# 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 | A complaint must be defined as:*‘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.’*  | Yes | Policy section 6.3 [Appendix A](#_APPENDICES)Or on our website [www.ndh-ltd.co.uk](http://www.ndh-ltd.co.uk)  | Our Policy sets out a clear definition which is in line with the code. |
| 1.3 | A resident does not have to use the word ‘complaint’ for it to be treated as such. Whenever a resident expresses dissatisfaction landlords must give them the choice to make complaint. A complaint that is submitted via a third party or representative must be handled in line with the landlord’s complaints policy. | Yes  | Policy section 6.3 Procedure  | Policy and procedures includes definition to allow this without use of word “Complaint” and staff are aware and operating on this basis.Policy can be found at [Appendix A](#_APPENDICES) |
| 1.4 | Landlords must recognise the difference between a service request and a complaint. This must be set out in their complaints policy. A service request is a request from a resident to the landlord requiring action to be taken to put something right. Service requests are not complaints, but must be recorded, monitored and reviewed regularly. | Yes | Policy section 6.3Staff Training  | This is set out in our policy and Staff are aware of this difference and approaching their work with this in mind.Policy can be found at [Appendix A](#_APPENDICES) |
| 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 | Policy section 6.3Dedicated Customer Complaints Advisor System to record complaints | Confirmation in writing to Customers that make contact on how we will deal with request for service or complaint.Policy can be found at [Appendix A](#_APPENDICES) |
| 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 | Policy sections 6.1, 6.3Surveys (copy [appendix B](#_Appendix_B_–))Procedures | We include details or a link on all surveys for our complaints policy. Dissatisfaction identified through surveys is followed up where possible to ensure it is resolved and / or progressed as a compliant if appropriate.Confirmation in writing to Customers that make contact on how we will deal with request for service or complaint.At any time, an ongoing issue can be (and is) escalated to become a complaint at the request of the customer.Policy can be found at [Appendix A](#_APPENDICES) |

# 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 | System recordsLettersPolicy section 6.3 | Policy states this. Confirmation in writing to Customers that make contact on how we will deal with request for service or complaint.Policy can be found at [Appendix A](#_APPENDICES) |
| 2.2 | A complaints policy must set out the circumstances in which a matter will not be considered as a complaint or escalated, and these circumstances must be fair and reasonable to residents. Acceptable exclusions include:* The issue giving rise to the complaint occurred over twelve months ago.
* Legal proceedings have started. This is defined as details of the claim, such as the Claim Form and Particulars of Claim, having been filed at court.
* Matters that have previously been considered under the complaints policy.
 | Yes | Policy section 6.3 | Our Policy clearly sets this out.Policy can be found at [Appendix A](#_APPENDICES) |
| 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 | Policy section 6.3 | Set out in our Policy We will always consider complaints out of this timescale Policy can be found at[Appendix A](#_APPENDICES) |
| 2.4 | If a landlord decides not to accept a complaint, an explanation must be provided to the resident setting out the reasons why the matter is not suitable for the complaints process and the right to take that decision to the Ombudsman. If the Ombudsman does not agree that the exclusion has been fairly applied, the Ombudsman may tell the landlord to take on the complaint.  | Yes | Policy section 6.3 | Letter to customer will confirm and give reasons in line with our Complaints Policy.Policy can be found at [Appendix A](#_APPENDICES) |
| 2.5 | Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint. | Yes | Policy section 6.3 ProcedureTraining  | Policy states this. Confirmation in writing to Customers that make contact on how we will deal with request for service or complaint.Policy can be found at [Appendix A](#_APPENDICES) |

