



NORTHAMPTON  
PARTNERSHIP HOMES

# Complaints and Feedback Policy

February 2021

Version 7

## Contents

Page

<b>1. Purpose of the Policy.....</b>	<b>4</b>
<b>2. Policy Aim.....</b>	<b>4</b>
<b>3. Definitions of feedback types and enq.....</b>	<b>6</b>
3.1 What is a Compliment	6
3.2 What are Customer Enquiries	
3.2.1 What is a Comment	6
3.2.2 What is a Complaint	6
3.4 What are MP and Councillor Enquiries	6
<b>4. How we handle compliments, comments and Councillor/MP Enquiries.....</b>	<b>7</b>
4.1 Compliments	7
4.2 Comments	7
4.3 MP & Councillor Enquiries	7
<b>5. How NPH handles Complaints.....</b>	<b>8</b>
5.1 What is a Complaint	8
5.2 What is not a complaint?	8
5.3 Petitions	9
5.4 Who can complain?	9
5.5 Anonymous complaints	9
<b>5.6 NPH Complaint stages.....</b>	<b>10</b>
5.7 How NPH Deal with Complaints	11
5.8 Informal Quick Wins	11
5.9 Formal Complaints	11
5.10 Acknowledging complaints	12
5.11 Appropriate remedy	12
5.12 Extending Time Limits for Complaints	13
5.13 Requests to escalate complaints between stages	13
5.14 Designated Person and Housing Ombudsman	14
5.15 Housing Ombudsman	14
5.16 Mediation	15
5.17 Subcontractor complaints	15
5.18 Third-Party Representation	15
5.19 Lessons Learnt and improvement	15
5.19.1 Internal Case Reviews	16
5.19.2 Satisfaction with Complaints Handling	16
5.20 Complainant Responsibilities	16
5.21 Unreasonable Behaviour	16
<b>6. Summary of NPH Responsibilities.....</b>	<b>18</b>
<b>7. Monitoring and learning.....</b>	<b>18</b>
<b>8. Consultation and customer involvement.....</b>	<b>19</b>
<b>9. Legal and regulatory compliance.....</b>	<b>19</b>
<b>10. Confidentiality and Data Protection.....</b>	<b>19</b>

<b>11. Equalities and Diversity.....</b>	<b>19</b>
<b>12. Links to other NPH document.....</b>	<b>20</b>
<b>APPENDIX 1: COMMUNITY IMPACT ASSESSMENT .....</b>	<b>21</b>
<b>APPENDIX 2: NPH COMPLAINTS FEEDBACK.....</b>	<b>27</b>

## DOCUMENT MANAGEMENT

<i>First Approved by: Board 10 February 2016</i> <i>Policy updated: February 2021 by EMT 17.02.2021</i> <i>Next Review Date: February 2022</i> <i>Version 7</i>	Contact Officer: Santina Chambers, Data Management Officer  Contact: (Responsible Person) Kathy Brooks, Corporate Strategy and Data Manager
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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
3. Compensation 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	<b>1</b>
September 2017	Annual Review - no amendments	<b>2</b>
September 2018	Clarification made on 'leaseholder' to include property and garage leaseholders	<b>4</b>
August 2018	Annual Review - no amendments	<b>3</b>
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	<b>5</b>
July 2020	<p>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.</p> <p>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.</p> <p>An update to the MP and Councillor Enquiries process to include automatic reopening if the Councillor is unhappy with the response.</p> <p>Updated Complaints Feedback Form</p>	<b>6</b>
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.	<b>7</b>

## 1. Purpose of the Policy

The purpose of this policy is to set out a clear and easy approach for anyone wishing to give feedback be it a compliment, comment, complaint or MP/Councillor Enquiry and to streamline the customer journey and manage their expectations.

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. NPH are members of the Housing Ombudsman Scheme and as such this Policy meets with the Housing Ombudsman Complaint Handling Code.

We encourage our customers to provide feedback and compliments on the services that NPH has provided. It means that we have done something special and encourages a repeat performance.

However, also we recognise that sometimes things do go wrong and we need to respond quickly and effectively to put things right.

This policy will help us to achieve our 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 positively 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.

