**Complaint Handling Code – Self-Assessment Form**

This self-assessment form should be completed by the complaints officer and discussed at the landlord’s governing body annually.

Evidence should be included to support all statements with additional commentary as necessary.

Explanations must also be provided where a mandatory ‘must’ requirement is not met to set out the rationale for the alternative approach adopted and why this delivers a better outcome.

# Section 1 - Definition of a complaint

## Mandatory ‘must’ requirements

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| **Code section** | **Code requirement** | **Comply:**  **Yes/No** | **Evidence, commentary and any explanations** |
| **1.2** | A complaint must be defined as:  ‘*an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the organisation, its own staff, or those acting on its behalf, affecting an individual resident or group of residents*. | Yes | This is outlined in our [policy](https://www.ncha.org.uk/media/2081/ncha-complaints-policy-for-customers.pdf) statement and part of complaint handling practice. |
| **1.3** | The resident does not have to use the word ‘complaint’  for it to be treated as such. A complaint that is  submitted via a third party or representative must still be handled in line with the landlord’s complaints policy. | Yes | Outlined at sections 1.2 & 3.1.3 in revised complaints policy and part of complaint handling practice |
| **1.6** | … if further enquiries are needed to resolve the matter, or if the resident requests it, the issue must be logged as a complaint. | Yes | Issues that can be dealt at the first contact will still be logged as a complaint but resolved at first contact |
| **1.7** | A landlord must accept a complaint unless there is a valid reason not to do so. | Yes | Reasons where a complaint may not be considered are stipulated in section 3.1.2 and part of complaint handling practice |
| **1.8** | A complaints policy must clearly set out the circumstances in which a matter will not be considered, and these circumstances should be fair and reasonable to residents. | Yes | Circumstances where a complaint may not be considered are stipulated in section 3.1.2 and part of complaint handling practice |
| **1.9** | If a landlord decides not to accept a complaint, a detailed 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. | Yes | In both 3.1.3 and 3.1.2 the policy states “*We will write to the complainant to confirm where we will not consider a complaint for these issues and explain our reasons’.* NCHA has a process where the Customer Satisfaction Manager controls this to offer additional assurance that only contacts ***not*** suitable for the complaints process are not accepted.  All complaint related correspondence includes details on when and how to escalate to the Ombudsman. |

## Best practice ‘should’ requirements

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| **Code section** | **Code requirement** | **Comply:**  **Yes/No** | **Evidence, commentary and any explanations** |
| **1.4** | Landlords should recognise the difference between a **service request**, where a resident may be unhappy with a **situation** that they wish to have rectified, and a **complaint** about the **service** they have/have not received. | Yes | Issues that can be dealt at the first contact will still be logged as a complaint but resolved at first contact. This is outlined in section 3.3.1 of [NCHA’s Complaints Policy for Customers](https://www.ncha.org.uk/media/2081/ncha-complaints-policy-for-customers.pdf). |
| **1.5** | Survey feedback may not necessarily need to be treated as a complaint, though, where possible, the person completing the survey should be made aware of how they can pursue their dissatisfaction as a complaint if they wish to. | No | This is not explicitly referenced in the revised policy. Current survey feedback processing will address outstanding issues but will not always result in a complaint being logged. A corporate customer insight project is underway to improve collection of customer sentiment and respond appropriately. This project is expected to conclude in 2023. |

