

Annual Complaints Performance and Service Improvement Report

April 2024 to March 25



**NORTHAMPTONSHIRE
PARTNERSHIP HOMES**

Introduction

Northamptonshire Partnership Homes (NPH) manages over 11,400 properties on behalf of West Northamptonshire Council, the landlord.

This report covers our compliance with the Housing Ombudsman Complaint Handling Code on behalf of the landlord, and our complaints handling performance from April 2024 to March 2025.

We've included in the report:

- Our statement about performance from NPH's board
- A summary of complaints including the numbers of complaints received and resolved, and the response times
- Compliance with the Housing Ombudsman Complaints Handling Code (Appendix B)
- Housing Ombudsman cases and reports on our complaint handling
- Service improvements made because of lessons learnt from complaints and actions for improvements

NPH Board Statement

We are committed to providing the best possible services to residents. Sometimes things go wrong and it's important we put things right as quickly as possible.

Over the last 12 months we have listened to resident feedback and reshaped our core company structure into three new Directorates to focus on Resources, Property and Customer. A designated Customer Excellence Team has been created, and a centralised Complaints Team has been introduced from October 2024. New ways of working, improved use of technology and a customer focused approach are starting to see improvements. We recognise that there is still more to do to ensure consistency of service across complaints and all core services.

We understand the impact that delivering quality and timely repairs has had on complaints and the repairs service has been a top priority over the last year with increased investment, better use of data interrogation and systems to improve management and to decrease the time taken to complete repairs. Changes are

delivering positive improvements. We are still on our improvement journey and our residents can expect to see and feel further changes over the coming year.

We have carried out a self-assessment of the complaint handling service and policy and are assured we meet the Housing Ombudsman Code (April 2024). Our board member responsible for complaints, along with the landlord's representative, will continue to scrutinise and challenge the self-assessment and performance to make sure it is a true reflection of our complaint handling.

A new tenant led Service Quality Committee reporting to the Board begins in May 2025 and they will be involved in scrutinising and assessing where we are and helping to shape further improvements to service.

Whilst we comply with the code in policy terms, further improvements will be made to working practices over the coming year to improve the customer experience and timeliness, and these are highlighted in the report.

NPH Board

Complaints Performance April 2024 to March 2025

Following resident feedback from our transactional survey and annual Tenant Survey, we recognised we needed to improve how we handled complaints and over the past year we've made many, positive changes.

For residents, the improvements we've made has meant:

- i. More consistent delivery of the complaints service for residents because we've increased the focus and resources and changed the way we manage complaints and improved the way we track progress.
- ii. More consistency in acknowledging complaints and responding on time. We have improved answering on time from 63% to 71% and we will continue to do better.
- iii. Improved contact with residents by allocating case handlers and acknowledging all complaints with a telephone call to fully understand the issues to be addressed and identify where health conditions affect a residents' circumstances, so the potential risks to residents are managed and reduced.
- iv. Cases investigated by designated case handlers to ensure all issues are addressed and appropriate resolutions provided.
- v. More effective learning from complaints so we avoid repeating the same mistakes.
- vi. Improved resident experience by responding to actionable insights from both the positive and less positive resident feedback from our complaint handling transactional survey and the annual Tenant Survey to make positive changes.

Summary of complaint performance April 2024 to March 2025

895 complaints

Reduced from
1,049 in 2023-24

71% complaints responded to on time.

Increased from
63% in 2023/24

743 Stage 1

Reduced from
1,005 in 2023-24

65.05 Stage 1 complaints per 1,000 properties

Reduced from
88.07 in 2023/24

73.62% Stage 1 met Housing Ombudsman Code timescales

Increased from 62.49% in
2023/24

152 Stage 2

Increased from 44
in 2023-24

13.31 Stage 2 complaints per 1,000 properties

Increased from
4.4 in 2023/24

57.24% Stage 2 met Housing Ombudsman Code timescales

Reduced from 72.73% in
2023/24

82 complaints refused

- 45 processed as service requests
- 29 addressed through another process
- 7 not related to NPH service
- 1 already being handled at Stage1/2

33.68% not upheld

Stage 1 33.52% / Stage 2 34.48%

Increased from 21.83% of all
complaints not upheld in 2023/24

34% satisfaction with Complaint Handling (TSM*)

Reduced from
36% in 2023/24

46% satisfaction with Complaint Handling (TS**)

