

## Appendix B – Self-Assessment Form

This self-assessment form should be completed by the complaints officer and discussed at the landlord’s governing body annually. Evidence should be included to support all statements with additional commentary as necessary.

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

### Section 1 - Definition of a complaint Mandatory ‘must’ requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
1.2	A complaint must be defined as: <i>‘an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the organisation, its own staff, or those acting on its behalf, affecting an individual resident or group of residents.</i>	Yes	Evidenced is located our website, complaint leaflet <a href="https://www.nehemiah-ucha.co.uk/images/documents/New%20complaints%20Leaflet%202022.pdf">https://www.nehemiah-ucha.co.uk/images/documents/New%20complaints%20Leaflet%202022.pdf</a> Comments, Compliments and Complaint Policy pg. 2 section <b>3.2) Nehemiah’s current definition:</b> Definition: A complaint is an expression of dissatisfaction, usually where: - There has been a failure of service and where action has not been taken within the agreed timescales - A number of customers requests for a service have not received a response - A complaint raised relating to poor conduct of a member of staff or contractor. We will investigate a complaint when a customer tells us: - We have done something poorly - We have failed to do something that we said we would - Staff have demonstrated poor attitude/conduct/performance We have failed to follow policy or procedure.

1.3	The resident does not have to use the word 'complaint' for it to be treated as such. A complaint that is submitted via a third party or representative must still be handled in line with the landlord's complaints policy.	Partially	Evidence: This is to be reinforced via training and toolbox talk. Policy, procedure, and leaflet to be reviewed to clearly reflect this point.
1.6	... if further enquiries are needed to resolve the matter, or if the resident requests it, the issue must be logged as a complaint.	Partially	Evidence: This does take place during initial conversation if a tenant calls and is not sure. This is to be reinforced via training and toolbox talk. Policy, procedure, and leaflet to be reviewed to clearly reflect this point.
1.7	A landlord must accept a complaint unless there is a valid reason not to do so.	Yes	<p>Evidence can be found: see extract from our Comments, Compliments and Complaints Policy section 3.5 pg. 3: <b>When should the complaints process not be used?</b></p> <p>The complaints process should not be used if a customer:</p> <ul style="list-style-type: none"> <li>• Is asking for a service from us for the first time, (for example the reporting of a repair)</li> <li>• Is making an initial request for information or an explanation of a decision made or</li> <li>• Wants to report incidents of anti-social behaviour or racial harassment. These issues are dealt with under other procedures.</li> <li>• The issue is identified as an avoidable contact (definition of avoidable contact is on pg. 5 section 3.5.1)</li> </ul> <p>(Source: Comments, Compliments and Complaint Policy pg. 3 section 3.5</p>

1.8	A complaints policy must clearly set out the circumstances in which a matter will not be considered, and these circumstances should be fair and reasonable to residents.	Yes	<p>Evidence can be found: see extract from our Comments, Compliments and Complaints Policy below: <b>When should the complaints process not be used?</b></p> <p>The complaints process should not be used if a customer:</p> <ul style="list-style-type: none"> <li>• Is asking for a service from us for the first time, (for example the reporting of a repair)</li> <li>• Is making an initial request for information or an explanation of a decision made or</li> <li>• Wants to report incidents of anti-social behaviour or racial harassment. These issues are dealt with under other procedures.</li> <li>• The issue is identified as an avoidable contact (definition of avoidable contact is on pg.5 section 3.5.1)</li> </ul> <p>(Source: Comments, Compliments and Complaint Policy pg. 3 section 3.5)</p>
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1.9	If a landlord decides not to accept a complaint, a detailed explanation must be provided to the resident setting out the reasons why the matter is not suitable for the complaints process and the right to take that decision to the Ombudsman.	Yes	<p>A detailed explanation is given by letter and information recorded on Sassha (housing management tool)</p> <p>Evidence can be found in Nehemiah's Comments, Compliments and Complaint Policy section:3.12 Closing paragraph of letter to complainant.</p> <p><i>'As members of the Housing Ombudsman scheme Nehemiah is committee to implement and follow the new complaint handling code when dealing with complaints raised. '</i></p> <p><i>And</i></p> <p><i>3.14 'if customer is unhappy with the decision at (Nehemiah's final stage) Stage 2, of our complaints process). They should contact the Housing Ombudsman 8 weeks after the final decision is made.</i></p>
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#### Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary, and any explanations
1.4	<p>Landlords should recognise the difference between a</p> <p><b>service request</b>, where a resident may be unhappy with a <b>situation</b> that they wish to have rectified, and <b>complaint</b> about the <b>service</b> they have/have not received</p>	Yes	<p>Evidence: Yes, we have a distinction between an unhappy resident pertaining to a service request and a complaint regarding a service they have not received. Source: Comments, Compliment and Complaints Policy pg. 3 section 3.5.1: <b>Avoidable contacts</b></p> <p>Where a customer reports a repair or requests a service and we fail to action or deliver that service and they have to contact us again to repeat their request, this is identified as an avoidable contact. For example:</p> <ul style="list-style-type: none"> <li>• A repair request is not actioned, so the customer has to report it again.</li> <li>• A customer requests a rent statement and it's not sent so they have to make the same request again</li> <li>• The customer contacts the office and leaves a message for a member of staff to contact them, and the telephone call is not returned.</li> </ul> <p>All avoidable contacts will be recorded so we know where we are getting it wrong. Avoidable contacts can be resolved at the repeat point of contact, to the customer's satisfaction whilst they are on the phone or in the office. Recording and collecting information around avoidable contacts helps us move to a "right first time" way of working making the business more efficient.</p>

