to escalate a complaint, we will clearly explain the reasons why in a formal written response.

4.13 Housing Ombudsman

The Ombudsman's Complaint Handling Code sets out requirements for Landlords to allow them to respond to complaints effectively and fairly. Landlords are expected to deal with complaints in line with both this Policy and the Ombudsman Complaint Handling Code. NPH acts on behalf of the landlord West Northamptonshire Council. A copy of the Code can be found at: <https://www.housing-ombudsman.org.uk/landlords-info/complaint-handling-code/>.

This Policy complies with The 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.

The Housing Ombudsman requires NPH to undertake an annual self-assessment against The Code which is published on our website at: <https://www.nph.org.uk/ho-self-assessment/>.

The contact information for the Housing Ombudsman is provided in our written correspondence response at each stage of the complaints process, to afford complainants the opportunity to engage with the Housing Ombudsman's dispute support advisors at any stage of the complaint process.

NPH will provide early advice to residents regarding their rights to access the Housing Ombudsman Service, and not just at the point they have exhausted the complaints process as per the Code. The Housing Ombudsman Service can assist residents throughout the life of a complaint with the 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

4.14 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. NPH Complaints Panel tenant members can also be invited to support a complainant with a mediation process. We may also use the mediation stage if the Housing Ombudsman asks us to revisit a decision or case.

4.15 Contractor complaints

We will ensure our contractors are aware of this policy and the new Housing Ombudsman Code and when they are tasked with investigating complaints on behalf of NPH they must provide information in line with the 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.

4.16 Third-Party Representation

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

- 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 complainant and the complaint is already open. In this instance we will notify the Councillor that a complaint has already been received and being responded to. The primary response will be sent to the complainant.

Where a third-party is helping a complainant 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.

4.17 Lessons Learnt and improvement

The lessons learnt from all complaints will be discussed and reviewed within service area team meetings. The Directors 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.

Feedback will be reported to the Executive Management Team (EMT), the Tenants Complaints Panel, a Complaints Annual Report, signposted to the NPH website, and the Board and Operations Committee alongside the Ombudsman's annual landlord performance report.

4.17.1 Internal Case Reviews

For complex cases or where a complaint has reached Stage 2 of the complaints process, after the response has been sent to the complainant, the case will 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.

4.18 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 if their contact details change.
- Respond to us in a timely manner when we ask for more information.
- Provide a written consent when they want 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 your complaint.

4.19 Unreasonable Behaviour

NPH recognises that customers 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, when contact becomes unreasonable in nature, we may refuse to continue to consider a person's complaint. We will explain the reasons for our refusal. NPH will not accept unreasonable behaviour and unfair treatment of employees or contractors.

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 the next stage. When this happens, we will clearly explain the reasons why. We may also limit the means by which the customer 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.

5. Summary of NPH Responsibilities

It is the responsibility of all NPH employees to ensure that we deliver the best possible response to feedback and provide an open and fair response to complaints. We will aim to:

- Treat complainants with courtesy, respect, and fairness at all times
- Respond to informal enquiries and formal complaints within the agreed timescales:

➤ Councillor and MP Enquiries	Within 5 working days of receipt
➤ Comments	Within 10 working days of receipt if requested
➤ Stage 1	Within 10 working days of acknowledgment
➤ Stage 2	Within 20 working days of escalation from Stage 1
➤ Consider escalation requests	Within 5 working days of receipt of request
- Accept, acknowledge, and log a complaint in within 5 working days of receipt.
- Advise the complainant in advance if an extension of time is required.
- Thoroughly investigate the complaint and respond in a clear, fair, and respectful manner.
- Have due regard to Equality and Diversity and have reasonable adjustments in place to address this.

Overall responsibility for this policy and its implementation rests with the Corporate Strategy and Data Management Team, which will ensure that we achieve the objectives of this policy.