# Section 2 - Accessibility and awareness Mandatory ‘must’ requirements

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| **Code section** | **Code requirement** | **Comply:**  **Yes/No** | **Evidence, commentary and any explanations** |
| **2.1** | Landlords must make it easy for residents to complain by providing different channels through which residents can make a complaint such as in person, over the telephone, in writing, by email and digitally. While the Ombudsman recognises that it may not be feasible for a landlord to use all of the potential channels, there must be more than one route of access into the complaints system. | Yes | A complaint can be made in the following ways:   * In writing * By telephone * By email * By using the website form * By using any of the social media platforms. * In person to any NCHA colleague * Anonymously * To a local Member of Parliament or local authority Councillor * Complaints about the social care services we provide can also be made directly to the commissioning organisation such as the local authority or health service |
| **2.3** | Landlords must make their complaint policy available in a clear and accessible format for all residents. This will detail the number of stages involved, what will happen at each stage and the timeframes for responding. | Yes | Any specific format requests will be followed as set out in our Policy Statement.  Details of the complaint investigation approach and stages are outlined in section 3.3 of the revised complaints policy. |
| **2.4** | Landlord websites, if they exist, must include information on how to raise a complaint. The complaints policy and process must be easy to find on the website. | Yes | Website has ability to translate policy and form in to hundreds of languages, adjust text size and contrast. The website also has an easy read version and form in signs and symbols. Outside of the website the policy can be provided in any format required on request. |
| **2.5** | Landlords must comply with the Equality Act 2010 and may need to adapt normal policies, procedures, or processes to accommodate an individual’s needs. Landlords must satisfy themselves that their policy sets out how they will respond to reasonable adjustments requests in line with the Equality Act and that complaints handlers have had appropriate training to deal with such requests. | Yes | NCHA’s Complaints Policy has been written in line with NCHA’s Equality, Diversity and Inclusion Policy and Equality  Statement and an Equality Impact Assessment has been completed.  All colleagues responsible for responding to complaints receive Equality, Diversity and Inclusion training. |
| **2.6** | Landlords must publicise the complaints policy and process, the Complaint Handling Code and the Housing Ombudsman Scheme in leaflets, posters, newsletters, online and as part of regular correspondence with residents. | Partial | Complaints policy is published on the website.  NCHA’s annual complaint handling code assessment is published on our website and can be shared with customers on request.  “We’re Listening” cards exist at all projects and NCHA reception areas.  NCHA intends to increase awareness further by including information about the Housing Ombudsman Scheme in leaflets, posters, newsletters and online. This is expected to be in place in 2023.  The policy is supported by a cultural, training publicity programme which will meet the expectations of the Code in this area. The first phase is complete with all departments receiving sessions to highlight the Code’s key messages, concerns from colleagues and guidance around complaint handling. The 2nd phase will commence in June 23 to build on Scrutiny Panel recommendations for best practice approaches, improvements to organisational learning & service improvements. |
| **2.7** | Landlords must provide residents with contact information for the Ombudsman as part of its regular correspondence with residents. | Partial | NCHA does provide customers with contact information for the Ombudsman in complaints correspondence’s standard letters. However, as set out in 2.6, this year, we will review how we can further increase awareness more generally. |
| **2.8** | Landlords must provide early advice to residents regarding their right to access the Housing Ombudsman Service throughout their complaint, not only when the landlord’s complaints process is exhausted. | Yes | This is provided in the complaint acknowledgement and response letters at Stage 1 and Stage 2 of the complaints process. |

## Best practice ‘should’ requirements

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| **Code section** | **Code requirement** | **Comply:**  **Yes/No** | **Evidence, commentary and any explanations** |
| **2.2** | Where a landlord has set up channels to communicate with its residents via social media, then it should expect  to receive complaints via those channels. Policies should contain details of the steps that will be taken when a complaint is received via social media and how confidentiality and privacy will be maintained. | Yes | NCHA’s Complaints Policy states ‘*By using any of our social media platforms – complaints made in this way will be handled confidentially in line with our policy and procedures’* |
|  |  |