We aim to ensure that:

- ✓ We clearly define what we consider to be a compliment, comment or complaint
- ✓ 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
- ✓ We respond in the right way – for example with an explanation or an apology when we have got things wrong
- ✓ Lessons learnt from complaints 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

We recognise that many concerns will be raised informally and dealt with quickly. An informal approach is appropriate when a resolution can be achieved quickly.

Our aims are to:

- ✓ Resolve informal concerns quickly
- ✓ Keep matters low key
- ✓ Keep you informed

We aim to:

- ✓ Tell customers how well we are doing in dealing with their complaints
- ✓ Encourage customers to tell us when we have exceeded their expectations
- ✓ Ensure our team members are well trained and supported to handle complaints effectively.

### **3. Definitions of feedback types and enquiries**

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

#### **3.1 What is a Compliment**

A Compliment is defined as a customer statement of positive recognition or praise for a service or member of staff.

#### **3.2 What are Customer Enquiries**

Customer enquiries under this policy are defined as comments and complaints.

##### **3.2.1 What is a Comment**

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

##### **3.2.2 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. Section 5 of this policy outlines NPH's Complaints process in more detail.

#### **3.3 What are 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.

## **4. How we handle compliments, comments and Councillor/MP Enquiries**

### **4.1 Compliments**

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 concerned.

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

### **4.2 Comments**

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 within 10 working days.

### **4.3 MP and Councillor Enquiries**

MP's and Councillors have always been involved in the complaints procedures as advocates for tenants and they will continue to have that role. If an enquiry is received from a Councillor or MP, on behalf of an NPH customer, we will deal with them within the established timescales.

- Councillor enquiries are dealt with at a local level and are investigated and responded to by Team Leaders or Managers in writing within 5 working days of receipt.
- MP enquiries are investigated and responded to by NPH Chief Executive in writing within 5 days of receipt.

If the Councillor is not satisfied with the response they receive, the case can be automatically re-opened, if they notify us of any outstanding issues within 28 days. The Team Leader or Manager will then have an additional 5 working days to investigate and respond in writing.

If the Councillor or MP is acting in the capacity as a 'designated person' this is addressed in section 3.4.2. The specific role as designated persons is different as they play a more specific part in helping to resolve the complaint locally through negotiation and conciliation.

Although MP and Councillor Enquiries are dealt with outside of the complaints process the feedback, they provide is used to inform the development and delivery of our services.

## **5. How NPH handle Complaints**

### **5.1 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 or policy time scales
- Treating a customer unfairly

Complaints must be brought to our attention within 3 months of an incident or issue arising. If NPH decides not to accept a complaint, a detailed explanation will be provided to the complainant setting out the reasons why the matter is not suitable for the complaints process. Complainants have the right to challenge this decision by taking their complaint to the Ombudsman.

### **5.2 What is not a complaint?**

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

- The termination or extension of an introductory tenancy
- The decision not to offer a further tenancy at the end of a fixed term flexible tenancy
- Allocation Appeal
- Rechargeable repairs appeal

If you are not happy with the way an appeal has been conducted, then you are entitled to submit a complaint through the complaints process.

For the purposes of this policy NPH does not define any of the following as complaints:

- A request for service, information or an explanation
- Complaints that have not been brought to our attention within 3 months of an incident or issue arising
- An issue that has already been considered through our complaints process and closed
- Cases where a customer is pursuing their issue through legal proceedings such as a disrepair claim or an insurance claim
- Requests for compensation
- Issues raised in petitions within the last 6 months
- Reports of anti-social behaviour or neighbour nuisance to be investigated
- Comments about our policies or policy decisions
- Complaints about bodies or persons over which NPH has no control

### 5.3 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.

### 5.4 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 travellers site pitch, tenant of garage, stakeholder or any person who receives a service from NPH. This includes future tenants and customers such as applicants and any person acting on behalf of a tenant or customer.

From here onwards, all those who are able to make a complaint under this policy will be referred to as 'customers'.

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 travellers site pitch or tenant of garage have full access to all identified stages of the Complaints Policy, and can progress their complaint to Stage 3 of NPH complaints process and beyond with the use of external recognised bodies. For other customers, the complaints process will stop at the end of Stage 1 and does not offer further action to any external body.

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.

