



NORTHAMPTONSHIRE
PARTNERSHIP HOMES

Complaints and Feedback Policy

June 2026, Version 12



Need help to share your feedback?

The complaints and feedback process can be available in different formats, for example large text, easy read, braille, or audio. If you need help to share your feedback in a different language or in alternative format, please contact 0300 330 7003.

You can appoint a representative to raise your feedback for you.

Complaints process easy read version can be found in Appendix B

Find your way around our policy using the content list below

		Page
	Introduction and policy scope	4
1.	Defining customer feedback	5
1.1	Compliments	5
1.2	Comments	5
1.3	Complaints	5
1.3.1	Time limits for making complaints	6
1.4	Service requests	6
1.5	Building Safety complaints in a high-rise building	7
1.6	Disrepair claims and the complaints process	8
1.7	Complaints about personal data	8
1.8	Social Media complaints	9
1.9	Petitions	9
1.10	Complaints raised in satisfaction surveys	9
1.11	MP and Councillor Enquiries and complaints	9
2.	How to share your feedback	10
2.1	Need help to share your feedback?	10
3.	Publishing the Policy	11
Appendix	NPH Complaints Process	12
1.1	Who can complain?	12
1.2	Complaining on behalf of someone else / third party representation	12
1.3	Complaining without giving your name	12
1.4	What is not a complaint, and why?	13
1.5	What happens once I've made a complaint?	14
1.6	Escalation to Stage 2	15
1.7	Raising additional issues	15
1.8	Engaging in the process	15
1.9	Extending time limits for complaints	16
1.10	Putting things right	16
1.11	Mediation	16
1.12	Contractor complaints	17
1.13	Unreasonable behaviour	17
1.14	Lessons learnt and internal case reviews	18
1.15	Resident involvement	18
1.16	The Housing Ombudsman and Local Government and Social	18
1.17	Legal and regulatory compliance	19
1.17.1	Housing Ombudsman's Complaint Handling Code	19
1.17.2	The Regulator for Social Housing Consumer Standards	19
1.17.3	Data Protection and information requests	20
1.17.4	Reasonable adjustments	20
1.18	Reporting and learning from complaints	21
APPENDIX B	Policy Easy Read version (to follow once Policy approved)	
APPENDIX C	Equality Impact Assessment	

DOCUMENT MANAGEMENT

<i>First Approved by: Board 10 February 2016 Policy updated: March 2026 desk top review followed by Tenant Scrutiny Review recommendations June 2026 and HO Policy Review Recommendations.</i> <i>Next Review Date: March 2027</i> <i>Version 12</i>	Contact Officer: Customer Excellence Manager Contact: (Responsible Person) Head of Customer Excellence
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THIS DOCUMENT IS TO BE READ IN CONJUNCTION WITH:

1. Resident Excellence Strategy	5. Complaints and Feedback Procedure (internal)
2. NPH Service Standards	6. Unacceptable behaviour Policy
3. Compensation Policy	7. Councillor and MP Enquiry Policy (WNC)
4. Rechargeable Repairs Policy	8. Data Protection Complaints Policy

REVISION HISTORY

Revision date	Summary of Changes	Version
February 2016	Updated document when agreed and signed off will replace post transfer policy document	1
September 2017	Annual Review - no amendments	2
September 2018	Clarification made on 'leaseholder' to include property and garage leaseholders	4
August 2018	Annual Review - no amendments	3
August 2019	Revised policy to include two new informal stages of call backs and quick wins for handling requests for service/information, redefined feedback definitions and include MP/Councillor Enquiries as feedback channels	5
July 2020	Annual Policy Review: Revised Policy has removed the Call backs feature as none had been reported since the policy was revised in 2019. This Policy makes the escalation request process clearer in terms of who conducts the review and the timescale. The NPH responsibilities section now includes 1) how we deal with complaints 2) when we will invoke case reviews for complex complaints and those that reach stage 2 and 3) increased opportunities to analyse lessons learnt for service improvements. An update to the MP and Councillor Enquiries process to include automatic reopening if the Councillor is unhappy with the response. Updated Complaints Feedback Form	6
December 2020 / January 2021	Policy review in response to HO Complaint Handling Code This Policy now complies with The Housing Ombudsman Complaints Handling Code (released in July 2020). We have completed The Codes Self-Assessment and published on NPH's website.	7
Aug-Sept 2022	Revised Policy amended to be compliant with revised HO complaints handling code. The main change is Implementing a 2 stage complaints process.	8
December 2023	Amendments in response to new HO Code – Removal of Stage 3 and inclusion of HoS to review Stage 2 and extension from 6 to 12 months for an issue to be brought to NPH's attention.	9
Feb-Mar 2024	Revised Policy amended to be compliant with new statutory HO Complaint Handling Code coming into force on 01.04.24. EMT review 08.03.2024.	10
Feb-March 2025	HO contact details and exemptions amended.	11
May 2026	Removed travelers from who can complain as not social housing and general fund site. WNC Policy references included for alignment. Equality Impact Assessment updated. Policy updates on building safety, disrepair claims, data protection complaints added. Stage 2 escalation request changed from 21 days to 28 working days. MP/Cllr Enquiries 10 wds. Feedback from SQC Complaints Scrutiny Review to review document flow and language. CLT April 2026, SQC and EMT June 2026, NPH Board July 2026.	12
June 2026	Updates made following HO review and recommendations on i. The same complaint definition is used throughout the policy ii. Remove petitions from the complaint exemption list as these are viewed as group complaints iii. Wording change to make it clear that complaints made within 12 months of an issue arisen will be accepted iv. Update the opening times for contacting the Ombudsman	

Introduction

Northamptonshire Partnership Homes (NPH) manage over 11,300 social housing homes on behalf of West Northamptonshire Council (WNC) as an Arm's Length Management Organisation (ALMO). West Northamptonshire Council is the overall governing body for the delivery of housing services and works closely with NPH to monitor feedback and complaints and the handling of complaints to ensure a high standard of service for their residents against the Housing Ombudsman Complaint Handling Code.

