

# NCHA Complaint Handling Code Self-Assessment 2024-25

## Appendix A: Self-assessment form

This self-assessment form should be completed by the complaints officer and it must be reviewed and approved by the landlord's governing body at least annually.

Once approved, landlords must publish the self-assessment as part of the annual complaints performance and service improvement report on their website. The governing body's response to the report must be published alongside this.

Landlords are required to complete the self-assessment in full and support all statements with evidence, with additional commentary as necessary.

We recognise that there may be a small number of circumstances where landlords are unable to meet the requirements, for example, if they do not have a website. In these circumstances, we expect landlords to deliver the intentions of the Code in an alternative way, for example by publishing information in a public area so that it is easily accessible.

## Section 1: Definition of a complaint

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
1.2	<p>A complaint must be defined as:</p> <p><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></p>	Yes	<p><a href="#">2024/25 NCHA Complaints Policy</a> Policy statement &amp; Policy Section 3.1.1:</p> <p>We have adopted the following definition of a complaint 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’.</p>	<p>No change for the updated 2025/26 Complaints Policy.</p> <p>We will use the launch of the updated Complaints Policy to remind colleagues about this definition.</p>
1.3	<p>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.</p>	Yes	<p><a href="#">2024/25 NCHA Complaints Policy</a> Policy statement &amp; Policy Section 3.1.2:</p> <p>We also recognise complaints can come in many forms without the term ‘complaint’ being used such as from our customer surveys or you believe we have not met our service standards.</p>	<p>No change for the updated 2025/26 Complaints Policy.</p> <p>No change for the updated 2025/26 Complaints Policy.</p>

			<p>Policy Section 1.3: Complaints within the scope of this policy include those from someone (including NCHA C&amp;S colleagues) acting on behalf of any customer where there is signed a consent giving permission, or, where they are acting in line with the Mental Capacity Act.</p>	
1.4	<p>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.</p>	Yes	<p><a href="#">2024/25 NCHA Complaints Policy</a> Policy Section 3.1.3 The following issues are not classed as complaints: Requesting a service from us for the first time, for example reporting a repair would go through the usual repairs reporting process. Requests for information about our services. Reporting a problem with a neighbour or another resident which is covered by our Antisocial Behaviour Policy or the Care and Support Service User Grievance Policy. Exceptions to this will be where the report includes a complaint about our response to the report. We will write to the</p>	<p>The updated 2025/26 Complaints Policy will be made clearer in Section 3.3.1 about how a service request is managed and recorded. These continue to be recorded and reviewed to identify trends.</p>

			complainant to confirm where we will not consider a complaint for these issues and explain our reasons.	
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	<a href="#">2024/25 NCHA Complaints Policy</a> Policy Section 3.1.1:  We have adopted the following definition of a complaint 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'.	No change for the updated 2025/26 Complaints Policy.
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	<a href="#">2024/25 NCHA Complaints Policy</a> Policy Section 3.1.2 We also recognise complaints can come in many forms without the term 'complaint' being used such as from our customer surveys.  NCHA has a robust approach to dissatisfaction expressed in surveys. We have established triggers on keywords and low scores that prompts colleague	No change for the updated 2025/26 Complaints Policy.

			intervention. Furthermore, when customers respond with a low score (1 or 2 out of 5), they will receive an automatic follow-up message outlining how to raise a formal complaint.	
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## 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	<a href="#">2024/25 NCHA Complaints Policy</a> Policy Section 3.1.3: The following issues are not classed as complaints: Requesting a service from us for the first time, for example reporting a repair would go through the usual repairs reporting process. Requests for information about our services. Reporting a problem with a neighbour or another resident which is covered by our Antisocial Behaviour Policy or the Care and Support Service User Grievance Policy. Exceptions to this will be where the report includes a complaint about our response to the report. We will write to the complainant to confirm where we will not consider a complaint for	No change for the updated 2025/26 Complaints Policy.