New measure in
2024/25

**Tenant Satisfaction Measures Survey – based on an annual Tenant Survey of 1,000 tenants in 2024/25*

***Transactional Survey for closed complaints based on 97 respondents between June 2024-January 2025*

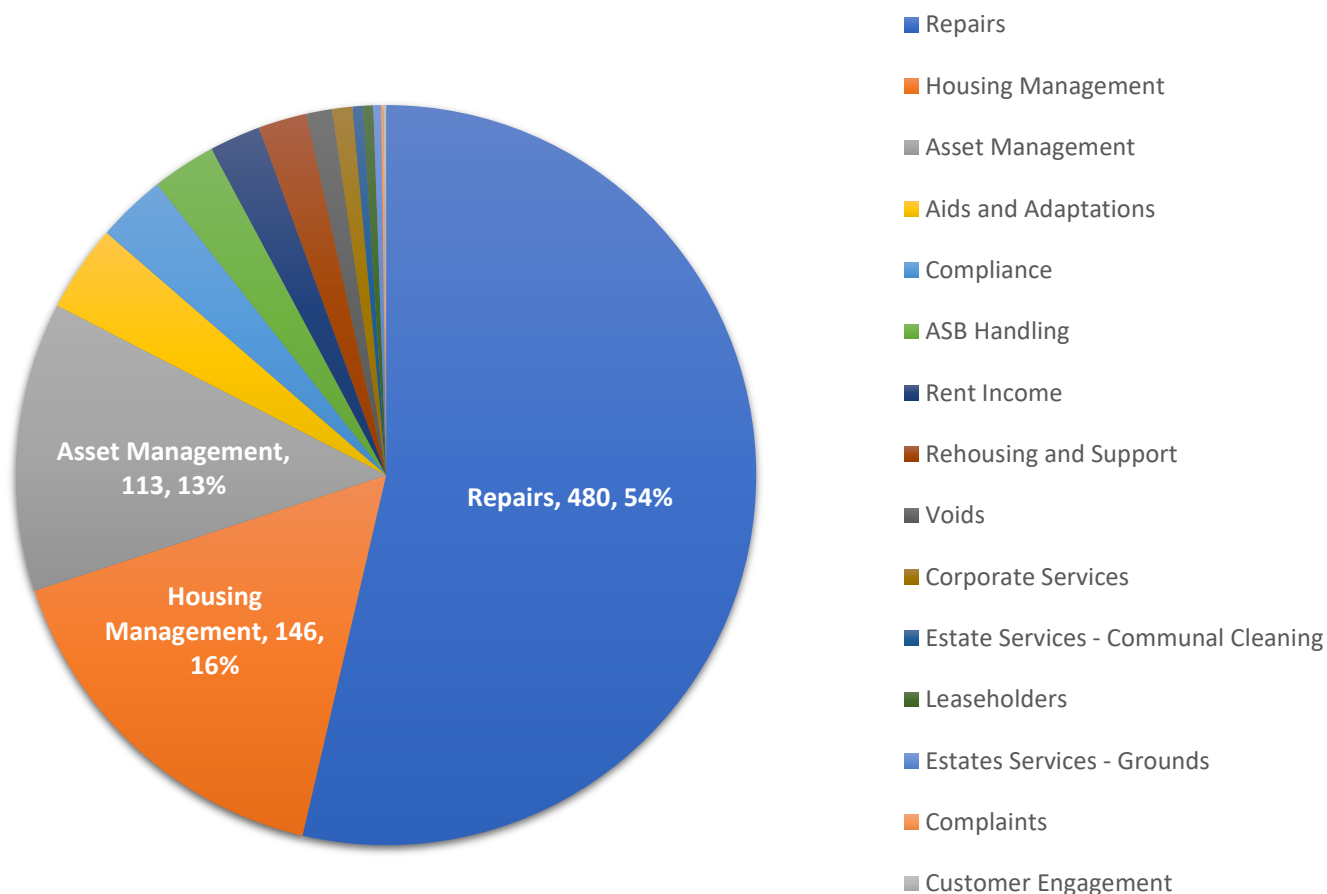
Complaint volumes

The chart below shows the total number of Stage 1 and 2 complaints received by service areas in 2024/25. During the year, 54% of complaints raised related to Responsive Repairs, 16% Housing Management and 13% Asset Management. On average we received 75 complaints per month - 62 at Stage 1 and 13 Stage 2.

Whilst the number of complaints received overall are falling, we have seen an increase in Stage 2 complaints partly due to a change to the Housing Ombudsman Code. Previously

there were circumstances where housing providers could refuse requests to escalate Stage 1 complaints to the next stage. This has been removed and now providers must honour all requests to escalate from a resident.

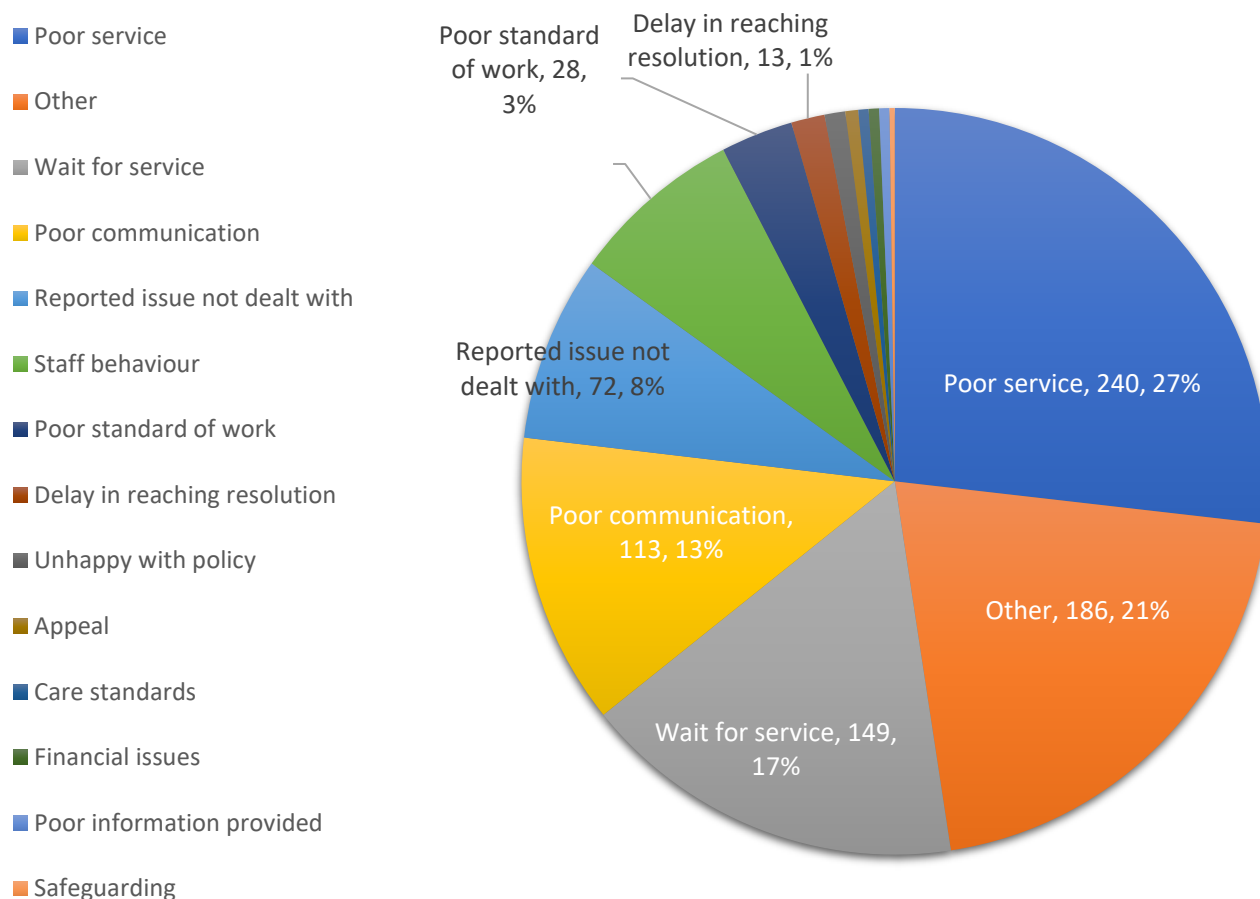
Whilst we record higher volume of complaints per 1,000 homes compared to other providers, this demonstrates that we are providing an accessible service during a time of implementing significant business change and improving performance in response to resident feedback and independent service reviews.



