

Appendix B: 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/about/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 3.3 – What is a Complaint NPH Complaints and Feedback Policy – Appendix 1, para 6 – Third-Party Representation 	<p>Paragraph 3.3 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 considered as a complaint. Where dissatisfaction is expressed, residents will be given the choice as to whether a complaint is raised or not.'</p> <p>Paragraph 6, appendix 1 (Third-Party Representation) states the following:</p> <p><i>Residents may wish to have a third-party to 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><i>Where a third-party is helping a resident with their complaint, we will require written consent to that effect. Where we have this authority, we will endeavour to take all possible steps to keep the third-party informed of progress on the complaint. NPH are unable to commence the complaints process until a Letter of Authority is received and the complaint investigation will be put on hold until consent is received.</i></p> <p>The policy also makes it clear that written consent from the customer will always be required. Our complaint system JADU CRM includes workflow to review if consent is already in place, or to request it where it is not. Consent is formally recorded on our core housing system for wider business reference and details the areas for which the representative can speak on the customers behalf.</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	<p>NPH Complaints and Feedback Policy – Paragraph 3.3 – Complaints</p> <p>CRM Reports</p>	<p>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.</p> <p>Training sets out the definitions and provides examples for staff. Specific training has been provided for the first point of contact staff where issues are discussed, and complaints logged.</p> <p>Service requests are logged through our CRM system and reviewed monthly by our senior management team.</p>

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	Tenant Survey Transactional surveys	NPH's TSM Survey and Transactional Surveys are conducted by an independent third party by telephone. An alert process is in place where issues can be recorded for follow up.

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 4.1 – What is not a complaint, and why? Paragraph 4.2 – Who can complain? 	Paragraph 4.1 (What is not a Complaint?) and 4.2 (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.
2.2	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: <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 4.1 – What is not a Complaint, and why?	Paragraph 4.1 (What is not a Complaint?) provides a clear list of exemptions to what NPH will accept as a complaint.
2.3	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.	Yes	NPH Complaints and Feedback Policy – Paragraph 4.1 – What is not a Complaint?	Paragraph 4.1 of our Complaints and Feedback Policy (What is not a Complaint?) states the following as a reason that we will not accept a complaint:

	Landlords must consider whether to apply discretion to accept complaints made outside this time limit where there are good reasons to do so.			<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>
2.4	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 the Ombudsman does not agree that the exclusion has been fairly applied, the Ombudsman may tell the landlord to take on the complaint.	Yes	<ul style="list-style-type: none"> • NPH Complaints and Feedback Policy – Paragraph 4.1 – What is a not a Complaint? • NPH complaint letter templates 	<p>Paragraph 4.1 (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 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 3.5 (How to make a complaint), 3.3.3 (Social media complaints) and 4.5.4 (Equalities and Diversity) Our complaints web form is available for residents to complete at https://www.nph.org.uk/about/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 By raising issues with a visiting officer e.g., Housing Officer, Tenancy Compliance Officer, tradesperson. <p>Section 4.5.4 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 4.1 (How to make a complaint) and 3.3.3 (Social media complaints) NPH Complaints Policy and Process Update (April 2024) Training Slides NPH Complaints Process Fact Sheet 	<p>Paragraph 4.1 (How to make a complaint) of our Complaints and Feedback Policy sets out all the channels through which a customer can make a complaint.</p> <p>Paragraph 3.3.3 (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</p>

				aware of the correct email inbox to forward any complaints received onto via internal email and intranet communications.
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 discussed at senior management meetings.</p> <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.</p>
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/about/give-us-feedback/	<p>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.</p> <p>Our complaints leaflet summarises the process and is provided with all complaint acknowledgement and response letters. Both documents can also be provided in large font. Both the Policy and Leaflet detail the stages and</p>

				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 	<p>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.</p> <p>Information on our process and the Housing Ombudsman is included in our Complaints Leaflet which can be downloaded from our website and is also attached to all our complaint acknowledgement and response letters.</p> <p>Paragraph 4.7 Publishing the Policy details where the policy will be publicised.</p>
3.6	Landlords must give residents the opportunity to have a representative deal with their complaint on their behalf, and to be represented or accompanied at any meeting with the landlord.	Yes	NPH Complaints and Feedback Policy Appendix 1, section 6 (Third-Party Representation) and 11 (Equalities and Diversity)	<p>Appendix 1, section 6 (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 organisations, professionals (such as social workers, support workers or carers) and friends or family members.</p> <p>Paragraph 4.5.4 (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 4.4 (Housing Ombudsman/Local Government and Social Care Ombudsman) • NPH complaint letter templates 	<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