Policy Scope

This policy sets out how to compliment, comment on or complain about a service provided to you by West Northamptonshire Council (the Council), our staff or any of the organisations who deliver services on our behalf. It is our aim to **listen, learn** and **improve** from what you, our residents, tell us about your experience of our services.

Your feedback is important in helping us shape services and make them better. This policy is not just for reporting when 'things have gone wrong,' but also for telling us where we have things right, so that we can share and learn from good practice too.

For complaints, the Policy covers those services which come under the jurisdiction of the Housing Ombudsman and the housing services provided by NPH. Services within the scope of this Policy include:

- Repairs and work being carried out to your home
- Concerns about property condition
- Issues about how your tenancy is being managed
- Communal area cleaning or repairs
- Tree and grounds maintenance
- Rent payment and collection or service charges
- Leasehold services
- How reported incidents on anti-social behaviour are being managed
- Mutual exchanges
- Aids and adaptations
- A complaint you have already raised
- NPH staff or contractor behaviour
- Complaint about how a request for information has been handled

Raising complaints about building safety, disrepairs and data protection follow specific processes as set out in section 1.5-1.7 below.

WNC provide the housing services listed below which are under the jurisdiction of the Local Government Ombudsman and are therefore not within the scope of this Policy:

- Housing applications and allocations
- Temporary accommodation
- Homelessness services and support
- Private sector housing

Feedback about the housing services provided by WNC will be passed across to WNC for response under their Customer Compliments, Comments and Complaints Policy:

www.westnorthants.gov.uk/communicating-us/comments-compliments-and-complaints

Please see Appendix A, section 1.17, page 19 for further information on the Ombudsman services.

1.0 Defining customer feedback

This policy covers all customer feedback types, and the section below sets out the definitions for each type.

1.1 Compliments

A **Compliment** is about telling us where we are getting it right. Compliments support us to learn and improve by helping us to:

- Recognise staff who go beyond their normal duties to make a difference!
- Acknowledge processes that work well to make a difference to you
- Support valued services.

1.2 Comments

A comment is "a quick suggestion or remark about our services, a decision or a policy." A comment **is not a complaint**. These are important, often spur-of-the-moment opportunities to tell us how we are doing, where no formal investigation is called for. They can also be anonymous. Where we can, we acknowledge all comments and ensure they are shared with the right service, but we will **not always** offer a response.

1.3 Complaints

NPH follow the Housing Ombudsman's definition of a complaint as:

'an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by NPH for the housing services delivered on behalf of the landlord WNC, its own staff, or those acting on its behalf, affecting a resident or group of residents'.

Examples of a complaint include:

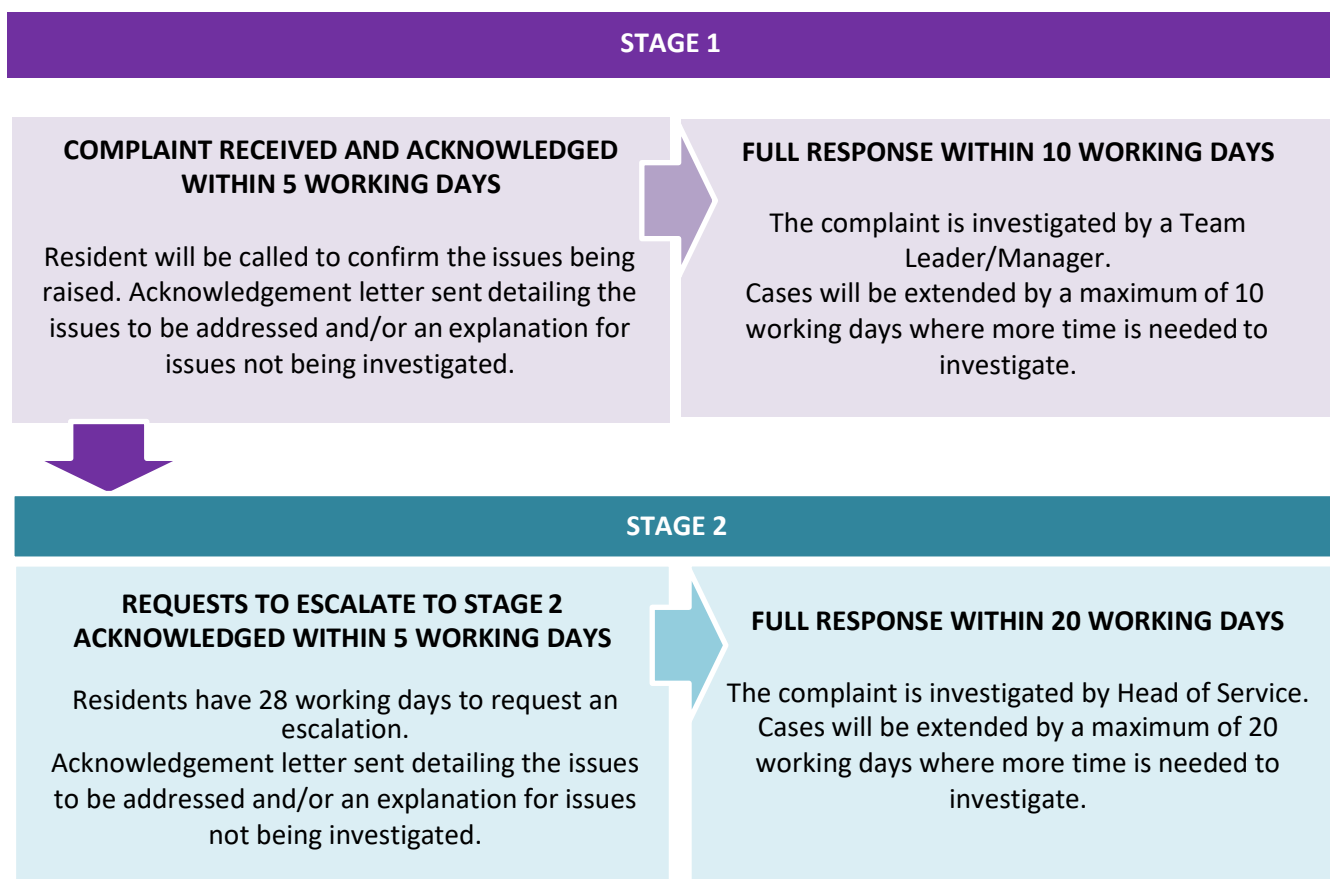
- Failure to do something that should have been done
- Not meeting our service standards, policy time scales or agreed process
- Treating an individual unfairly
- Concerns about safeguarding or health and safety issues