			<p>these issues and explain our reasons.</p> <p><a href="#">2024/25 NCHA Complaints Policy</a></p> <p>Policy Section 3.1.4</p> <p>We aim to provide a complaints service that is accessible to all customers and all complaints will be considered unless:</p> <p>The issue(s) being complained about took place over 12 months before.</p> <p>The same issue from the same complainant has been investigated and closed.</p> <p>The issue is part of any legal proceedings or where the same issue is part of a case that has been referred to court.</p> <p>We have evidence that the complaint is based on false information.</p> <p>We have acted where regulatory, policy or legislative restrictions apply.</p> <p>A customer's actions are considered to be unreasonable and we reserve the right to restrict, change access or take further action.</p>	
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			<p>A customer makes what we consider to be unreasonable demands that impact substantially on our services due to the amount of information being requested or provided, the nature and scale of the service they expect, or the frequency or number of approaches made including for example: asking for a response within an unreasonable timescale; insisting on communicating with a particular colleague; continual telephone calls, emails or letters; repeatedly changing the issues raised in a complaint or raising unrelated concerns; refusal to co-operate with the complaint investigation process whilst still requesting the complaint is resolved; persistent refusal to accept a decision or explanations about what we can or cannot do o continuing to pursue a complaint without presenting any new information.</p> <p>We will write to the complainant to confirm where a complaint will not be considered for these issues and explain our reasons.</p>	
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2.2	<p>A complaints policy must set out the circumstances in which a matter will not be considered as a complaint or escalated, and these circumstances must be fair and reasonable to residents. Acceptable exclusions include:</p> <ul style="list-style-type: none"> <li>• The issue giving rise to the complaint occurred over twelve months ago.</li> <li>• 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.</li> <li>• Matters that have previously been considered under the complaints policy.</li> </ul>	Yes	See evidence for 2.1	No change for the updated 2025/26 Complaints Policy.
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. Landlords must consider whether to apply discretion to accept complaints made outside this time limit where there are good reasons to do so.	Yes	Discretion is applied by senior colleagues, however not explicit in the current policy.	This will be made clear in the updated 2025/26 Complaints Policy.
2.4	If a landlord decides not to accept a complaint, an explanation must be	Yes	<a href="#">2024/25 NCHA Complaints Policy</a>	No change for the updated 2025/26 Complaints Policy.

	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.		Policy Section 3.1.4 We will write to the complainant to confirm where a complaint will not be considered for these issues and explain our reasons. All complaints correspondence includes information about taking decisions to the Ombudsman.	
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Yes	Discretion is applied by senior colleagues, however not explicit in the current policy.	This will be made clear in the updated 2025/26 Complaints Policy.

### 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	<p><a href="#">2024/25 NCHA Complaints Policy</a></p> <p>Policy Section 3.2.1</p> <p>Complaints can be made in a range of ways:</p> <p>In writing via letter or using our 'We're Listening' card to NCHA - Clifton Place, 9 Fairham Brook Drive, Clifton, Nottingham, NG11 8PY.</p> <p>By telephoning the Freephone number on 0800 013 8555.</p> <p>By email to <a href="mailto:info@ncha.org.uk">info@ncha.org.uk</a></p> <p>Online at <a href="http://www.ncha.org.uk">www.ncha.org.uk</a></p> <p>Via our social media platforms – complaints made in this way will be handled confidentially in line with our policy and procedures.</p> <p>In person or directly to any NCHA colleague.</p> <p>Anonymously.</p> <p>To a local Member of Parliament or local authority Councillor or relevant Ombudsman.</p>	Office address change for the updated 2025/26 Complaints Policy.

			Directly to commissioning organisations such as the local authority or health service if the complaint is about the social care services we provide.	
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	<a href="#">2024/25 NCHA Complaints Policy</a> Policy Section 3.2.1 Complaints can be made in a range of ways: In person or directly to any NCHA colleague.  NCHA allows complaints to be made through any staff member, ensuring all staff are informed of the process.	No change for the updated 2025/26 Complaints Policy.
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	While the policy does not directly address complaint volumes, the emphasis on accessibility confirms our understanding of this requirement.  The comprehensive range of options provided for making a complaint (Section 3.2.1) highlights our encouragement for feedback and complaints, indirectly supporting the principle that high volumes of complaints are not viewed negatively but as part of an accessible process.	

