



NORTHAMPTONSHIRE
PARTNERSHIP HOMES

NPH Annual Complaints Performance and Service Improvement Report 2023/24

Annual Complaints Performance and Service Improvement Report 2023/24

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1.0 INTRODUCTION

- 1.1 Under the Social Housing (Regulation) Act 2023 the Housing Ombudsman has been given additional powers, resulting in the first statute backed Complaint Handling Code. The revised Code came into effect from 1 April 2024 and the monitoring of compliance will go-live at the same time. Compliance with the Code will be monitored through this, an Annual Complaints Performance and Service Improvement Report, and Self-Assessments and case management in practice.
- 1.2 NPH manages the complaints for the housing services it provides on behalf of WNC, and which fall under the jurisdiction of the Housing Ombudsman. Services managed by WNC, including allocations, TA, homelessness and private sector housing, are under the jurisdiction of the LGSCO.
- 1.3 NPH provide assurance on compliance with the Code through its Complaints and Feedback Policy and the completion of the required self-assessment.
- 1.4 NPH's Complaints and Feedback Policy has been revised to align to the new Code from 1 April 2024. Following final publication of the Code, the timescales for acknowledging and responding to Stage 1 and Stage 2 complaints remained the same as previous guidance, at 10 and 20 working days respectively. The revised Code requires the acknowledgement of Stage 1 complaints to be made within 5 working days and must now be counted from the date of receipt and not from the date when a complaint is logged. In addition to this change, requests for Stage 2 complaints must now also be formally acknowledged within 5 working days. Below details NPH Complaint process.

Acknowledge	Following receipt of a complaint it will be logged, accepted, and acknowledged within five working days .
Stage 1 Resolution	<p>A Stage 1 complaint will be investigated and responded to by a Team Leader or Manager. The Team Leader/Manager will do all they can to resolve a complaint and respond to you within 10 working days.</p> <p>For more complex complaints, the response can be extended for a further 10 working days with the customer being kept informed.</p>
Stage 2 Acknowledge	<p>Requests to escalate to Stage 2 should be made within 21 days of the Stage 1 response. Any Stage 2 escalation requests will be acknowledged within 5 working days of receipt.</p>
Stage 2 Review	<p>A Stage 2 complaint will be reviewed by a Head of Service or Director. They will review the findings of your complaint at Stage 1. They will also look at how your complaint was handled. Any issues that have not been addressed or fully investigated already will be considered and you will receive a full response to the complaint within 20 working days of the Stage 2 acknowledgment.</p> <p>For more complex complaints, the response can be extended for a further 20 working days with the customer being kept informed.</p>

1.5 Summary of Complaint Performance 2023/24

- 1.5.1 As the new Code requires that organisations no longer have more than two stages as part of their complaints process, Stage 3 was removed in December 2023. Due to the changes implemented, this report covers complaints from 1 April 2023 to 20 December 2023 where Stage 3 was in place and 21 December 2023 to 31 March 2024, when the new process was applied.
- 1.5.2 In total during the year, NPH received 1,006 Stage 1 and 44 Stage 2 complaints – a total of 1,050, which is comparable to the previous year at 1,067.
- 1.5.3 During the year, 60% of complaints raised related to Responsive Repairs, 16% Asset Investment and 10% Housing Management.
- 1.5.4 The top three reasons for raising a complaint were:
- I. Reported issue not dealt with (37%),
 - II. Poor communication (19%) and;
 - III. Delay in reaching resolution (17%).
- 1.5.5 The Regulator for Social Housing TSM results relating to complaints for 2023/24 are:
- I. **CHO1 – Complaints relative to the size of the landlord per 1,000 homes** is 88 for Stage 1 complaints and 3.9 for Stage 2. Housemark comparison from mid-year 2023/24 showed an overall average of 22 per 1,000 homes although complaint ratios will vary significantly between landlords. NPH volumes are comparatively higher as we have had an open and transparent approach to resolving issues through the complaints process when they have been service requests and/or when the issue was the first time of reporting. We have provided further internal training on the categorisation and resolution of issues raised as service requests in line with the Ombudsman Code whilst maintaining an open approach and may therefore see the number of issues raised as formal complaints decrease over 2024/25.
 - II. **CH02 – Complaints responded to within Complaint Handling Code timescales** – 62.88% of complaints were responded to in timescales which breaks down into 62.49% for Stage 1 complaints and 72.09% for Stage 2 complaints. Our target for 2023/24 was an ambitious target to meet the Housing Ombudsman’s Code timescales in 80% of cases, which has not been achieved.
 - III. Performance in the first half of 2023/24 was impacted by a) vacancies in the Customer Insight Officer posts and the corporate Customer Excellence Officer and b) clarification in August 2023 of how Stage 1 complaint timeliness should be recorded for Stage 1 complaints. Prior to the clarification, timeliness was being based on responding within 10 working days and not acknowledged within 5 working days of receipt AND responded to within 10 working days (or agreed extension) of acknowledgement.
 - IV. For the second half of the year, performance improved significantly from September 2023 to March 2024. The average rate for complaint handling within Housing Ombudsman Code timescales was 74% from October to March compared to 54% from April to September. This has been achieved through proactive management and oversight of complaints across core customer facing service areas, supported by the corporate Customer Excellence Officer who came into post in summer 2023 and the appointment of Customer Insight Officers in the front-line services of Responsive Repairs and Asset Management.

- V. NPH currently operates a decentralised complaints handling service and this approach is being reviewed for 2024/25 so that timescales are met in 100% of cases.
- VI. **TP09 – Satisfaction with the landlord’s approach to handling complaints** is 36% (Quartile 2 when compared with the mid-year Housemark Mid-year benchmark). This result is from the perception-based Tenant Survey for the TSMs and to provide further insight a transactional survey will be implemented for all closed cases in 2024/25.

- 1.5.6 In 2023-24, 78.66% of all closed cases at the time of reporting were upheld and evidence was found to support the complaint. This breaks down into 78.46% of Stage 1 complaints and 83.33% of Stage 2 complaints.
- 1.5.7 During 2023/24, there were 12 cases where the Housing Ombudsman contacted NPH on behalf of the complainant – referred to as ‘first contact letters’ – which were responded to as required. The Housing Ombudsman formally investigated 5 cases, 3 of which have been determined by the Housing Ombudsman during the year, and 2 are still pending. Of the 3 determined, 2 counts of maladministration were found relating to NPH’s handling of the resident request for a shower bench, a resident report of suspected subsidence and service failure regarding complaint handling in both cases relating to timeliness. See section 4.1 for further detail.

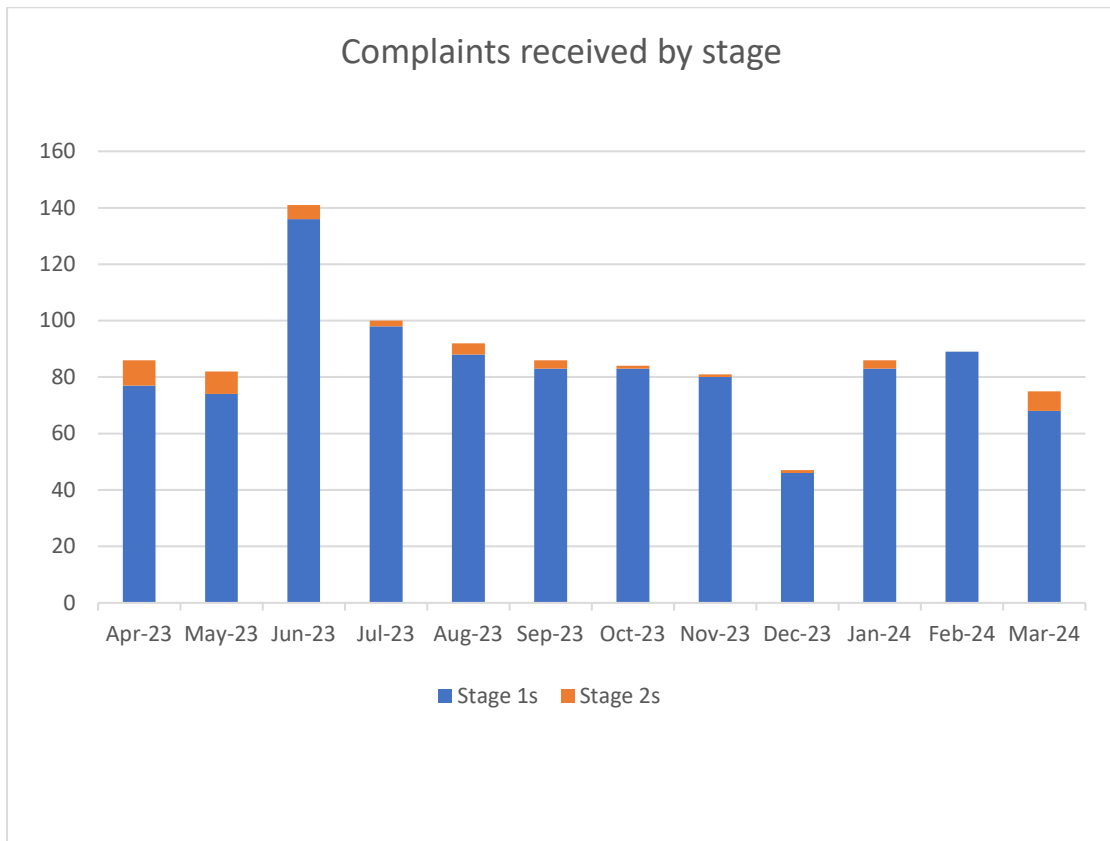
1.6 Code Self-Assessment

NPH have completed a self-assessment against the Housing Ombudsman’s new Complaint Handling Code, which is included in this report as Appendix B. NPH’s Complaints and Feedback Policy is compliant with the Code. The main area of work is continuing the work in practice towards the target of 100% of all complaints being responded to fully within the Code timescales during 2024/25.