6. Monitoring and learning

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 and reporting regularly to our Tenant Complaints Panel.
- 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 Consultation and customer involvement

There are two aspects to how customers can be involved in NPH complaint handling. Firstly, we recognise the importance of working in partnership with our customers to develop and continuously improve our services. As such, we will consult with customers on the content and operation of this policy and involve our customers 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. From time-to-time NPH will also conduct wider customer surveys, which will include questions regarding complaint handling.

Secondly, Customers can directly help to resolve disputes, through the Tenant Complaints Panel at any stage of the complaints process.

5 Legal and regulatory compliance

We operate this policy with due regard to all relevant legislation, regulation, and good practice. We will comply with all regulatory requirements:

- **The Regulator for Social Housing Consumer Standards** – This policy contributes towards achieving the Tenant Involvement and Empowerment Standard by:
 - Adopting an approach to complaints that is clear, simple, and accessible.
 - Ensuring that complaints are resolved promptly, politely, and fairly.

This Complaints and Feedback Policy statement satisfies our regulatory and statutory obligations.

6 Governing Body

As landlord West Northamptonshire Council are the governing body with regards to the oversight of complaint handling compliance. NPH shares with them complaint performance quarterly including any arising issues or trends and an Annual Complaint Report.

Complaint information is reported monthly to NPHs Executive Management Team and quarterly to our Operations and Resources Committee.

7 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 GDPR.

8 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 of our customers. We may take reasonable steps to accommodate any reasonable adjustments you may have to enable you to access this policy or receive responses to complaints in other formats and provide such assistance as you may reasonably require.

Reasonable adjustments can include:

- Use of a Mediator or NPH support worker
- Extra time to provide additional information to support a complaint
- Use of the Tenant Complaint Panel
- Independent repair 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.

9 Links to other NPH documents

- Customer Service Strategy (Currently under review)
- Customer Service Standards (currently under review)
- Compensation Policy (currently under review)
- Unacceptable Behaviour policy
- Petitions Policy
- Rechargeable Repairs Policy
- Complaints toolkit (internal only)
- Complaints and Feedback procedures (internal only)

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
<p>Summary of the project, new or revised strategy, policy, process or service:</p> <p>The Housing Ombudsman released a Complaints Handling Code in July 2020. This Policy version 7 was reviewed to comply with The 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.</p> <p>The main Policy changes in response to the Code are:</p> <ul style="list-style-type: none"> In response to the code question 'Do we have a reasonable adjustments policy?', a reasonable adjustments section has been added into the policy under Section 11 and para 5.15 on mediation has been expanded. Stage 3 is an optional stage in the formal process in line with the new code requirements. The Complaints Panel will now be offered as an optional mediation stage and can be involved at any stage of the process to offer support and help to a complainant. In response to the Code question 'Are residents informed of the landlord's position and given a chance to respond and challenge any area of dispute before the final decision?' we have amended our policy to state that for formal complaints, complaint handlers must discuss the action they are taking and ensure it resolves all aspects of the complaint before a final decision is made and a formal letter sent at Stage 1 and 2 to close the complaint. Amending our policy to specifically include a section on appropriate remedies (see Policy para 5.11) and factors that should be considered to resolve a complaint as set out in section 5.5 of the Code. <p>Process changes in response to the Code are:</p> <ul style="list-style-type: none"> We will actively capture lessons learnt in weekly meetings to review complaints. Introduction of quarterly updates on our website about complaint numbers, trends and lessons learnt. Implementing Case Reviews for complex complaints and those that have been escalated to Stage 2 to fully review root cause and lessons learnt. Log all escalation requests and refusals more formally and include refusal numbers in reporting. Roll out a new Complaint Handling Satisfaction Survey from the Tenants Complaints Panel from 1 January 2021 				