Any customer wishing to make a complaint can easily do so by:

- Completing a feedback form <https://www.nph.org.uk/customer-feedback>
- By telephoning NPH on 0300 330 7003
- Emailing to [nphcustomerfeedback@nph.org.uk](mailto:nphcustomerfeedback@nph.org.uk)
- Writing to us by post: Northampton Partnership Homes, 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

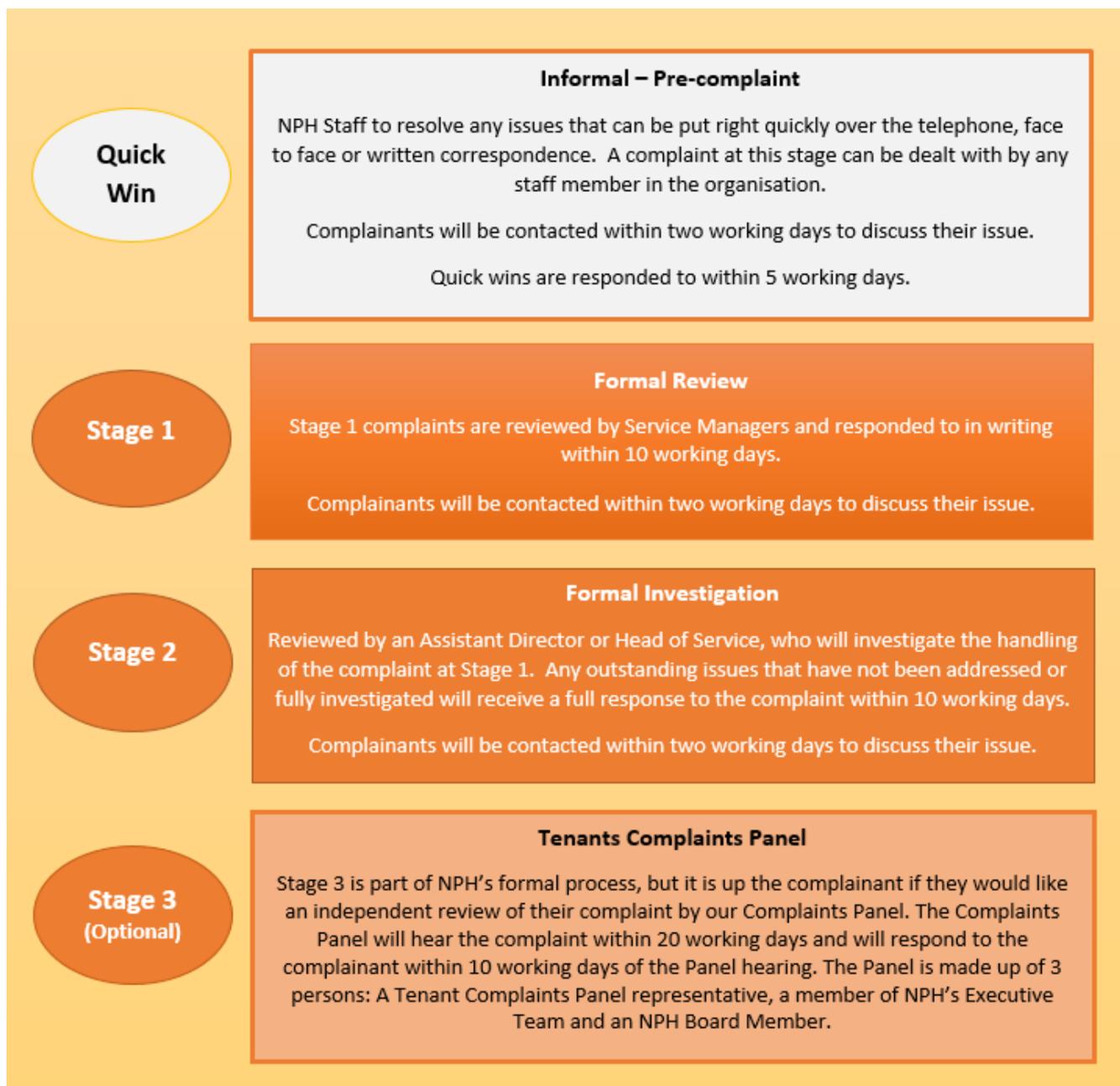
Complaints received via social media will adhere to confidentiality requirements and privacy will be maintained. Therefore, responses will be made via an alternate method.

### 5.5 Anonymous complaints

Anonymous complaints will be recorded as a complaint and will be considered but restricted to Stage 1 of our complaints process. We may not investigate an anonymous complaint where it would be impractical or not within our remit. To be able to consider the complaint further the complainant would need to make themselves known to NPH.