2.0 COMPLAINT VOLUMES, BY SERVICE AND NATURE

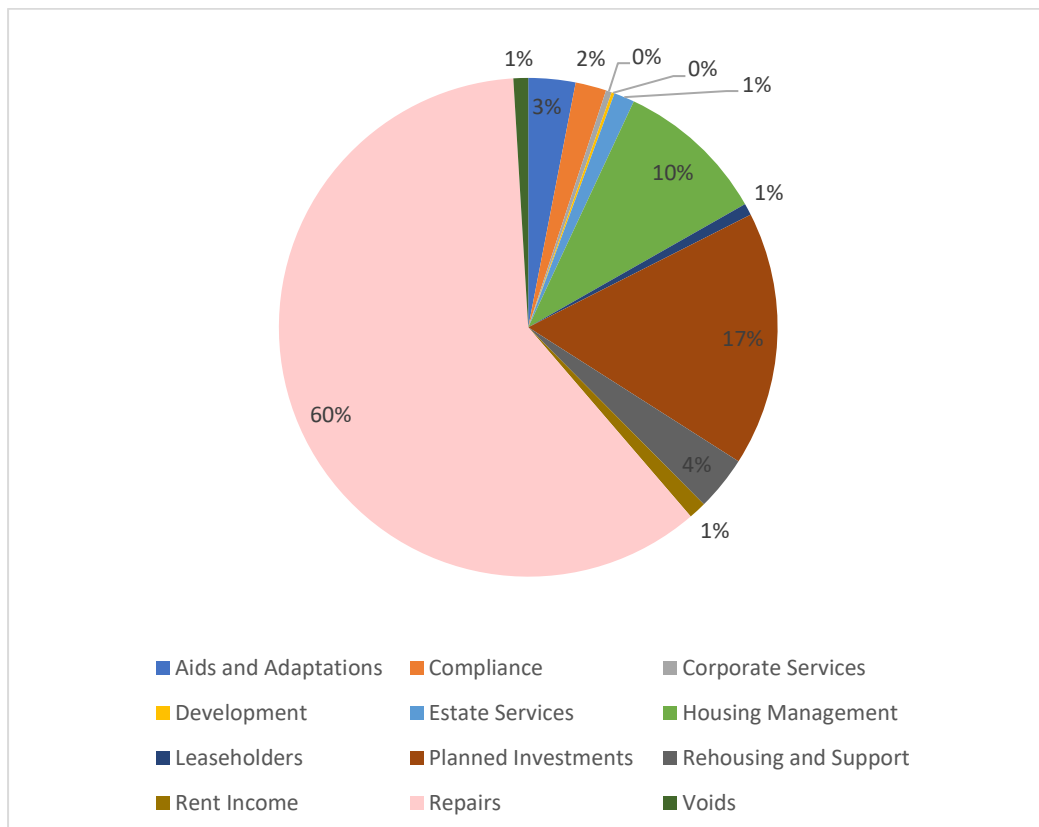
2.1 Complaint volumes

- 2.1.1 The graph below shows the total number of complaints (Stage 1 and 2) received in 2023/24 by month. On average NPH received 85 Stage 1 complaints and 4 Stage 2 complaints per month. Numbers fluctuated between a low in December when the Contact Centre was closed for a week (47 complaints received) and a high in June (136 Stage 1s received).



2.2 Volumes by Service Area

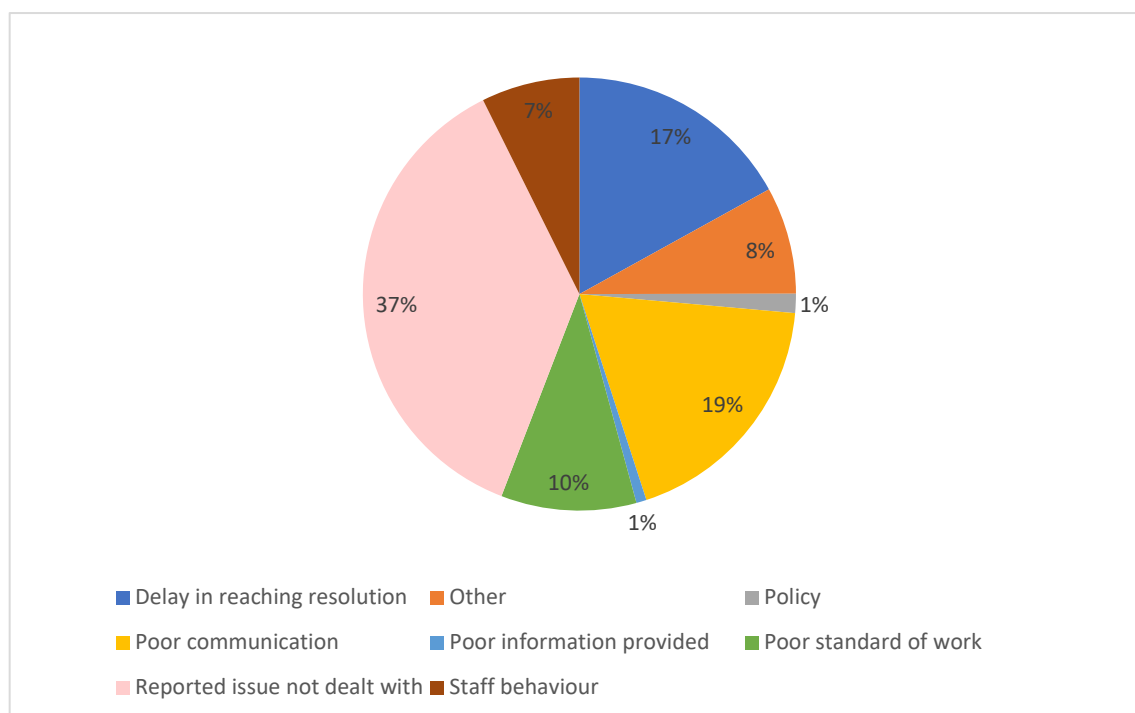
The chart and table below provide a breakdown of complaints received by service area.



Service areas	Stage 1	Stage 2	Total	%
Repairs	611	22	633	60.34%
Asset Investment	159	14	173	16.49%
Housing Management	98	5	103	9.82%
Rehousing and Support	35	2	37	3.53%
Aids and Adaptations	31	1	32	3.05%
Compliance	21	0	21	2.00%
Estate Services	14	0	14	1.33%
Rent Income	12	0	12	1.14%
Voids	10	0	10	0.95%
Leaseholders	8	0	8	0.76%
Corporate Services	4	0	4	0.38%
Development	2	0	2	0.19%
Grand Total	1005	44	1049	100%

2.3 Nature of complaints

When a complaint is logged, the issue is categorised. The most common reason for raising a complaint is 'Reported issue not dealt with' (37%), 'Poor Communication' (18%) and 'Delay in reaching resolution' (17%). The chart and table below show the total number of complaints received during 2023/24 and how they were categorised.



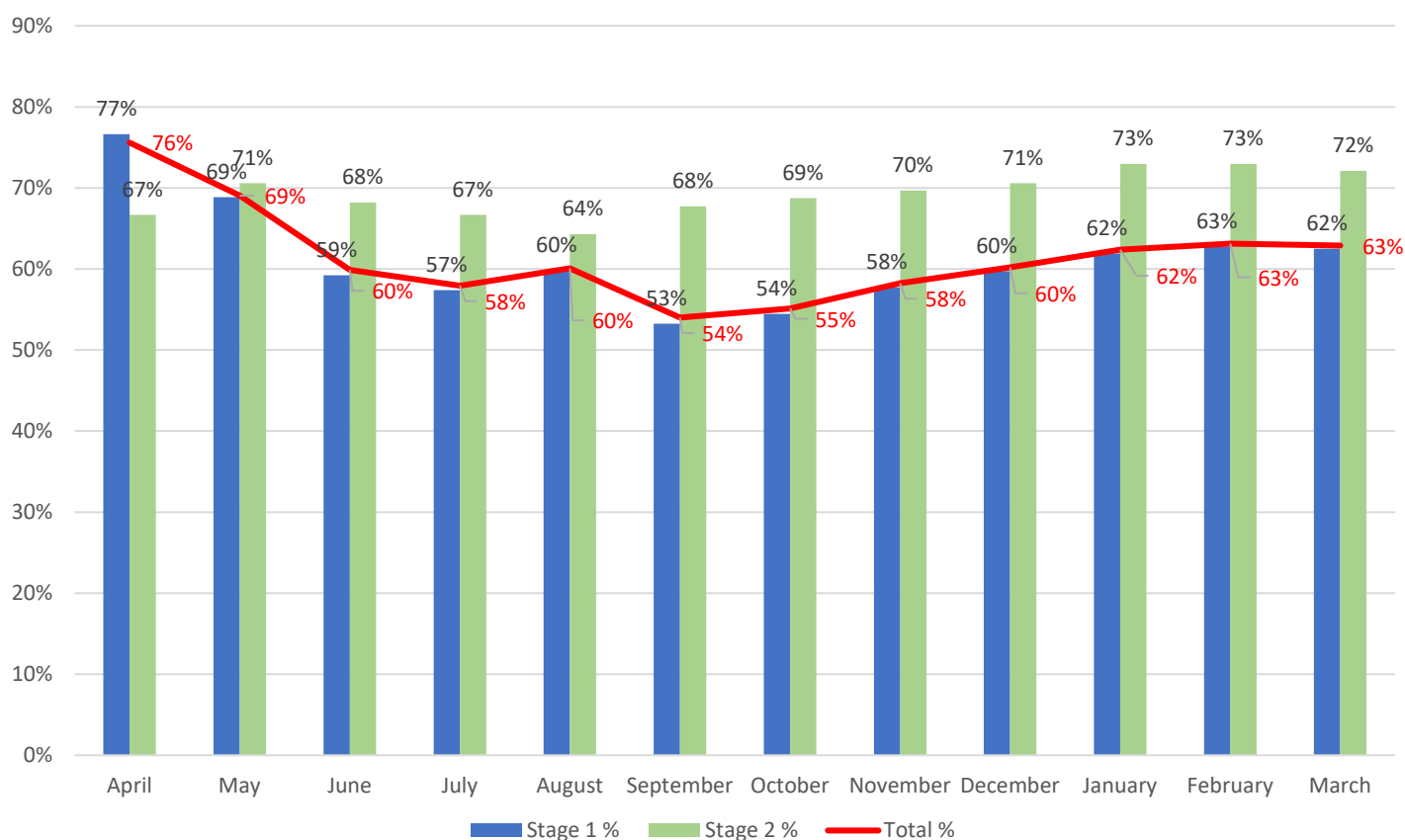
Complaint category	Stage 1	Stage 2	Total	%
Reported issue not dealt with	366	20	386	36.80%
Poor communication	191	4	195	18.59%
Delay in reaching resolution	170	8	178	16.97%
Poor standard of work	100	6	106	10.10%
Other	81	3	84	8.01%
Staff behaviour	75	2	77	7.34%
Policy	15	0	15	1.43%
Poor information provided	7	1	8	0.76%
Grand Total	1005	44	1049	100%