# Section 3 - Complaint handling personnel Mandatory ‘must’ requirements

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| **Code section** | **Code requirement** | **Comply:**  **Yes/No** | **Evidence, commentary and any explanations** |
| **3.1** | Landlords must have a person or team assigned to take  responsibility for complaint handling to ensure complaints receive the necessary attention, and that these are reported to the governing body. This Code will refer to that person or team as the “complaints officer”. | Yes | This is delivered by the Customer Satisfaction Manager and Customer Satisfaction Co-Ordinator. These roles report to the Head of Customer Experience and Assistant Director of Homes and Wellbeing as overall senior lead for complaint management |
| **3.2** | …the complaint handler appointed must have appropriate complaint handling skills and no conflicts of interest. | Yes | The role is dedicated to complaint management and has no conflicts of interest. |

## Best practice ‘should’ requirements

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| --- | --- | --- | --- |
| **Code section** | **Code requirement** | **Comply:**  **Yes/No** | **Evidence, commentary and any explanations** |
| **3.3** | Complaint handlers should:   * be able to act sensitively and fairly * be trained to handle complaints and deal with distressed and upset residents * have access to staff at all levels to facilitate quick resolution of complaints * have the authority and autonomy to act to resolve disputes quickly and fairly. | Partial | There are inconsistencies across the organisation in responding to complaints in these ways.  The introduction of the revised policy will be supported by a cultural, training publicity programme which will meet the expectations of the Code in this area.  The first phase is complete with all departments receiving sessions to highlight the Code’s key messages, concerns from colleagues and guidance around complaint handling. The 2nd phase will commence in June 23 to build on Scrutiny Panel recommendations for best practice approaches, improvements to organisational learning & service improvements. |

# Section 4 - Complaint handling principles

## Mandatory ‘must’ requirements

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| **Code section** | **Code requirement** | **Comply:**  **Yes/No** | **Evidence, commentary and any explanations** |
| **4.1** | Any decision to try and resolve a concern must be taken in agreement with the resident and a landlord’s audit trail/records should be able to demonstrate this. Landlords must ensure that efforts to resolve a resident’s concerns do not obstruct access to the complaints procedure or result in any unreasonable delay. It is not appropriate to have extra named stages (such as ‘stage 0’ or ‘pre-complaint stage’) as this causes unnecessary confusion for residents. When a complaint is made, it must be acknowledged and logged at stage one of the complaints procedure **within five days of receipt**. | Yes | NCHA will always aim to resolve the customer’s issue at first point of contact. Where this is not possible, in line with our policy, we will write to the customer to acknowledge in writing, within three working days.  NCHA has robust controls to ensure that customer correspondence is stored in line with the relevant policies.  NCHA’s stages are compliant with the Housing Ombudsman’s guidance and we only have two stages. |
| **4.2** | Within the complaint acknowledgement, landlords must set out their understanding of the complaint and the outcomes the resident is seeking. If any aspect of the complaint is unclear, the resident must be asked for clarification and the full definition agreed between both parties. | Yes | NCHA’s standard acknowledgement letter which is system-driven states ‘*This is what you told us*’ which summarises the customer’s complaint and moves on to ‘*As a required outcome for your complaint, you have requested*’ – outlining what the customer expects as a resolution. Where the resolution is unclear, the customer is asked to clarify. |
| **4.6** | A complaint investigation must be conducted in an impartial manner. | Yes | This is considered in section 3.3.3 of NCHA’s policy. |
| **4.7** | The complaint handler must:   * deal with complaints on their merits * act independently and have an open mind * take measures to address any actual or perceived conflict of interest * consider all information and evidence carefully * keep the complaint confidential as far as possible, with information only disclosed if necessary to properly investigate the matter. | Yes | This is included in NCHA’s Complaint Procedure section 3.6.3. |
| **4.11** | Landlords must adhere to any reasonable arrangements agreed with residents in terms of frequency and method of communication | Yes | NCHA expects that colleagues would consider any reasonable arrangements that customers request generally and more specifically, during the course of a complaint.  Where a customer makes a request for regular updates, this will be considered and all complaints are expected to be completed within 10 working days and if an extension is required, this is discussed and agreed with the customer. |
| **4.12** | The resident, and if applicable any staff member who is the subject of the complaint, must also be given a fair chance to:   * set out their position * comment on any adverse findings before a final decision is made. | Yes | Where a customer or a colleague is the subject of a complaint, they will be invited to set out their position and provide comments during the course of the investigation. We captured information about this element on the investigation on our Thorough Investigation Form (TIF) which informs lessons learned. |
| **4.13** | A landlord must include in its complaints policy its timescales for a resident to request escalation of a complaint | Yes | This is published in section 3.3.3 and 3.3.4 of NCHA’s Complaints Policy. |
| **4.14** | A landlord must not unreasonably refuse to escalate a complaint through all stages of the complaints procedure and must have clear and valid reasons for taking that course of action. Reasons for declining to escalate a complaint must be clearly set out in a landlord’s complaints policy and must be the same as the reasons for not accepting a complaint. | Yes | NCHA does not unreasonable refuse to escalate a complaint through all stages. Where it is not appropriate to escalate stage 2 we explain this to the customer in writing as set out in section 3.3.5 of NCHA’s Complaints Policy. |
| **4.15** | A full record must be kept of the complaint, any review 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 reports or surveys prepared. | Yes | NCHA records this information in the customer’s tenancy file and records. However, we recognise there is an opportunity to strengthen our compliance in this area.  NCHA has invested in a new complaints system that will store fully digital records of the complaint, any review and the outcomes at each stage, the original complaint and date received, all correspondence and other relevant information to the case. This is in addition to other data that will help us learn from complaints. |
| **4.18** | Landlords must have policies and procedures in place for managing unacceptable behaviour from residents and/or their representatives when pursuing a complaint. | Yes | NCHA has policies and procedures in place for managing unacceptable behaviours when pursuing a complaint. These instances are set out in 3.1.2 of the complaints policy and are also outlined in our Anti-Social Behaviour policy and Treating People Fairly service standard. |