## 5.6 NPH Complaint stages

NPH's complaints process has an informal stage followed by three formal stages, of which the last is optional.



- The formal Complaints process ends at Stage 3 with stage 3 being an optional choice for the complainant.
- Complainants can request that their issue is escalated at the end of each stage if they feel that their issue has not been fully resolved.
- Requests to escalate a complaint to the next stage must be made within 28 days of receiving our response and will be reviewed by the complaints officer within 3 working days once received.
- NPH Complaints Panel members, which includes Tenants, can support complainants at any stage of the process and help to mediate.
- The Housing Ombudsman can be contacted at the end of NPH complaints process or to speak to their advisors at any time. Visit [www.housing-ombudsman.org.uk](http://www.housing-ombudsman.org.uk) or call 0300 111 3000.

## **5.7 How NPH Deals with 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 actual or perceived conflict of interest
- Considering all information and evidence carefully
- Considering what outcome would resolve the matter for the complainant

This Policy allows NPH to exercise discretion in how we respond to a complaint. This discretion is used only when appropriate and the complainant will be provided with clear explanations when this approach is used. Discretion can be applied by Managers and/or Assistant Directors at Stage 1, and Assistant Directors and/ or Executive Director/ Chief Executive at Stage 2.

The Data Management Officer and Strategy & Data Management Manager (Corporate Services) are overseers of the Policy to ensure that complaint resolution and discretion approaches are applied fairly.

## **5.8 Informal Quick Wins**

Quick Wins are when something can be put right quickly. When a customer expresses initial dissatisfaction with something we have done or failed to do we will carry out a short informal investigation. We will treat these as pre-complaints and not 'Requests for Service'. They can be dealt with by any staff member or team leader and do not need to be formally responded to by means of a standard letter or email a simple email or telephone conversation will suffice. The resolution or conclusion could be conducted over the telephone, face to face or by written correspondence within 5 working days. Within 2 working days of the Quick Win being logged, the customer will be contacted so their issue can be discussed and fully understood, a resolution discussed, and timescales agreed.

Should we require additional time to conclude our investigation, this will be discussed with the customer and a new date for completion agreed. We will agree with customer the frequency for keeping them informed about the progress of the review of their issue, and the frequency and timing will depend on each individual case.

Quick Wins are managed outside of the formal complaints process. However, if a customer is not satisfied with the outcome of the Quick Win they may request escalation to a formal Stage 1 complaint. Escalation to Stage 1 is not automatic. All requests will be reviewed by the designated complaints officer. Requests to escalate to the next stage must be made within 28 days of receiving our response to the quick win. Refer to para 5.13 for further information.

## **5.9 Formal Complaints**

Where it is not possible to resolve an issue raised as an informal Quick Win, we will operate an escalated 3 stage formal process which consists of:

- **Stage 1** – A complaint will be reviewed by the most appropriate service manager. The service manager will do all they can to resolve a complaint and respond to the complainant within 10 working days.
- **Stage 2** – A Stage 2 complaint will be reviewed by an Assistant Director or Head of Service, who will look at the handling 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 10 working days.
- **Stage 3 (Optional)** – An independent review by our Complaints Panel, which is an optional for the complainant. The Complaints Panel will hear the complaint within 20 working days and will respond to the complainant within 10 days of the Panel hearing. The Panel is made up of 3 persons:
  - a) Tenants Complaints Panel representative
  - b) Member of Executive Team and;
  - c) an NPH Board Member

Complaints must be brought to our attention within 3 months of an incident or issue arising.

Complainants will be contacted within 2 working days of their complaint being logged.

Only a tenant, including shared ownership tenants or leaseholder of a property who has exercised the right to buy, licensee of a travellers site pitch or tenant of garage have full access to all identified stages of the Complaints Policy, and can progress their complaint to Stage 3 of NPH complaints process and beyond with the use of external recognised bodies. For other customers, the complaints process will stop at the end of Stage 1 and does not offer further action to any external body.

Requests to escalate to the next stage must be made within 28 days of receiving our response. Refer to para 5.13 for further information.