			<ul style="list-style-type: none"> • NPH complaints leaflet 	<ul style="list-style-type: none"> • 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 4.4 (Housing Ombudsman/Local Government and Social Care Ombudsman) of our policy and in our complaint leaflet which is sent with all acknowledgement and complaint letters.</p>
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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"> Centralised complaint team led by a Customer Excellence Manager. Customer Excellence Manager and Customer Service Excellence Officer job descriptions 	<p>A revised approach to complaint handling has been implemented from November 2024 with the transition to a dedicated centralised complaints team led by a Customer Excellence Manager. The team oversee complaint handling and compliance with the Code. A new Head of Customer Excellence is in place and the full centralised complaints team will be operationally complete by end January 2025.</p> <p>Team Leaders and/or Managers are all assigned to be accountable to investigate complaints at Stage 1 and Heads of Service/Directors at Stage 2. Response will be sent to the central team for quality assurance and review.</p> <p>The Manager and Customer Service Excellence Officer roles are the main contact points for the Ombudsman service.</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>A revised approach to complaint handling has been implemented from November 2024 with the transition to a dedicated centralised complaints team led by a Customer Excellence Manager. The team will acknowledge all complaints and assign service area officers to investigate and provide responses back.</p> <p>Complaints are assigned to investigating officers across all service areas – Stage 1 team</p>

				<p>leader/managers, Stage 2 Heads of Service/Directors who are empowered to make autonomous decisions relating to complaint resolution and remedy.</p> <p>Service areas investigate complaints and provide responses to the central team. The central team will review and ensure complaint responses fully address the issues raised, provide the required resolution and are fair.</p> <p>Team Leaders and/or Managers in the relevant service areas that are assigned to be accountable to responding to complaints are trained.</p>
4.3	Landlords are expected to prioritise complaint handling and a culture of learning from 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	Yes	<ul style="list-style-type: none"> NPH Complaints Policy and Process Update (April 2024) Training Slides 	<p>Appropriate training has been provided to all those involved in complaint handling and our Complaints & Feedback Policy. Refresher training across management and front-line service officers is taking place in January and February 2025 on the complaint handling process, investigations and resolution and identifying lessons learnt.</p> <p>A dedicated complaint handling team is in place. Stage 1 and 2 complaints are investigated and responded to by Team Leaders and/or Managers and of Heads of Service and/or Directors respectively who have the autonomy and authority to resolve the complaint appropriately.</p>

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/about/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 – NPH Complaint Process	We have two formal complaint stages – Stage 1 and Stage 2 which is set out in paragraph 4 - NPH Complaint Process .
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 – NPH Complaint Process	We have two formal complaint stages – Stage 1 and Stage 2 which is set out in paragraph 4 - NPH Complaint Process .
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 – Appendix 1, paragraph 5 – Contractor Complaints	Appendix 1, Paragraph 5 (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 – Appendix 1, paragraph 5 – Contractor Complaints	Appendix 1, paragraph 5 (Contractor Complaints) of our Complaints and Feedback Policy states the following: <i>'We will ensure our contractors are</i>

				<p><i>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></p>
5.6	<p>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.</p>	Yes	<ul style="list-style-type: none"> • NPH Complaints and Feedback Policy – Appendix 1 – NPH Complaint Process • NPH complaint acknowledgement letter template 	<p>Appendix 1 – NPH Complaint Process sets out the Acknowledgement stage for stage 1 and 2. (Acknowledging complaints) states the following:</p> <p><i>“When a new complaint is received, it will be accepted, logged, and acknowledged in writing at Stage 1 within 5 working days of receipt.</i></p> <ul style="list-style-type: none"> • <i>The complainant will be contacted within the 5 working days to ensure all concerns are clearly understood and to clarify any aspects of the complaint that may be unclear.</i> • <i>A formal written acknowledgement letter will be sent to the complainant outlining the basis of which the complaint will be investigated (the complaint definition), and the desired resolution required by the complainant.</i> • <i>The acknowledgement will be used to explain the complaints procedure, to get a full understanding of the issues and the resolution sought, confirm the timescales for response and to establish if there are any barriers or reasonable adjustments that need to be made to assist the complainant throughout the process.”</i> <p>And at Stage 2:</p>