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.

NPH operate a two stage complaints process and follows the Housing Ombudsman Complaint Handling Code.

APPENDIX A of this policy sets out the full complaints process.

Diagram 1: NPH Complaint handling process



1.3.1 Time limits for making complaints

NPH will 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 on a case-by- case basis. If NPH decides not to accept a complaint, a detailed explanation will be provided to the resident setting out the reasons why the matter is not suitable for consideration under the NPH complaints process. Residents have the right to challenge this decision by making their complaint to the Housing Ombudsman or the Local Government and Social Care Ombudsman.

1.4 Service requests

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

- A service request is an initial request from a resident requiring action to be taken to put something right. For example, a request that NPH provides a service or fixes a problem when reported. Service requests are not a complaint, but will be recorded, monitored and reviewed regularly.

Where we have been unable to resolve service requests within the timescales provided or if further enquiries are needed to resolve a matter, or if the resident requests it, we will log the issue as a complaint, even if the handling of the service request remains ongoing. We will not stop our efforts to address a service request if a resident makes a complaint.

1.5 Building Safety Complaints in a high-rise building

Following the introduction of the Building Safety Act (2023), residents in high-rise buildings can raise concerns about building safety risks, or the performance of an accountable person or principal accountable person.

A high-rise residential building is describe as having at least 7 storeys or is at least 18 metres high. For NPH this includes the high-rise blocks of St Stephen's, St Katherines and St Johns in the Spring Borough estate, Northampton.

The accountable person for NPH managed homes is Jane Carr, Director of Communities and Opportunities and responsible person is Winston Williams, Deputy Chief Executive and Director of Asset Management with support from the Head of Compliance and Building Safety Manager.

Relevant complaints can include concerns about:

- communications to residents
- responses to raised concerns
- how building safety risks are being managed
- flammable cladding on the outside of a building
- fire doors or smoke extraction which are not working or missing that may increase the risk of fire spread
- failure of the building's structure, such as parts of the building collapsing, cracks, or parts of the building falling off

To make a complaint about a high-rise building, please see section 2, page 10 on how to report feedback. Your concerns will be logged and shared with the person responsible for reviewing under the complaint handling process set out in this policy.

After making a complaint the responsible person will acknowledge your concerns, confirm receipt and tell you if they accept or reject the issues raised as a relevant complaint under the definitions set out above within 5 working days.

If they accept it, the responsible person will investigate the complaint with the Compliance Team and within 10 working days:

- provide you with a date when they expect to respond to you
- tell you the actions they have taken
- update you with a timeline for any remaining issues

If a complaint is rejected, you will be told the reasons why.

If you're not satisfied with the final response or your complaint gets rejected, residents can challenge it and details on how this can be done will be set out in the final response to you.

You can refer a complaint to the Building Safety Regulator via www.gov.uk/guidance/contact-the-building-safety-regulator if you:

- cannot make a complaint
- feel unable to raise your concerns
- have unresolved issues
- are not satisfied with your response from the principal accountable person

1.6 Disrepair Claims and the complaints process

NPH Complaint and Feedback Policy is stage 1 of the disrepair and claims process as set out in the Disrepair Policy.

Disrepair in housing is the property state of being broken, damaged, or in poor condition, requiring repair. In a legal and housing context, it refers to a rented property that has deteriorated beyond reasonable wear and tear, falling into a state of neglect, damage, or disrepair that makes it unsafe, unhealthy, or unfit to live in.