3.0 COMPLAINT HANDLING

3.1 Complaint response times

- 3.1.1 Under the Housing Ombudsman Code in 2023/24, Stage 1 complaints needed to fulfil two criteria to count as timely – be acknowledged within 5 working days and be responded to within 10 working days (or agreed extension) of acknowledgement. Stage 2 complaints needed to be responded to within 20 working days (or agreed extension) of escalation. Escalation to Stage 2 was by agreement and not automatic.
- 3.1.2 Our target for 2023/24 was to fully respond to 80% of complaints within target time. In 2023/24, our provisional figure is 62.88% overall (TSM CH02) which breaks down into 62.49% for Stage 1 complaints and 72.09% for Stage 2 complaints.
- 3.1.3 The table below shows the total number of Stage 1 and Stage 2 complaints closed during 2023/24 and the number where we have responded to the complaint within Housing Ombudsman Code timescales. 7 complaints are not yet closed (6 Stage 1 and 1 Stage 2). All of the Stage 1 complaints have already passed SLA and are included in the above calculation. However, the one remaining Stage 2 complaint could be closed within SLA.

% complaints responded to within HO Complaint Handling Code Timescales - Year to Date



3.1.4 For the second half of the year, performance improved from September 2023 to March 2024 following the recruitment of additional resources. The average rate for complaint handling within the Housing Ombudsman Code timescales was 74% from October to March compared to 54% from April to September.

3.2 Complaint determinations

3.2.1 As part of the complaints process the investigating officer will look at the case and either uphold or not uphold the complaint. Upheld means that an investigation has found evidence to support the complaint, whilst not upheld means that evidence has not been found to support the complaint.

3.2.2 In 2023/24, 79.07% of all closed cases were upheld and evidence was found to support the complaint. The table below shows the total number of Stage 1 and Stage 2 complaints closed in 2023/24 and the number where we have upheld or not upheld the complaint.

Category	Upheld	%	Not upheld	%
Stage 1	776	78.46%	213	21.54%
Stage 2	35	83.33%	7	16.67%
Total for the year	811	78.66%	220	21.34%

3.3 Complaint Refusals

In 2023/24, NPH refused to accept 56 complaints for the following reasons:

Reason	Number
Request for Service	21
Services delivered by WNC	12
Appeal – Banding Decision	10
ASB/Neighbour Nuisance	5
Already considered through complaints process	4
Outside 6 months of an issue/incident arising	2
Not related to the actions or decisions of NPH	2

4.0 OMBUDSMAN CASES

4.1 Housing Ombudsman contact

4.1.1 During 2023/24, there were 12 cases where the Housing Ombudsman contacted NPH on behalf of the complainant – referred to as ‘first contact letters’ – which were responded to as required. The Housing Ombudsman conducted 5 formal investigations and at year end there were 2 open cases pending determination.

4.1.2 The 3 cases formally determined by the Housing Ombudsman during the year related to the following:

- I. NPH’s handling of an infestation of bedbugs as well as our communication with the resident and associated complaint handling. The Housing Ombudsman determined that there was no maladministration in respect of its handling of the bedbug investigation or its complaint handling but found a service failure in NPH’s communication with the resident where NPH should have done more to ensure that it was checking in with the resident and that she was complying with the pest controller’s advice by checking traps. NPH also should have given the resident more frequent updates about the general situation at the block. A Bed bug policy has now been introduced following this case.
- II. NPH’s response to the resident’s request for a shower bench to be fitted in their wet room and its associated complaint handling. The Housing Ombudsman determined that there was maladministration by NPH regarding its handling of the resident’s request for a shower bench and a service failure regarding its complaint handling. NPH should have arranged further occupational health assessments in a more reasonable timescale and followed up on a referral made to a specialist moving and handling team once no response had been received in a reasonable timescale. NPH should also have ensured it properly communicated with the resident to notify them of any extensions needed for a response to their complaint. In response to the case, officers have been retrained on the complaint process and timescales to address the delays in response not being communicated clearly enough to the tenant. The case also highlighted that tenants were not receiving communication of the outcomes of OT assessments and the actions being taken and this has now been addressed.
- III. NPH’s handling of the resident’s reports of suspected subsidence causing damage and unlevel flooring and its associated complaint handling. The Housing Ombudsman determined that there was maladministration in both the way that NPH dealt with the resident’s reports of suspected subsidence and its handling of the resident’s complaints.

NPH should have surveyed the property at an earlier stage to mitigate the time and trouble of the resident in pursuing the repairs through to their conclusion, and acted more promptly to ensure the investigations recommended by its surveyor were carried out at an earlier stage. NPH should also have progressed the resident's initial complaint through its formal complaint procedure rather than dealing with it as a "quick win" so that it responded to all the resident's concerns in writing and included a clear statement about whether NPH considered the complaint upheld or not. The case highlighted the need for a Repairs Policy and to ensure that multiple complaints about the same issues are joined up and not treated separately.

- 4.1.3 The Housing Ombudsman publishes individual landlord performance reports annually if formal determinations have been made. In the last reporting period 2022-23, only one formal determination was made with no maladministration found, and no performance report was issued by the Housing Ombudsman.

5.0 SERVICE IMPROVEMENT AND LESSONS LEARNT

5.1 Service improvements

Service improvement work underway is focused on:

- I. Service first resolution – a review of service request resolution at the first point of contact
- II. Front line service improvements in the areas where we receive the most complaints.
- III. Root cause analysis and customer journey mapping, including deep dives into the main reasons for customers raising a complaint.
- IV. The complaints service delivery model to improve the customer experience and the timeliness of complaint handling.
- V. Lessons learnt from complaint cases, including HO cases.

5.1.1 Customer service improvements

Work is underway to review the 'first point of contact' with our customers. NPH's contact centre is delivered by WNC and 80% of contacts are resolved at the first contact. A further 20% of contact is referred onto NPH back office. The review is looking at the main reasons for customers contacting us in the first instance and how we are revolving requests for service, how many go on to be repeat contacts and avoidable contact, all of which can lead to service failure and complaints being raised.

All service areas are continually undertaking on-going root cause analysis of complaints and customer journey mapping to understand the customer experience when interacting with services, key points of contact and communication and where issues are arising. The first point of contact, root cause analysis and customer journey mapping work will continue in 2024/25.

A Complaint Transactional Survey will restart in April 2024/25 and be conducted independently by an external company. The feedback will provide intelligence of the customer experience of services, what led to complaints being raised and service improvements that can be made, as well as the complaint handling process.

The complaints service delivery model to improve the customer experience and the timeliness of complaint handling is under review. NPH currently operates a decentralised complaints handling

service and this approach will be replaced with a centralised team within the new Directorate for Customer in early 2024/25.

Learning lessons from complaints is central to improving services to our customers. As such, service areas proactively scrutinise complaints to identify actions that can prevent their recurrence. Below is a snapshot of some of the changes made during 2023/24 through reviewing and learning from cases to improve the customer experience through better communication, managing customer expectations and changing the way we do things:

- I. NPH service areas need to maintain support to tenants with resolving potential third party liability issues even when it believes it has evidence that NPH has no liability for a tenant's loss. As agent for the Landlord, NPH must help tenants to navigate and contact third parties and support with any available evidence.
- II. Complaint handlers were not following agreed policy and process regarding addressing all issues raised by complainants in the stage 1 response. Training and advice were redelivered, and line management advised of the issues for future monitoring.
- III. The Mutual Exchange Policy and associated processes were reviewed in July 2023 following issues raised by a complainant.