CIA carried out by:		
Lead officer: Santina Chambers, Data Management Officer Staff: N/A		Residents: Tenants Complaints Panel External stakeholders: Other:
Document Management		
Approved by: EMT Date of approval: September 2022	Last review date: August 2021 Next review date: September 2023 Version: 3	Contact Officer: Data Management 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 to ensure that the complaints process is accessible to all	Housing Ombudsman Complaints Handling Training	Tenant complaints panel reviews the complaints satisfaction survey responses
Monthly and quarterly reports that include trend analysis of repeat issues	Housing Ombudsman Handling Complaints Code Self-Assessment	
Satisfaction and complaints handling survey for all closed complaints after stage 1 broken down by diversity strands	Customer satisfaction survey results	
Complaints Panel can be used to undertake a review of the complaint, speaks with the complainant and ensures fairness and objectivity is applied as well as an optional Stage 3.		Tenant complaints panel
Complaints training for panel members and corporate wide training	Housing Ombudsman Complaint Handling on-line training	
Housing Liaison meetings between contact centre and NPH services to ensure regular communication between teams so that agents are better equipped to deal with customer queries and preventing those becoming complaints.		

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	None			
Disability	Yes	Positive impact as the Policy recognises reasonable adjustments and support as required.		
Sex	None			
Age	None			
Religion or Belief	None			
Gender Reassignment	None			
Sexual Orientation	None			
Pregnancy and Maternity	None			
Marriage and Civil Partnership	None			
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				
<p>Evidence Base: Evidence used / likelihood / size of impact)</p> <p>How certain are you about the assessment of each potential impact, and what evidence have you used to arrive at the decision?</p> <p>E.g. Data – population trends data, census data, service data. Research – national, regional, local research. Engagement/Consultation – with partners, the public, the voluntary sector.</p>				

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: Corporate Strategy & Data Manager
Comments:
No negative impacts identified. Policy provides a framework for customers to raise issues with NPH.
Next review date: December 2024



NPH Complaints Feedback

Your views



Registered Office: The Guildhall St Giles Square, Northampton NN1 1DE
www.nph.org.uk



NORTHAMPTON
 PARTNERSHIP HOMES

NPH Complaints Feedback

Dear Residents,

NPH Tenant Complaints Panel Members would like to hear your views about how your recent complaint has been handled. As residents, we are particularly keen to hear from you. We would appreciate you taking a few minutes to answer the questions below. Please return them to us either by email: letusknow.nph@nph.org.uk or by post to:

NPH Tenant Complaints Panel, The Guildhall, St Giles Square, Northampton NN21 1DE

Each completed form will be reviewed by the Complaints Panel. We may also wish to contact you to discuss your experience. Please let us know your contact details if you would like this to happen. Your feedback will give us evidence & information that we can use to advise or suggest possible solutions & improvements.

Thank you for your time & providing valuable feedback that could help to improve NPH services.

NPH Tenant Complaints Panel Members

Reference: NCU00XXXX

- 1) Thinking about your experience what score would you give for being kept informed?

Not Satisfied: 1 2 3 4 5 6 7 8 9 10 Very Satisfied

- 2) Were you given the name and contact details of the person dealing with your complaint? E

Yes ☐ No ☐

- 3) What score would you give for the helpfulness of staff dealing with your complaint?

Not Satisfied: 1 2 3 4 5 6 7 8 9 10 Very Satisfied

- 4) Did it take more than 10 working days to respond to your complaint? Yes ☐ No ☐

If yes, did the person dealing with your complaint contact you to agree additional time to complete?

Yes ☐ No ☐

- 5) Did the final response address every aspect of your complaint? Yes ☐ No ☐

- 6) On a scale of 1 to 10, how would you rate the way your complaint was dealt with overall?

Not Satisfied: 1 2 3 4 5 6 7 8 9 10 Very Satisfied

Please let us know if there is anything else you would like to tell the Complaints Panel to help improve the way complaints are dealt with.

☐ I agree the NPH Tenant Complaints Panel can contact me to discuss how my complaint has been handled

Name: _____ Tel No. _____