The three-stage disrepair process outlines the required steps for a tenant to take when dealing with serious disrepair, moving from internal complaints to independent mediation and, finally, legal pre-action protocols. Disrepair stages:

1. **Exhaust Complaints Process** (Internal) Before initiating external action, the tenant must report any repair issues and then formally exhaust NPH's internal two stage complaint handling procedure as set out in this policy.
2. **Mediation** (Independent/External)
3. **Disrepair Claim Process** (Pre-Action Protocol)

1.7 Complaints about personal data

Where a complaint relates to the handling of your personal data, this will be considered under the relevant data protection legislation, including the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

Personal data is any information that can identify an individual. This includes information held in electronic systems, paper records, and recorded communications. Residents may raise a complaint if they believe that NPH has not handled their personal data appropriately. This may include concerns that NPH has;

- Recorded or retained inaccurate information
- Used personal information in a way that is unclear or not explained
- Retained information for longer than necessary
- Shared information without a lawful basis

Complaints about data protection matters will not be responded to through this Policy but will need to be reported to: DataComplaints@westnorthants.gov.uk. You should clearly state within your complaint that the issue relates to your personal data and provide sufficient details of the problem to support a full and fair investigation. For further information on the type of data protection complaints see: www.ico.org.uk/for-organisations/how-to-deal-with-data-protection-complaints/what-are-data-protection-complaints/#whatare

Complaints relating to personal data will be:

- Investigated by NPH's designated data protection officer in the Governance Team
- Managed in accordance with NPH's Data Protection Policy and Privacy Notices

Where appropriate, NPH will:

- Take steps to rectify any identified issues
- Provide an explanation of the outcome
- Advise you of any corrective actions taken

If you remain dissatisfied following the Council's response, you have the right to escalate your concerns to the Information Commissioner's Office (ICO).

Information Commissioner's Office (ICO)

Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

Telephone: 0303 123 1113

Website: www.ico.org.uk

1.8 Social media complaints

All NPH social media accounts are monitored daily by our Communications Team and issues being raised through these platforms which are identified as complaints are replied to privately to maintain confidentiality and forwarded to a centralised Complaints Team to log.

1.9 Petitions

NPH defines a petition as a document with signatures of petitioners that number over 20 in Northampton. Petitions are complaints by a group of residents about the same issue. An NPH tenant or leaseholder can submit a petition and will be dealt with under our complaints process as a group complaint.

1.10 Complaints raised in Satisfaction Survey responses

Where issues are raised by residents taking part in any NPH service surveys, we will follow up accordingly with the residents if they have given us consent to contact them back. Feedback will be assessed to consider if the issue was a complaint, and a discussion will take place with the residents and a complaint raised as appropriate. NPH also conducts transactional surveys for a sample of closed complaints to ensure we learn from feedback and make improvements to our service.

1.11 MP and Councillor Enquiries and complaints

Residents may ask their local MP or Councillor to approach NPH with an enquiry on their behalf. If NPH are approached in this way, we will take this as an acknowledgement that the resident has given consent for us to share information about the issue being raised, and we will disclose information relevant to the enquiry to the MP or Councillor and where appropriate the resident.

MP and Councillor Enquiries are responded to outside of the complaints process as a service request for issues reported for the first time through the Councillor and MP Enquiry Policy (WNC). However, if the content of the enquiry renders it appropriate to deal with as a complaint and a previous complaint relating to the same issue has not already been raised by the individual in question, a complaint will be raised.

MP and Councillor Enquiries will be responded to as follows:

- Letters to us from an MP on behalf of an individual are investigated and replied to by our Chief Executive in writing within 10 days of receipt.
- Councillor Enquiries are investigated and responded to by a Team Leader or Manager in writing within 10 working days of receipt. Where a complaint is raised by a Councillor on behalf of a resident and a complaint is already open relating to the same issue, we will respond to the Councillor to say that a complaint has already been received and a full response will be made directly to the resident in the first instance.

2. How to share your feedback

Any resident wishing to make a complaint, compliment or comment regarding NPH housing services can easily do so in any of the following ways:

- Completing an on-line feedback form at: www.nph.org.uk/about-northamptonshire-partnership-homes/comments-compliments-and-complaints/
- By telephoning NPH on 0300 330 7003
- Sending an email to: myfeedback@westnorthants.gov.uk
- Writing to us by post at Northamptonshire Partnership Homes, Complaints Team, One Angel Square, Angel Street, Northampton, NN1 1ED
- Visiting in person to the One Stop Shop at One Angel Square, Angel Street, Northampton, NN1 1ED
- Using Social Media Platforms i.e., Facebook and Twitter
- In person to their Housing Officer, Welfare Officer, Tenancy Compliance Officer, any other member of NPH staff or engagement event

Feedback on housing services provided by WNC can be made in the following ways:

- Completing an on-line feedback form at: www.westnorthants.gov.uk/contact-or-visit-us/comments-compliments-and-complaints
- Sending an email to: myfeedback@westnorthants.gov.uk
- Write to WNC at Compliments, Comments & Complaints Team, One Angel Square, Angel Street, Northampton, NN1 1ED

2.1 Need help to share your feedback?

No resident should be at a disadvantage when accessing our services. The following statements offer a general overview to ensure that our services are adjusted to meet the needs of our residents where possible. This list is not exhaustive, and we will adapt our approach based on individual resident needs.