# 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 | Training Website Policy section 6.3LettersRecords of complaints  | A complaint can be logged by all the options identified in the code.A preference on method of communication will be requested to ensure responses are kept confidential. We adapt our approach to meet the needs of individual customers and ensure they can exercise their right to make a complaint effectively. Refresher training for all front-line staff has taken place during the year on the Equality Act.We accept complaints through social media. A preference on method of communication will be requested to ensure responses are kept confidential. We will not ordinarily publicly respond with detail on complaint on social mediaPolicy can be found at [Appendix A](#_APPENDICES)  |
| 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 | All Staff meeting UpdatesCore brief Policy section 6.3Procedures Team meetings | Communication to staff on staff through team meetings and staff meetings Managers will feedback to staff after Complaint review meeting.Policy can be found at[Appendix A](#_APPENDICES) |
| 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 | Policy section 6.5Complaint review meeting minutesComplaints report to Board Customer Board partnership meeting  | We track all complaints actions and learning through our Complaints review Group which is all customer facing managers and our Exec team for positive outcomes of change to be made to our processes |
| 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 | WebsitePolicy [Complaints Leaflet](https://www.ndh-ltd.co.uk/sites/default/files/2024-06/Complaints%20and%20compliments.pdf) or see [Appendix E](#_APPENDICES) | Our Policy details this and is advertised on our website.Our complaints leaflet sets this out is and is sent to all customers who wish to complain as well as being available on website.Our approach has been reviewed and endorsed by our customer groups.Our policy is advertised on our website, in newsletters and communications and through a dedicated leaflet detailing the process on an ongoing basisOur website includes information about how to raise a complaint, our Policy and Process and how to contact the Housing Ombudsman.Policy can be found at [Appendix A](#_APPENDICES) |
| 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 section 6.0Complaints Leaflet  | Our complaints leaflet sets this out is and is sent to all customers who wish to complain as well as being available on website.Our website includes information about how to raise a complaint, our Policy and Process and how to contact the Housing Ombudsman. |
| 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 | Policy section 6.3Complaints Leaflet | Our Policy details this and is advertised on our website along with our Complaints leaflet Policy can be found at [Appendix A](#_APPENDICES) |
| 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 | Letters In house system recordsProcedure Complaint Leaflet  | All complaints letters routinely reference the Ombudsman to ensure customers know they can seek advice throughout the process. Our Stage 1 & 2 response letters routinely detail next steps and provide Housing Ombudsman contact details if outcome is not considered satisfactory.Our Leaflet explains the internal process and the opportunity to contact the Housing Ombudsman and details about how to contact the Housing Ombudsman are available on our websiteSee leaflet at [Appendix E](#_APPENDICES) |

# 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 | Complaints review group minutes.Customer Advisor in Post  | We have a Dedicated and permanent Complaints Advisor who is supported by a Complaints Group of Senior Managers. |
| 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 | Resolution Letters detail communication between staff members | Advisor has open access to all staff across the organisation and independently investigates speaking to those she needs too. In addition all front line managers attend Complaints review group and a twice weekly meeting is held with Head of Customer and Housing Services, Head of Performance, Customer Experience Manager and Customer Services Manager to monitor complaints and ensure Complaints Advisor is accessing all that is required to investigate the complaint. |
| 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 | Training recordsProcedure | Dedicated Complaints Advisor to ensure complaints are dealt with promptly All Front facing line managers part of Complaints Review GroupAll staff aware of complaints procedure |