1.5	<p>Survey feedback may not necessarily need to be treated as a complaint, though, where possible, the person completing the survey should be made aware of how they can pursue their dissatisfaction as a complaint if they wish to.</p>	Partially	<p>Evidence: We use a specialist and independent organisation to carry out our customer surveys. M·E·L Research is a specialist market, social and behavioural research, and insights consultancy. Part of the survey is to capture dissatisfaction and areas for improvement. Our Customer Engagement Officer will contact tenants that have expressed dissatisfaction and give their consent to be contacted by Nehemiah Staff. Once the dissatisfaction has been identified an action plan is put in place. This is monitored in Nehemiah's Customer Satisfaction Working Group.</p> <p>When applicable the tenant is to be made aware of the complaint process if they wish to pursue their dissatisfaction as a complaint.</p>
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## Section 2 - Accessibility and awareness Mandatory

### 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary, and any explanations
2.1	Landlords must make it easy for residents to complain by providing different channels through which residents can make a complaint such as in person, over the telephone, in writing, by email and digitally. While the Ombudsman recognises that it may not be feasible for a landlord to use all of the potential channels, there must be more than one route of access into the complaints system.	Yes	<p>Evidence</p> <ol style="list-style-type: none"> <li>1. During the sign-up process of a new tenant the complaint process is explained and both tenant and staff member sign to confirm this process has taken place and information is handed over to the tenant. The check list is then placed on tenant's file.</li> <li>2. The Tenant Handbook which is handed to tenant and also accessible on our website contains: 'if dissatisfied you can let us know by: Online, phone, email/letter, face to face or via an advocate' (source tenant handbook pg. 12 <a href="https://www.nehemiah-ucha.co.uk/images/documents/Tenant%20Handbook.pdf">https://www.nehemiah-ucha.co.uk/images/documents/Tenant%20Handbook.pdf</a>)</li> <li>3. How can our customers complain? 'Complainants can tell us about their complaint in the most convenient way to them. This can include Letter, email, website (contact form), face to face, telephone and via an advocate (e.g., a relative, support worker, tenant advocate. Source 3.6 in Comments, Compliment and Complaints Policy pg. 3-4</li> </ol>
2.3	Landlords must make their complaint policy available in a clear and accessible format for all residents. This will detail the number of stages involved, what will happen at each stage and the timeframes for responding.	Yes	<p>Our Comments, Compliment and Complaints Policy is located on our website and easily accessible, detailing each stage of the process and timescale source pg. 5, section 3.14:</p> <ol style="list-style-type: none"> <li>1. <a href="https://www.nehemiah-ucha.co.uk/images/documents/Comments%20Compliments%20and%20ComplaintsPolicy%20%20March%202021.pdf">https://www.nehemiah-ucha.co.uk/images/documents/Comments%20Compliments%20and%20ComplaintsPolicy%20%20March%202021.pdf</a></li> </ol>
2.4	Landlord websites, if they exist, must include information on how to raise a complaint. The complaints policy and process must be easy to find on the website.	Yes	<p>The complaint's process is on our website in our Comments, Compliments and Complaints Policy:</p> <p><a href="https://www.nehemiah-ucha.co.uk/images/documents/Comments%20Compliments%20and%20ComplaintsPolicy%20%20March%202021.pdf">https://www.nehemiah-ucha.co.uk/images/documents/Comments%20Compliments%20and%20ComplaintsPolicy%20%20March%202021.pdf</a></p> <p>Complaint form and complaint leaflet on the website:</p> <p><a href="https://www.nehemiah-ucha.co.uk/complaint.php">https://www.nehemiah-ucha.co.uk/complaint.php</a></p> <p><a href="https://www.nehemiah-ucha.co.uk/images/documents/New%20complaints%20Leaflet%202022.pdf">https://www.nehemiah-ucha.co.uk/images/documents/New%20complaints%20Leaflet%202022.pdf</a></p>