			Furthermore, our <a href="#">Annual Report to Customers 2023-2024</a> (pages 14-15) demonstrates the volumes and performance of complaints.	
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 href="#">2024/25 NCHA Complaints Policy</a> NCHA's complaints policy is designed to be clear and accessible, with detailed explanations of the complaints process and its stages at policy sections 3.3.2, 3.3.3 & 3.3.4. The policy is published on the website within the dedicated complaints webpage <a href="#">NCHA Complaints</a>	No change for the updated 2025/26 Complaints Policy.
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	Policy Statement: Information about the complaints policy will also be provided as part of any new tenancy, licence or at the start of any care and support in a format to suit individual communication needs.  The Complaint Handling code is provided as a link in the Legislation and Regulation section of the Policy. It is also included on the website within the dedicated complaints webpage <a href="#">NCHA Complaints</a>	The updated 2025/26 Complaints Policy will include a link to the Housing Ombudsman service, in addition to the Complaint Handling Code

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	While specific provision for representation in meetings isn't explicitly stated in our policy, the policy's openness and support for complainants, including signposting to advocacy services confirms our intention to accommodate representatives in the complaint process.	This will be made clear in the updated 2025/26 Complaints Policy.
3.7	Landlords must provide residents with information on their right to access the Ombudsman service and how the individual can engage with the Ombudsman about their complaint.	Yes	All complaint correspondence includes information on how the Ombudsman can be accessed	

## 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	NCHA has designated roles for handling complaints and in April 2024 launched a centralised complaints team (Customer Resolution Team) to respond to sector changes and strengthen our service to customers. Our policy outlines various responsibilities across staff roles for complaint handling (e.g., colleagues for investigation at Stage 1 and senior managers for review), confirming the presence of a structured approach to complaints management.	An annual review of the customer Resolution Team has been included in the Annual Complaints Report for NCHA Board
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	The Customer Resolution Team has access to all colleagues, regardless of seniority. A complaints Procedure is in place to support the Complaints Policy and give guidance to all colleagues in relation to complaint management and responsibilities. There is an organisation wide agreement to respond to complaint enquiries within 3 working days via an	For 2025/26 NCHA will be updating the policy and procedure to include Stage 2 submission meetings with the Customer Resolution Team and Head of customer Experience to provide extra assurance

			agreed proforma. With the support of the Customer Resolution Service Manager the Customer Resolution Agents have the autonomy to resolve complaints promptly and fairly, and in line with the Ombudsman's expectations. There is clear guidance in the Complaints Procedure for Stage 2 complaint management by senior managers.	
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	Following the launch of the Customer Resolution Team in April 2024 we have continued to brief teams around the importance of complaint handling and learning. We have developed internal processes to for teams to identify lessons learned from complaints which feed into wider reporting. All colleagues expected to handle complaints receive training on the complaint management system alongside the procedure for complaint management	To support the launch of the updated Policy in July 2025 there will be a structured communications plan to all colleagues covering complaint handling principles and expectations, the lessons learned process and tracker, and learning from the Ombudsman and our own complaints

## Section 5: The Complaint Handling Process

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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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	The <a href="#">2024/25 NCHA Complaints Policy</a> is the only complaints policy for NCHA covering all tenures and customers. The policy commits to the fair and equal treatment of all customers who complaint	
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	The <a href="#">2024/25 NCHA Complaints Policy</a> is clear there are only 2 stages of the complaints process. First contact resolution referred to in Section 3.3.1 is used for service requests to put things right and is not treated as an informal complaint or stage 0.	NCHA's policy emphasises resolving complaints at the earliest possible stage.  The 2025/26 updated Complaints Policy will be clearer about the use of first contact resolution.
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	<a href="#">2024/25 NCHA Complaints Policy</a>	NCHA's complaints procedure consists of two stages, aligning with the Code's stipulations.
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	All complaints that relate to a third party are investigated in line with the NCHA Complaints Policy. NCHA will work with the third party to obtain information and agreement on a resolution. NCHA does not delegate complaint responsibility to any third parties and so is directly responsible for complaints in line with our Policy and the Complaint Handling Code.	The updated 2025/26 Complaints Policy will include this statement, so it is clear for customers

5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Yes	NCHA does not delegate complaint responsibility to any third parties and so is directly responsible for complaints in line with our Policy and the Complaint Handling Code.	The updated 2025/26 Complaints Policy will include this statement, so it is clear for customers
5.6	When a complaint is logged at Stage 1 or escalated to Stage 2, landlords must set out their understanding of the complaint and the outcomes the resident is seeking. The Code will refer to this as “the complaint definition”. If any aspect of the complaint is unclear, the resident must be asked for clarification.	Yes	<a href="#">2024/25 NCHA Complaints Policy</a> Section 3.3.1: Write to acknowledge the complaint within 3 working days. This will include our understanding of the complaint and the outcomes being sought.	No change for the updated 2025/26 Complaints Policy.
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	<a href="#">2024/25 NCHA Complaints Policy</a> Section 3.3.1: Manage expectations from the outset and be clear where the desired outcome is unreasonable or unrealistic.	The updated 2025/26 Complaints Policy will include greater clarity for customers
5.8	At each stage of the complaints process, complaint handlers must: <ul style="list-style-type: none"> <li>a. deal with complaints on their merits, act independently, and have an open mind;</li> <li>b. give the resident a fair chance to set out their position;</li> </ul>	Yes	The NCHA Complaints Procedure outlines the following principles for both stages of a complaint: Deal with the complaint on its merits Act independently/objectively and have an open mind	This procedure will be refreshed and launched alongside the updated 2025/26 Complaints Policy