5.1.2 Front line service improvements

In 2023/24, 60% of the 1,060 complaints raised related to Responsive Repairs and 16% Asset Management and the overall top reasons for raising a complaint were:

- I. Reported issue not dealt with (36%),
- II. Poor communication (18%) and;
- III. Delay in reaching resolution (10%).

The main reasons for complaints received by Responsive Repairs and Asset Management are detailed below:

Complaint category	%	Repairs (633 complaints)	Asset Management (173 complaints)
Reported issue not dealt with	36.51%	267 (42%)	50 (29%)
Poor communication	18.40%	111 (18%)	29 (17%)
Delay in reaching resolution	17.08%	118 (19%)	26 (15%)
Poor standard of work	10.00%	53 (8%)	37 (21%)
Other	8.21%	42 (7%)	18 (10%)
Staff behaviour	7.64%	31 (5%)	8 (0.05%)
Policy	1.42%	9 (1%)	
Poor information provided	0.75%	2 (0.003%)	5 (0.03%)
Grand Total	100%		

Responsive repairs

Responsive repairs accounted for 60% of complaints logged in 2023/24 and accounted for the majority of the top three reasons for complaints – reported issues not dealt with, poor communication and the time tenants were having to wait for their repairs.

The Tenant Survey for 2023/24 also showed TSM satisfaction with repairs in the last 12 months at 67%, and 56% for the time taken for repairs. The time taken to complete repairs is by far the main reason for dissatisfaction. The quality of work, the service in general, outstanding repairs, right first time and appointments are all secondary areas for expressing dissatisfaction.

The improvement actions that have been taken and will continue into 2024/25 are:

- I. An external review of the repairs service has been procured, which will help to address the performance issues and will make recommendations for improvement, including the development of a Repairs Policy. By delivering improvements to the repairs service performance there will be a reduction in the number of complaints.
- II. Additional external contractors, covering the plastering, carpentry, plumbing, roofing, guttering, drainage and electrical trades have been employed, providing an opportunity to outsource some of the larger repairs, with the smaller repairs being undertaken by our in-house team of trade operatives.
- III. During 2023/24 a repairs 'Back to Basics' project has been in place and is now nearing its completion. The project has seen a reduction in the wait times for repairs through more effective and efficient ways of working, increased quality control, performance management and adherence to new processes. During January-March 2024, performance for repairs completed in target times has incrementally improved from 77% to 79% and then 86% in March, meaning the average YTD performance has improved from 76% to 80% in the last quarter. However, the main issue to be addressed during 2024/25 is reducing the target for non-urgent repairs priority from 90 days to 28 to deliver real improvements.
- IV. The repairs business support team have been proactively managing works in progress and have improved communication with tenants and ensuring they are kept updated. Jobs have been bought forward from their appointment dates where the priority of the job has changed.

Asset Management

The most notable issues being raised for Asset Management are regarding contractor works in relation to quality, communication and being kept updated, confirming dates for when work is to be completed and ensuring that remedial work agreed is followed through and completed to an acceptable standard. Detailed root cause analysis of the complaints received which highlighted that complaints were arising from a) outstanding repairs which have escalated into larger/more complex works b) mutual exchanges have been agreed and as a result there may be a need where works have to be carried out c) service/contractor inaction.

The improvement actions that have been taken to address the findings, which continue into 2024/25 are:

- I. Contract management meetings that include discussion on the below for a more direct overview:
 - a. Complaints, with contractors presenting cases where a tenant may have gone to them direct and NPH have no record of this and:
 - b. Review of agreed programme schedules and timeliness against their delivery with tenant's contacted proactively before the programme starts when works are to be scheduled in.
 - c. Weekly, Monthly and Quarterly contractor meetings at different levels including at Director level to ensure all issues are reviewed and addressed in a timely manner

- II. Reinstated the use of a Contractor Portal, a software portal that enables both services across NPH and the contractors, to have a shared oversight of live jobs and how they are progressing.
- III. Implemented joint work inspections with NPH and contractors to scope and agree works up front, conduct inspections during works and again at sign-off for every job to ensure quality and timeliness and increase visibility.
- IV. Introducing an independent transactional survey alongside contractor satisfaction surveys to verify tenant feedback.
- V. Internal senior officer group meetings to review issues, trends and patterns with contractor works.
- VI. Monthly internal cross cutting service area meetings, which include, repairs, compliance, voids, housing management and WNC Contact Centre to look at trends and identify issues.
- VII. Introduced an Assets Resident Panel where complaints and the customer journey will be discussed and where opportunity will be provided for residents to influence and input to what and how we do things.

Appendix A: Housing Ombudsman Self-assessment form

Section 1: Definition of a complaint

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
1.2	A complaint must be defined as: <i>‘an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the landlord, its own staff, or those acting on its behalf, affecting a resident or group of residents.’</i>	Yes	NPH Complaints and Feedback Policy – Paragraph 3.3 – Complaints	This definition is used in our Complaints and Feedback Policy in paragraph 3.3 – Complaints and within our internal training processes. Our full Complaints and Feedback Policy can be accessed on our website at https://www.nph.org.uk/give-us-feedback .
1.3	A resident does not have to use the word ‘complaint’ for it to be treated as such. Whenever a resident expresses dissatisfaction landlords must give them the choice to make complaint. A complaint that is submitted via a third party or representative must be handled in line with the landlord’s complaints policy.	Yes	<ul style="list-style-type: none"> NPH Complaints and Feedback Policy – Paragraph 4.1 – What is a Complaint NPH Complaints and Feedback Policy – Paragraph 4.16 – Third-Party Representation 	<p>Paragraph 4.1 of our Complaints and Feedback Policy states ‘A resident 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.’</p> <p>Paragraph 4.16 (Third-Party Representation) states the following:</p> <p><i>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:</i></p> <ul style="list-style-type: none"> <i>advice organisations</i> <i>professionals such as social workers, support workers or carers</i>

				<ul style="list-style-type: none"> • <i>family members or friends</i> <p>The policy also makes it clear that written consent from the customer will always be required.</p>
1.4	Landlords must recognise the difference between a service request and a complaint. This must be set out in their complaints policy. A service request is a request from a resident to the landlord requiring action to be taken to put something right. Service requests are not complaints, but must be recorded, monitored and reviewed regularly.	Yes	NPH Complaints and Feedback Policy – Paragraph 3.3 – Complaints	Paragraph 3.3 of our Complaints and Feedback Policy sets out the difference between a service request and a complaint as defined by the Housing Ombudsman within the Code.
1.5	A complaint must be raised when the resident expresses dissatisfaction with the response to their service request, even if the handling of the service request remains ongoing. Landlords must not stop their efforts to address the service request if the resident complains.	Yes	NPH Complaints and Feedback Policy – Paragraph 4.1 – What is a Complaint?	This is set out in paragraph 4.1 of our Complaints and Feedback Policy, a resident making a complaint about how their service request has been dealt with would not stop our efforts to resolve the service request.
1.6	An expression of dissatisfaction with services made through a survey is not defined as a complaint, though wherever possible, the person completing the survey should be made aware of how they can pursue a complaint if they wish to. Where landlords ask for wider feedback about their services, they also must provide details of how residents can complain.	Yes	NPH Complaints and Feedback Policy – Paragraph 4.1 – What is a Complaint?	<p>Paragraph 4.1 (What is a Complaint?) states the following:</p> <p><i>‘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.’</i></p>

Section 2: Exclusions

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation																
2.1	Landlords must accept a complaint unless there is a valid reason not to do so. If landlords decide not to accept a complaint they must be able to evidence their reasoning. Each complaint must be considered on its own merits	Yes	NPH Complaints and Feedback Policy: <ul style="list-style-type: none">Paragraph 4.2 – What is not a complaint?Paragraph 4.4 – Who can complain?	<p>Paragraph 4.2 (What is not a Complaint?) and 4.4 (Who can complain?) of the Complaints and Feedback Policy detail who can complain and our exemptions. Each complaint is considered on its own merit and exemptions will be applied in line with other policies such as Equal Opportunities, our Unreasonable Behaviour Policy and appeal processes. Within this scope we will also consider the history of issues and make a decision.</p> <p>In 2023/24, NPH did not accept 56 complaints for the following reasons:</p> <table><tr><th>Reason</th><th>Number</th></tr><tr><td>Request for Service</td><td>21</td></tr><tr><td>Services delivered by WNC</td><td>12</td></tr><tr><td>Appeal – Banding Decision</td><td>10</td></tr><tr><td>ASB/Neighbour Nuisance</td><td>5</td></tr><tr><td>Already considered through complaints process</td><td>4</td></tr><tr><td>Outside 6 months of an issue/incident arising: NB Policy is now within 12 months.</td><td>2</td></tr><tr><td>Not related to the actions or decisions of NPH</td><td>2</td></tr></table>	Reason	Number	Request for Service	21	Services delivered by WNC	12	Appeal – Banding Decision	10	ASB/Neighbour Nuisance	5	Already considered through complaints process	4	Outside 6 months of an issue/incident arising: NB Policy is now within 12 months.	2	Not related to the actions or decisions of NPH	2
Reason	Number																			
Request for Service	21																			
Services delivered by WNC	12																			
Appeal – Banding Decision	10																			
ASB/Neighbour Nuisance	5																			
Already considered through complaints process	4																			
Outside 6 months of an issue/incident arising: NB Policy is now within 12 months.	2																			
Not related to the actions or decisions of NPH	2																			