2.5	Landlords must comply with the Equality Act 2010 and may need to adapt normal policies, procedures, or processes to accommodate an individual's needs. Landlords must satisfy themselves that their policy sets out how they will respond to reasonable adjustments requests in line with the Equality Act and that complaints handlers have had appropriate training to deal with such requests.	Yes	All our policies are equality impact assessed. We also refer to other policies. In our Comment, Compliments and Complaints Policy we state related policies, Acts and other relevant policies. The Equality Act 2010 is referred to in section 10 pg. 7
2.6	Landlords must publicise the complaints policy and process, the Complaint Handling Code and the Housing Ombudsman Scheme in leaflets, posters, newsletters, online and as part of regular correspondence with residents.	Yes	Housing Ombudsman Scheme is publicised on Facebook, Nehemiah website and complaints leaflets.  The Ombudsman poster displayed on Nehemiah's Facebook ( <a href="#">Nehemiah Housing Facebook</a> )
2.7	Landlords must provide residents with contact information for the Ombudsman as part of its regular correspondence with residents.	Yes	<b>A statement from the Housing Ombudsman is included in, Nehemiah's complaint leaflet:</b> The Ombudsman can be contacted in the following ways: <i>Telephone: 0300 111 3000</i> <i>Email: info@housing-ombudsman.org.uk Website: www.housingombudsman.org.uk</i>  And is included in our response letters when tenants make a complaint:  <b><i>As members of the Housing Ombudsman scheme Nehemiah is committed to implement and follow the new complaint handling code when dealing with complaints raised. You are entitled to refer your complaint to the Housing Ombudsman service if you are unhappy with your complaint outcome, after stage 2 of our internal complaints process'</i></b>

2.8	Landlords must provide early advice to residents regarding their right to access the Housing Ombudsman Service throughout their complaint, not only when the landlord's complaints process is exhausted.	Yes	<p>We provide early advice to our tenants, this is evidenced:</p> <ul style="list-style-type: none"> <li>• In our Complaint leaflet and Tenant Handbook. Which is given to all new tenants and is accessible to all tenants on our website (<a href="https://www.nehemiah-ucha.co.uk/images/documents/Tenant%20Handbook.pdf">https://www.nehemiah-ucha.co.uk/images/documents/Tenant%20Handbook.pdf</a>)</li> </ul> <p>This information is also included in our Comments, Compliments and Complaints Policy, which is accessible on our Nehemiah's website. (<a href="https://www.nehemiah-ucha.co.uk/images/documents/Comments%20Compliments%20and%20ComplaintsPolicy%20%20March%202021.pdf">https://www.nehemiah-ucha.co.uk/images/documents/Comments%20Compliments%20and%20ComplaintsPolicy%20%20March%202021.pdf</a>)</p>
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**Best practice 'should' requirements**

Code section	Code requirement	Comply: Yes/No	Evidence, commentary, and any explanations
2.2	Where a landlord has set up channels to communicate with its residents via social media, then it should expect to receive complaints via those channels. Policies should contain details of the steps that will be taken when a complaint is received via social media and how confidentiality and privacy will be maintained.	Partially	<p>Process to be outline in a standard response when complaints are received via social media. With a copy of the complaint process sent out to the complainant.</p> <p>Complaints are hidden from members of the public on Facebook to ensure complainant's privacy is considered when discussing issue raised. All complaints are recorded on our housing management system (Sassha), and acknowledgement letters are sent out to the complainant. The complaint is then dealt with in line with Nehemiah's complaint process.</p> <p>Complaint leaflet and policy to be updated to contain more detailed steps that will be taken when a complaint is received via social media and how confidentiality and privacy will be maintained.</p>