Reasons for complaints

When a complaint is logged, the issue is categorised by the person logging the complaint. The most common reason for raising a complaint has been 'Poor service' (27%), then 'Other' (21%).

Analysis is being undertaken to establish whether we need additional categories, or whether complaints categorised as 'other' could in fact have been categorised better. 'Wait for service' was next (17%) then 'poor communication' (13%). Over three quarters of complaints are assigned to one of these four categories.



In 2024/25, 54% of the 895 complaints raised related to Responsive Repairs, 16% for Housing Management and 13% Asset Management. The main reasons for complaints received by these areas are detailed in the table below.

The reasons for repairs complaints reflects other resident feedback received through satisfaction surveys. The main feedback issues

relate to the time taken to complete a repair, poor communication, a lack of empathy and consideration of impacts, the standard of works and/or unfinished/temporary fixes not getting to root causes.

The lessons learnt section of the report covers the actions being taken in response to the main reasons for complaints.

Complaint Category	Repairs		Housing Management		Asset Management	
Poor service	134	27.92%	44	30.14%	25	22.12%
Wait for service	101	21.04%	13	8.9%	17	15.04%
Other	86	17.92%	44	30.14%	26	23.01%
Poor communication	58	12.08%	10	6.85%	21	18.58%
Reported issue not dealt with	48	10.00%	5	3.42%	9	7.96%
Staff behaviour	24	5.00%	21	14.38%	4	3.54%
Poor standard of work	15	3.13%	2	1.37%	7	6.19%
Delay in reaching resolution	5	1.04%	1	0.68%	1	0.88%
Unhappy with policy	4	0.83%	1	0.68%	0	0.00%
Appeal	3	0.63%	0	0.00%	0	0.00%
Financial issues	1	0.21%	1	0.68%	0	0.00%
Poor information provided	1	0.21%	0	0.00%	2	1.77%
Care standards	0	0.00%	2	1.37%	1	0.88%
Safeguarding	0	0.00%	2	1.37%	0	0.00%
Total	480		146		113	

Complaint response times

Under the Housing Ombudsman Code, Stage 1 complaints need to fulfil two criteria to count as timely – be acknowledged within 5 working days and be responded to within 10 working days (or agreed extension) of acknowledgement.

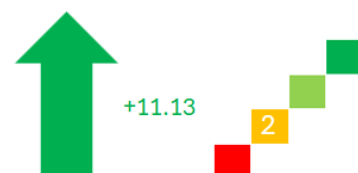
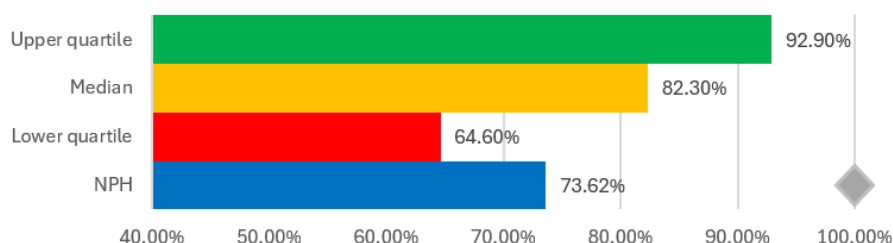
Stage 2 complaints needed to be responded to within 20 working days (or agreed extension) of escalation. Escalation to Stage 2 is now automatic on request whereas in previous years housing providers were able to refuse requests to escalate where a policy exemption applied.

In 2024/25, 71% of complaints met the Housing Ombudsman Code timescales overall (TSM CH02) which breaks down into 73.62% for

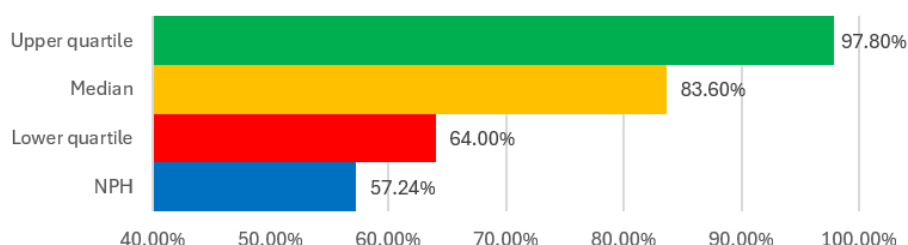
Stage 1 complaints and 57.24% for Stage 2 complaints.