### **5.10 Acknowledging complaints**

All Quick Win issues raised and formal complaints will be acknowledged through contact with an NPH officer within two working days of the complaint being logged with us, primarily by telephone, however we will use whatever contact options are available, including preferred contact methods when known. The acknowledgement will be 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 customer throughout the process

### **5.11 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.

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 customers 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.

### **5.12 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.

### **5.13 Requests to escalate complaints between stages**

If a complainant is not satisfied with the response they receive at any stage 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** and is subject to consideration of the reasons put forward by the customer.

All requests of this nature will be reviewed by the designated complaints officer, who will review how the original complaint was handled, and to establish if all relevant issues raised had been appropriately covered in our response. The complaints officer will advise the complainant within 3 working days on the outcome of their request to escalate. If the complainant does not provide sufficient additional information in the first instance or should the complaints 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.

## 5.14 Designated Person and Housing Ombudsman

Where a customer exhausts the NPH complaints process and they do not consider it resolved we will inform them that they can either:

- Refer the matter to a designated person, which can be an NPH recognised Tenant Complaint Panel member, a local MP or local councillor,  
**or;**
- Wait for the required period of 8 weeks and then refer the matter directly to the Housing Ombudsman

A Designated Person has no legal authority over NPH's policies or procedures. A Designated Person will help to resolve a complaint by either trying to resolve the complaint themselves, mediate or refer the complaint straight to the Housing Ombudsman.

The offer of using the Designated Person resolution route be is not a barrier to a complainant choosing to contact the Housing Ombudsman. The complainant has the option to approach the Housing Ombudsman directly as long as more than 8 weeks have elapsed since the completion of our internal complaints process.

## 5.15 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. 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 a self-assessment against The Code which is published on our website at: <https://www.nph.org.uk/sites/default/files/December%202020%20Complaint-Handling-Code-self-assessment.pdf>

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.

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. This affords to residents the opportunity to engage with the Ombudsman's dispute support advisors.

The Housing Ombudsman can be contacted on:

[www.housing-ombudsman.org.uk](http://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

## **5.16 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.

## **5.17 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 5.9) An NPH co-ordinator for each service area will follow up complaint management with our contractors to ensure that any agreed actions are carried out. If an NPH contractor sub-contracts work packages it is their responsibility to ensure the policy is cascaded through the supply chain.

## **5.18 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

Legal representatives such as solicitors are not accepted by NPH. 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 respond to complaints until a Letter of Authority is received.

## **5.19 Lessons Learnt and improvement**

The lessons learnt from all Quick Wins and Stage 1 complaints will be discussed and reviewed within service area team's weekly meetings. The Assistant Directors or Heads of Service will take steps to improve the services we provide and our internal processes. This review process is used to identify any themes or trends, learning from complaints to revise policies and procedures, and to train staff and contractors and to improve communication and record-keeping.

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

### **5.19.1 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 Assistant Directors/ Head of Service and all staff who were involved in dealing with the complaint. A Tenant Complaint Panel member will also be in attendance with the review, which 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.

### **5.19.2 Satisfaction with Complaints Handling**

For each Stage 1 and Stage 2 complaint a Complaints Feedback Survey (Appendix 2) will be sent to complainants after our final response has been made. The NPH Tenants Complaint Panel will be responsible for receiving all completed Feedback forms, to review the levels of satisfaction on case handling. The Complaints Panel may also contact the complainant directly to gather additional information, if required. The feedback received will be reviewed at the Quarterly Tenants Complaints Panel Meeting, and opportunities for development of the Policy or improvement to service delivery will be shared across NPH service teams and management.

## **5.20 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 letter of authority 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

## **5.21 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 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 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 you do not agree with our determination of a complaint being inappropriate you can raise a separate complaint to appeal the decision, which will be reviewed by the designated complaints officer.

## 6. 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 you with courtesy, respect and fairness at all times
- Respond to your informal enquiries and formal complaints within the agreed timescales
  - Councillor and MP Enquiries Within 5 working days
  - Comments Within 10 working days if requested
  - Quick Wins\* Within 5 working days
  - Stage 1 or 2\* Within 10 working days
  - Requests for escalation Within 3 working days
- Acknowledge your informal or formal complaint in within 2 working days
- Advise you in advance if an extension of time is required at any of the starred \* stages.
- Thoroughly investigate your complaint
- 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.