**Section 3 - Complaint handling personnel:  
Mandatory 'must' requirements**

Code section	Code requirement	Comply: Yes/No	Evidence, commentary, and any explanations
3.1	Landlords must have a person or team assigned to take responsibility for complaint handling to ensure complaints receive the necessary attention, and that these are reported to the governing body. This Code will refer to that person or team as the "complaints officer".	Yes	Nehemiah Housing has appointed complaints officer Director of Operations from February 2021. Customers complaints are processed through the Operations Department in Nehemiah. All Nehemiah staff are trained and inducted in complaint handling.
3.2	...the complaint handler appointed must have appropriate complaint handling skills and no conflicts of interest.	Yes	Evidenced in our Comments, Compliments and Complaints Policy pg. 4-5 section 3.1 The complaints officer will ensure that the complaints handling process works well. Our complaints officer will: <ul style="list-style-type: none"> <li>- Act sensitively and fairly.</li> <li>- Is trained to receive complaints and deal with distressed and upset customers.</li> <li>- Has access to all staff at all levels, so if applicable is able to facilitate quick resolutions of any complaints.</li> <li>- Has the authority and autonomy to act and resolve disputes quickly and fairly.</li> </ul>

**Section 3 – C**

**Complaint handling personnel**

**Mandatory Must’ requirements**

**Best practice ‘should’ requirements**

Code section	Code requirement	Comply: Yes/No	Evidence, commentary, and any explanations
3.3	Complaint handlers should: <ul style="list-style-type: none"> <li>• be able to act sensitively and fairly</li> <li>• be trained to handle complaints and deal with distressed and upset residents</li> <li>• have access to staff at all levels to facilitate quick resolution of complaints</li> <li>• have the authority and autonomy to act to resolve disputes quickly and fairly.</li> </ul>	Yes	Nehemiah Housing has appointed complaints officer, Director of Operations, from February 2021. The complaints officer will ensure that the complaints handling process works well. Our complaints officer will: <ul style="list-style-type: none"> <li>- Act sensitively and fairly.</li> <li>- Is trained to receive complaints and deal with distressed and upset customers.</li> <li>- Has access to all staff at all levels, so if applicable is able to facilitate quick resolutions of any complaints.</li> <li>- Has the authority and autonomy to act and resolve disputes quickly and fairly.</li> </ul>

**Section 4 - Complaint handling principles**  
**Mandatory 'must' requirements**

Code section	Code requirement	Comply: Yes/No	Evidence, commentary, and any explanations
4.1	Any decision to try and resolve a concern must be taken in agreement with the resident and a landlord's audit trail/records should be able to demonstrate this. Landlords must ensure that efforts to resolve a resident's concerns do not obstruct access to the complaints procedure or result in any unreasonable delay. It is not appropriate to have extra named stages (such as 'stage 0' or 'pre-complaint stage') as this causes unnecessary confusion for residents. When a complaint is made, it must be acknowledged and logged at stage one of the complaints procedure <b>within five days of receipt.</b>	Yes	In line with the complaint process, all complaints are logged on Sassha. With complaints acknowledged via email within 5 working days of receipt. This process is explained in our Comment, Compliments and Complaints Policy, in our Tenant Handbook and in our Tenants Complaint Leaflet.

4.2	Within the complaint acknowledgement, landlords must set out their understanding of the complaint and the outcomes the resident is seeking. If any aspect of the complaint is unclear, the resident must be asked for clarification and the full definition agreed between both parties.	Yes	We issue standardised letters and when clarification is needed, we speak to complainant. Once this is clarified we acknowledge the complaint and use this to investigate. Our response will detail our understanding of the complaint and includes our outcomes and any further actions.
4.6	A complaint investigation must be conducted in an impartial manner.	Partially	All complaints are investigated by an independent member of staff. If a complaint is made about a member of staff, they will not deal with the complaint. Where applicable tenants are interviewed during the investigation and a final decision is made once all information is collected and analysed. Throughout the two stages of the complaints process tenants will have the opportunity to formally express their views, observations, and concerns to the Investigating Officer. We will update our induction/training process and policy to ensure all staff offer interviews to complainant during the investigation.
4.7	The complaint handler must: <ul style="list-style-type: none"> <li>• deal with complaints on their merits</li> <li>• act independently and have an open mind</li> <li>• take measures to address any actual or perceived conflict of interest</li> <li>• consider all information and evidence carefully</li> <li>• keep the complaint confidential as far as possible, with information only disclosed if necessary to properly investigate the matter.</li> </ul>	Yes	Complaints are kept confidential as far as possible, with information only disclosed if necessary to properly investigate the matter.  Our current system SASSHA is only accessible by Nehemiah staff. We also have an option on the system to hide this from a staff member if needed.  What we have agreed to do moving forward is erased staff name from complaint so only investigator and line manager will be aware.