The table below shows the total number of Stage 1 and Stage 2 complaints received during 2024/25 and the number where we have responded to the complaint within Housing Ombudsman Code timescales. When we compare our performance with the national RSH figures we are in quartile 2 for stage 1 and quartile 1 for stage 2, where 4 is the higher performers. We will be continuing to improve response times through the co-ordination of complaints through the centralised team and supporting officers with investigations to ensure resolution within timescales in 2025/26.

CH02(1) Proportion of stage one complaints responded to within the Housing Ombudsman's Complaint Handling Code timescales



CH02(1) Proportion of stage two complaints responded to within the Housing Ombudsman's Complaint Handling Code timescales



Satisfaction with complaint handling

We monitor satisfaction with complaint handling through two surveys; an annual Tenant Survey which complies with the Regulator of Social Housing requirements and is a perception-based survey, and an independent transactional survey for a sample of closed complaints which have been responded to through our formal process.

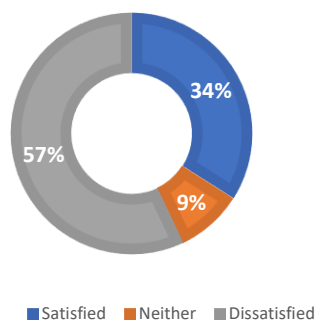
Annual Tenant Survey

The Tenant Survey captures feedback on the regulatory tenant satisfaction measure (TSM) **‘Satisfaction with the landlord’s approach to handling complaints’ (TPO09)**. Satisfaction with complaint handling is very low across the sector as it is very difficult to tell whether the survey responses relate to complaints made through the formal process or were service requests yet to be fully actioned, an issue faced by many since the introduction of this question in the TSMs. Nonetheless, it is important that tenants feel confident any complaint they make will be taken seriously and dealt with effectively and in good time. Clear communications around how to make a

complaint and the complaints process is vital to increasing awareness and accessibility.

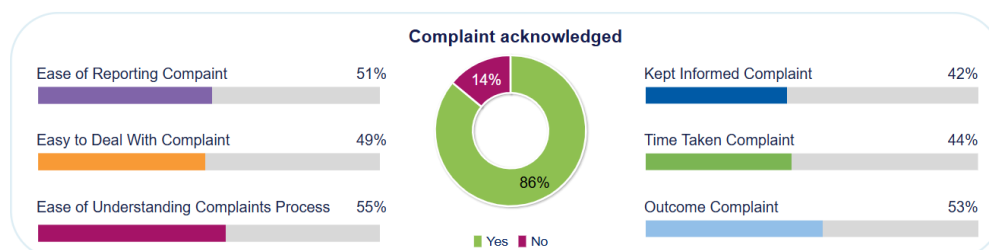
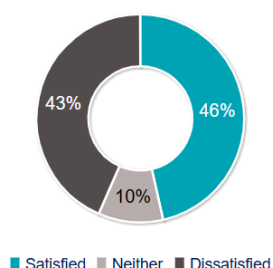
In 2024/25 satisfaction with complaint handling (TP09) was 34%, down from 36% the previous year, compared with last year’s national results where the median was 34.5% and the best reached +41%.

Of the 254 respondents who stated they had made a complaint in the last 21 months, the main causes of dissatisfaction were commented as complaint not resolved, the complaint handling, outstanding/forgotten repairs, timescales to complete repairs and time taken to resolve enquiry.



Complaint Transactional Survey

An independent Complaint Transactional Survey conducted by Acuity commenced in June 2024, at the time of writing 97 had participated in providing feedback on their experience of making a complaint. Survey results show that of the 97 responses, 46% were overall satisfied and 43% dissatisfied. The tables below summarise the feedback.



Satisfied with

- ◆ Ease of understanding the complaint process
- ◆ The outcome of the complaint
- ◆ The ease of reporting
- ◆ Easy to deal with

Dissatisfied with

- ◆ Being kept informed
- ◆ Overall complaint satisfaction
- ◆ Easy to deal with
- ◆ Time taken

Suggestions for improvement

- ◆ Time taken to resolve enquiry
- ◆ To be kept informed of progress
- ◆ Generally happy, no problems

What has impacted satisfaction with the complaint outcome?

- ◆ The outcome of a complaint
- ◆ Good overall service
- ◆ Timescales to complete repairs
- ◆ Outstanding repairs

What has impacted satisfaction overall?

- ◆ The time taken to resolve enquiry
- ◆ The handling of the complaint
- ◆ Good overall service

Lessons learnt from resident feedback

Overall, feedback highlights the need to provide a consistent approach to complaint handling and ensure that we provide more of the good experience that residents have had. This includes improving customer service, building trust, listening, and showing empathy. The feedback also shows the importance and

impact of delivering a quality repairs service with the timely completion of repairs.

The lessons learnt section of the report covers the actions being taken in response to complaint feedback.

Housing Ombudsman

About the Housing Ombudsman

The Housing Ombudsman is a free (to residents), independent, and impartial service. Their work is funded through landlord subscription fees. They investigate complaints and resolve disputes involving the tenants and leaseholders of social landlords, (housing associations and local authorities). Residents can take a complaint to the Housing Ombudsman Service for investigation and support at any time and to help where the landlord is not responding to a complaint they've received. A formal investigation will be considered after going through the landlord's

complaint process if the issues have not been resolved. Members of the Housing Ombudsman Scheme must comply with the Ombudsman's Complaint Handling Code. The code aims to achieve best practice in complaint handling. The Ombudsman has the power to make orders to landlords, this might mean ordering the landlord to apologise, carry out works or pay compensation. Please see the Housing Ombudsman website for more information: [Complaint Handling Code 2024 | Housing Ombudsman Service](#)

Housing Ombudsman determinations

The Housing Ombudsman will make recommendations and a determination when they review a complaint. There are several types of determination including:

- **Maladministration:** where the landlord, for example, has failed to comply with its legal obligations, its policies and procedures, or unreasonably delayed dealing with the matter. This could be a finding of [service failure, maladministration or severe maladministration](#), depending on the seriousness of the failure and the impact on the resident. Service failure is the lowest level of maladministration and is reserved for minor failings where action is still needed to put things right.
- **No maladministration:** where the landlord is found to have acted appropriately.
- **Redress:** where the landlord made redress to the resident which resolved the complaint satisfactorily in the Ombudsman's opinion.
- **Resolved with intervention/early resolution:** where the complaint was resolved with the Ombudsman's intervention.
- **Outside jurisdiction (OSJ):** where the Ombudsman didn't have the authority to investigate. This could be for a variety of reasons including: the complaint had not been made within a reasonable timescale; the complaint did not meet the conditions of the scheme; or the matter was more appropriately dealt with by the courts, a tribunal, another complaint handling body or regulator.