## Best practice ‘should’ requirements

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| **Code section** | **Code requirement** | **Comply:**  **Yes/No** | **Evidence, commentary and any explanations** |
| **4.3** | Landlords should manage residents’ expectations from the outset, being clear where a desired outcome is unreasonable or unrealistic | Partial | NCHA is committed to hearing customers’ complaints and will work to resolve this at first point of contact. If the customer’s contact qualifies as a complaint in line with our policy, this will be investigated and during the course of the investigation and the outcome, if we are unable to meet the expectations of the customer we will inform them of the reasons why.  NCHA recognises the opportunity to improve objection handling from the outset and this is considered in our Customer Experience training with a broader cultural change program dedicated to complaints handling underway. |
| **4.4** | A complaint should be resolved at the earliest possible opportunity, having assessed what evidence is needed to fully consider the issues, what outcome would resolve the matter for the resident and whether there are any urgent actions required. | Yes | This is outlined in section 1.2 of our complaints policy. NCHA operates on a First Contact Resolution (FCR) basis and will aim to resolve the issue without the need for formal investigation. The urgency of the complaint will be assessed when logging it and NCHA routinely monitors the timeliness of complaint resolution. |
| **4.5** | Landlords should 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 where this is reasonable. | Yes | This is standard practice across NCHA and such requests are not unreasonably refused. |
| **4.8** | Where a key issue of a complaint relates to the parties’ legal obligations landlords should clearly set out their understanding of the obligations of both parties. | Yes | NCHA set this out during the course of the complaints procedure. We outline this in section 3.4.4 of our policy. |
| **4.9** | Communication with the resident should not generally identify individual members of staff or contractors. | Yes | This is outlined in section 3.6.2 of NCHA’s Complains Procedure. |
| **4.10** | Landlords should keep residents regularly updated about the progress of the investigation. | Yes | This is outlined in section 3.6.2 of NCHA’s Complains Procedure. |
| **4.16** | Landlords should seek feedback from residents in relation to the landlord’s complaint handling as part of the drive to encourage a positive complaint and learning culture. | Partial | NCHA conducts surveys on closed complaints to seek feedback from customers in respect of its complaints handling.  There is a Voice of the Customer Programme (Customer Insight Project) that will enhance this further and increase the sample size to better understand our performance in complaints handling. |
| **4.17** | Landlords should recognise the impact that being complained about can have on future service delivery. Landlords should ensure that staff are supported and engaged in the complaints process, including the learning that can be gained | Partial | NCHA recognises that there is work to do to comply to this requirement. We have examples of very good practice in terms of lessons learned but this is not consistent.  NCHA’s new complaint system mandates the requirement for lessons learned which is expected to drive accountability for Complaints Officers. |
| **4.19** | Any restrictions placed on a resident’s contact due to unacceptable behaviour should be appropriate to their needs and should demonstrate regard for the provisions of the Equality Act 2010. | Yes | Included in the revised Treating People Fairly service standard |