	<ul style="list-style-type: none"> <li>c. take measures to address any actual or perceived conflict of interest; and</li> <li>d. consider all relevant information and evidence carefully.</li> </ul>		<p>Take measures to address any actual or perceived conflict of interest</p> <p>Consider all information and evidence carefully, including older reports or previous complaints as part of the background to the current complaint if this will help with the resolution</p> <p>Keep the complaint confidential as far as possible with information only disclosed if necessary to properly investigate the matter</p> <p>Ensure the complainant and if applicable, any colleague who is the subject of the complaint, is given a fair chance to set out their position both at the start and conclusion of the investigation</p>	
5.9	Where a response to a complaint will fall outside the timescales set out in this Code, the landlord must agree with the resident suitable intervals for keeping them informed about their complaint.	Yes	<p><a href="#">2024/25 NCHA Complaints Policy</a></p> <p>Section 3.3.3: Provide updates with the progress of the complaint investigation and agree the preferred way to communicate.</p> <p>Make contact if we cannot give a full response within 10 working days to make an agreement to</p>	No change for the updated 2025/26 Complaints Policy.

			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.	
5.10	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	<a href="#">2024/25 NCHA Complaints Policy</a> Section 7.1: This policy has been written in line with NCHA's Equality, Diversity and Inclusion Policy and Equality Statement. An Equality Impact Assessment has been completed	NCHA launched the Customers with Vulnerabilities Policy in 2024. The procedure ensures colleagues proactively identify vulnerabilities & service adjustments. These are recorded and date stamped on our core system.
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	<a href="#">2024/25 NCHA Complaints Policy</a> Section 3.3.5: We will not unreasonably refuse a stage 2 review request and if we do refuse, we will explain why in writing and who the complainant can contact if they do not agree with this decision. Reasons for not agreeing to a review can include: The request is over 20 days from the date of the complaint investigation outcome without a reasonable explanation.	The updated 2025/26 Complaints Policy no longer includes 'where demands are made that are unreasonable or distressing' as a reason to refuse to escalate a complaint

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	NCHA use a dedicated complaints management system for Stage 1 and Stage 2 complaints. Specific information and milestones must be recorded on the system to close a complaint. These include the original complaint, and correspondence with the customer and other parties. Key correspondence (acknowledgement, extension letter, outcome letter). All entries are date stamped. The system is designed for end to end case management. The complaints procedure outlines the record keeping requirements in line with the Code.	Complaints management forms part of the biannual business critical controls audit carried out by NCHA's auditors. Complaint samples are quality and compliance checked to ensure record keeping is accurate and thorough.
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	<del>The complaints procedure outlines for colleagues receiving a complaint to seek first contact resolution.</del> Prior to concluding a Stage 1 complaint the customer is contacted and the outcome is discussed which allows for a resolution to be sought to avoid escalation. Stage 2 complaint outcomes are sent to the Customer Resolution Manager for quality checking which gives	The updated 2025/26 Complaints Policy and Procedure will include a pre-submission review with the investigating senior manager, Customer Resolution Manager and Head of Customer Experience to ensure all possible resolutions are explored

			the opportunity for a resolution to be sought to avoid escalation.	
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	<p>NCHA <a href="#">Antisocial Behaviour &amp; Hate Crime Policy</a> covers unacceptable behaviour towards colleagues and contractors.</p> <p>The <a href="#">Treating People Fairly Service Standard</a> service standard outlines how we will treat customers fairly in the delivery of our services, alongside our expectations on customer behaviour when interacting with NCHA.</p>	NCHA are developing a specific policy for colleagues and customers outlining our approach to managing unacceptable behaviour
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	Both the <a href="#">Treating People Fairly Service Standard</a> service standard and <a href="#">Antisocial Behaviour &amp; Hate Crime Policy</a> ensure actions by NCHA are proportionate and demonstrate for the provisions of the Equality Act 2010	The process for applying any 'red flag' to a tenancy is supported by a detailed procedure and aligns to the provisions of GDPR