2.2	<p>A complaints policy must set out the circumstances in which a matter will not be considered as a complaint or escalated, and these circumstances must be fair and reasonable to residents. Acceptable exclusions include:</p> <ul style="list-style-type: none"> • The issue giving rise to the complaint occurred over twelve months ago. • Legal proceedings have started. This is defined as details of the claim, such as the Claim Form and Particulars of Claim, having been filed at court. • Matters that have previously been considered under the complaints policy. 	Yes	NPH Complaints and Feedback Policy – Paragraph 4.2 – What is not a Complaint?	Paragraph 4.2 (What is not a Complaint?) provides a clear list of exemptions to what NPH will accept as a complaint.
2.3	<p>Landlords must accept complaints referred to them within 12 months of the issue occurring or the resident becoming aware of the issue, unless they are excluded on other grounds. Landlords must consider whether to apply discretion to accept complaints made outside this time limit where there are good reasons to do so.</p>	Yes	NPH Complaints and Feedback Policy – Paragraph 4.1 – What is a Complaint?	<p>Paragraph 4.2 of our Complaints and Feedback Policy (What is not a Complaint?) states the following as a reason that we will not accept a complaint:</p> <p><i>‘Complaints that have not been brought to our attention within 12 months of an incident or issue arising, or where it would not be possible for NPH to consider the complaint effectively and fairly, e.g., due to changes in staffing and document retention timescales. However, discretion will be applied to accept complaints made outside this time limit on a case-by-case basis.’</i></p>
2.4	<p>If a landlord decides not to accept a complaint, an explanation must be provided to the resident setting out the reasons why the matter is not suitable for the complaints process and the right to take that decision to the Ombudsman. If</p>	Yes	<ul style="list-style-type: none"> • NPH Complaints and Feedback Policy – Paragraph 4.2 – What is a not a Complaint? • NPH complaint letter templates 	<p>Paragraph 4.2 (What is not a Complaint?) states the following:</p> <p><i>‘Any decision to not consider a complaint under this Policy will be made by a service area manager. A</i></p>

	the Ombudsman does not agree that the exclusion has been fairly applied, the Ombudsman may tell the landlord to take on the complaint.			<p><i>response will be sent in a formal letter to the complainant outlining our reasons aligning to one or more of the exemptions above and will set out the complainant's right to take our decision to the relevant Ombudsman.'</i></p> <p>Letter templates are also provided.</p>
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Yes	NPH Complaints and Feedback Policy – Paragraph 4.2 – What is not a Complaint?	Paragraph 4.2 (What is not a complaint?) of our Complaints and Feedback Policy states: ' <i>Any decision to not consider a complaint under this Policy will be made by a service area manager and will consider the individual circumstances of the complaint.'</i>

Section 3: Accessibility and Awareness

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
3.1	Landlords must make it easy for residents to complain by providing different channels through which they can make a complaint. Landlords must consider their duties under the Equality Act 2010 and anticipate the needs and reasonable adjustments of residents who may need to access the complaints process.	Yes	<ul style="list-style-type: none"> NPH Complaints and Feedback Policy – Paragraphs 4.5 (How to make a complaint), 4.5.1. (Social media complaints) and 11 (Equalities and Diversity) Our complaints web form is available for residents to complete at https://www.nph.org.uk/give-us-feedback 	<p>A customer can contact us via a number of channels that include, but are not limited, to:</p> <ul style="list-style-type: none"> Telephone Email Letter Social media (Facebook and Twitter) Web form via our website In person at the West Northants Council Drop-In Centre or the Community Bus By raising issues with a visiting officer e.g.,

				<p>Housing Officer, Tenancy Compliance Officer, tradesperson.</p> <p>Paragraph 11 of the Complaints and Feedback Policy also sets out what reasonable adjustments can be made so that the Policy is accessible to all customers.</p>
3.2	Residents must be able to raise their complaints in any way and with any member of staff. All staff must be aware of the complaints process and be able to pass details of the complaint to the appropriate person within the landlord.	Yes	<ul style="list-style-type: none"> • NPH Complaints and Feedback Policy – Paragraphs 4.5 (How to make a complaint) and 4.5.1 (Social media complaints) • NPH Complaints Policy and Process Update (April 2024) Training Slides • NPH Complaints Process Fact Sheet 	<p>Paragraph 4.5 (How to make a complaint) of our Complaints and Feedback Policy sets out all the ways that a customer can make a complaint.</p> <p>Paragraph 4.5.1 (Social media complaints) also clarifies how complaints made via social media will be logged and dealt with.</p> <p>All NPH staff members have been given appropriate training and have also been made aware of the correct email inbox to forward any complaints received onto via internal email and intranet communications.</p>
3.3	High volumes of complaints must not be seen as a negative, as they can be indicative of a well-publicised and accessible complaints process. Low complaint volumes are potentially a sign that residents are unable to complain.	Yes	<ul style="list-style-type: none"> • NPH Complaints Policy and Process Update (April 2024) Training Slides • NPH Complaints Process Fact Sheet • Annual Complaints Report 	<p>All NPH staff across the business have been given appropriate training in the importance of customer complaints, how to recognise the difference between a service request and a complaint, as well as how to raise a complaint with the appropriate person within the organisation. This helps to promote a positive and pro-active attitude towards complaint handling.</p> <p>Our Annual Complaints Report is reviewed yearly by our governing body, and monthly reports regarding complaint volumes and lessons learned are presented to SMT/EMT and quarterly to Board.</p>

				NPH have allocated a Board Complaint Champion Member who is also our tenant representative. WNC have appointed the Cabinet Portfolio for Housing as the new MRC role. Both roles will receive monitoring reports on complaint volumes, trends and improvements going forward.
3.4	Landlords must make their complaint policy available in a clear and accessible format for all residents. This will detail the two stage process, what will happen at each stage, and the timeframes for responding. The policy must also be published on the landlord's website.	Yes	A link to the 'Give Us Feedback' page on our website: https://www.nph.org.uk/give-us-feedback	Our full Complaints and Feedback Policy is available on our website where a web tool is available that will translate and/or read documents for users. Our complaints leaflet summarises the process and is provided with all complaint acknowledgement and response letters. Both of these documents can also be provided in large font. Both the Policy and Leaflet detail the stages and timeframes for responding.
3.5	The policy must explain how the landlord will publicise details of the complaints policy, including information about the Ombudsman and this Code.	Yes	<ul style="list-style-type: none"> Link to the 'Give Us Feedback' page on our website: https://www.nph.org.uk/give-us-feedback NPH Complaint Letter Templates 	Our website www.nph.org.uk includes our Complaints and Feedback Policy and information on the complaints process, the joint Complaint Handling Code, and the Housing Ombudsman Scheme. Information on our process is available in our Complaints Leaflet which can be downloaded from our website and is also attached to all our complaint acknowledgement and response letters.
3.6	Landlords must give residents the opportunity to have a representative deal with their complaint on their behalf, and to be	Yes	NPH Complaints and Feedback Policy paragraphs 4.16 (Third-Party Representation) and 11 (Equalities and Diversity)	Paragraph 4.16 (Third-Party Representation) of our Complaints and Feedback Policy explains that complainants have the right to have a third-party act on their behalf which may include advice

	represented or accompanied at any meeting with the landlord.			<p>organisations, professionals (such as social workers, support workers or carers) and friends or family members.</p> <p>Paragraph 11 (Equalities and Diversity) also clarifies that complainants may be represented and/or accompanied at meetings with NPH where consent is given.</p>
3.7	Landlords must provide residents with information on their right to access the Ombudsman service and how the individual can engage with the Ombudsman about their complaint.	Yes	<ul style="list-style-type: none"> • NPH Complaints and Feedback Policy – Paragraph 4.13 (Housing Ombudsman/Local Government and Social Care Ombudsman) • NPH complaint letter templates • NPH complaints leaflet 	<p>Contact details for the Housing Ombudsman are included in all correspondence with the customer as follows:</p> <ul style="list-style-type: none"> • Stage 1 Complaint not accepted letter • Stage 1 Acknowledgment letter • Stage 1 Response letter • Stage 2 Acknowledgment letter • Stage 2 Response letter • Stage 1 or 2 Extension letters <p>This information is also detailed in paragraph 4.13 (Housing Ombudsman/Local Government and Social Care Ombudsman) and in our complaint leaflets.</p>

Section 4: Complaint Handling Staff

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
4.1	Landlords must have a person or team assigned to take responsibility for complaint handling, including liaison with the Ombudsman and ensuring complaints are reported to the governing body (or equivalent). This Code will refer to that person or team as the 'complaints officer'. This role may be in addition to other duties.	Yes	<ul style="list-style-type: none"> Customer Service Excellence Officer job description 	<p>The Customer Service Excellence Officer is allocated for this role in a central corporate team to oversee complaint handling, compliance with the Code and complex case management.</p> <p>The service areas that receive the highest volume of complaints (Repairs and Assets Investment) have dedicated Complaint Handlers, of which complaint handling is their sole purpose.</p> <p>Team Leaders and/or Managers are all assigned to be accountable to responding to complaints in their relevant service areas.</p>
4.2	The complaints officer must have access to staff at all levels to facilitate the prompt resolution of complaints. They must also have the authority and autonomy to act to resolve disputes promptly and fairly.	Yes	<ul style="list-style-type: none"> Customer Service Excellence Officer job description 	<p>The Customer Service Excellence Officer is in a central Corporate Team and reviews complaints independently of the relevant service area which have their own Complaint Handlers where appropriate. Our recruitment process ensures the postholder has appropriate experience and skills for the role.</p> <p>Team Leaders and/or Managers in the relevant service areas that are assigned to be accountable to responding to complaints are trained and will not be involved in any complaint resolutions where they have been party to the service request.</p>
4.3	Landlords are expected to prioritise complaint handling and a culture of learning from	Yes	<ul style="list-style-type: none"> NPH Complaints Policy and Process Update (April 2024) Training Slides 	Appropriate training has been provided to all those involved in complaint handling and our

	complaints. All relevant staff must be suitably trained in the importance of complaint handling. It is important that complaints are seen as a core service and must be resourced to handle complaints effectively		<ul style="list-style-type: none"> NPH Complaints Process Fact Sheet 	<p>Complaints & Feedback Policy. The service areas that receive the highest volume of complaints have dedicated Complaint Handlers, of which complaint handling is their sole purpose.</p> <p>Stage 1 and 2 complaints are responded to by Complaint Handlers with the assistance of Team Leaders and/or Managers and Senior Complaint Handlers with the assistance of Heads of Service and/or Directors respectively who have the autonomy and authority to resolve the complaint appropriately.</p>
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Section 5: The Complaint Handling Process