# Section 5 - Complaint stages

## Mandatory ‘must’ requirements Stage 1

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| **Code section** | **Code requirement** | **Comply:**  **Yes/No** | **Evidence, commentary and any explanations** |
| **5.1** | Landlords must respond to the complaint **within 10 working days** of the complaint being logged. Exceptionally, landlords may provide an explanation to the resident containing a clear timeframe for when the response will be received. This should not exceed a further 10 days without good reason. | Yes | This is outlined in NCHA’s Complaints Policy, section 3.3.3 and 3.3.4. NCHA has a process that informs the customer of an extension where this is required and routinely monitors the timeliness of complaint responses, reporting this to NCHA’s Senior Leadership Team and key stakeholders. |
| **5.5** | A complaint response must be sent 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 expeditiously with regular updates provided to the resident. | Partial | Whilst we respond to complaints within 10 days, we do not have an organisational approach to monitoring any remediation activity after the ten days. This will be considered in 23/23 for system development (FiX). |
| **5.6** | Landlords must address all points raised in the complaint and provide clear reasons for any decisions, referencing the relevant policy, law and good practice where appropriate. | Yes | Included in the complaint investigation and outcome template letter. |
| **5.8** | Landlords must confirm the following in writing to the resident at the completion of stage one in clear, plain language:   * the complaint stage * the decision on the complaint * the reasons for any decisions made * the details of any remedy offered to put things right * details of any outstanding actions * details of how to escalate the matter to stage two if the resident is not satisfied with the answer | Yes | Included in the complaint investigation and outcome template letter. |

## Stage 2

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| --- | --- | --- | --- |
| **Code section** | **Code requirement** | **Comply:**  **Yes/No** | **Evidence, commentary and any explanations** |
| **5.9** | If all or part of the complaint is not resolved to the resident’s satisfaction at stage one it must be progressed to stage two of the landlord’s procedure, unless an exclusion ground now applies. In instances where a landlord declines to escalate a complaint it must clearly communicate in writing its reasons for not escalating as well as the resident’s right to approach the Ombudsman about its decision. | Yes | Included in section 3.8.3 of revised Complaints policy |
| **5.10** | On receipt of the escalation request, landlords must set out their understanding of issues outstanding and the outcomes the resident is seeking. If any aspect of the complaint is unclear, the resident must be asked for clarification and the full definition agreed between both parties. | Yes | This is set out in NCHA’s Complaint Procedure, section 3.8.4 |
| **5.11** | Landlords must only escalate a complaint to stage two once it has completed stage one and at the request of the resident. | Yes | This is set out in NCHA’s Complaint Procedure, section 3.7.1. We also have system controls in place to prevent the premature investigation at Stage 2. |
| **5.12** | The person considering the complaint at stage two, must not be the same person that considered the complaint at stage one. | Yes | NCHA’s Complaints Procedure and Policy confirms that Stage 2 Investigations will be carried out by a senior manager. |
| **5.13** | Landlords must respond to the stage two complaint **within 20 working days** of the complaint being escalated. Exceptionally, landlords may provide an explanation to the resident containing a clear timeframe for when the response will be received. This should not exceed a further 10 days without good reason. | Yes | NCHA’s policy details in section 3.3.4:   * Write to acknowledge the complaint review request within 3 working days. This will include our understanding of the reasons for the review and the outcomes being sought. * Provide a full response within 10 working days with an outcome, the reasons for any decisions made, details of what action we plan to take, remedies available and how to get further help. * Make contact if we cannot give a full response within 10 working days to make an agreement to extend the time by a further 10 working days and confirm this in writing. We will provide the contact details of the relevant Ombudsman if an agreement to extend cannot be reached. |
| **5.16** | Landlords must confirm the following in writing to the resident at the completion of stage two in clear, plain language:     * the complaint stage * the complaint definition * the decision on the complaint * the reasons for any decisions made * the details of any remedy offered to put things right • details of any outstanding actions **and** * if the landlord has a third stage, details of how to escalate the matter to stage three * if this was the final stage, details of how to escalate the matter to the Housing Ombudsman Service if the resident remains dissatisfied. | Yes | All areas (except third stage information) is included in the stage 1 review template letter. |