## 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	<a href="#">2024/25 NCHA Complaints Policy</a> The Customer Resolution Team aim to resolve straightforward complaints as quickly as possible and ensure sufficient time is given to more complex complaints, using extensions when required and agreed with the customer. The complaints procedure requires colleagues to assess the complexity of the issue and any vulnerabilities that might prevent first contact resolution.	This approach aligns with the requirement to differentiate between complaints that can be quickly resolved and those needing further investigation.
6.2	Complaints must be acknowledged, defined and logged at stage 1 of the complaints procedure <b><u>within five working days of the complaint being received.</u></b>	Yes	<a href="#">2024/25 NCHA Complaints Policy</a> Section 3.3.1: Write to acknowledge the complaint within 3 working days. This will include our understanding of the complaint and the outcomes being sought	The updated 2025/26 Complaints Policy has changed to 5 working days to be consistent with the Code and to ensure quality at Stage 1

6.3	Landlords must issue a full response to stage 1 complaints <b><u>within 10 working days</u></b> of the complaint being acknowledged.	Yes	<a href="#">2024/25 NCHA Complaints Policy</a> Section 3.3.3: Provide a full response within 10 working days with an outcome, details of what action we plan to take, remedies available, how to escalate the complaint and how to get further help	The updated 2025/26 Complaints Policy will include “from the date of acknowledgement” in section 3.3.3 for clarity.  This is a Board key performance measure which is reported monthly
6.4	Landlords must decide whether an extension to this timescale is needed when considering the complexity of the complaint and then inform the resident of the expected timescale for response. Any extension must be no more than 10 working days without good reason, and the reason(s) must be clearly explained to the resident.	Yes	<a href="#">2024/25 NCHA Complaints Policy</a> Section 3.3.3: 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.	No change for the updated 2025/26 Complaints Policy.
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	See 6.4	No change for the updated 2025/26 Complaints Policy.
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	Yes	The Complaints Procedure requires the investigating colleague at both stages to record and track outstanding actions following the outcome. All investigating colleagues are expected to provide the outcome	The updated 2025/26 Complaints Policy will include this for clarity

	appropriate updates provided to the resident.		when it is known and not when the outstanding actions required to address the issue are completed. The investigating colleague is expected to retain ownership for any follow up actions until these are completed and retain contact with the customer.	
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	<a href="#">2024/25 NCHA Complaints Policy</a> Section 3.3.3: The Customer Resolution Agent will complete a thorough investigation of the complaint which will be confidential, objective and impartial. The Customer Resolution Agent will consider what has happened, what should have happened, what lessons have been learned and what needs to change.  The complaints procedure provides more detail for the complaint outcome including: Was the complaint related to a potential breach of legislation or statutory regulations Was the complaint related to a communal area	No change for the updated 2025/26 Complaints Policy.

			Did the complainant say they were treated unfairly/disrespectfully	
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	Any new issues raised will be incorporated into the current investigation if the outcome has not been issued and these are related to the current complaint. If the new issue(s) cannot be incorporated into the current complaint the customer will be informed and a new complaint will be logged	The updated 2025/26 Complaints Policy and Procedure will include this for clarity
6.9	Landlords must confirm the following in writing to the resident at the completion of stage 1 in clear, plain language: <ul style="list-style-type: none"> <li>a. the complaint stage;</li> <li>b. the complaint definition;</li> <li>c. the decision on the complaint;</li> <li>d. the reasons for any decisions made;</li> <li>e. the details of any remedy offered to put things right;</li> <li>f. details of any outstanding actions; and</li> <li>g. details of how to escalate the matter to stage 2 if the individual is not satisfied with the response.</li> </ul>	Yes	<a href="#">2024/25 NCHA Complaints Policy</a> Section 3.3.3: The Customer Resolution Agent will Provide a full response within 10 working days with an outcome, details of what action we plan to take, remedies available, how to escalate the complaint and how to get further help.	Complaint outcomes also confirm the complaint stage, complaint definition and reasons for the decisions. The updated 2025/26 Complaints Policy will include this for clarity