We aim to provide services that are accessible to all who require them. As a result of this, we will:

- Ensure our officers get to know our residents and their individual needs
- Provide a range of ways for residents to contact our officers including phone, mail, email and via our website [Home - Northamptonshire Partnership Homes](http://www.westnorthants.gov.uk)
- Provide alternative communication methods on request, such as large print, easy read, Braille, foreign language interpreter, large print etc.
- Ensure residents are always able to select their preferred method of contact.

If you need help to share your feedback in a different language or in alternative format, please call 0300 330 7003.

You can appoint a third party or representative to raise your feedback for you on your behalf. Any individual with vulnerabilities or who would like help to share feedback can have the support of an advocate at any stage of the process. For example, they may include:

- family members or friends
- advice organisations
- professionals such as social workers, support workers or carers

It will be necessary for us to check with the person that is complaining on someone else's behalf that they have permission to raise the complaint and that they are happy for us to discuss their information with them. We may be able to do this 'verbally' over the phone or we may ask that they complete a written consent form first. 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.

Complaints process easy read version can be found in **Appendix B**.

3. Publishing the Policy

This Policy will be publicised on NPH Website under 'Comments, compliments and complaints' (www.nph.org.uk/about-northamptonshire-partnership-homes/comments-compliments-and-complaints).

Information on the policy and the feedback process is shared with all new tenants at sign up and publicised in our newsletter.

APPENDIX A - NPH Complaints Process

Northamptonshire Partnership Homes (NPH) provide high quality services to our tenants and customers, and it is our aim to provide an early resolution to prevent complaints where possible. We learn through our interactions with people and encourage residents to provide feedback and compliments on the services that NPH has provided. However, we also recognise that sometimes things do go wrong, and we need to respond quickly to resolve issues and to put things right.

1.1 Who can complain?

We define a complainant as a tenant or leaseholder of a property, tenant of a garage, stakeholder or any person who receives a service from NPH. A member of the public can make a complaint about services, properties or areas managed by NPH.

1.2 Complaining on behalf of someone else / third party representation

Any individual with vulnerabilities or who would like help to make a complaint can have the support of an advocate at any stage of the process or a third party to act on their behalf. For example, they may include:

- family members or friends
- advice organisations
- professionals such as social workers, support workers or carers

Exemptions that apply are:

- Letters to us from your MP as these will be replied to by our Chief Executive through the MP and Councillor Enquiry process.
- When a complaint is raised by a Councillor on behalf of a tenant the complaint is already open. In this instance we will notify the Councillor that a complaint has already been received and is being responded to. The primary response will be sent to the tenant.
- Legal representatives such as solicitors are not accepted by NPH.

It will be necessary for us to check with the person that is complaining on someone else's behalf that they have permission to raise the complaint and that they are happy for us to discuss their information with them. We may be able to do this 'verbally' over the phone or we may ask that they complete a written consent form first. 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.

1.3 Complaining without giving your name

If you wish to tell us something but remain '**anonymous**,' we will always log and share your feedback with the responsible service, but it will prevent us from being able to offer you a response.

1.4 What is not a complaint, and why?

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

- A new first request for service, information, or an explanation.
- 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. We may apply discretion where the resident was unable to make the complaint earlier (for example health grounds) or where the complaint raises safeguarding or health and safety issues.
- Something that has already been concluded within both stages of this complaints policy.
- An issue that has not yet been considered through the relevant appeals process where relevant
 - Some services that we provide, for example making decisions on aids and adaptations applications, Rechargeable Repairs, data protection, have their own appeal processes.
 - In these cases, you may still be able to complain about how we did something or about the actions of a member of staff that you have dealt with; but you will need to formally appeal against NPH's decision first if you disagree.
- Are subject to legal processes. This is defined as details of the claim, such as the Claim Form and Particulars of claim, have been filed at court.
- Where a complaint has been pursued in a way that we determine is unreasonable. Unacceptably persistent, vexatious, and unreasonable complaint requests which stop us looking into a matter or make repeated complaints about the same subject as well as contacting us many more times than is necessary to resolve a matter. In these cases, we may limit our responses or advise you that we cannot respond to you. (see section 1.13, page 17).
- Data protection related complaints about the use of personal data. Data protection complaints must be made via the data protection complaints procedure (see section 1.7, page 8)
- Letters to us from your MP. They are looked at and replied to by our Chief Executive.
- Matters which are not related to the actions or decisions of NPH or of anybody acting on our behalf.
- Complaints about services delivered by West Northamptonshire Council (WNC), as they will be processed via their own complaint's procedure, including housing applications, homeless decisions and banding decisions under the Choice Based Letting Scheme.
- Complaints about anti-social behaviour or neighbour nuisance, as these will be investigated by our ASB Team. However, dissatisfaction with the service provided after reports have been made and investigated will be considered.
- Comments about our policies or policy decisions.
- Complaints about bodies or people over which NPH has no control.
- Complaints about a property after a Right to buy (RTB) is completed will be considered on a case-by-case basis. For example, complaints about the RTB process will be considered, but complaints about the condition of the property following sale will not as this would have been deemed as accepted at the point of completion of sale by the purchaser.

Any decision to not consider a complaint under this Policy will be made by the Customer Excellence Manager a service area manager and will consider the individual circumstances of the complaint. A response will be sent in a formal letter to the resident outlining our reasons aligning to one or more of the exemptions above and will set out the resident's right to take our decision to the relevant Ombudsman. Where possible we will direct the resident to an alternative process, appropriate organisation, or service.