## Stage 3

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| **Code section** | **Code requirement** | **Comply:**  **Yes/No** | **Evidence, commentary and any explanations** |
| **5.17** | Two stage landlord complaint procedures are ideal. This ensures that the complaint process is not unduly long. If landlords strongly believe a third stage is necessary, they must set out their reasons for this as part of their self-assessment. A process with more than three stages is not acceptable under any circumstances. | Yes | NCHA do not have a third stage in our complaints procedure. |
| **5.20** | Landlords must confirm the following in writing to the resident at the completion of stage three in clear, plain language:   * the complaint stage * the complaint definition * the decision on the complaint * the reasons for any decisions made * the details of any remedy offered to put things right * details of any outstanding actions * details of how to escalate the matter to the Housing   Ombudsman Service if the resident remains dissatisfied | Yes | NCHA do not have a third stage. |

## Best practice ‘should’ requirements Stage 1

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| **Code section** | **Code requirement** | **Comply:**  **Yes/No** | **Evidence, commentary and any explanations** |
| **5.2** | If an extension beyond 20 working days is required to enable the landlord to respond to the complaint fully, this should be agreed by both parties. | Yes | NCHA will discuss extensions on agreement with the customer, explaining any reasons for delay. This process is monitored and controlled by the Customer Satisfaction Manager and is exceptional with the majority of complaints being resolved in 10 working days. |
| **5.3** | Where agreement over an extension period cannot be reached, landlords should provide the Housing Ombudsman’s contact details so the resident can challenge the landlord’s plan for responding and/or the proposed timeliness of a landlord’s response. | Yes | All extensions are overseen by the Customer Satisfaction Manager and the Housing Ombudsman’s contact details included in correspondence. |
| **5.4** | Where the problem is a recurring issue, the landlord should consider any older reports as part of the background to the complaint if this will help to resolve the issue for the resident. | Partial | Not consistently applied.  The introduction of the revised policy will be supported by a cultural, training publicity programme which will meet the expectations of the Code in this area.  The first phase is complete with all departments receiving sessions to highlight the Code’s key messages, concerns from colleagues and guidance around complaint handling. The 2nd phase will commence in June 23 to build on Scrutiny Panel recommendations for best practice approaches, improvements to organisational learning & service improvements. |
| **5.7** | Where residents raise additional complaints during the investigation, these should be incorporated into the stage one response if they are relevant and the stage one response has not been issued. Where the stage one response has been issued, or it would unreasonably delay the response, the complaint should be logged as a new complaint. | Yes | Complaint investigators will follow this approach and consult the Customer Satisfaction Manager if required. |

