### **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:<br>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                 | NCHA Complaints Policy. | NCHA has 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'. This aligns with the code's requirements. |
| 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                 | NCHA Complaints Policy. | This is set out in our policy statement and detail, it is well-established within existing working practices.   |
| 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                 | NCHA Complaints Policy. | 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." This distinction meets the code requirement by clarifying the difference between a service request and a complaint in NCHA's policy.       |

| 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 | NCHA Complaints Policy. | This is set out in our policy statement and is well-established within working practices. Where dissatisfaction is expressed, colleagues will attempt to resolve at First Point of Contact and where this is not possible, a formal complaint investigation will ensue.  |
|-----|--|-----|-------------------------|--|
| 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 | N/A                     | NCHA has a robust approach to dissatisfaction expressed in surveys. We have established triggers on keywords and low scores that prompts colleague 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. |

#### **Section 2: Exclusions**

| Code provision | Code requirement   | Comply: Yes<br>/ 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                 | NCHA Complaints<br>Policy. | All complaints will be considered unless: The issue(s) being complained about took place over 12 months before. The same issue from the same complainant has been investigated and closed; Section 3.1.2 clearly outlines valid reasons for not accepting a complaint, demonstrating compliance by evidencing their reasoning for any exclusions.   |
| 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                 | NCHA Complaints<br>Policy. | NCHA's policy specifies scenarios under which complaints will not be accepted, aligning with the code's exclusions.  We will write to the complainant to confirm where a complaint will not be considered for these issues and explain our reasons (Section 3.1.2). This provision ensures fairness and reasonableness in deciding not to accept a complaint, directly aligning with the code's guidance on exclusions. |

| 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 | NCHA Complaints<br>Policy. | The policy outlines a 12-month period for accepting complaints but also allows for discretion in exceptional circumstances which are assessed on a case-by-case basis.  NCHA's working practice considers discretion and this will be decided upon by the manager of the service when considering if a complaints meets the qualifying criteria; ensuring a suitable expert is the decision-maker in this process.  |
|-----|--|-----|----------------------------|---|
| 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 | NCHA Complaints<br>Policy. | NCHA commits to providing explanations for not accepting complaints, informing residents of their right to escalate the issue to the Ombudsman.  In our policy, we confirm that we will "Provide a written explanation if we decide not to accept a complaint." NCHA's policy to offer written explanations for non-acceptance of complaints, including information on further escalation options, is in direct compliance with the code's requirement for transparency and accountability. |
| 2.5 | Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.   | Yes | NCHA Complaints<br>Policy. | NCHA's policy confirms that complaints are evaluated on an individual basis, avoiding generic exclusions.  The detailed criteria for not accepting a complaint, as outlined in Section 3.1.2, stipulates NCHA's commitment to assessing each complaint based on its unique merits.  |

**Section 3: Accessibility and Awareness** 

| Code<br>provision | Code requirement  | Comply: Yes<br>/ 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                 | NCHA Complaints Policy. | NCHA offers multiple channels for complaints, considering accessibility and inclusivity.  Complaints can be made in a range of ways: In writing, by telephoning, by email, by using the form on our website, by using any of our social media platforms, in person, anonymously, to a local MP or councillor, and directly to commissioning organisations. This demonstrates NCHA's commitment to accessibility in the complaints process. |
| 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                 | NCHA Complaints Policy. | NCHA allows complaints to be made through any staff member, ensuring all staff are informed of the process.  The inclusion of complaints made "in person to any NCHA colleague" (Section 3.2.1) outlines that all staff are expected to be able to receive complaints, demonstrating compliance with this requirement.   |

| 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 | NCHA Complaints Policy.  Annual Report to Customers | 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 Annual Report to customers 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 | NCHA Complaints Policy.                             | NCHA's complaints policy is designed to be clear and accessible, with detailed explanations of the complaints process and its stages.  Our complaints policy has 2 stages comprising of a thorough investigation (Stage 1) and a review (Stage 2)" (Policy Statement), and the detailed provisions for each stage (Sections 3.3.2 to 3.3.5) confirm our policy's transparency and accessibility.  |
| 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 | NCHA Complaints Policy.                             | NCHA's policy includes provisions for supporting individuals through the complaint process and indicates signposting to external organisations, including the Ombudsman.  Our complaint correspondence publicises details of customers' rights to access 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 | NCHA Complaints Policy.  NCHA Customers with  Vulnerabilities Policy | NCHA acknowledges the right of customers to engage a representative or advocate in the complaints process.  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 is standard practice within our processes and is further strengthened by a specific Customer with Vulnerabilities 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 | NCHA Complaints Policy.  | NCHA commits to providing contact details for other organisations, including the Ombudsman, during the complaint process.  "We will provide the contact details of the relevant Ombudsman if an agreement to extend cannot be reached." (Sections 3.3.3 & 3.3.4). This ensures customers are informed of their rights to escalate complaints to the Ombudsman, aligning with the requirement for transparency and access to external redress.  |