				<p><i>“At this stage, if any aspect of the complaint is unclear, we may ask the complainant for clarification. The acknowledgment will set out our understanding of any outstanding issues and the outcome the complainant is seeking.”</i></p> <p>Acknowledgement letter templates request that contact is made if the customer would like to change or amend the complaint definition.</p> <p>NPH are moving towards all complaints being centrally acknowledged in the first instance once the full centralised team is in place by 29 February 2024.</p>
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	<p>NPH Complaints and Feedback Policy – Appendix 1 – NPH Complaint Process</p> <p>Acknowledgement letter templates</p>	<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 NPH Complaints and Feedback Policy – Appendix 1 – NPH Complaint Process</p> <p>Acknowledgement letter templates include the prompt: <i>Please be clear which aspects of the complaint that NPH are, and are not, responsible for and clarify any areas where this is not clear.</i></p>

5.8	At each stage of the complaints process, complaint handlers must: 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 – Appendix 1, paragraph 1 – How NPH handles complaints	Appropriate training has been provided to all those involved in complaint handling and 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. Appendix 1, paragraph 1 (How NPH handles complaints) of the Policy also sets out how any complaint investigations will be handled.
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 – Appendix 1, Paragraph 3 – Extending Time Limits for Complaints	Appendix 1, Paragraph 3 (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 4.5.4 – Equalities and diversity	Paragraph 4.5.4 (Equalities and diversity) refers to reasonable adjustments.
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 – Appendix 1 – Requests to escalate complaints to Stage 2	This is set out in Appendix 1 (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 as referenced under paragraph 4.1.

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 at any stage of the complaints process without the need for escalation.	Yes	NPH Complaints and Feedback Policy – Appendix 1, paragraph 2 – Appropriate Remedy	Each complaint is assessed on its own merit. Our policy allows for complaints to be resolved at any point during the complaint process without the need for escalation with the aim to resolve all complaints at the earliest point without delay.
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 – Appendix 1, Paragraph 9 – Unreasonable Behaviour 	<p>NPH have an Unacceptable Behaviour Policy in place.</p> <p>Appendix 1, Paragraph 9 (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,</p>

				<p>arrangements and restrictions are discussed with the Customer Excellence Manager 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>
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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	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.
6.2	Complaints must be acknowledged, defined and logged at stage 1 of the complaint's procedure <u>within five working days of the complaint being received.</u>	Yes	NPH Complaints and Feedback Policy – Appendix 1	Upon receipt, contacts are recorded on the JADU CRM system which tracks to ensure complaint acknowledgements (where accepted) are sent within five working days. This is set out in Appendix 1 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 – Appendix 1	Timescales for Stage 1 complaints are set out in the Complaints and Feedback Policy Appendix 1. This is managed through the JADU CRM system and reported as part of the Tenant Satisfaction Measures.
6.4	Landlords must decide whether an extension to this timescale is needed when considering the complexity of the complaint and then inform	Yes	NPH Complaints and Feedback Policy – Appendix 1, Paragraph 3 – Extending Time Limits for Complaints	Appendix 1, Paragraph 3 (Extending Time Limits for Complaints) sets out that if an extension is required, the complainant will be

	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.			<p>notified of the reasons why 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 is a further 10 working days without good reason.</p>
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 Appendix 1, paragraph 2 – Appropriate Remedy	<p>The centralised Complaint Handling Team ensure that complaint responses go out when the answer to the complaint is known. Outstanding actions are logged in JADU CXM.</p> <p>Complaint responses include any outstanding actions and dates for any remedial action, where they have been agreed.</p> <p>Remedial actions are captured in our complaint handling system (JADU), and the customer kept informed through to completion – this is stated in Appendix 1, paragraph 2 (Appropriate remedy) of the Policy.</p> <p>HO determinations in November 2024 identified failures to ensure that follow up works were conducted.</p> <p>Training in February 2025 will refresh</p>

				<p>complaint handlers on the tracking actions through to completion.</p> <p>A Repairs Improvement Plan in place to drive performance, culture and process which includes ensuring repairs work completed through to the end through follow on tracking and system workflow flags and reviews of open repair jobs.</p>
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 – Appendix 1, Paragraph 1 – How NPH handles complaints	<p>This is stated in Appendix 1, paragraph 1 (How NPH handles complaints) of our Complaints and Feedback Policy.</p> <p>Complaint Handling Officers ensure that all substantive issues of a complaint are addressed, including where customers raise additional substantive issues either within scope of the existing complaint where this is appropriate, or otherwise as a new complaint.</p>
6.9	<p>Landlords must confirm the following in writing to the resident at the completion of stage 1 in clear, plain language:</p> <ol style="list-style-type: none"> the complaint stage; the complaint definition; the decision on the complaint; the reasons for any decisions made; 	Yes	NPH Complaint Response Letter Template Stage 1	Letter templates are in place for all stages and include all the points required.