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
5.1	Landlords must have a single policy in place for dealing with complaints covered by this Code. Residents must not be treated differently if they complain.	Yes	NPH Complaints and Feedback Policy which is available to available to download on our website at https://www.nph.org.uk/give-us-feedback .	A single policy relating to the handling of Housing Ombudsman Complaint Handling Code is the NPH Complaints and Feedback Policy.
5.2	The early and local resolution of issues between landlords and residents is key to effective complaint handling. It is not appropriate to have extra named stages (such as 'stage 0' or 'informal complaint') as this causes unnecessary confusion.	Yes	NPH Complaints and Feedback Policy – Paragraph 4.7 – NPH Complaint Stages	We have two formal complaint stages – Stage 1 and Stage 2 which is set out in paragraph 4.7 - NPH Complaint Stages .

5.3	A process with more than two stages is not acceptable under any circumstances as this will make the complaint process unduly long and delay access to the Ombudsman.	Yes	NPH Complaints and Feedback Policy – Paragraph 4.7 – NPH Complaint Stages	We have two formal complaint stages – Stage 1 and Stage 2 which is set out in paragraph 4.7 - NPH Complaint Stages .
5.4	Where a landlord’s complaint response is handled by a third party (e.g. a contractor or independent adjudicator) at any stage, it must form part of the two stage complaints process set out in this Code. Residents must not be expected to go through two complaints processes.	Yes	NPH Complaints and Feedback Policy – Paragraph 4.15 – Contractor Complaints	Paragraph 4.15 (Contractor Complaints) of our Complaints and Feedback Policy states the following: <i>‘We will ensure our contractors are aware of this policy and the Housing Ombudsman’s Complaint Handling Code, and when they are tasked with investigating complaints on behalf of NPH they must provide information in line with the two-stage process and timescales set out in this policy.’</i>
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Yes	NPH Complaints and Feedback Policy – Paragraph 4.15 – Contractor Complaints	Paragraph 4.15 (Contractor Complaints) of our Complaints and Feedback Policy states the following: <i>‘We will ensure our contractors are aware of this policy and the Housing Ombudsman’s Complaint Handling Code, and when they are tasked with investigating complaints on behalf of NPH they must provide information in line with the two-stage process and timescales set out in this policy.’</i>
5.6	When a complaint is logged at Stage 1 or escalated to Stage 2, landlords must set out their understanding of the complaint and the outcomes the resident is seeking. The Code will refer to this as “the complaint definition”. If any aspect of the complaint is unclear, the resident must be asked for clarification.	Yes	<ul style="list-style-type: none"> NPH Complaints and Feedback Policy – Paragraph 4.7 – NPH Complaint Stages NPH Complaints and Feedback Policy – Paragraph 4.9 – Acknowledging complaints NPH complaint letter templates 	<p>Paragraph 4.9 (Acknowledging complaints) states the following:</p> <p><i>‘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 complaints are clearly understood and to clarify any aspects of the complaint that may be unclear.’</i></p>

				This is also clarified for both Stage 1 and 2 in paragraph 4.7 (NPH Complaint Stages).
5.7	When a complaint is acknowledged at either stage, landlords must be clear which aspects of the complaint they are, and are not, responsible for and clarify any areas where this is not clear.	Yes	NPH Complaints and Feedback Policy – Paragraph 4.9 – Acknowledging complaints	<p>This will be done by the complaint handler when:</p> <ul style="list-style-type: none"> a) initial contact with the customer is made at the point of acknowledgement if further clarification of the issues raised is required and; b) during the investigation stage. <p>This is also stated in paragraph 4.9 (Acknowledging complaints) of our Complaints and Feedback Policy.</p>
5.8	<p>At each stage of the complaints process, complaint handlers must:</p> <ul style="list-style-type: none"> a. deal with complaints on their merits, act independently, and have an open mind; b. give the resident a fair chance to set out their position; c. take measures to address any actual or perceived conflict of interest; and d. consider all relevant information and evidence carefully. 	Yes	NPH Complaints and Feedback Policy – Paragraph 4.8 – How NPH handles complaints	<p>Appropriate training has been provided to all those involved in complaint handling and is this is an ongoing process. The training sets out how Complaint Handlers should be dealing with complaints and that they should be contacting residents directly at the acknowledgment stage to clarify any aspects of the complaint that is unclear.</p> <p>Paragraph 4.8 (How NPH handles complaints) of the Policy also sets out how any complaint investigations will be handled.</p>
5.9	Where a response to a complaint will fall outside the timescales set out in this Code, the landlord must agree with the resident suitable intervals for keeping them informed about their complaint.	Yes	NPH Complaints and Feedback Policy – Paragraph 4.11 – Extending Time Limits for Complaints	Paragraph 4.11 (Extending Time Limits for Complaints) states that if an extension is required, we will keep the complainant informed of the progress of the investigation at a frequency agreed with them.

5.10	Landlords must make reasonable adjustments for residents where appropriate under the Equality Act 2010. Landlords must keep a record of any reasonable adjustments agreed, as well as a record of any disabilities a resident has disclosed. Any agreed reasonable adjustments must be kept under active review.	Yes	NPH Complaints and Feedback Policy – Paragraph 4.11 – Extending Time Limits for Complaints	Paragraph 4.11 (Extending Time Limits for Complaints) states that if an extension is required, we will keep the complainant informed of the progress of the investigation at a frequency agreed with them.
5.11	Landlords must not refuse to escalate a complaint through all stages of the complaints procedure unless it has valid reasons to do so. Landlords must clearly set out these reasons, and they must comply with the provisions set out in section 2 of this Code.	Yes	NPH Complaints and Feedback Policy – Paragraph 4.12 – Requests to escalate complaints to Stage 2	This is set out in paragraph 4.12 (Requests to escalate complaints to Stage 2) which states that 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 upon request unless a valid exclusion ground applies.
5.12	A full record must be kept of the complaint, and the outcomes at each stage. This must include the original complaint and the date received, all correspondence with the resident, correspondence with other parties, and any relevant supporting documentation such as reports or surveys.	Yes	CXM JADU Case Print - Evidence	<p>All complaint cases are managed on our JADU CXM system with all contacts with the complainant recorded to the case timeline and letter correspondence also attached. Evidence such as internal reports, photographs and letters can be attached to the timeline.</p> <p>The system also records any internal correspondence during the complaint investigation process.</p> <p>At the point of logging a complaint in JADU, it includes the original complaint and the date received on the timeline.</p>
5.13	Landlords must have processes in place to ensure a complaint can be remedied at any stage of its complaints process. Landlords must ensure appropriate remedies can be provided	Yes	NPH Complaints and Feedback Policy – Paragraph 4.10 – Appropriate Remedy	<p>Each complaint is assessed on its own merit. We aim to resolve all complaints at the earliest point without delay.</p> <p>There may be times when a complaint needs extra time for resolution, and this will always be</p>

	at any stage of the complaints process without the need for escalation.			<p>agreed with the customer.</p> <p>The customer will be kept informed regularly throughout the process through the agreed contact method.</p>
5.14	Landlords must have policies and procedures in place for managing unacceptable behaviour from residents and/or their representatives. Landlords must be able to evidence reasons for putting any restrictions in place and must keep restrictions under regular review.	Yes	<ul style="list-style-type: none"> • NPH Unacceptable Behaviour Policy • NPH Complaints and Feedback Policy – Paragraph 4.19 – Unreasonable Behaviour 	<p>NPH have an Unacceptable Behaviour Policy in place.</p> <p>Paragraph 4.19 (Unreasonable Behaviour) of our Policy also addresses this.</p>
5.15	Any restrictions placed on contact due to unacceptable behaviour must be proportionate and demonstrate regard for the provisions of the Equality Act 2010.	Yes	NPH Unacceptable Behaviour Policy	<p>NPH have in place an Unacceptable Behaviour Policy. Before any restrictions are considered, Managers and relevant Officers consider the situation and the needs of that resident before taking the appropriate actions.</p> <p>All SPOC (Single Point of Contact) requests, arrangements and restrictions are discussed with the Customer Service Excellence Officer and restriction timescales are monitored.</p> <p>Complaints raised by a customer subject to a SPOC will need to be raised through their designated point of contact person. There may be instances where a SPOC includes a restriction on contact regarding repeated calls about the same issue.</p> <p>Any restrictions are carefully considered in SPOC Review meetings.</p>

Section 6: Complaints Stages

Stage 1

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
6.1	Landlords must have processes in place to consider which complaints can be responded to as early as possible, and which require further investigation. Landlords must consider factors such as the complexity of the complaint and whether the resident is vulnerable or at risk. Most stage 1 complaints can be resolved promptly, and an explanation, apology or resolution provided to the resident.	Yes	JADU Process Maps/Development Forms	<p>Complaint handlers are trained to monitor any new complaints that come in as quickly as possible (ideally on the same day or the next working day) to ascertain if the issue(s) raised within the complaint can be remedied and responded to quickly or whether more in depth investigation will be required.</p> <p>We are currently in the process of making improvements to the JADU system and will be introducing a traffic light system to identify high risk and/or complex cases vs. low-risk quick resolution cases.</p> <p>The system updates will be completed by the end of June 2024.</p>
6.2	Complaints must be acknowledged, defined and logged at stage 1 of the complaints procedure <u>within five working days of the complaint being received.</u>	Yes	<p>NPH Complaints and Feedback Policy:</p> <ul style="list-style-type: none"> • Paragraph 4.7 – NPH Complaint Stages • Paragraph 4.9 – Acknowledging complaints • Paragraph 5 – Summary of NPH Responsibilities 	This is set out in paragraph 4.7 (NPH Complaint Stages), 4.9 (Acknowledging complaints) and 5 (Summary of NPH Responsibilities) of our Complaints and Feedback Policy.