**Section 4: Complaint Handling Staff** 

| Code provision | Code requirement   | Comply:<br>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 Complaints Policy. | NCHA has designated roles for handling complaints and in April 2024, launched a centralised complaints 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. |
| 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                 | NCHA Complaints Policy. | The Customer Resolution Team has access to all colleagues, regardless of seniority. There are clear Service Level Agreements (SLA) and performance measures to ensure the prompt resolution of complaints in line with the Complaint Handling Code. They have authority and autonomy at Stage 1 of the complaints policy and Stage 2 is investigated independently by a Senior Manager.   |

| 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 | N/A - Training Content is Internal Only | In April 2024, NCHA launched a centralised complaint handling team.  Our comprehensive and dedicated approach to managing complaints, including stages of review and the roles of various staff, confirms our prioritisation of effective complaint handling. We ensure that colleagues receive the necessary training which is developed in accordance with the Complaint Handling Code. Moreover, there are KPIs that assess the efficiency and quality of the service that these colleagues offer to customers. |
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## **Section 5: The Complaint Handling Process**

| Code provision | Code requirement  | Comply:<br>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                 | NCHA Complaints Policy. | The attached policy is the single and only policy that is utilised in the provision of complaints management. We explain in our policy how customers will be treated fairly during the process.   |
| 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                 | NCHA Complaints Policy. | NCHA's policy emphasises resolving complaints at the earliest possible stage.  The policy describes an initial attempt to resolve complaints promptly upon first contact, aiming for early resolution where feasible, aligning with the principle of addressing issues swiftly and effectively at the local level. Where this is not possible, the customer will be supported in our Complaints Policy/Procedure. |
| 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                 | NCHA Complaints Policy. | 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                 | NCHA Complaints Policy. | NCHA's complaints procedure consists of two stages, aligning with the Code's stipulations.  |

| 5.5 | Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.   | Yes | NCHA Complaints Policy. | 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.   |
|-----|--|-----|-------------------------|---|
| 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 | NCHA Complaints Policy. | NCHA's policy involves acknowledging the complaint and clarifying the outcomes sought by the complainant.  The process of acknowledging complaints and discussing the concerns and desired outcomes with complainants, as part of the investigation and review stages, confirms compliance with this aspect of ensuring mutual understanding of the issues at hand. |
| 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 | NCHA Complaints Policy. | NCHA's complaints handling process includes clarifying the scope and responsibility of the complaint.  Our approach to investigating complaints and providing responses, including clarifications on NCHA's responsibilities, aligns with the Code's requirements for transparency and accountability in complaint handling.  |

| 5.8  | At each stage of the complaints process, complaint handlers must:  a. deal with complaints on their merits, act independently, and have an open mind;  b. give the resident a fair chance to set out their position;  c. take measures to address any actual or perceived conflict of interest; and  d. consider all relevant information and evidence carefully. | Yes | NCHA Complaints Policy. | The policy's emphasis on objective, impartial investigations confirms our compliance with these principles.  NCHA's approach to handling complaints, particularly in the investigation and review stages, stipulates our commitment to fairness, impartiality, and thorough consideration of all aspects of a complaint.                   |
|------|---|-----|-------------------------|--|
| 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 | NCHA Complaints Policy. | NCHA specifies communication mechanisms for cases where responses may be delayed, including the potential extension of timelines.  |
| 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 | NCHA Complaints Policy. | NCHA's policy includes provisions for accessibility and support, indicating a willingness to make reasonable adjustments.  |
| 5.11 | Landlords must not refuse to escalate a complaint through all stages of the complaints procedure unless it has valid reasons to do so. Landlords must clearly set out these reasons, and they must comply with the provisions set out in section 2 of this Code.  | Yes | NCHA Complaints Policy. | NCHA outlines circumstances under which a complaint may not be escalated or accepted, providing reasons in line with the Code's standards. The structured review process and criteria for not proceeding with complaints or reviews (e.g., time limits and the nature of the issues raised) ensure transparency and fairness in decisions. |