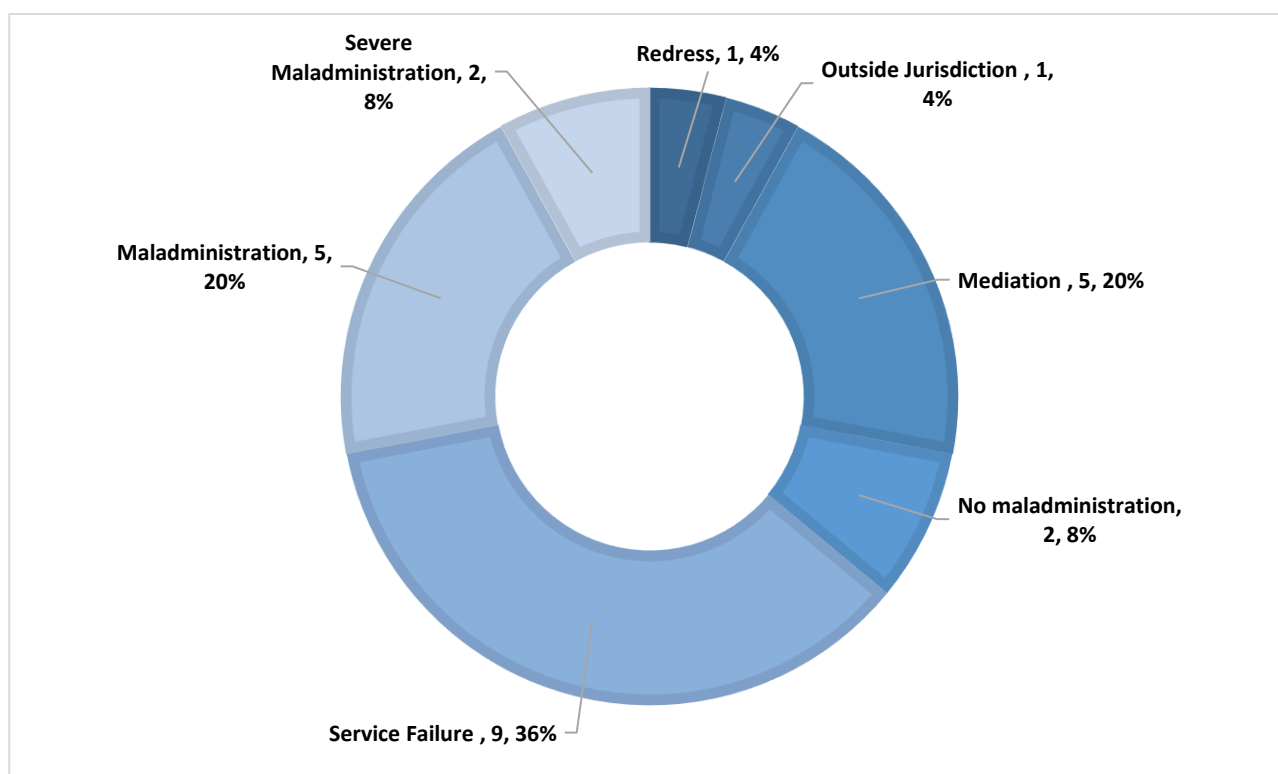
Housing Ombudsman determinations 2024/25

The charts below summarise the outcomes from the ten cases formally investigated by the Housing Ombudsman in 2024/25 and the 25 findings.

In 2024/25 our maladministration rate was 63% compared to the national maladministration rate for landlords between 10,000-50,000 units at 71% in 2024-25, and 80% for Local Authority/ALMOs (calculated by findings total divided by total number of maladministration findings).

♦ Determinations	10
♦ Findings Total	25
♦ Maladministration Findings Total	15
♦ Orders Made	33
♦ Recommendations	14
♦ Complaint Handling Failure Order	1*
♦ Compensation	£8,310
♦ Maladministration Rate	63%

**One Complaint failure order was issued due to not responding to a request for evidence from the Housing Ombudsman on time due to an administrative oversight. Case management has been improved and we now have access to the HO on-line portal which provides us with better oversight of cases logged with the HO, the stages they are at and request/action deadlines.*



Of the ten cases investigated, nine related to the repairs service and one to estates/housing management. There were 25 findings from the 10 cases and the chart below summarises the case findings by type.



Issues highlighted in relation to service area determinations included:

- ◆ Two cases related to guttering and the time taken to resolve issues.
- ◆ Three cases had issues relating to damp and mould that were not addressed appropriately and the length of time taken to resolve.
- ◆ Two cases related to our response to a sewage overflow and a blocked pipe where appropriate action and support was not provided.
- ◆ One case regarded ongoing reported repairs issues and our inability to show that we had fully considered the reported repairs, surveyed, and taken all appropriate action. Record keeping and evidence was a key issue in this case.
- ◆ We received two cases where mediation was offered as a solution and financial redress was sought in both cases. Where mediation is appropriate and agreed, a case may not go to a full investigation stage.