6.3	Landlords must issue a full response to stage 1 complaints <u>within 10 working days</u> of the complaint being acknowledged.	Yes	NPH Complaints and Feedback Policy: <ul style="list-style-type: none"> Paragraph 4.7 – NPH Complaint Stages Paragraph 5 - Summary of NPH Responsibilities 	This is set out in paragraph 4.7 (NPH Complaint Stages) and 5 (Summary of NPH Responsibilities) of the Policy.
6.4	Landlords must decide whether an extension to this timescale is needed when considering the complexity of the complaint and then inform the resident of the expected timescale for response. Any extension must be no more than 10 working days without good reason, and the reason(s) must be clearly explained to the resident.	Yes	NPH Complaints and Feedback Policy – Paragraph 4.11 – Extending Time Limits for Complaints	Paragraph 4.11 (Extending Time Limits for Complaints) sets out that if an extension is required, the complainant will be notified of the reasons why along with the new expected timescale and will be kept informed at an agreed frequency of progress. This paragraph also confirms that the maximum extension period is a further 10 working days.
6.5	When an organisation informs a resident about an extension to these timescales, they must be provided with the contact details of the Ombudsman.	Yes	NPH Complaint Letter Templates NPH Complaint Leaflets	Our letter template used to notify complainants of any SLA extensions includes a paragraph confirming they have the right to contact the relevant Ombudsman at any stage of the complaints process, and the full contact details for both the HO and LGSCO are provided.
6.6	A complaint response must be provided to the resident when the answer to the complaint is known, not when the outstanding actions required to address the issue are completed. Outstanding actions must still be tracked and actioned promptly with appropriate updates provided to the resident.	Yes	NPH Complaints and Feedback Policy – Paragraph 4.10 – Appropriate Remedy	Complaint responses include any outstanding actions and dates for any remedial action, where they have been agreed. Any remedial actions will be tracked using prompts by our complaint handling computer system (JADU), and the customer kept informed through to completion – this is stated in paragraph 4.10 (Appropriate remedy) of the Policy.

6.7	Landlords must address all points raised in the complaint definition and provide clear reasons for any decisions, referencing the relevant policy, law and good practice where appropriate.	Yes	NPH Complaint Letter Templates	<p>Stage 1 and 2 response letter templates prompt the complaint handler to include all the issues raised and include them in the acknowledgement letter to ensure all points are addressed.</p> <p>The template also includes a prompt to address policy, law and good practice, where relevant.</p>
6.8	Where residents raise additional complaints during the investigation, these must be incorporated into the stage 1 response if they are related and the stage 1 response has not been issued. Where the stage 1 response has been issued, the new issues are unrelated to the issues already being investigated or it would unreasonably delay the response, the new issues must be logged as a new complaint.	Yes	NPH Complaints and Feedback Policy – Paragraph 4.8 – How NPH handles complaints	This is stated in paragraph 4.8 (How NPH handles complaints) of our Complaints and Feedback Policy.
6.9	<p>Landlords must confirm the following in writing to the resident at the completion of stage 1 in clear, plain language:</p> <ul style="list-style-type: none"> a. the complaint stage; b. the complaint definition; c. the decision on the complaint; d. the reasons for any decisions made; e. the details of any remedy offered to put things right; f. details of any outstanding actions; and g. details of how to escalate the matter to stage 2 if the individual is not satisfied with the response. 	Yes	NPH Complaint Letter Templates	Letter templates are in place for all stages and include all the points required.

Stage 2

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
6.10	If all or part of the complaint is not resolved to the resident's satisfaction at stage 1, it must be progressed to stage 2 of the landlord's procedure. Stage 2 is the landlord's final response.	Yes	NPH Complaints and Feedback Policy – Paragraph 4.12 – Requests to escalate complaints to Stage 2	This is stated in paragraph 4.12 (Requests to escalate complaints to Stage 2) of our Complaints and Feedback Policy.
6.11	Requests for stage 2 must be acknowledged, defined and logged at stage 2 of the complaints procedure within five working days of the escalation request being received.	Yes	NPH Complaints and Feedback Policy: <ul style="list-style-type: none"> • Paragraph 4.7 – Complaint Stages • Paragraph 4.12 – Requests to escalate complaints to Stage 2 	This is stated in paragraphs 4.7 (NPH Complaint Stages) and 4.12 (Requests to escalate to Stage 2) of our Complaints and Feedback Policy.
6.12	Residents must not be required to explain their reasons for requesting a stage 2 consideration. Landlords are expected to make reasonable efforts to understand why a resident remains unhappy as part of its stage 2 response.	Yes	NPH Complaints and Feedback Policy – Paragraph 4.12 – Requests to escalate complaints to Stage 2	This is stated in paragraph 4.12 (Requests to escalate complaints to Stage 2) of our Complaints and Feedback Policy.
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Yes	NPH Complaints and Feedback Policy – Paragraph 4.7 – NPH Complaint Stages	Our Complaints and Feedback Policy states that all Stage 1 complaints are investigated into and considered by a Complaint Handler with the assistance of a Team Leader and/or Manager. All Stage 2 complaints are investigated into and considered by a Senior Complaints Handler with the assistance of a Head of Service and/or Director.
6.14	Landlords must issue a final response to the stage 2 within 20 working days of the complaint being acknowledged.	Yes	NPH Complaints and Feedback Policy: <ul style="list-style-type: none"> • Paragraph 4.7 – NPH Complaint Stages • Paragraph 5 – Summary of NPH Responsibilities 	This is set out in paragraph 4.7 (NPH Complaint Stages) and 5 (Summary of NPH Responsibilities) of the Policy.

6.15	Landlords must decide whether an extension to this timescale is needed when considering the complexity of the complaint and then inform the resident of the expected timescale for response. Any extension must be no more than 20 working days without good reason, and the reason(s) must be clearly explained to the resident.	Yes	NPH Complaints and Feedback Policy – Paragraph 4.11 – Extending Time Limits for Complaints	<p>Paragraph 4.11 (Extending Time Limits for Complaints) of our Complaints and Feedback Policy sets out that if an extension is required, the complainant will be notified of the reasons why in writing along with the new expected timescale and will be kept informed at an agreed frequency of progress.</p> <p>This paragraph also confirms that the maximum extension period for a Stage 2 complaint is a further 20 working days.</p>
6.16	When an organisation informs a resident about an extension to these timescales, they must be provided with the contact details of the Ombudsman.	Yes	NPH Complaint Letter Templates	Our letter template used to notify complainants of any SLA extensions includes a mandatory paragraph confirming that the complainant has the right to contact the relevant Ombudsman at any stage of the complaints process, and the full contact details for both the HO and LGSCO are provided.
6.17	A complaint response must be provided to the resident when the answer to the complaint is known, not when the outstanding actions required to address the issue are completed. Outstanding actions must still be tracked and actioned promptly with appropriate updates provided to the resident.	Yes	NPH Complaints and Feedback Policy – Paragraph 4.10 – Appropriate Remedy	<p>Complaint responses include any outstanding actions and dates for any remedial action, where they have been agreed.</p> <p>Any remedial actions will be tracked, and the customer kept informed through to completion – this is stated in paragraph 4.10 (Appropriate remedy) of our Complaints and Feedback Policy.</p>
6.18	Landlords must address all points raised in the complaint definition and provide clear reasons for any decisions, referencing the relevant policy, law and good practice where appropriate.	Yes	NPH Complaint Letter Templates	Stage 1 and 2 response letter templates prompt the complaint handler to include all the issues raised and include them in the acknowledgement letter to ensure all points are addressed.

				The template also includes a prompt to address policy, law and good practice, where relevant.
6.19	Landlords must confirm the following in writing to the resident at the completion of stage 2 in clear, plain language: a. the complaint stage; b. the complaint definition; c. the decision on the complaint; d. the reasons for any decisions made; e. the details of any remedy offered to put things right; f. details of any outstanding actions; and g. details of how to escalate the matter to the Ombudsman Service if the individual remains dissatisfied.	Yes	NPH Complaints and Feedback Policy – Paragraph 4.8 – How NPH handles complaints	This is stated in paragraph 4.8 (How NPH handles complaints) of our Complaints and Feedback Policy.
6.20	Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.	Yes	NPH Complaints and Feedback Policy: • Paragraph 4.7 – NPH Complaint Stages • Paragraph 4.17.1 – Internal Case Reviews	All Stage 2 complaints are dealt with by a Senior Complaint Handler with the assistance of a Head of Service and/or Director. It is also common practise to arrange an internal case review if a complaint reaches Stage 2 to gather the input of all relevant staff members before a response is sent to the resident.