## 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	<a href="#">2024/25 NCHA Complaints Policy</a> Section 3.3.4: Complainants can request a review of the complaint if they are unhappy with the stage 1 decision and outcome. The Customer Resolution Team Manager will acknowledge the complaint review request within 3 working days which will include our understanding the reasons for review and the outcome being sought.	The updated 2025/26 Complaints Policy has changed to 5 working days for acknowledgement and the Customer Resolution Agent who handled the complaint at Stage 1 will acknowledge the escalation.
6.11	Requests for stage 2 must be acknowledged, defined and logged at stage 2 of the complaints procedure within five working days of the escalation request being received.	Yes	<a href="#">2024/25 NCHA Complaints Policy</a> Section 3.3.4: Write to acknowledge the complaint within 3 working days. This will include our understanding of the complaint and the outcomes being sought	The updated 2025/26 Complaints Policy has changed to 5 working days to be consistent with the Code and to ensure quality at Stage 2
6.12	Residents must not be required to explain their reasons for requesting a stage 2 consideration. Landlords are	Yes	<a href="#">2024/25 NCHA Complaints Policy</a> Section 3.3.5:	No change for the updated 2025/26 Complaints Policy.

	expected to make reasonable efforts to understand why a resident remains unhappy as part of its stage 2 response.		<p>We will not unreasonably refuse a stage 2 review request and if we do refuse, we will explain why in writing and who the complainant can contact if they do not agree with this decision. Reasons for not agreeing to a review can include: The request is over 20 days from the date of the complaint investigation outcome without a reasonable explanation.</p> <p>The complaints procedure confirms the Customer Resolution Manager must obtain an understanding of issues outstanding and the outcomes the complainant is seeking</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	<a href="#">2024/25 NCHA Complaints Policy</a> Section 3.3.4: All stage 2 reviews are carried out by a Senior Manager.	The Stage 1 complaint will have been investigated by the Customer Resolution Team. In the event the Stage 1 complaint is investigated by a manager in another team, the Stage 2 will be investigated by another manager.
6.14	Landlords must issue a final response to the stage 2 <b><u>within 20 working days</u></b> of the complaint being acknowledged.	Yes	<a href="#">2024/25 NCHA Complaints Policy</a> Section 3.3.4:	The updated 2025/26 Complaints Policy will include “from the date of

			Provide a full response within 20 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.	acknowledgement” in section 3.3.4 for clarity.  This is a Board key performance measure which is reported monthly
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	<a href="#">2024/25 NCHA Complaints Policy</a> Section 3.3.4: Make contact if we cannot give a full response within 20 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.  The complaints procedure includes a template letter for all agreed extensions.	No change for the updated 2025/26 Complaints Policy.
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	See 6.15	No change for the updated 2025/26 Complaints Policy.
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	Yes	The Complaints Procedure requires the investigating colleague at both stages to record and track outstanding actions following the outcome. All investigating colleagues are	The updated 2025/26 Complaints Policy and Procedure will include this for clarity

	actioned promptly with appropriate updates provided to the resident.		expected to provide the outcome when it is known and not when the outstanding actions required to address the issue are completed. The investigating colleague is expected to retain ownership for any follow up actions until these are completed and retain contact with the customer.	
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	<a href="#">2024/25 NCHA Complaints Policy</a> Section 3.3.4: All stage 2 reviews are carried out by a Senior Manager who will provide a full response within 20 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. Following the stage 2 review, the Customer Resolution Team Manager will: Ensure that any actions as a result of the complaint resolution are monitored through to completion. Process any compensation payments in line with our policies and procedures.	The updated 2025/26 Complaints Policy and Procedure will include a pre-submission review with the investigating senior manager, Customer Resolution Manager and Head of Customer Experience to provide further assurance on the outcome.