Issues highlighted in relation to complaint handling determinations included:

- ◆ Non-compliance with timescales to respond was found in three cases. In one case the resident was not informed of the delay with an explanation or reason.
- ◆ Delays in responding to a request to escalate and a decision not to escalate a complaint due to the timeframe.
- ◆ Complaint handling failures were not acknowledged or addressed in two cases where compensation should have been offered.

Two findings of severe maladministration related to the handling of repairs to a resident's property and the handling of the resident's reports of damp and mould. The lessons learnt section of the report details the actions taken to improve services.

Housing Ombudsman Code Self-Assessment

NPH have completed a self-assessment against the Housing Ombudsman's new Complaint Handling Code, which is included in this report as Appendix B. NPH's Complaints and Feedback Policy is compliant with the Code. The main area of work is continuing the work in practice towards the target of responding to all complaints within the Code timescales during 2025/26. Changes made in the later part of 2024/25 have seen a positive impact and overall response times improved to 71% from 63% the previous year.

Following the annual review of our self-assessment, analysis of complaints and satisfaction survey feedback we have identified the areas below to continue to improve our complaint handling service and will undertake the following actions in 2025/26 to continue to improve in those areas:

- ◆ Engage our new tenant-led Service Quality Committee and tenant Sounding Board to scrutinise our Complaints and Feedback Policy and self-assessment. Both tenant groups are made up of individuals from diverse backgrounds who will bring a range of perspectives to influence improvements to complaints handling. Alongside our Member Responsible for Complaints (MRC) the tenant groups will also review and challenge performance to help drive better resident experiences.
- ◆ We will be reviewing our Compensation Policy and Unacceptable Behaviour Policy, both of which are used within the complaints process, to ensure they are fair and equitable and are being applied consistently across the business with the oversight of the new centralised team.
- ◆ Continue work already started on NPH values and behaviours and ensuring a culture that is customer centric where customers feel listened too, individual circumstances considered, and reasonable adjustments made so residents feel supported through the process. Within this, we will address the recommendations in the Housing Ombudsman spotlight reports on Attitudes, Rights and Respect and work with our tenant groups to support our work in this area.
- ◆ As raised in a Housing Ombudsman case, records management is important in demonstrating compliance with processes and policies and to ensure working practices are being applied correctly and fairly. Within this, we will address the recommendations in the Housing Ombudsman spotlight report on Knowledge and information management and our new Data Strategy.
- ◆ During 2024/25 our complaint handling system workflow was re-designed and the risk management of cases and the consideration of reasonable adjustments was built into the process by rating and flagging high risk cases. We will continue to embed this approach into working practices.
- ◆ Continue to review the categorisation of complaints to ensure complaint themes are right and support the ease of reporting granular data analysis and insight.
- ◆ Continuing our review of service request resolution at first point of contact which began in 2024/25. NPH's contact centre is delivered by WNC and 80% of contacts are resolved at the first contact. A further 20% of contact is referred onto NPH back office. The review is looking at the main reasons for residents contacting us in the first instance and how we are resolving requests for service, how many go on to be repeat contacts and avoidable contact, all of which can lead to service failure and complaints being raised.
- ◆ Improve the tracking of actions arising from complaints to ensure they are followed through.
- ◆ Reviewing our Service Standards to ensure they are right and where we set out the standards of service residents can expect from us.
- ◆ Continuing service area improvement in the key areas of repairs and assets.
- ◆ Continue to embed learning from complaints.

Learning from complaints

This section focuses on what we have learnt from complaint cases, Housing Ombudsman determinations and resident feedback from our Tenant Survey and Complaints Transactional Survey and the changes made.

Complaint handling

We've made significant changes to complaint handling over the year to improve resident experiences taking on board feedback from our transactional survey and the Tenant Survey and Housing Ombudsman determinations.

Changes have included:

- ◆ Reorganising and increasing the resource to create a Customer Excellence Team in October 2024 to improve timeliness, the quality of responses
- ◆ Changes to the way we work and handle complaints, so we're delivering a consistent service to all residents. This has included:
 - Making sure we understand all the circumstances surrounding a resident complaint by acknowledging all complaints with a telephone call in the first instance followed by an acknowledgement letter to confirm the issues and outcomes desired. Calls will identify if there are health conditions that we need to consider for residents and their occupants that we may not be aware of and taking action based on that information
 - Introducing complaint referral forms detailing the case issues to be addressed for service areas to investigate so that no issues go unaddressed and;
 - Designating Customer Feedback Coordinators for each case to work directly with service areas on addressing issues, making sure that compensation is considered appropriately where service failure has been found and resolving the complaint and to ensure complaints are acknowledged and responded to on time
- ◆ Carrying out training to help ensure the effective ownership of complaints, and the continuation of a culture of complaint handling and learning from complaints. Training staff in the contact centre to effectively recognise complaints in line with the Housing Ombudsman code, and making sure they are logged correctly and sent to the Complaints Team.
- ◆ Improving our complaint handling technology systems by re-designing the workflow in the case management system to improve tracking of timeliness and case allocation to ensure response times are met. The system allows the record of refusals and to track and monitor actions arising from complaints.
- ◆ Challenging our performance with WNC's Member Responsible for Complaints (MRC) and NPH's Tenant Board member MRC to support improvements.
- ◆ Re-introducing a Complaint Transactional Survey where a sample of closed cases are contacted by an independent provider.
- ◆ Improving the way we learn from and act upon lessons from complaints - we've more work to do on this in 2025 and this will help to drive better resident experiences

Repairs

During 2024/25 improving the Repairs Service has been a priority. 54% of complaints received during 2024/25 related to repairs. Resident feedback tells us the main issues included the time taken to complete repairs, outstanding and forgotten repairs, quality of work, communication and being kept informed.