| 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 | Supporting Evidence<br>Provided Below                            | The structure of the complaints process is comprehensively tracked and recorded on a complaints system that ensures we have all of the information to investigate complaints based on the information shared by customers. This is not limited to correspondence/supporting documentation.  |
|------|---|-----|--|---|
| 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 | NCHA Complaints Policy.  | NCHA's complaints process allows for resolution at both stages of the complaint, aligning with this requirement.  Our policy's emphasis on resolving issues and providing remedies throughout the complaints process demonstrates a proactive approach to addressing complaints at any point, in accordance with the Code.  |
| 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 | NCHA Complaints Policy.  Treating People Fairly Service Standard | The comprehensive nature of NCHA's complaints policy confirms our understanding of the need to manage diverse aspects of complaint handling. We recognises that unacceptable behaviour may occur on rare occasions and have set out examples of that in our policy under [Section 3.1.4].  We also have a dedicated Service Standard to inform customers how we will treat them fairly in the delivery of our services. This is called the 'Treating People Fairly' Service Standard. |

| Any restrictions placed on contact due to unacceptable behaviour must be proportionate and demonstrate regard for the provisions of the Equality Act 2010. | Yes | NCHA Complaints Policy. | Our policy's commitment to fairness and accessibility confirms our understanding of a balanced approach to managing contact with complainants, even in challenging circumstances. |
|--|-----|-------------------------|---|
|--|-----|-------------------------|---|

## **Section 6: Complaints Stages**

### Stage 1

| Code provision | Code requirement  | Comply:<br>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                 | NCHA Complaints Policy.  Customers with Vulnerabilities Policy | NCHA aims to resolve issues at first contact whenever possible, confirming our support for early resolution.  "When a complaint is made we aim to resolve and put right any issues when we are first contacted" This approach aligns with the requirement to differentiate between complaints that can be quickly resolved and those needing further investigation.  In addition to our established policy that sets out how we support Customers with Vulnerabilities, we also regularly review repeat complaints to determine any opportunities to tailor the service to |
|                |   |                     |  | make it more supportive for customers.   |

| 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 | NCHA Complaints Policy. | NCHA's policy includes procedures for acknowledging complaints within specific timeframes.  We write to acknowledge the complaint within 3 working days. This exceeds the requirement, ensuring complaints are promptly recognised and action taken.  |
|-----|---|-----|-------------------------|---|
| 6.3 | Landlords must issue a full response to stage 1 complaints within 10 working days of the complaint being acknowledged.  | Yes | NCHA Complaints Policy. | NCHA commits to providing a full response to stage 1 complaints within a 10-working-day timeframe but aims to resolve matters sooner than this. Where 10 days may be exceeded, we will ensure that we contact the customer and confirm this in writing.   |
| 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 | NCHA Complaints Policy. | NCHA permits colleagues to extend response times based on the complexity of the complaint, with a process for informing the complainant.  We state this in our policy, in that we will "Make contact if we cannot give a full response within 10 working days to make an agreement to extend the time." This provision ensures transparency and communication |

|     |   |     |                                       | with the complainant regarding any delays.  |
|-----|---|-----|---------------------------------------|---|
| 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 | NCHA Complaints Policy.               | NCHA policy includes providing Ombudsman contact details if a resolution timeline needs to be extended beyond the agreed period. This information is available in our standard letters when communicating with complainants.  |
| 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 | Supporting Evidence<br>Provided Below | NCHA commits to communicating outcomes and planned actions once the investigation is concluded, not necessarily waiting for all actions to be finalised. We have a robust system that tracks commitments made to customers to ensure that all matters of the complaint are resolved.  |
| 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 | NCHA Complaints Policy.               | NCHA's policy includes providing detailed explanations for decisions made in response to complaints. The Investigating colleague will: Consider what has happened, what should have happened, what lessons have been learned, and what needs to change. This process ensures that all aspects of a complaint are thoroughly addressed and explained to customer(s). |

| 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 | NCHA Complaints Policy. | NCHA's procedure allows for the integration of new, related issues into the ongoing investigation, provided it does not unduly delay the response. During the acknowledgement of the complaint, we will clearly clarify the scope of the complaint which mitigates the likelihood of further issues being introduced which may cause further customer frustration.  |
|-----|--|-----|-------------------------|---|
| 6.9 | Landlords must confirm the following in writing to the resident at the completion of stage 1 in clear, plain language:  a. the complaint stage; b. the complaint definition; c. the decision on the complaint; d. the reasons for any decisions made; e. the details of any remedy offered to put things right; f. details of any outstanding actions; and g. details of how to escalate the matter to stage 2 if the individual is not satisfied with the response. | Yes | NCHA Complaints Policy. | NCHA ensures that the outcome of stage 1, along with escalation options, is clearly communicated to the complainant.  We confirm that we 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." This practice ensures complainants are fully informed of their options following stage 1, adhering to the principle of transparency. |