Section 7: Putting things right

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
7.1	Where something has gone wrong a landlord must acknowledge this and set out the actions it has already taken, or intends to take, to put things right. These can include:	Yes	<ul style="list-style-type: none"> NPH Complaints and Feedback Policy – Paragraph 4.10 – Appropriate remedy NPH Complaint Letter Templates 	Our complaint handling training and letter response templates ensure that all the issues raised are addressed, resolved and that where something has gone wrong, this is

	<ul style="list-style-type: none"> • Apologising; • Acknowledging where things have gone wrong; • Providing an explanation, assistance or reasons; • Taking action if there has been delay; • Reconsidering or changing a decision; • Amending a record or adding a correction or addendum; • Providing a financial remedy; • Changing policies, procedures or practices. 			<p>acknowledged, and an apology given.</p> <p>Letter templates include the actions to be taken or already taken to address the issues and to put things right.</p> <p>This is also stated in paragraph 4.10 (Appropriate remedy) in our Complaints and Feedback Policy.</p>
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Yes	NPH Complaints and Feedback Policy – Paragraph 4.10 – Appropriate remedy	This is stated in paragraph 4.10 (Appropriate remedy) of our Complaints and Feedback Policy.
7.3	The remedy offer must clearly set out what will happen and by when, in agreement with the resident where appropriate. Any remedy proposed must be followed through to completion.	Yes	<ul style="list-style-type: none"> • NPH letter templates • NPH Complaints and Feedback Policy – Paragraph 4.10 – Appropriate remedy 	<p>Our response letter templates include a remedy section. Complaint owners are then responsible for tracking and following up any agreed actions.</p> <p>This is also stated in paragraph 4.10 (Appropriate remedy) of our Complaints and Feedback Policy.</p>
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes	NPH Complaints and Feedback Policy – Paragraph 4.10 – Appropriate remedy	This is stated in paragraph 4.10 (Appropriate remedy) of our Complaints and Feedback Policy.

Section 8: Putting things right

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
8.1	Landlords must produce an annual complaints performance and service improvement report for scrutiny and challenge, which must include: a. the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements. b. a qualitative and quantitative analysis of the landlord's complaint handling performance. This must also include a summary of the types of complaints the landlord has refused to accept; c. any findings of non-compliance with this Code by the Ombudsman; d. the service improvements made as a result of the learning from complaints; e. any annual report about the landlord's performance from the Ombudsman; and f. any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord.	Yes	NPH Complaints and Feedback Policy – Paragraph 9 – Governing Body	<p>The appropriate arrangements have been made within the central Corporate Team (in conjunction with and with assistance from our governing body West Northants Council) to compile an annual complaints performance and service improvement report that is fully compliant with the Code by the appropriate deadline.</p> <p>This is also stated in paragraph 9 (Governing Body) of our Complaints & Feedback Policy.</p>
8.2	The annual complaints performance and service improvement report must be reported to the landlord's governing body (or equivalent) and published on the on the section of its website relating to complaints. The governing body's response to the report must be published alongside this.	Yes	NPH Complaints and Feedback Policy - Paragraph 4.13 – Housing Ombudsman and Local Government and Social Care Ombudsman	<p>The appropriate arrangements have been made by the central Corporate Team (in conjunction with and with assistance from our governing body West Northants Council) to complete these actions by the appropriate deadline. www.nph.org.uk/our-complaints-performance</p> <p>This is also stated in paragraph 4.13 (Housing Ombudsman and Local Government and Social</p>

				Care Ombudsman) of our Complaints and Feedback Policy.
8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	Yes	NPH Complaints and Feedback Policy – Paragraph 4.13 – Housing Ombudsman and Local Government and Social Care Ombudsman	<p>The Corporate Team at NPH will ensure that a new self-assessment is completed and submitted to the Ombudsman following any significant restructure, merger and/or change in procedures.</p> <p>This is also stated in paragraph 4.13 (Housing Ombudsman and Local Government and Social Care Ombudsman) of our Complaints and Feedback Policy.</p>
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	Yes	NPH Complaints and Feedback Policy – Paragraph 4.13 – Housing Ombudsman and Local Government and Social Care Ombudsman	<p>The Corporate Team at NPH will ensure to review and update the self-assessment form if asked to by the Ombudsman following an investigation.</p> <p>This is also stated in paragraph 4.13 (Housing Ombudsman and Local Government and Social Care Ombudsman) of our Complaints and Feedback Policy.</p>
8.5	If a landlord is unable to comply with the Code due to exceptional circumstances, such as a cyber incident, they must inform the Ombudsman, provide information to residents who may be affected, and publish this on their website Landlords must provide a timescale for returning to compliance with the Code.	Yes	NPH Complaints and Feedback Policy – Paragraph 4.13 – Housing Ombudsman and Local Government and Social Care Ombudsman	<p>The Corporate Team will ensure to report any exemptional circumstances by which we are temporarily unable to comply with the Code to the Ombudsman without delay.</p> <p>This is also stated in paragraph 4.13 (Housing Ombudsman and Local Government and Social Care Ombudsman) of our Complaints and Feedback Policy.</p>

Section 9: Scrutiny & oversight: continuous learning and improvement

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
9.1	Landlords must look beyond the circumstances of the individual complaint and consider whether service improvements can be made as a result of any learning from the complaint.	Yes	NPH's complaints data and lessons learned are published on our website here: https://www.nph.org.uk/our-complaints-performance	<p>At the point of complaint closure, officers are prompted to capture lessons learnt. Lessons learnt are reported each month to our Executive Management Team, quarterly to our Operations and Resource Committee and Annually to the NPH Board.</p> <p>We publish complaint data and lessons learnt on our website quarterly. Through this we identify where processes or systems need to be amended for the wider benefit of all.</p> <p>Case review meetings are conducted by the Customer Service Excellence Officer which address service improvements and lessons learned.</p>
9.2	A positive complaint handling culture is integral to the effectiveness with which landlords resolve disputes. Landlords must use complaints as a source of intelligence to identify issues and introduce positive changes in service delivery.	Yes	N/A	<p>At the point of complaint closure, officers are prompted to capture lessons learnt. Lessons learnt are reported each month to our Executive Management Team (EMT), quarterly to our Operations and Resource Committee and Annually to NPH Board.</p> <p>This process highlights wider issues, and these are discussed and addressed at EMT level.</p>
9.3	Accountability and transparency are also integral to a positive complaint handling culture. Landlords must report back on wider learning and improvements from complaints to	Yes	N/A	At the point of complaint closure, officers are prompted to capture lessons learnt. Lessons learnt are reported each month to our Executive Management Team (EMT), quarterly

	stakeholders, such as residents' panels, staff and relevant committees.			<p>to our Operations and Resource Committee and Annually to NPH Board.</p> <p>This process highlights wider issues, and these are discussed and addressed at EMT level.</p> <p>The Head of Corporate Strategy and Data Management and the Customer Service Excellence Officer are planning to meet with the NPH tenant's panel to gather feedback on complaint handling in May 2024.</p>
9.4	Landlords must appoint a suitably senior lead person as accountable for their complaint handling. This person must assess any themes or trends to identify potential systemic issues, serious risks, or policies and procedures that require revision.	Yes	N/A	The appropriate arrangements have been made within the Corporate Team (in conjunction with and with assistance from our governing body West Northants Council) to appoint a member of the NPH Board to fill this role.
9.5	In addition to this a member of the governing body (or equivalent) must be appointed to have lead responsibility for complaints to support a positive complaint handling culture. This person is referred to as the Member Responsible for Complaints ('the MRC').	Yes	N/A	The appropriate arrangements have been made within the Corporate Team in conjunction with and with our governing body West Northants Council to appoint a suitable person for this role.
9.6	The MRC will be responsible for ensuring the governing body receives regular information on complaints that provides insight on the landlord's complaint handling performance. This person must have access to suitable information and staff to perform this role and report on their findings.	Yes	N/A	The appropriate arrangements are being made within the Corporate Team in conjunction with and with our governing body West Northants Council to progress this.
9.7	As a minimum, the MRC and the governing body (or equivalent) must receive:	Yes	N/A	The appropriate arrangements are being made within the Corporate Team in conjunction with

	<p>a. regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance;</p> <p>b. regular reviews of issues and trends arising from complaint handling;</p> <p>c. regular updates on the outcomes of the Ombudsman's investigations and progress made in complying with orders related to severe maladministration findings; and</p> <p>d. annual complaints performance and service improvement report.</p>			our governing body West Northants Council to progress this.
9.8	<p>Landlords must have a standard objective in relation to complaint handling for all relevant employees or third parties that reflects the need to:</p> <p>a. have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments;</p> <p>b. take collective responsibility for any shortfalls identified through complaints, rather than blaming others; and</p> <p>c. act within the professional standards for engaging with complaints as set by any relevant professional body.</p>	Yes	NPH Complaints Policy and Process Update (April 2024) Training Slides	<p>The standard objectives will be included in the appraisals of all officer roles that undertake complaint handling.</p> <p>Our complaint process is embedded across all service areas with designated complaint handlers and one central coordinating role. This ensures we have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments. Corporate training has been provided to the wider organisation to imbed a positive complaint handling culture at all levels. An ICS Customer Service training programme has also been rolled out corporately as part of a wider Customer Service Programme.</p>