# Section 5: The Complaint Handling Process

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| Code provision | Code requirement | Comply: Yes / No | Evidence | Commentary / explanation |
| 5.1 | Landlords must have a single policy in place for dealing with complaints covered by this Code. Residents must not be treated differently if they complain.  | Yes | Policy | Complaints Policy and Leaflet detail Policy can be found at [Appendix A](#_APPENDICES) |
| 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 | System recordsPolicy section 6.3Procedure | Informal Contact will be discussed with the customer and an approach agreed to take a complaint forward. Contact and agreements is recorded through our in-house housing system.Our KPI suite includes a target to acknowledge and log complaints within 5 days of receipt.Policy can be found at [Appendix A](#_APPENDICES) |
| 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 | ProcedurePolicy section 6.3System recordsMonitored by Complaints review group  | North Devon Homes has a 2-stage process.We would not ordinarily have or encourage a third stage on the complaints process, have not done so to date and it is not defined within our policy.Whilst this has not been necessary to date, we would comply with this aspect of the code should the need arise.Policy can be found at [Appendix A](#_APPENDICES) |
| 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 | Policy section 6.3Procedure | All Complaints go through our internal process. If complaints are related to a contractor, we will contact and interview the Contractor to seek feedback during the internal investigationPolicy can be found at [Appendix A](#_APPENDICES) |
| 5.5 | Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.   | Yes | Policy section 6.0Procedure | All Complaints go through our internal process.Policy can be found at [Appendix A](#_APPENDICES) |
| 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 | LettersIn house system recordProcedurePolicyExecutive review of Stage 2 Complaints Review Group | Acknowledgement letters give details and set out a summary in the format “we understand your complaint to be”Our Complaints Advisor clarifies any issues before sending letter, and offers an option to revise the complaint at acknowledgement if it has not been expressed correctly or in line with the customers intentPolicy can be found at [Appendix A](#_APPENDICES) |
| 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 | Letters In-House system recordsProcedures Policy section 6.3Review Group  | All acknowledgements of complaints detail what we understand the complaint to be and request agreement.The Complaints Advisor will discuss all complaints with the Customer and desired outcomes and will seek to manage expectations where desired outcomes are unrealistic or unreasonable.Policy can be found at [Appendix A](#_APPENDICES) |
| 5.8 | At each stage of the complaints process, complaint handlers must:  1. deal with complaints on their merits, act independently, and have an open mind;
2. give the resident a fair chance to set out their position;
3. take measures to address any actual or perceived conflict of interest; and
4. consider all relevant information and evidence carefully.
 | Yes | Policy section 6.3Leaflet  | Complaints Advisor has been appointed with experience of complaint handlingComplaints Advisor reports directly to Senior Managers to influence how complaints can be resolved but is physically located in the office with independent performance and compliance team.Complaints Advisor recruited with these skills / experience.On-going training is given to ensure up to date. Our Complaints advisor is empowered to investigate and has direct access to senior staff including our Director of Neighbourhoods who can make decisions to resolve issues quickly and fairly where possible.All complaints are investigated by our independent Complaints Advisor at stage 1 and a Senior Manager that has not been involved at Stage 2.A report to Exec team before all stage 2 acknowledgements will also be presented to ensure that the complaint has been impartial.Policy and Leaflet sets this out.Policy can be found at [Appendix A](#_APPENDICES)See leaflet at [Appendix E](#_APPENDICES) |
| 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 | Leaflet | The Complaints Advisor will keep regular contact as set out in our leaflet.See leaflet at [Appendix E](#_APPENDICES) |
| 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 | Policy section 6.7Leaflet  | We adapt our approach to meet the needs of individual customers and ensure they can exercise their right to make a complaint effectively. Refresher training for all front-line staff has taken place during the year on the Equality Act.See leaflet at [Appendix E](#_APPENDICES)Policy can be found at [Appendix A](#_APPENDICES) |
| 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 | Policy section 6.3 | Policy sets out timescales.Timescale's will be confirmed in letter to customer at all stages.Policy can be found at [Appendix A](#_APPENDICES) |
| 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 | In house system recordsComplaint Review Group Minutes | Our all complaints are recorded through our in-house system.Complaints are reviewed by our Complaints Review Group. |
| 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 | Policy section 6.3Procedure LeafletIn house records | Policy and Leaflet sets this out. Where appropriate, and with agreement of customer, urgent action (e.g., repairs) is underway before complaint is concluded.Policy can be found at [Appendix A](#_APPENDICES)Leaflet can be found See leaflet at [Appendix E](#_APPENDICES) |
| 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 | [Reasonable Behaviour Policy](https://www.ndh-ltd.co.uk/sites/default/files/2024-01/HP%20190%20Reasonable%20Behaviour%20policy%20-%20v3%201Sep22.pdf)or see [Appendix C](#_APPENDICES) | We have a Reasonable Behaviour Policy in place which defines and promotes positive conduct on all sides and sets out exceptions and how this will be handled to support best working. |
| 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 | Reasonable Behaviour Policy Vulnerability Strategy see [Appendix D](#_APPENDICES) | We have a Reasonable Behaviour Policy in place which defines and promotes positive conduct on all sides and sets out exceptions and how this will be handled to support best working.We also have a Vulnerability Strategy which we will also consider during this time.Reasonable Behaviour Policy can be found at [Appendix C](#_APPENDICES) |