## Stage 2

| Code provision | Code requirement  | Comply: Yes<br>/ 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                 | NCHA Complaints Policy. | NCHA allows for the escalation of complaints to a second stage if the complainant is not satisfied with the stage 1 outcome.   |
| 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                 | NCHA Complaints Policy. | NCHA commits to acknowledging stage 2 review requests within three working days which exceeds the requirement of the Complaint Handling Code.  |
| 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                 | NCHA Complaints Policy. | NCHA's policy does not state that residents must provide reasons for escalating to stage 2, confirming our open approach to requests to review the Stage 1 outcome. We will, however, work to understand the customer's expectations of a complaint review.        |
| 6.13           | The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.   | Yes                 | NCHA Complaints Policy. | Stage 2 reviews are conducted by a senior manager who was not involved in the stage 1 decision.  We state in our policy "Stage 2 is a review by a Senior Manager of the stage 1 decision upon request." This separation ensures impartiality and fresh perspective |

| 6.14 | Landlords must issue a final response to the stage 2 within 20 working days of the complaint being acknowledged.  | Yes | NCHA Complaints Policy. | in the review process, aligning with best practices for escalation and review.  NCHA outlines our timeline for providing final responses to stage 2 complaints. Ensuring a comprehensive, thorough and impartial review, we will issue a full and final response within 20 working days, explaining how the customer can seek independent redress via the Housing Ombudsman if they wish to. |
|------|---|-----|-------------------------|--|
| 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 | NCHA Complaints Policy. | NCHA's policy includes provisions for extending response times, with an agreement from the complainant. Our approach of seeking agreement for any extension beyond initial timeframes for stage 2 responses demonstrates our adherence to principles of communication and mutual agreement, respecting the complainant's time and expectations.  |
| 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 | NCHA Complaints Policy. | Similar to stage 1, NCHA commits to providing Ombudsman contact details if timelines are extended beyond agreed periods. This practice is consistent across both stages of the complaints process,   |

|      |   |     |                                       | ensuring residents are aware of<br>their rights and options for<br>external review, reinforcing<br>transparency and accountability  |
|------|---|-----|---------------------------------------|---|
| 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 | NCHA Complaints Policy.               | NCHA ensures that outcomes and next steps are communicated as soon as decisions are made, not waiting for all actions to be completed. We have independent mechanisms for ensuring that we follow-up on actions that we have committed to customers.  |
| 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 | NCHA Complaints Policy.               | Our policy mandates a thorough review and response to all aspects of the complaint at Stage 2, providing clarity and rationale for decisions. We ensure comprehensive responses and clear explanations for all decisions made during the stage 2 review process aligns with best practices for fairness and thoroughness in complaint resolution. |
| 6.19 | Landlords must confirm the following in writing to the resident at the completion of stage 2 in clear, plain language:  a. the complaint stage;  b. the complaint definition;  c. the decision on the complaint;  d. the reasons for any decisions made;  | Yes | Supporting Evidence<br>Provided Below | NCHA's procedure for concluding stage 2 includes detailed communication of the outcome and further escalation options.  We follow the format suggested by the Housing Ombudsman and during the course of launching a  |

|      | e. the details of any remedy offered to put things right; f. details of any outstanding actions; and g. details of how to escalate the matter to the Ombudsman Service if the individual remains dissatisfied. |     |                         | centralised complaints team have reviewed our standard letters to make the language clearer plain.   |
|------|--|-----|-------------------------|--|
| 6.20 | Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.  | Yes | NCHA Complaints Policy. | NCHA involves senior management in stage 2 reviews, confirming that colleagues of appropriate seniority are engaged in providing the final response. |