1.5 What happens once I've made a complaint?

NPH has a two-stage complaint process. Below sets out what happens at each stage:

Stage 1 - Acknowledgement	- When a new complaint is received, it will be accepted, logged, and acknowledged in writing at Stage 1 within 5 working days of receipt. - The complainant will be contacted by telephone within the 5 working days to ensure all concerns are clearly understood and to clarify any aspects of the complaint that may be unclear and the outcome sought. - 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. - 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.
Stage 1 Response	- A Stage 1 complaint will be investigated and responded to by a Team Leader or Manager. - The Complaint Handler will do all they can to resolve the complaint and respond to the complainant within 10 working days of the complaint being acknowledged. - For more complex complaints the response can be extended for a further 10 working days with the complainant being kept informed and the reason(s) for the extension being clearly explained. - A complaint response will be sent to the complainant when the answer to the complaint is known, not when any outstanding actions required to address the issue, are completed. - Outstanding actions will be tracked and actioned expeditiously with regular updates provided to the complainant.
Requests to escalate to Stage 2	- A complaint can only be escalated to Stage 2 once it has completed Stage 1 and at the request of the complainant. - If a resident is not satisfied with all or part of the response they receive at Stage 1 of our complaints process, they can request an escalation of their complaint to Stage 2. - Requests to escalate a complaint to Stage 2 must be made by the resident within 28 working days of receiving the Stage 1 response and will be acknowledged within 5 working days of receipt of the escalation request. A resident does not need to explain their reasons for requesting an escalation of their complaint. It will be progressed to Stage 2 upon their request unless a valid exclusion ground applies. Where a decision is made not to escalate a complaint to Stage 2, we will clearly explain the reasons in a formal written response to the resident. - 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.
Stage 2 Response	- A Stage 2 complaint will be reviewed by a Head of Service or Director, who will review the handling and findings of the complaint at Stage 1. - A final response including a review of the adequacy of the Stage 1 investigation plus any outstanding issues that have not been addressed or fully investigated will be sent to the complainant within 20 working days of the Stage 2 complaint being acknowledged. - For more complex complaints the response can be extended for a further 20 working days with the complainant being kept informed and the reason(s) for the extension being clearly explained. The complainant will also be provided with the contact details of the relevant Ombudsman if an extension is needed. - A complaint response will be sent to the complainant when the answer to the complaint is known, not when any outstanding actions required to address the issue, are completed. - Outstanding actions will be tracked and actioned expeditiously with regular updates provided to the complainant.

1.6 Escalation to Stage 2

A complaint can only be escalated to Stage 2 once it has completed Stage 1 and at the request of the complainant. If a resident is not satisfied with all or part of the response they receive at Stage 1 of our complaints process, they can request an escalation of their complaint to Stage 2.

Requests to escalate a complaint to Stage 2 must be made by the resident within 28 working days of receiving the Stage 1 response and will be acknowledged within 5 working days of receipt of the escalation request.

A resident does not need to explain their reasons for requesting an escalation of their complaint. It will be progressed to Stage 2 upon their request unless a valid exclusion ground applies. Where a decision is made not to escalate a complaint to Stage 2, we will clearly explain the reasons in a formal written response to the resident.

1.7 Raising additional issues

If a resident raises additional issues during the investigation that are related to the original complaint, these will be incorporated into the Stage 1 response if it has not been provided. However, if the Stage 1 response has already been provided and the new areas of complaint are unrelated to the complaint already under investigation, the new issue(s) raised will be logged as a new complaint and begin the process from the beginning or incorporated into an escalation where appropriate.

1.8 Engaging in the process

To assist us in dealing with a complaint quickly and effectively, we will require the complainant to:

- Provide us with full details of their complaint, why and how they believe NPH have failed and what action they would like to see taken to resolve the issue.
- Tell us if they have any individual needs that will require additional support from the start of the process and help us when dealing with their complaint.
- Inform us of their current contact details and update us if their contact details change.
- Respond to us in a timely manner when we ask for more information and engage fully with the complaints process.
- Provide written consent if they would like a third party to act on their behalf.
- Pursue their complaint in a reasonable way and be respectful to our employees and contractors.
- Allow response times to be met before contacting us about the progress of their complaint.

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

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

1.9 Extending Time Limits for Complaints

We aim to complete our investigation into all complaints received about our service within the timescales set out above. However, in a limited number of cases, it may be necessary to extend the timescales to ensure we have all the information necessary to appropriately deal with the complaint. If this is the case, we will keep you informed of any progress with the investigation in the timescales and frequency agreed with you, the reasons for the delay, inform you of next steps and the new expected timescale for response. Extensions will not exceed a further 10 working days (at Stage 1) or 20 working days (at Stage 2) without good reason.

1.10 Putting things right

Complaints can be resolved in a number of ways. Any remedy offered will reflect the extent of any and all service failures, and the level of detriment caused to the resident as a result. These shall include:

- acknowledging where things have gone wrong
- providing an explanation, assistance, or reasons
- apologising
- taking action if there has been a delay
- reconsidering or changing a decision
- amending a record or adding a correction or addendum
- providing a financial remedy in line with our Compensation Policy
- changing policies, procedures, or practices
- signposting to make insurance claims as appropriate

Factors that will be considered in formulating a remedy will include, but are not limited to the:

- length of time that a situation has been ongoing
- frequency with which something has occurred
- severity of any service failure or omission
- number of different failures
- cumulative impact on the resident
- resident's circumstances or vulnerabilities

When offering a remedy, we will set out what will happen and by when, in agreement with the resident where appropriate. Any remedy proposed will be monitored through to completion and will take into account the guidance issued by the Housing Ombudsman.