6.19	Landlords must confirm the following in writing to the resident at the completion of stage 2 in clear, plain language: <ul style="list-style-type: none"> <li>a. the complaint stage;</li> <li>b. the complaint definition;</li> <li>c. the decision on the complaint;</li> <li>d. the reasons for any decisions made;</li> <li>e. the details of any remedy offered to put things right;</li> <li>f. details of any outstanding actions; and</li> <li>g. details of how to escalate the matter to the Ombudsman Service if the individual remains dissatisfied.</li> </ul>	Yes	<a href="#">2024/25 NCHA Complaints Policy</a> Section 3.3.4: All stage 2 reviews are carried out by a Senior Manager who will provide a full response within 20 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.	Complaint outcomes also confirm the complaint stage, complaint definition and reasons for the decisions. The updated 2025/26 Complaints Policy will include this for clarity
6.20	Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.	Yes	Stage 2 complaint outcomes are sent to the Customer Resolution Manager for quality checking.	For 2025/26 NCHA will be updating the policy and procedure to include Stage 2 submission meetings with the Customer Resolution Team and Head of customer Experience to provide extra assurance

## Section 7: Putting things right

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
7.1	Where something has gone wrong a landlord must acknowledge this and set	Yes	All complaint outcomes at both stages will include a section for	

	<p>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"> <li>• Apologising;</li> <li>• Acknowledging where things have gone wrong;</li> <li>• Providing an explanation, assistance or reasons;</li> <li>• Taking action if there has been delay;</li> <li>• Reconsidering or changing a decision;</li> <li>• Amending a record or adding a correction or addendum;</li> <li>• Providing a financial remedy;</li> <li>• Changing policies, procedures or practices.</li> </ul>		<p>putting things right. These will include actions already taken or are intended to take. The examples included in the Code are all examples used within complaint outcomes. NCHA promotes meaningful resolutions for all investigating colleagues to explore and to seek advice from senior colleagues if they are unsure.</p>	
7.2	<p>Any remedy offered must reflect the impact on the resident as a result of any fault identified.</p>	Yes	<p><a href="#">2024/25 NCHA Complaints Policy</a>  Section 3.4.1:  At both stage 1 and stage 2 of the complaint, we can offer resolutions where the complaint is partially or fully upheld. We will consider the following factors when offering a resolution:  The severity of any service failure or omission and the level of detriment caused as a result.  The length of time that a situation has been ongoing.</p>	<p>No change for the updated 2025/26 Complaints Policy.</p>

			<p>The frequency with which something has occurred.</p> <p>The number of different failures.</p> <p>The cumulative impact on the complainant.</p> <p>The complainant's particular circumstances or vulnerabilities.</p>	
7.3	<p>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.</p>	Yes	<p><a href="#">2024/25 NCHA Complaints Policy</a></p> <p>Section 3.4.1:</p> <p>Following the stage 2 review, the Customer Resolution Team Manager will:</p> <p>Ensure that any actions as a result of the complaint resolution are monitored through to completion.</p> <p>Process any compensation payments in line with our policies and procedures.</p> <p>Outcomes with a remedy will include how the remedy will take place with timescales.</p>	<p>No change for the updated 2025/26 Complaints Policy.</p>
7.4	<p>Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.</p>	Yes	<p>NCHA had adopted the Ombudsman guidance as part of the <a href="#">NCHA Compensation Policy</a></p>	

## Section 8: Self-assessment, reporting and compliance

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
8.1	<p>Landlords must produce an annual complaints performance and service improvement report for scrutiny and challenge, which must include:</p> <ul style="list-style-type: none"> <li>a. the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements.</li> <li>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;</li> <li>c. any findings of non-compliance with this Code by the Ombudsman;</li> <li>d. the service improvements made as a result of the learning from complaints;</li> <li>e. any annual report about the landlord's performance from the Ombudsman; and</li> <li>f. any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord.</li> </ul>	Yes	<p>An annual complaints and compensation report for the previous reporting year is produced for NCHA Board and Customer Committee in Quarter 1 of the new reporting year. The 2024/25 annual report included the following areas of focus, for review, comment and scrutiny: Complaints analysis (volume, performance, categories, outcomes), equality and diversity analysis, lessons learned analysis, sector profile information, customer facing information, a review of the first year of the Customer Resolution Team, Complaint Handling Code self assessment, Ombudsman activity and compensation analysis.</p> <p>The annual performance report from the Ombudsman is published on the website <a href="#">here</a></p>	

8.2	The annual complaints performance and service improvement report must be reported to the landlord's governing body (or equivalent) and published on the on the section of its website relating to complaints. The governing body's response to the report must be published alongside this.	Yes	See 8.1 for details on the annual performance review, which is reported to NCHA Board and Customer Committee.  <a href="#">Complaints   NCHA</a> <a href="#">Recent complaints   NCHA</a> These webpages lead to the <a href="#">Annual Complaints Performance Review</a> – this includes the Board's response to the performance review	
8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	Yes	The 2024/25 self-assessment considers the change to a centralised team.	
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	Yes	NCHA would review and update its self-assessment following an Ombudsman investigation if requested.	
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	As active members of the Ombudsman we would notify the Ombudsman of any issue affecting our ability to comply with the Code	