## Section 7: Putting things right

| Code provision | Code requirement  | Comply: Yes<br>/ No | Evidence                | Commentary / explanation   |
|----------------|---|---------------------|-------------------------|--|
| 7.1            | <ul> <li>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: <ul> <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> </ul> </li> </ul> | Yes                 | NCHA Complaints Policy. | NCHA's policy emphasises addressing complaints by acknowledging issues and outlining corrective actions. The policy specifies providing apologies, explanations and detailing the actions taken to rectify the issue. While specific examples of remedies are not cited, the general approach outlined in the complaints handling process confirms our commitment to comprehensive resolution strategies, aligning with the Code's emphasis on |

|     | Changing policies, procedures or practices.   |     |  | rectifying issues and providing suitable remedies.   |
|-----|---|-----|--|--|
| 7.2 | Any remedy offered must reflect the impact on the resident as a result of any fault identified.   | Yes | NCHA Complaints Policy.  NCHA Compensation Policy. | Remedies proposed by NCHA aims to address the consequences experienced by the complainant due to the identified issue. Our Compensation Policy whilst not exclusively used for the remedy of complaints and instead to consider general financial redress, is used as a form of complaint redress.                       |
| 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 | NCHA Complaints Policy.                            | The procedure for discussing resolutions and providing updates confirms that NCHA aims to clearly communicate the nature of remedies and their implementation timelines, ensuring complainants are informed of how and when issues will be addressed. This is standard practice and is set out in our written responses. |
| 7.4 | Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.  | Yes | NCHA Compensation Policy.                          | NCHA's approach to complaints resolution is within established guidance and sector best practice. We have recently reviewed our Compensation Policy to ensure that it remains consistent with the Housing Ombudsman's expectations of  |

|  | financial redress. In terms of non- |
|--|-------------------------------------|
|  | financial redress, we consider      |
|  | each case on its own merits with    |
|  | a view to meeting the customer's    |
|  | expectations.                       |

## **Section 8: Putting things right**

| Code provision | Code requirement  | Comply: Yes<br>/ No | Evidence | Commentary / explanation   |
|----------------|---|---------------------|----------|--|
| 8.1            | Landlords must produce an annual complaints performance and service improvement report for scrutiny and challenge, which must include:  a. the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements.  b. a qualitative and quantitative analysis of the landlord's complaint handling performance. This must also include a summary of the types of complaints the landlord has refused to accept;  c. any findings of non-compliance with this Code by the Ombudsman;  d. the service improvements made as a result of the learning from complaints;  e. any annual report about the landlord's performance from the Ombudsman; and f. any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord. | Yes                 | N/A      | NCHA has a general approach to monitoring, reporting, and learning from complaints, recognising the value that can be gained by learning from customers' experiences with our services.  We complete the following:  Annual Self-Assessment; this is published to customer on our website and be requested in an alternative format.  A quarterly update on performance qualitative and quantitative.  We highlight any areas of noncompliance or partial compliance in the third column of this assessment. |

|     |   |     |   | We are strengthening our format further by introducing a 'You said, we did' section on our website where customers can be assured of the action taken to prevent future occurrence or failure(s).  |
|-----|---|-----|---|--|
| 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 | NCHA Complaints Performance www.ncha.org.uk | NCHA publishes it's annual complaints performance on www.ncha.org.uk and our performance is also distributed to customers in physical format, namely our LINK magazine which is distributed to all residents.  |
| 8.3 | Landlords must also carry out a self-<br>assessment following a significant restructure,<br>merger and/or change in procedures.   | Yes | N/A   | NCHA considers the regular review of the Complaint Handling Code as a means of risk control and mitigation and as a result of the centralisation of our complaints service, we include this as an action to ensure we could test our compliance. We will continue to regularly review this with a formal review every twelve months. |
| 8.4 | Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.   | Yes | N/A   | NCHA would review and update it's 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  | Yes | N/A   | In the unlikely event of a cyber-<br>incidents, NCHA would inform<br>key regulatory bodies and<br>stakeholders, including customers  |

| who may be affected, and publish this on their | and we would have a robust |
|--|----------------------------|
| website Landlords must provide a timescale for | communication strategy to  |
| returning to compliance with the Code.         | mange this.                |