In awarding compensation, NPH will consider whether any statutory payments are due, if any quantifiable losses have been incurred as well as the time and trouble a complainant has been put to as well as any distress and inconvenience caused.

1.11 Mediation

We are committed to using all possible means to resolve a complaint. This could include using mediation or arbitration as alternative ways of resolving disputes at any stage of the process or providing reasonable adjustments to assist with a complaint. Mediation can be conducted with NPH Officers or with an external third party for independence and will take the form of face-to-face meetings or telephone calls to understand the issues and outcomes sought. Mediation looks to resolve issues between NPH and the complainants and to reach a mutual resolution for both parties. Where appropriate, we may engage

the services of an independent third party to investigate a formal complaint. We may also use the mediation stage if the relevant Ombudsman asks us to revisit a decision or case.

1.12 Contractor complaints

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. If an NPH contractor sub-contracts work packages it is their responsibility to ensure the policy is cascaded through the supply chain.

1.13 Unreasonable Behaviour

NPH recognises that residents may exert pressure on NPH service areas and/or contractors when making a complaint, as they believe that they may have failed in their delivery of service to them. Such pressure may be persistent, but in most cases, this is accepted as reasonable if conducted with respect and fair treatment.

However, NPH will not accept unreasonable behaviour and unfair treatment of employees or contractors. When contact becomes unreasonable in nature, we may consider the use of restrictions and as a last resort exclusion where all options to assist the resident have been met. NPH's Unacceptable Behaviour Policy and Specific Point of Contact Policy will apply.

NPH will treat a complainant as unreasonable if:

- The complaint is pursued in an inappropriate manner e.g., vexatious complaints, not allowing reasonable time for investigation, review and resolution, and sending the complaint to multiple departments. We reserve the right to determine whether a complaint is inappropriate based upon each individual case and circumstance.
- The complainant is abusive, insulting, or aggressive towards employees, contractors, or other customers.
- If NPH believe the complainant has previously made and/or continually raises the same complaint, which has been responded to and closed.
- Where necessary, as a result of investigations, it is decided that the complaint is without merit or substance - reasons will be provided as to how this decision has been arrived at.
- The complainant makes an excessive number of complaints which are deemed to be vexatious.
- The complainant places unreasonable demands on NPH in terms of the amount of information they want from us or the nature and scale of service they expect.

If we consider a complainant to be unreasonable, we may close a complaint and not allow the complainant to take their complaint to Stage 2 of the complaints process. When this happens, we will clearly explain the reasons why and how the individual can contact the relevant Ombudsman. We may also limit the means by which the individual can communicate with us. If the complainant does not agree with our determination of a complaint being inappropriate, they can raise a separate complaint to appeal the decision, which will be reviewed by the designated complaints officer.

1.14 Lessons Learnt and Internal Case Reviews

For complex cases or where a complaint has reached Stage 2 of the complaints process, the case may be subject to an internal Case Review with the Directors and all staff involved in dealing with the complaint. The review will examine the complaint at each stage to determine how the case was dealt with and what lessons should be learnt from the exercise. Agreed actions and outcomes will be formally recorded and implemented.

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

1.15 Resident involvement

There are two aspects to how residents can be involved in NPH complaint handling. Firstly, we recognise the importance of working in partnership with residents to develop and continuously improve our services. As such, we will consult with residents on the content and operation of this policy and involve them in reviewing and learning from complaints and use this information to improve services. We will achieve this through our active resident engagement channels, such as the Service Quality Committee and interest groups and sharing the Annual Complaints Performance and Service Improvement Report. NPH will conduct a complaints transactional survey for closed cases, which will include questions regarding complaint handling experience and outcome.

1.16 The Housing Ombudsman and the Local Government and Social Care Ombudsman

Residents can access advice and support from the Housing Ombudsman **at any time in the complaint handling process, and not just at the point where they have exhausted the complaints process.**

If you have already complained to NPH and you remain unhappy then you will be advised about how to contact the right Ombudsman service to consider your complaint, as some Housing complaints are regulated by the Housing Ombudsman Service, and some are regulated by the Local Government and Social Care Ombudsman.

You can find more information about the services that are covered by each Ombudsman on their websites: www.lgo.org.uk/make-a-complaint/fact-sheets/housing/which-ombudsman-for-complaints-about-social-housing

The contact information for the Housing Ombudsman and the Local Government and Social Care Ombudsman is provided in all our written correspondence at each stage of the complaints process to afford complainants the opportunity to engage with dispute support advisors at any stage of the process. The Housing Ombudsman Service and the Local Government Social Care Ombudsman can assist individuals throughout the life of a complaint with the relevant Ombudsman's dispute support advisors.