At the same time, feedback and compliments highlighted the same issues but from a positive perspective highlighting an inconsistency of service. As a result of resident feedback and challenging performance, an external third party conducted a service review and over the course of the year we have been actioning and implementing their recommendations and making significant changes to improve the service and resident experience including:

- ◆ Transitioning all non-urgent repair jobs to a 28-day target to improve timeliness.
- ◆ Providing managers with real-time performance dashboards and reports to better manage teams, have oversight of all open jobs to ensure progress is monitored and to action those at risk of falling out of target.
- ◆ Improving the alignment of data within systems and the quality of the management data interrogated at a weekly Repairs Team Meeting
- ◆ Investing in people – we have recruited staff with repairs sector expertise and technical skills and will be expanding the team into 2025/26. Comprehensive training plans are being developed to ensure the workforce have the right skills for now and into the future. Improved skills will improve the diagnostics of more complex repair works and stop longer standing issues from arising
- ◆ Increasing resource and introducing more efficient and effective ways of working which have enabled us to reduce the number of repairs assigned to sub-contractors. This has enabled us to have better control of quality, reduce damage caused during works, staff behaviours and management.
- ◆ Improving contract management where contractors are used to ensure works are completed, and standards and targets are met. We are introducing NPH lead contractor training, ensuring our contractors know what we expect of them and that the service they provide reflects this.
- ◆ Improving the quality of works by implementing a more robust post-inspection regime. All failed jobs and jobs relating to a complaint are now post-inspected.
- ◆ Implementing east and west teams in 2025/26 to continue to drive efficiencies and controlled management zones.
- ◆ Improving the customer experience by:
 - Working closely with the WNC Contact Centre as the first point of contact to log a repair to improve communication and resolve issues including shadowing between teams, attendance at joint meetings and implementing system and process improvements
 - Increasing the number of appointments available as we have increased staff resource
 - Introducing automated text messages and telephone calls at the different stages of a repair, such as when a trade is on route
 - Introducing quarterly Property Directorate staff briefings which include the importance of a customer first service and culture as well as recognising where staff have gone above and beyond for residents
 - In the future, we will be exploring the use of technology such as video calling to diagnose repairs remotely.

Housing Management

During 2024/25, 16% of complaints were received by housing management. The service area includes Housing Officers who respond to tenancy management enquiries. Complaint feedback raised poor service, delays in service, staff behaviour and communication as issues. TSM feedback also raised issues about being able to contact Housing Officers. Over the last 6 months the Housing Officer teams have focused on ensuring all requests for call backs are responded to within 5 working days and this is monitored closely in staff one to ones and set as an appraisal objective leading to an increase in responses within target times. Staff behaviour complaints are closely monitored and in most cases, complaints have been made where expectations have been managed, or the outcomes of decisions have not been as wanted rather than staff acting below the standards expected.

Asset Management

During 2024/25, 13% of complaints were received by Asset Management covering poor service, communication, and delays. Following resident feedback and improving contractor performance management we are reprocurring our main contractors during 2025/26. As part of this change to drive performance and quality up, we have also brought the Resident Liaison Officer roles back in house. This will improve communication between us and residents during major works, provide better oversight of any issues arising and their resolution and improve customer service.

Solar Panel Repairs

We have reviewed complaints about solar panel repairs and the delays experienced in this category of repair, due in part to poor communication between teams. As a result, we have designed new ways of working which will deliver an improved service for residents.

Damp and mould

We recognise the importance of acting on reports of damp and mould and the impact it can have on resident's health and well-being. We have learnt from the outcomes of a Housing Ombudsman cases and complaint feedback and have invested in the creation of a dedicated Damp and Mould Team with the right specialist skills to diagnose cases and to act more quickly. The team will be in place by July/August 2025 following recruitment. We have completed and are implementing recommendations from the Housing Ombudsman spotlight report on damp and mould.

Anti-social behaviour (ASB)

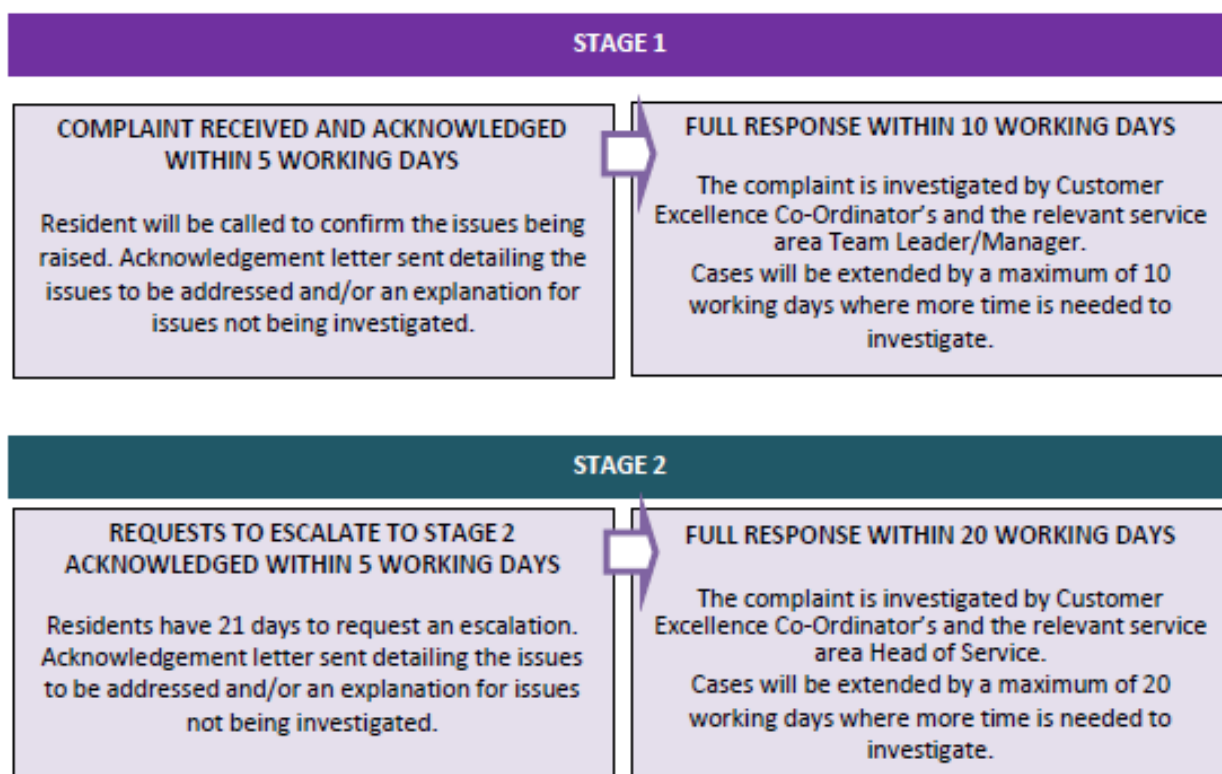
ASB is a key concern for residents, leading to complaints relating to the handling of ASB cases.