	<p>e. the details of any remedy offered to put things right;</p> <p>f. details of any outstanding actions; and</p> <p>g. details of how to escalate the matter to stage 2 if the individual is not satisfied with the response.</p>			
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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 – Appendix 1 – Requests to escalate complaints to Stage 2	This is stated in Appendix 1 (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 complaint's procedure within five working days of the escalation request being received.	Yes	NPH Complaints and Feedback Policy: <ul style="list-style-type: none"> Appendix 1 - Requests to escalate complaints to Stage 2 	<p>Upon receipt, stage 2 requests are recorded on the JADU CRM system which tracks to ensure complaint acknowledgements (where accepted) are sent within five working days.</p> <p>This is stated in Appendix 1 (Requests to escalate to Stage 2) of our Complaints and Feedback Policy.</p>
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 – Appendix 1 – Requests to escalate complaints to Stage 2	<p>This is stated in Appendix 1 (Requests to escalate complaints to Stage 2) of our Complaints and Feedback Policy.</p> <p>The Stage 2 request will be accepted unless meets exemptions as per paragraph 4.1 of the Policy. Where customers do not set out why they remain unhappy or their sought outcome, this is</p>

				not a reason to refuse the complaint.
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 – Appendix 1 – NPH Complaint process and procedure	Our Complaints and Feedback Policy states that all Stage 1 complaints are investigated by a Team Leader and/or Manager. All Stage 2 complaints are investigated into and considered by 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 – Appendix 1 – NPH Complaint process and procedure	This is set out in Appendix 1 – NPH Complaint process and procedure. Timescales for Stage 1 complaints are set out in the Complaints and Feedback Policy Appendix 1. This is managed through the JADU CRM system and reported as part of the Tenant Satisfaction Measures.
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 – Appendix 1, Paragraph 3 – Extending Time Limits for Complaints	Appendix 1, Paragraph 3(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. This paragraph also confirms that the maximum extension period for a Stage 2 complaint is a further 20 working days.
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	See 6.6 above. Complaint responses include any outstanding actions and dates for any remedial action, where they have been agreed. Outstanding actions are logged in JADU CXM 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.
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 Complaint Response Letter Template Stage 2	Letter templates are in place for all stages and include all the points required.

6.20	Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.	Yes	<p>NPH Complaints and Feedback Policy:</p> <ul style="list-style-type: none"> • Paragraph 4.7 – NPH Complaint Stages • Paragraph 4.17.1 – Internal Case Reviews 	All Stage 2 complaints are dealt with by a Head of Service and/or Director. Case review meetings are held where required to gather the input of all relevant staff members before a response is sent to the resident.
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Section 7: Putting things right

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
7.1	<p>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:</p> <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. 	Yes	<ul style="list-style-type: none"> • NPH Complaints and Feedback Policy – Appendix 1, paragraph 2 – Appropriate remedy • NPH Complaint Response Letter Templates 	<p>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 acknowledged, and an apology given.</p> <p>Response letter templates include sections on findings, apologies and explanations, redress, and learning.</p> <p>Response 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 Appendix 1, paragraph 2 (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	<ul style="list-style-type: none"> • NPH Complaints and Feedback Policy – Appendix 1, paragraph 2 – Appropriate remedy • NPH Compensation Policy 	<p>This is stated in paragraph 4.10 (Appropriate remedy) of our Complaints and Feedback Policy.</p> <p>NPH's Compensation Policy sets out further guidance on remedy and supports the Complaint and Feedback Policy. The Policy is currently being reviewed and updated and will be shared with tenants for their input before being published by 31 March 2025.</p>
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 response letter templates • NPH Complaints and Feedback Policy – Appendix 1, paragraph 2 – Appropriate remedy 	Our response letter templates include a remedy section. Complaint owners are then responsible for tracking and following up any agreed actions.