## 7. Monitoring and learning

We recognise that compliments, comments, quick wins 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
- Recording the lessons learned from complaints and using this information to change and improve services

## 8. 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 and via their role as Designated Persons.

## 9. 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
- **Localism Act 2011** – Tenants have a legal right to request that their complaint is considered by a ‘designated person’ once our internal procedure is complete. Such a person can be an MP, a local councillor or a recognised group of tenants or customers. The complainant may also approach the Housing Ombudsman directly if more than 8 weeks have elapsed since the completion of our internal complaints process.

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

## 10. Confidentiality and Data Protection

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

## 11. 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
- Translation/Interpreter services

## **12. Links to other NPH documents**

- Customer Service Strategy
- Customer Service Standards (currently under review)
- Compensation Policy (currently under review)
- 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><b>Summary of the project, new or revised strategy, policy, process or service:</b></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"> <li>• 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.</li> <li>• 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.</li> <li>• 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.</li> <li>• Amending our policy to specifically include a section on appropriate remedies (see Policy para 5.11) and factors that should considered to resolve a complaint as set out in section the 5.5 of the Code.</li> </ul> <p>Process changes in response to the Code are:</p> <ul style="list-style-type: none"> <li>• We will actively capture lessons learnt in weekly meetings to review complaints.</li> <li>• Introduction of quarterly updates on our website about complaint numbers, trends and lessons learnt.</li> <li>• Implementing Case Reviews for complex complaints and those that have been escalated to Stage 2 to fully review root cause and lessons learnt.</li> <li>• Log all escalation requests and refusals more formally and include refusal numbers in reporting.</li> <li>• Roll out a new Complaint Handling Satisfaction Survey from the Tenants Complaints Panel from 1 January 2021</li> </ul>				

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: January 2021	Last review date: 12 December 2020 Next review date: August 2021 Version: 2	Contact Officer: Santina Chambers, 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	Tenants 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.		Tenants 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

Protected Characteristics	Which groups would be affected	Impact (Positive/Negative/Neutral)	Risks	Mitigations / Recommendations
<b>Race and ethnicity</b>	None			
<b>Disability</b>	Yes	Positive impact as the Policy recognises reasonable adjustments and support as required.		
<b>Sex</b>	None			
<b>Age</b>	None			
<b>Religion or Belief</b>	None			
<b>Gender Reassignment</b>	None			
<b>Sexual Orientation</b>	None			
<b>Pregnancy and Maternity</b>	None			
<b>Marriage and Civil Partnership</b>	None			
<b>Evidence Base: (Evidence used / likelihood / size of impact)</b>				
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.				

service review will achieve these aims.

**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.

<b>Category Area</b>	<b>Which groups could be affected</b>	<b>Impact:</b>	<b>Risks</b>	<b>Mitigations / Recommendations</b>
<b>Mental Health and Wellbeing</b>	<b>All Complainants</b>	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
<b>Healthy Lifestyles</b>				
<b>Accidents and Falls Prevention</b>				
<b>Access to referral of other services/partners</b>				
<b>Independent Living</b>				
<b>Safeguarding</b>				
<b>Other</b>				

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

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

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

## 5. Analysis of Impact on Community

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

<b>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.</b>			
<b>Impact and groups that could be affected</b>	<b>Impact (Positive, neutral, negative)</b>	<b>Risks</b>	<b>Mitigations / Recommendations</b>
<b>Impact to the Economy:</b>	<b>Neutral</b>	None	
<b>Impact to the Environment:</b>	<b>Positive</b>	None	Customer complaints may highlight environment issues that NPH can then resolve
<b>Impact to localities / communities:</b> <ul style="list-style-type: none"> <li><i>E.g. disadvantaged groups, for example, carers, veterans, and military staff, homeless, rurality, low income etc.</i></li> </ul>	Neutral	None	Customer complaints may highlight local community issues that NPH can then resolve
<b>Other:</b>			
<b>Evidence Base: (Evidence used / likelihood / size of impact)</b>			
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

<b>Assessment Review completed by:</b> Corporate Strategy & Data Manager
<b>Comments:</b>
No negative impacts identified. Policy provides a framework for customers to raise issues with NPH.
<b>Next review date:</b> August 2021



## NPH Complaints Feedback

Your views



Registered Office: The Guildhall St Giles Square, Northampton NN1 1DE  
[www.nph.org.uk](http://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](mailto: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. \_\_\_\_\_