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	In addition to reporting lessons learned and service improvements to NCHA Board and Customer Committee, a lessons learned tracker is in place to support this reporting. This tracker outlines the complaint themes, relevant department, the source of the lessons learned, when it was assigned to the department, what actions have been taken, whether it has been reported to more senior colleagues for debate/decision, any actions as a result and when these took place, expected/known impact of the changes, updates for the next quarter and when customers have been notified of the change	For 25/26 this high level tracker will be supported by a clear process for all service managers to follow to ensure ownership and accountability for following up lessons learned to improve services. This process will capture all lessons learned prior to being themed and will be monitored by senior managers.
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	NCHA introduced its Customer Insight strategy in 2024, which included bespoke software to capture transactional feedback from a range of services, including complaints. The insight	

			<p>and performance is reported to Customer Committee.</p> <p>The annual TSMs provide insight into our performance in the sector and customer perception.</p> <p>The mid-year and full year results are reported to Board and Customer Committee, with senior colleagues responsible for identifying how to improve poor performance or perception.</p>	
9.3	<p>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.</p>	Yes	<p>NCHA will run periodic and focussed communications plans around complaints, particularly when there are significant changes or opportunities for learning from the sector or our own complaints.</p> <p>The Scrutiny Panel completed a scrutiny on complaints at NCHA, with the recommendations accepted, particularly the recommendation to move to a centralised complaints team. The Homes and Neighbourhood Panel receive complaints performance on a quarterly and have been involved in reviewing the progress of the Customer Resolution Team.</p> <p>The NCHA website has a dedicated complaints page that</p>	

			provides customers and stakeholders a wide range of information from making a complaint, performance, learning from complaints, performance reports from the Ombudsman and information about the Ombudsman, the complaints and the self-assessment against the Code.	
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	The Director of Homes & Wellbeing has overall accountability for compliance for complaint handling. The role has delegated authority to the Assistant Director of Homes and Wellbeing and Head of Customer Experience, of which will assess any themes or trends to identify potential systemic issues, serious risks, or policies and procedures that require revision. Any assessments and recommendations will be made to the Director of Homes & Wellbeing, as well as Customer Committee.	
9.5	In addition to this a member of the governing body (or equivalent) must be appointed to have lead responsibility for complaints to support a positive complaint handling culture. This person	Yes	This role has been in place for 24/25	This role will be developed further throughout 25/26 to ensure it can further influence the complaint handling culture at NCHA.

	is referred to as the Member Responsible for Complaints ('the MRC').			
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	The MRC is a NCHA Board and Customer Committee member and has access to all complaints information. The MRC actively engages with the Customer Resolution Manager and Head of Customer Experience.	
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	As a Customer Committee member, the MRC alongside the wider Committee membership receive quarterly performance reports. These reports a wide range of performance measures and analysis of complaints received and managed. These reports include trends and themes from lessons learned and what actions have been taken as a result. The MRC alongside the wider Committee membership will receive all Ombudsman maladministration judgements and the actions taken to comply with orders. The MRC alongside the wider Committee membership will receive the annual complaints	

			and service improvement report prior to Board approval.	
9.8	<p>Landlords must have a standard objective in relation to complaint handling for all relevant employees or third parties that reflects the need to:</p> <ul style="list-style-type: none"> <li>a. have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments;</li> <li>b. take collective responsibility for any shortfalls identified through complaints, rather than blaming others; and</li> <li>c. act within the professional standards for engaging with complaints as set by any relevant professional body.</li> </ul>	Yes	<p>The introduction of a centralised complaints team presented a risk that wider teams would no longer take collective responsibility for shortfalls through complaints or work towards to improving their services. To mitigate this risk, the Head of Customer Experience and Customer Resolution Manager have developed collaborative approaches to work with other teams to ensure the value of complaints and learning from them is fully shared. Complaints and lessons learned are standard items on senior manager agendas. NCHA will run periodic and focussed communications plans around complaints, particularly when there are significant changes or opportunities for learning from the sector or our own complaints. NCHA's overall approach to complaints is modelled against the Complaint Handling Code and other models promoted by the Ombudsman, such as action plans following a Spotlight report.</p>	