Section 9: Scrutiny & oversight: continuous learning and improvement

| Code provision | Code requirement   | Comply: Yes<br>/ 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                 | N/A – Report (Internal Only) | NCHA recognises that individual complaint learnings are important, considering themes for service improvements is essential and we categorise our data to be able to identify trends which inform continuous improvement activity and is reported to NCHA's Senior Leadership Team for oversight.  |
| 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 Complaints Policy.      | Our structured approach to handling and learning from complaints confirms that NCHA is committed to identifying and implementing service improvements based on feedback and complaint outcomes, in alignment with the Code's emphasis on systemic improvement. Our policy details that NCHA fosters a culture that views complaints as opportunities for improvement, encouraging a positive, proactive approach to resolving disputes and enhancing services. |

| 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 | N/A | NCHA's approach includes principles of accountability and transparency. We have a number of assurance mechanisms at NCHA, including our Board, Executive, Senior Leadership Team, Customer Committee and Scrutiny Panels who are each informs of complaints performance and are able to comment on proposed changes to make improvements. |
|-----|--|-----|-----|---|
| 9.4 | Landlords must appoint a suitably senior lead person as accountable for their complaint handling. This person must assess any themes or trends to identify potential systemic issues, serious risks, or policies and procedures that require revision.             | Yes | N/A | NCHA has a robust governance framework in place for the administration and management of complaints. Whilst we recognise a collective responsibility in ensuring that customers have fair redress, we have a designated Board Member who is our senior, appointed representative for Complaints Handling.                                 |
| 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 | N/A | See response to 9.4.  |

| 9.6 | The MRC will be responsible for ensuring the governing body receives regular information on complaints that provides insight on the landlord's complaint handling performance. This person must have access to suitable information and staff to perform this role and report on their findings.   | Yes | N/A                        | See response to 9.4. Additionally, a suite of insight is presented to these governance bodies, inclusive of the MRC to ensure that complaint handling is compliant with the Ombudsman code and continues to meet customer expectations.   |  |
|-----|--|-----|----------------------------|---|--|
| 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 | N/A – Internal Report Only | The governing body, which the MRC resides receives standard reporting on a quarterly basis which includes:  • Volumes of complaints, categories and performance. • Issues and trends, including recommendations for improvement. • Bespoke reports to Ombudsman investigations and findings. • Annual complaints performance report, outlining service improvement initiatives. |  |
| 9.8 | Landlords must have a standard objective in relation to complaint handling for all relevant employees or third parties that reflects the need to:  a. have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments;   | Yes | NCHA Complaints Policy.    | Our policy emphasises fairness, transparency, and improvement. We foster a culture that encourages a co-operative and responsible approach to complaint handling among all relevant staff, in keeping with the Code's principles for effective resolution and service improvement.  |  |

| b. take collective responsibility for any shortfalls identified through complaints, rather than blaming others; and |  |  |  |
|---|--|--|--|
| c. act within the professional standards for engaging with complaints as set by any relevant professional body.     |  |  |  |

# **Supporting Evidence**

Below are various bodies of evidence that supplements NCHA's submissions to demonstrate it's compliance with the Housing Ombudsman's' Complaint Handling Code – 2024.

| Ref.   | Requirement   | Evidence                                       |   |                      |                |   |  |
|--|---|--|---|----------------------|----------------|---|--|
| A full record must be kept of the complaint, and the |   |  | Investigation 1                                     |                      |                |   |  |
|  | Туре  | Filename                                       | Added   | Sent                 |                |   |  |
|  | Copy Of<br>Communication  | complaint.docx                                 | 31 Oct<br>2023 15:26                                | 1                    | ×              |   |  |
|  | Acknowledgement<br>Letter   | 0875 - Complaint<br>Acknowledgement Letter.pdf | 31 Oct<br>2023 16:34                                | 31 Oct<br>2023       | ×              |   |  |
|  | utcomes at each stage. This must include the riginal complaint and the date received, all | Final Response Letter                          | Stage 1 Complaint - Mr                              | 13 Nov<br>2023 08:16 | 13 Nov<br>2023 | × |  |
| 4.3  | prrespondence with the resident, correspondence   |  | 0875 - Final Stage 1 Response<br>Letter.pdf         | 13 Nov<br>2023 10:43 | 13 Nov<br>2023 | × |  |
|  | ith other parties, and any relevant supporting ocumentation such as reports or surveys.   |  | COMPLAINT 0875 - Email from<br>tnt and my reply.msg | 25 Mar<br>2024 10:22 | 25 Mar<br>2024 | × |  |
| documentation such as reports or surveys.            |   | COMPLAINT 0875 - Email to<br>Capitacoms.msg    | 25 Mar<br>2024 10:22                                | 25 Mar<br>2024       | ×              |   |  |
|  | Additional Info   |  | ***   | * * *                |                |   |  |
|  | Holding Letter  |  | ***   |                      |                |   |  |
|  | Advocate Consent  |  | 222   | 12.23                |                |   |  |