# 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 | Policy section 6.3Procedure | Set out in Policy.Policy can be found at [Appendix A](#_APPENDICES) |
| 6.2 | Complaints must be acknowledged, defined and logged at stage 1 of the complaints procedure **within five working days of the complaint being received**.  | Yes | Policy section 6.3KPI’sComplaint review Group Tracker | This is set out in policy and leaflet and tracked through our in-house system. Policy can be found at [Appendix A](#_APPENDICES) |
| 6.3 | Landlords must issue a full response to stage 1 complaints **within 10 working days** of the complaint being acknowledged.   | Yes | Policy section 6.3KPI’sComplaint review Group Tracker | This is set out in policy and leaflet and tracked through our in-house system. As part of our KPI suite we have a KPI to track and report the 10 days. All exceptions will be agreed wherever possible with the customers.Policy can be found at [Appendix A](#_APPENDICES) |
| 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 | Policy section 6.3ProcedureIn house system recordsKPI’s | Agreed with Customer and confirmed in writing.Policy can be found at [Appendix A](#_APPENDICES) |
| 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 | Letters Leaflet Policy section 6.3 | Policy covers this. Policy can be found at [Appendix A](#_APPENDICES)See leaflet at [Appendix E](#_APPENDICES) |
| 6.6 | A complaint response must be provided to the resident when the answer to the complaint is known, not when the outstanding actions required to address the issue are completed. Outstanding actions must still be tracked and actioned promptly with appropriate updates provided to the resident.    | Yes | Complaint review Group TrackerBoard reports | A KPI tracks this has been done for all complaints received |
| 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 | Letters In house system recordsProcedure Policy 6.3Complaints Review Group  | Stage 1 response will confirm all points raised and request customer confirmationPolicy can be found at [Appendix A](#_APPENDICES) |
| 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 | Procedure and Policy section 6.3 | Agreed with Customer and confirmed in writing.Policy can be found at [Appendix A](#_APPENDICES) |
| 6.9 | Landlords must confirm the following in writing to the resident at the completion of stage 1 in clear, plain language:  1. the complaint stage;
2. the complaint definition;
3. the decision on the complaint;
4. the reasons for any decisions made;
5. the details of any remedy offered to put things right;
6. details of any outstanding actions; and
7. details of how to escalate the matter to stage 2 if the individual is not satisfied with the response.
 | Yes | Procedure and Policy section 6.3In house system recordsComplaint review Group Tracker | Stage 1 response will confirm all points raised and request customer confirmation. Also includes details of how to escalate and the Housing Ombudsman contact details to allow Customers to seek advice and support externallyPolicy can be found at [Appendix A](#_APPENDICES) |

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 | Procedure and Policy section 6.3 | We would always allow a stage 2 investigationPolicy can be found at [Appendix A](#_APPENDICES) |
| 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 | Procedure and Policy section 6.3Letters | Stage 2 letter sets this out.Stage 1 will be completed, and resolution confirmed to customer. This will include option to go to Stage 2. Policy can be found at [Appendix A](#_APPENDICES) |
| 6.12 | Residents must not be required to explain their reasons for requesting a stage 2 consideration. Landlords are expected to make reasonable efforts to understand why a resident remains unhappy as part of its stage 2 response. | Yes | Procedure and Policy section 6.3Letters | Letter of acknowledgement and confirmation request at Stage 2 Policy can be found at [Appendix A](#_APPENDICES) |
| 6.13 | The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.  | Yes | Procedure and Policy section 6.3 | Stage 1 Complaints will be investigated by our Complaints Advisor and Stage 2 by a Senior Manager who is not directly involved in the service.Policy can be found at [Appendix A](#_APPENDICES) |
| 6.14 | Landlords must issue a final response to the stage 2 **within 20 working days** of the complaint being acknowledged.   | No | Procedure and section Policy 6.3 | This is set out in policy and leaflet and tracked through our in-house system. We have a KPI to track and report the 20 days. All exceptions will be agreed with the customersDuring 2023/2024 we did not meet this criteria by failing to send out single stage 2 on time by missing the deadline by one day day. All other Stage 2 Complaints met the deadline.We have put additional checks in place by our Customer Experience Manager which are designed to stop this from happening in the future and reported this through to our board.Policy can be found at [Appendix A](#_APPENDICES) |
| 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 | Policy section 6.3ProcedureIn house system recordsLetters  | Agreed with Customer and confirmed in writingPolicy can be found at [Appendix A](#_APPENDICES) |
| 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 | Policy section 6.3ProcedureIn house system recordsLetters | Agreed with Customer and confirmed in writingPolicy can be found at [Appendix A](#_APPENDICES) |
| 6.17 | A complaint response must be provided to the resident when the answer to the complaint is known, not when the outstanding actions required to address the issue are completed. Outstanding actions must still be tracked and actioned promptly with appropriate updates provided to the resident.   | Yes | Procedure and PolicyIn house system recordsComplaint review Group Tracker | Letter of Resolution will set this out Policy can be found at [Appendix A](#_APPENDICES) |
| 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 | Letters on system Records on system | Letter of Resolution will set this out |
| 6.19 | Landlords must confirm the following in writing to the resident at the completion of stage 2 in clear, plain language:  1. the complaint stage;
2. the complaint definition;
3. the decision on the complaint;
4. the reasons for any decisions made;
5. the details of any remedy offered to put things right;
6. details of any outstanding actions; and
7. details of how to escalate the matter to the Ombudsman Service if the individual remains dissatisfied.
 | Yes | Report to Exec team Procedure | Stage 2 Letter will include these details as listed.There is no third stage in our NDH policy and process the letter refers on to Ombudsman |
| 6.20 | Stage 2 is the landlord’s final response and must involve all suitable staff members needed to issue such a response. | Yes | Report to Exec Team Procedure  | Review by exec team include a report on stage 1 and 2 process and outcomes and recommendations  |