				This is also stated in Appendix 1, paragraph 2 (Appropriate remedy) of our Complaints and Feedback Policy.
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	<p>The Ombudsman guidance is reflected in Appendix 1, paragraph 2 (Appropriate remedy) of our Complaints and Feedback Policy.</p> <p>NPH's Compensation Policy sets out further guidance on remedy and supports the Complaint and Feedback Policy. The Policy is currently being reviewed and updated and will be shared with tenants for their input before being published by 31 March 2025.</p>

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: <ol style="list-style-type: none"> the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements. 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; any findings of non-compliance with this Code by the Ombudsman; the service improvements made as a result of the learning from complaints; any annual report about the landlord's performance from the Ombudsman; and any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord. 	Yes	Annual complaints and performance and service improvement report for 2023/24 is published on the NPH website at: https://www.nph.org.uk/our-complaints-performance	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 meets the Codes requirements and is published by the appropriate deadline.
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	Annual complaints and performance and service improvement report for 2023/24 is published on the NPH website at: https://www.nph.org.uk/our-complaints-performance	The Annual complaints and performance and service improvement report for 2023/24 was considered by the landlord, West Northamptonshire Council Cabinet. meeting on 11 June 2024. Papers and minutes of the governing bodies response is published on WNCs website at: Agenda for Cabinet on Tuesday 11th June 2024, 6.00 pm - West Northamptonshire Council

8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	Yes	Code self-assessment refresh December 2024	The central Complaints 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.
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	Yes	Code self-assessment refresh December 2024	The central Complaints Team at NPH will ensure to review and update the self-assessment form if asked to by the Ombudsman following an investigation.
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 4.5.1 – 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. To date, NPH have not been required to report any such incidents in 2024.</p> <p>This is also stated in paragraph 4.5.1 (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, investigating officers must capture the lessons learnt. Complaint response letters include a section on learning to share with complainants regarding what has been learnt and changed as result of the issues raised.</p> <p>Case review meetings for complex cases are conducted with all involved officers by the Customer Excellence Manager/Head of Customer Excellence which address service improvements and lessons learned.</p> <p>NPH 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>HO case determinations in November were not confident that lessons learnt had been fully considered in the complaint cases. To address this, further training is taking place in February 2025 with officers involved in complaint investigations that will refresh on not only resolving complaints, but to learn from them and identify service improvements. The centralisation of the complaint team will provide an overview of learning. The team will co-ordinate letter responses ensuring that learning is considered in all cases. Monthly reports will review complaints at service level and allow</p>

				lessons learnt and trends to be reviewed at team level.
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	Customer feedback report	A monthly customer feedback report will be reported each month to our Company Leadership Team and monthly landlord assurance meetings. A quarterly report will go to our new tenant led Service Quality Committee (SQC) which holds the first meeting in February 2025 and to the NPH Board. The SQC will review complaint volumes, trends and lessons learnt to help support tenant led service re-design and improvements.
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 stakeholders, such as residents' panels, staff, and relevant committees.	Yes	Customer feedback report	A monthly customer feedback report will be reported each month to our Company Leadership Team and monthly landlord assurance meetings. A quarterly report will go to our new tenant led Service Quality Committee (SQC) which holds the first meeting in February 2025 and to the NPH Board. The SQC will review complaint volumes, trends and lessons learnt to help support tenant led service re-design and improvements.
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	A senior lead officer has been appointed by the landlord.
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	Yes	N/A	An MRC has been appointed by the landlord, the Portfolio Holder for Housing, and NPH have

	positive complaint handling culture. This person is referred to as the Member Responsible for Complaints ('the MRC').			appointed a NPH Board Member in the equivalent 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 have been made within the Corporate Team in conjunction with and with our governing body West Northants Council for quarterly meetings of the senior officer lead, the MRC for WNC and NPH's Board member representative for complaints.
9.7	As a minimum, the MRC and the governing body (or equivalent) must receive: <ul style="list-style-type: none"> a. regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance; b. regular reviews of issues and trends arising from complaint handling; c. regular updates on the outcomes of the Ombudsman's investigations and progress made in complying with orders related to severe maladministration findings; and d. annual complaints performance and service improvement report. 	Yes	Quarterly Customer Feedback report	An MRC has been appointed by the landlord, the Portfolio Holder for Housing, and NPH have appointed a NPH Board Member in the equivalent role. A quarterly report will include the required information.
9.8	Landlords must have a standard objective in relation to complaint handling for all relevant employees or third parties that reflects the need to: <ul style="list-style-type: none"> a. have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments; b. take collective responsibility for any shortfalls identified through complaints, rather than blaming others; and 	Yes	NPH Complaints Policy and Process Update (April 2024) Training Slides	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. This objective is set out in training being delivered to all relevant colleagues across the organisation, including front-line

	c. act within the professional standards for engaging with complaints as set by any relevant professional body.			customer facing roles and managers involved in complaint handling.
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