## Stage 2

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| --- | --- | --- | --- |
| **Code section** | **Code requirement** | **Comply:**  **Yes/No** | **Evidence, commentary and any explanations** |
| **5.14** | If an extension beyond 10 working days is required to enable the landlord to respond to the complaint fully, this should be agreed by both parties. | Yes | NCHA outline this position in section 3.3.3 of our Complaints Policy. Any extension requests are closely monitored and agreed with the Customer Satisfaction Manager to ensure that the customer is consulted and informed of the decision. |
| **5.15** | Where agreement over an extension period cannot be reached, landlords should provide the Housing Ombudsman’s contact details so the resident can challenge the landlord’s plan for responding and/or the proposed timeliness of a landlord’s response | Yes | NCHA outline this position in section 3.3.3 of our Complaints Policy. Any extension requests are closely monitored and agreed with the Customer Satisfaction Manager to ensure that the customer is consulted and informed of the decision. |

## Stage 3

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| **Code section** | **Code requirement** | **Comply:**  **Yes/No** | **Evidence, commentary and any explanations** |
| **5.18** | Complaints should only go to a third stage if the resident has actively requested a third stage review of their complaint. Where a third stage is in place and has been requested, landlords must respond to the stage three complaint **within 20 working days** of the complaint being escalated. Additional time will only be justified if related to convening a panel. An explanation and a date for when the stage three response will be received should be provided to the resident. | Yes | NCHA do not have a third stage |
| **5.19** | Where agreement over an extension period cannot be reached, landlords should provide the Housing Ombudsman’s contact details so the resident can challenge the landlord’s plan for responding and/or the proposed timeliness of a landlord’s response. | Yes | All extensions are overseen by the Customer Satisfaction Manager |

# Section 6 - Putting things right

## Mandatory ‘must’ requirements

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| **Code section** | **Code requirement** | **Comply:**  **Yes/No** | **Evidence, commentary and any explanations** |
| **6.1** | Effective dispute resolution requires a process designed to resolve complaints. 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. | Yes | NCHA include this in our Complaints Procedure section 3.10.1. |
| **6.2** | Any remedy offered must reflect the extent of any service failures and the level of detriment caused to the resident as a result. A landlord must carefully manage the expectations of residents and not promise anything that cannot be delivered or would cause unfairness to other residents. | Yes | NCHA include this in our Complaints Procedure section 3.10.1. |
| **6.5** | 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 | Included in complaint outcome letter templates, guidance and thorough investigation forms |
| **6.6** | In awarding compensation, a landlord must consider whether any statutory payments are due, if any quantifiable losses have been incurred, the time and trouble a resident has been put to as well as any distress and inconvenience caused. | Yes | NCHA considers this in it’s existing Compensation Policy but intends to publish a revised Compensation Policy that makes this position much clearer to customers. |

## Best practice ‘should’ requirements

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| **Code section** | **Code requirement** | **Comply:**  **Yes/No** | **Evidence, commentary and any explanations** |
| **6.3** | Landlords should look beyond the circumstances of the individual complaint and consider whether anything needs to be ‘put right’ in terms of process or systems to the benefit of all residents. | Partial | NCHA does have a lessons learned process that considers any continuous improvement opportunity. However, this is not consistently applied. A new system launched on 1st April is expected to address this by mandating the requirement to comment on opportunities that will enhance our service to others. |
| **6.7** | In some cases, a resident may have a legal entitlement to redress. The landlord should still offer a resolution where possible, obtaining legal advice as to how any offer of resolution should be worded. | Yes | NCHA considers this in it’s existing Compensation Policy but intends to publish a revised Compensation Policy that makes this position much clearer to customers. |