# 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 out the actions it has already taken, or intends to take, to put things right. These can include: * Apologising;
* Acknowledging where things have gone wrong;
* Providing an explanation, assistance or reasons;
* Taking action if there has been delay;
* Reconsidering or changing a decision;
* Amending a record or adding a correction or addendum;
* Providing a financial remedy;
* Changing policies, procedures or practices.
 | Yes | ProceduresComplaint Review Group Leaflet Letters  | Our policy and leaflet set this out.Our acknowledgement and resolution letters confirm this to Customers.See leaflet at [Appendix E](#_APPENDICES) |
| 7.2 | Any remedy offered must reflect the impact on the resident as a result of any fault identified.  | Yes | In house system recordsLetters Report to Exec TeamComplaints Group Tracker  | Our acknowledgement and resolution letters confirm this to Customers |
| 7.3 | The remedy offer must clearly set out what will happen and by when, in agreement with the resident where appropriate. Any remedy proposed must be followed through to completion. | Yes | In house system recordsLetters Report to Exec TeamComplaints Group Tracker | Our acknowledgement and resolution letters confirm this to Customers. |
| 7.4 | Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.  | Yes | Report to Exec TeamComplaints Group Tracker | Our Compensation Policy sets this out and has been reviewed and approved in light of the Housing Ombudsman’s ‘Guidance on Remedies’ document |

# Section 8: Self-assessment, reporting and compliance

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| Code provision | Code requirement | Comply: Yes / No | Evidence | Commentary / explanation |
| 8.1 | Landlords must produce an annual complaints performance and service improvement report for scrutiny and challenge, which must include: 1. the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements.
2. 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;
3. any findings of non-compliance with this Code by the Ombudsman;
4. the service improvements made as a result of the learning from complaints;
5. any annual report about the landlord’s performance from the Ombudsman; and
6. any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord.
 | Yes | Self AssessmentPolicyReport to Board  | A Self-Assessment is completed and reviewed and approved by Board annuallySelf-Assessment process will include our involved customers at our scrutiny meeting and approval of finished assessment by our Customer board Partnership and Board.Our Self-assessment can be found on our website and links are advertised in our annual report.Policy can be found at [Appendix A](#_APPENDICES) |
| 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 | Self AssessmentPolicyReport to Board | Self-Assessment process will include our involved customers at our scrutiny meeting and approval of finished assessment by our Customer board Partnership and Board.Our Self-assessment can be found on our website and links are advertised in our annual report.Policy can be found at [Appendix A](#_APPENDICES) |
| 8.3 | Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures. | Yes | Self AssessmentPolicyReport to Board | Self-assessment will be reviewed annually and when required.Policy can be found at [Appendix A](#_APPENDICES) |
| 8.4 | Landlords may be asked to review and update the self-assessment following an Ombudsman investigation. | Yes | Self AssessmentPolicyReport to Board | Self-assessment will be reviewed annually and when requiredPolicy can be found at [Appendix A](#_APPENDICES) |
| 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 | Self AssessmentPolicyReport to Board | Policy can be found at [Appendix A](#_APPENDICES) |