The Housing Ombudsman can be contacted on:

- www.housing-ombudsman.org.uk
- Telephone: 0300 111 3000 (Monday, Tuesday, Wednesday, Friday 9am to 5pm, Thursday 9am to 3.30pm)
- By post: Housing Ombudsman Service, PO Box 1484, Unit D, Preston, PR2 0ET

The Local Government and Social Care Ombudsman can be contacted on:

- www.lgo.org.uk
- Telephone: 0300 061 0614 (Mon, Tues, Thrs, Fri 10am-1:00pm: Wed 1:00pm to 4pm)
- By post: Local Government and Social Care Ombudsman, PO Box 4771, Coventry, CV4 0EH

1.17 Legal and regulatory compliance

NPH operates this policy with due regard to all relevant legislation, regulation, and good practice.

1.17.1 Housing Ombudsman's Complaint Handling Code

The Policy complies with the Housing Ombudsman's Complaint Handling Code, which is statutory under the Housing Ombudsman's powers in the Housing Act 1996, as amended by the Social Housing (Regulation) Act 2023.

The Housing Ombudsman's Complaint Handling Code sets out the requirements for Landlords to comply with to allow them to respond to complaints effectively and fairly. NPH acts on behalf of the landlord West Northamptonshire Council to deliver the housing services listed above. A copy of the Housing Ombudsman's Complaint Handling Code can be found at: www.housing-ombudsman.org.uk/landlords-info/complaint-handling-code/

This policy complies with the Housing Ombudsman's Complaint Handling Code and acts as a guide for residents setting out what they can and should expect from NPH when they complain, and to ensure that complaints are resolved promptly, politely, and fairly.

If NPH is unable to comply with the Complaint Handling Code due to exceptional circumstances, such as a cyber incident, we will inform the Housing Ombudsman, provide information to customers who may be affected, and publish this information on our website at www.nph.org.uk, as well as provide a timescale for returning to compliance with the Code.

1.17.2 The Regulator for Social Housing Consumer Standards

The Policy complies with The Regulator for Social Housing (RSH) Consumer Standards and achieving the Tenant Involvement and Empowerment Standard by:

- Adopting an approach to complaints that is clear, simple, accessible and publicised.
- Ensuring that complaints are resolved promptly, politely, and fairly in line with the required timescales for Stage 1 and 2 complaints, which are reported to the RSH as the Tenant Satisfaction Measures
- Providing accessible information on:
 - how tenants can make a complaint about their registered provider
 - the complaints policy and complaints handling process
 - what tenants can do if they are dissatisfied with the outcome of a complaint or how a complaint was handled, and;

- information on type of complaints received and how they have learnt from complaints to continuously improve services.

1.17.3 Data Protection and Information Requests

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

1.17.4 Reasonable adjustments

We want to make sure you can use our services comfortably and fairly. If you have a disability, health condition, or personal need that makes things harder, you can ask us for a **reasonable adjustment**. Reasonable adjustments are **changes we can make** to the way we communicate with you or deliver our services, so you're not disadvantaged.

Everyone's needs are different, so adjustments are personal to you.

Here are some common adjustments customers might ask for:

Communication support

- Using your preferred way of contacting us (email, phone, text, letter)
- Giving information in large print or easy read format-read formats
- Speaking slowly or giving extra time to respond
- Sending a summary after a phone call.

Process support

- Extra time to complete forms or provide documents
- Accepting complaints or information in a format that works for you (audio message, written statement, through a representative, etc.)
- Providing a single named contact so you don't have to repeat your story.

Practical support

- Arranging quieter spaces for in-person conversations-person conversations
- Allowing someone to support you during a call or meeting
- Breaking information down into smaller steps.

You can ask us for an adjustment at any time. Just tell us **What you need**, and **How it will help you**. You do not need to share personal medical details if you don't want to. You can request an adjustment:

- Over the phone
- By email
- In writing
- Through someone you trust
- Or by telling us during a conversation.

We will always do our best to agree an adjustment that works for you.

When you ask for an adjustment:

- We will **listen and discuss what would help most**
- We will **confirm what we can offer**

- We will **record your adjustment** (with your permission) so you don't have to ask again
- We will keep you updated if anything changes.

If you would like a version of this document in large print, or another language, please call 0300 330 7003.

1.18 Reporting and learning from complaints

The Housing Ombudsman require NPH to produce and publish an Annual Complaints Performance and Service Improvement Report for scrutiny and challenge which includes a self-assessment against The Complaint Handling Code which is published on our website at: <https://www.nph.org.uk/ho-self-assessment/>. The full Annual Complaints Performance and Service Improvement Report along with the governing body's response will also published on our website annually.

As landlord West Northamptonshire Council are the governing body with regards to the oversight of complaint handling compliance. NPH regularly updates the **Member Responsible for Complaints** (MRC) within the governing body (the Cabinet Portfolio Holder for Housing) and NPH's Complaints Champion Board Member on our complaint performance including the volume, categories and outcomes of complaints, any arising issues or trends, the outcome of any Ombudsman investigations and an Annual Complaints Performance and Service Improvement Report.

Complaint information is also reported quarterly to NPHs Executive and Senior Management Teams and to our tenant and leaseholder Service Quality Committee and NPH Board.

We recognise that compliments, comments, and complaints provide a valuable source of information to help us improve our services. We will ensure that our feedback service is working by:

- Monitoring and reporting our performance including the number of compliments, comments, complaints, and MP/Councillor Enquiries received and performance against target response times.
- Displaying performance information on our website and in our newsletter 'YourVoice'.
- Testing the satisfaction of customers with our complaints service through our monthly Complaints Transactional Survey.
- Analysing the types of complaints we receive across all our service areas.
- Tracking lessons learned from complaints and using this information to change and improve services.