Learning from case reviews identified a case that was dealt with but not initially identified as a hate crime. This led to refresh training on hate crime for the ASB Team to ensure any future cases were identified appropriately.

Improving knowledge and information management

We have learnt from Housing Ombudsman cases and our own case management the importance of good recording keeping. During 2025/26 a new Data Strategy is being developed that will include record management and making better use of systems and business tools to support better record keeping.

APPENDIX A: OUR COMPLAINT HANDLING PROCESS



Appendix B: Housing Ombudsman Self-assessment form

Section 1: Definition of a complaint

Review date: April 2025

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 or at one of our Community based engagement activities such as Drop Ins, Engagement Café and Community Cafe <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>

				All NPH staff members have been given appropriate training and have also been made aware of the correct email inbox to forward any complaints received onto via internal email and intranet communications.
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</p>

				acknowledgement and response letters. Both documents can also be provided in large font. Both the Policy and Leaflet detail the stages and timeframes for responding.
3.5	The policy must explain how the landlord will publicise details of the complaints policy, including information about the Ombudsman and this Code.	Yes	<ul style="list-style-type: none"> Link to the 'Give Us Feedback' page on our website: https://www.nph.org.uk/give-us-feedback NPH Complaint Letter Templates 	<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	Yes	<ul style="list-style-type: none"> NPH Complaints and Feedback Policy – Paragraph 4.4 (Housing 	Contact details for the Housing Ombudsman are included in all correspondence with the customer

	Ombudsman service and how the individual can engage with the Ombudsman about their complaint.		Ombudsman/Local Government and Social Care Ombudsman) <ul style="list-style-type: none"> • NPH complaint letter templates • NPH complaints leaflet 	<p>as follows:</p> <ul style="list-style-type: none"> • Stage 1 Complaint not accepted letter • Stage 1 Acknowledgment letter • Stage 1 Response letter • Stage 2 Acknowledgment letter • Stage 2 Response letter • Stage 1 or 2 Extension letters <p>This information is also detailed in paragraph 4.4 (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 to a dedicated centralised complaints team led by a Customer Excellence Manager. The team oversee complaint handling and compliance with the Code. The team:</p> <ul style="list-style-type: none"> Acknowledge all complaints with a call to confirm the complaint definition and outcomes required. Work with the assigned service areas to investigate the complaint and resolution Write the complaint response and sign off with team leaders/managers at Stage 1 and Heads of Service/ADs/Directors at Stage 2. <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 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 leader/managers, Stage 2 Heads of</p>

				<p>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 took 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 took place to 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 not a reason to refuse the complaint.</p>

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 May 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 May 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: a. the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements. b. a qualitative and quantitative analysis of the landlord's complaint handling performance. This must also include a summary of the types of complaints the landlord has refused to accept; c. any findings of non-compliance with this Code by the Ombudsman; d. the service improvements made as a result of the learning from complaints; e. any annual report about the landlord's performance from the Ombudsman; and f. any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord.	Yes	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 2024/25 was considered by the landlord, West Northamptonshire Council Cabinet. meeting on 24 June 2024 as part of the Landlord Services 2024-25 Annual Report (agenda item 15, report pack page 179). Papers and minutes of the governing bodies response is published on WNCs website at:

				Agenda for Cabinet on Tuesday 24th June 2025, 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 2024-25.</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 took 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 lessons learnt and</p>

				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	Customer feedback is considered at our monthly Company Leadership Team and landlord assurance meetings. A quarterly report will go to our new tenant led Service Quality Committee (SQC) which holds the first meeting in May 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. Quarterly meetings with WNC and NPH MRC representatives take place where complaints data and insight are reviewed.
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	Customer feedback is considered at our monthly Company Leadership Team and landlord assurance meetings. A quarterly report will go to our new tenant led Service Quality Committee (SQC) which holds the first meeting in May 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. Quarterly meetings with WNC and NPH MRC representatives take place where complaints data and insight are reviewed.
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	Yes	N/A	An MRC has been appointed by the landlord, the Portfolio Holder for Housing, and NPH have

	lead responsibility for complaints to support a positive complaint handling culture. This person is referred to as the Member Responsible for Complaints ('the MRC').			appointed a NPH Board Member in the equivalent role. Quarterly meetings take place where complaints data and insight are reviewed.
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: 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. Quarterly meetings with WNC and NPH MRC representatives take place where complaints data and insight are reviewed.
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: a. have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments;	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

	<ul style="list-style-type: none"> b. take collective responsibility for any shortfalls identified through complaints, rather than blaming others; and c. act within the professional standards for engaging with complaints as set by any relevant professional body. 			being delivered to all relevant colleagues across the organisation, including front-line customer facing roles and managers involved in complaint handling.
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