# 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 | Report to Exec TeamComplaints Review Group MinutesCustomer Complaint Review Group Minutes Policy | The learning from all complaints – reviewed by Complaints Review Group – considers whether each complaint gives learning that could be more widely applied. Our Report at stage 2 includes this specifically. |
| 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 | Complaints Review Group MinutesCustomer Complaint Review Group Minutes Policy | Survey to all Customers that have made a complaint. Results shared with Customer Board Partnership.A dedicated Involved Customer Group which looks at all complaints received each quarter. They feed back on the way in which complaints are handled and track actions coming out of complaints.Letter on resolution will include the identified learning.Our Complaints Review Group review all learning gathered by Complaints Advisor to initiate improvements. Staff and services are supported where there have been complaints. |
| 9.3 | Accountability and transparency are also integral to a positive complaint handling culture. Landlords must report back on wider learning and improvements from complaints to stakeholders, such as residents’ panels, staff and relevant committees.  | Yes | Complaints Review Group MinutesCustomer Complaint Review Group Minutes Staff Updates | Complaints review group includes our Executive team and senior managers with service responsibility. All complaint actions are discussed and trackedWe have also introduce a Customer Complaints review group made up of our involved customers which meets each quarter.Updates on performance, trends and learning are provided to Customer Board Partnership which includes customers Policy changes are consulted upon with our customer groups. |
| 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 | Minutes from meetings with Board Champion Board Report | We have a Board Champion for Complaints which reviews all complaints received each quarter and tracks actions within the learning outcomes. |
| 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 is referred to as the Member Responsible for Complaints (‘the MRC’). | Yes | Minutes from meetings with Board ChampionBoard ReportCustomer Board Partnership | We have a Board Champion for Complaints which reviews all complaints received each quarter and tracks actions within the learning outcomes. |
| 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 | Minutes from meetings with Board ChampionBoard ReportCustomer Board Partnership | Annual complaints reportUpdates at each board meeting included in DON report |
| 9.7 | As a minimum, the MRC and the governing body (or equivalent) must receive: 1. regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance;
2. regular reviews of issues and trends arising from complaint handling;
3. regular updates on the outcomes of the Ombudsman’s investigations and progress made in complying with orders related to severe maladministration findings; and
4. annual complaints performance and service improvement report.
 | Yes | Minutes from meetings with Board ChampionBoard ReportCustomer Board Partnership | More regular interim updates are provided in the Executive Team report to the Board routinely at every meetingAnnual Self-Assessment against Complaints Code to Board and Customer Board Partnership and Customer Complaints Review Group.Summary of learning identified and implemented from complaints throughout the year to Board and Customer Board PartnershipUpdate on complaints received, trends and issues raised to every Board and Customer Board Partnership meetingDetails of any Housing Ombudsman cases provided to BoardAnnual report by Ombudsman on performance to Board (if there is one)Complaints KPIs reported to Board and Customer Board Partnership as part of performance reporting |
| 9.8 | Landlords must have a standard objective in relation to complaint handling for all relevant employees or third parties that reflects the need to: 1. have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments;
2. take collective responsibility for any shortfalls identified through complaints, rather than blaming others; and
3. act within the professional standards for engaging with complaints as set by any relevant professional body.
 | Yes | [Complaints Review Group Terms of Reference](https://view.officeapps.live.com/op/view.aspx?src=https%3A%2F%2Fwww.ndh-ltd.co.uk%2Fsites%2Fdefault%2Ffiles%2F2024-06%2FComplaints%2520Review%2520Group%2520ToR%2520v%2520June%25202024.docx&wdOrigin=BROWSELINK) or [Appendix F](#_APPENDICES) | Complaints review group includes Executive team and senior managers all complaint actions are discussed and tracked.All Staff must work under Corporate NDH Values: Flexible; accountable; compassionate, professional and polite; Team NDH; and service excellence.  |

# APPENDICES

Appendix A – [Customer Complaints and Feedback policy](https://www.ndh-ltd.co.uk/sites/default/files/2024-07/HP%20700%20Customer%20Complaints%20and%20Feedback%20policy%20-%20v11%2026Jun24%20ET.pdf)

Appendix B - [Survey](#_Appendix_B_–)

Appendix C - [Reasonable Behaviour Policy](https://www.ndh-ltd.co.uk/sites/default/files/2024-01/HP%20190%20Reasonable%20Behaviour%20policy%20-%20v3%201Sep22.pdf)

Appendix D – [Vulnerability Strategy](https://view.officeapps.live.com/op/view.aspx?src=https%3A%2F%2Fwww.ndh-ltd.co.uk%2Fsites%2Fdefault%2Ffiles%2F2024-06%2FVulnerability%2520Strategy%2520V3.docx&wdOrigin=BROWSELINK)

Appendix E - [Complaints and compliments leaflet](https://www.ndh-ltd.co.uk/sites/default/files/2024-06/Complaints%20and%20compliments.pdf)

Appendix F - [Complaints Review Group Terms of Reference](https://view.officeapps.live.com/op/view.aspx?src=https%3A%2F%2Fwww.ndh-ltd.co.uk%2Fsites%2Fdefault%2Ffiles%2F2024-06%2FComplaints%2520Review%2520Group%2520ToR%2520v%2520June%25202024.docx&wdOrigin=BROWSELINK)

# Appendix B – survey