# Section 7 - Continuous learning and improvement

**Mandatory ‘must’ requirements**

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| **Code section** | **Code requirement** | **Comply:**  **Yes/No** | **Evidence, commentary and any explanations** |
| **7.2** | Accountability and transparency are integral to a positive complaint handling culture. Landlords must report back on wider learning and improvements from complaints in their annual report and more frequently to their residents, staff and scrutiny panels. | Partial | NCHA’s Customer Satisfaction Manager reports on organisational and general improvement opportunities to a wide variety of stakeholders, including the Senior Leadership Team and relevant departmental managers, Customer and Care Committee and scrutiny panels. We also published complaints performance on our website on a quarterly basis.  Whilst we report on complaints performance to customers, there is work to do to include learning and improvements from complaints. |

**Best practice ‘should’ requirements**

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| **Code section** | **Code requirement** | **Comply:**  **Yes/No** | **Evidence, commentary and any explanations** |
| **7.3** | A member of the governing body should be appointed to have lead responsibility for complaints to support a positive complaint handling culture. This role will be responsible for ensuring the governing body receives regular information on complaints that provides insight to the governing body on the landlord’s complaint handling performance. | Yes | Chris Blackburn, Board Members is appointed to have lead responsibility for complaints and is responsible for ensuring that the board receives regular information on complaints performance and insight. |
| **7.4** | As a minimum, governing bodies should receive:   * Regular updates on the volume, categories and outcome of complaints, alongside complaint handling performance including compliance with the Ombudsman’s orders * Regular reviews of issues and trends arising from complaint handling, * The annual performance report produced by the Ombudsman, where applicable * Individual complaint outcomes where necessary, including where the Ombudsman made findings of severe maladministration or referrals to regulatory bodies. The implementation of management responses should be tracked to ensure they are delivered to agreed timescales. The annual self-assessment against the Complaint Handling Code for scrutiny and challenge. | Yes | NCHA receive an annual complaints and compensation report and the self -assessment against the Code |
| **7.5** | Any themes or trends should be assessed by senior management to identify potential systemic issues, serious risks or policies and procedures that require revision. They should also be used to inform staff and contractor training. | Yes | Senior Leadership Team receive quarterly complaints reports that include themes and areas for organisational learning. These areas are translated into team briefings, further training and senior leaders are held to account should their areas continue to under perform |
| **7.6** | Landlords should have a standard objective in relation to complaint handling for all employees that reflects the need to:   * have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments * take collective responsibility for any shortfalls identified through complaints rather than blaming others * act within the Professional Standards for engaging with complaints as set by the Chartered Institute of Housing. | Yes | The complaints procedure places an emphasis on service manager (complaint investigator) ownership and to own areas of the complaint outside of their service area.  Colleagues have also been provided with a complex case collaboration procedure to support colleagues in managing complex and cross team issues (not confined to complaints). The complaints procedure and policy reads across to the complex case collaboration procedure for complaints that meet its criteria.  NCHA have adopted the CIG professional standards for its housing activity. |

# Section 8 - Self-assessment and compliance Mandatory ‘must’ requirements

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| **Code section** | **Code requirement** | **Comply:**  **Yes/No** | **Evidence, commentary and any explanations** |
| **8.1** | Landlords must carry out an annual self-assessment against the Code to ensure their complaint handling remains in line with its requirements. | Yes | NCHA last conducted a self-assessment against the code in July 2022. It expects to repeat this process annually in March ahead of the new financial year to offer assurance to our key stakeholders. |
| **8.2** | Landlords must also carry out a self-assessment following a significant restructure and/or change in procedures. | Yes | This assessment followed a restructure of NCHA’s Customer Experience Team. |
| **8.3** | Following each self-assessment, a landlord must:   * report the outcome of their self-assessment to their governing body. In the case of local authorities, self-assessment outcomes should be reported to elected members * publish the outcome of their assessment on their website if they have one, or otherwise make accessible to residents * include the self-assessment in their annual report section on complaints handling performance | Yes | NCHA has already reported the outcome of the July’s self-assessment to our governing body and published the outcome on the website.  NCHA will repeat this process annually. |