4.11	Landlords must adhere to any reasonable arrangements agreed with residents in terms of frequency and method of communication	Yes	<p>Various methods of communication are in place dependent on resident requirements  See extract from our Comments, Compliment and Complaint Policy section 3.6 pg. 3:</p> <p><b>3.6 How can our customers complain?</b></p>
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			<p>We aim to communicate and respond quickly and appropriately, in the style, language and format requested.</p> <p>See extract from our Comments, Compliments and Complaints Policy section 3.13 pg.5:</p> <ul style="list-style-type: none"> <li>All customers will be kept informed of their complaint throughout the investigation. We will publish details of our complaint process including timescales for dealing with complaints. We will notify complainants if we are unable to meet the target response times.</li> </ul>
4.12	<p>The resident, and if applicable any staff member who is the subject of the complaint, must also be given a fair chance to:</p> <ul style="list-style-type: none"> <li>set out their position</li> <li>comment on any adverse findings before a final decision is made.</li> </ul>	Yes	<p>Findings are collected and outlined in writing to the resident and staff member if required.</p>
4.13	<p>A landlord must include in its complaints policy its timescales for a resident to request escalation of a complaint</p>	Yes	<p>Timescales are outline via the complaints leaflet and policy and any communication which is sent out to the complainant</p> <p>See extract below from our Comments, Compliments and Complaints Policy section 3.14 pg. 5:</p> <p><b>3.14 Timescales</b></p> <ul style="list-style-type: none"> <li>- Logging and Acknowledging Complaint – 5 Working days</li> <li>- Stage 1 - 10 Working Days from receipt of complaint – if this is not possible, an explanation and a date for stage 1 will be sent to the customer. Where the complaint is complex for example involvement of a third party/ statutory agencies, we will try not to exceed a further 10 working days. The customer has 20 working days to appeal if they are not satisfied with the outcome.</li> <li>- Stage 2 – 20 Working days from request to escalate, if this is not possible an explanation and a date for stage 2 will be sent to the customer.</li> <li>- If customer is unhappy with decision at Stage 2, they should contact the Housing Ombudsman 8 weeks after the final decision is made.</li> </ul>
4.14	<p>A landlord must not unreasonably refuse to escalate a complaint through all stages of the complaints procedure and must have clear and valid reasons for taking that course of action. Reasons for declining to escalate a complaint must</p>	Yes	<p>All stages are communicated to the complainant at every opportunity, giving the complainant a copy of the complaint process outlining the various stages.</p> <p>We also include any reasons we may decline the complaint where appropriate.</p>

	be clearly set out in a landlord's complaints policy and must be the same as the reasons for not accepting a complaint.		
<b>4.15</b>	A full record must be kept of the complaint, any review and the outcomes at each stage. This must include the original complaint and the date received, all correspondence with the resident, correspondence with other parties and any reports or surveys prepared.	Yes	All Complaint correspondences are logged on our internal Housing Management System – (Sassha) in the Complaints Management section.
<b>4.18</b>	Landlords must have policies and procedures in place for managing unacceptable behaviour from residents and/or their representatives when pursuing a complaint.	Yes	See extract from our Comments, Compliments and Complaints Policy section 4 pg. 5  Persistent, Unreasonable and Vexatious complaints Nehemiah Housing is committed to dealing with all complaints fairly and impartially. Staff are trained to respond with professionalism, patience, and empathy to the needs of all those making a complaint. However, staff or contractors are not expected to tolerate behaviour by complainants that are unreasonable, for example abusive, offensive, or threatening behaviour or a complainant makes many unreasonable and persistent demands. In these instances, we will reserve the right to restrict or change access to our complaints service. We will tell the person in writing why we have decided to restrict access, what the restrictions are and how long they will last.



### Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary, and any explanations
4.3	Landlords should manage residents' expectations from the outset, being clear where a desired outcome is unreasonable or unrealistic	Yes	This is evidenced in our Tenant agreement, handbook, support agreement with young families and acknowledgement letter
4.4	A complaint should be resolved at the earliest possible opportunity, having assessed what evidence is needed to fully consider the issues, what outcome would resolve the matter for the resident and whether there are any urgent actions required.	Yes	Nehemiah has Key Performance Indicators in place to monitor and ensure the earliest possible resolution. These are reported monthly to management and quarterly to our Operations Committee. Our Comments, Compliments and Complaints Policy section outline the timescale for dealing with a complaint.
4.5	Landlords should give residents the opportunity to have a representative deal with their complaint on their behalf, and to be represented or accompanied at any meeting with the landlord where this is reasonable.	Partially	We advise tenants verbally and if tenants have support issues or request for someone to attend interview, we confirm this is ok.  We will add this in our complaint leaflet and include in our policy, to give clarity around representation.
4.8	Where a key issue of a complaint relates to the parties' legal obligations landlords should clearly set out their understanding of the obligations of both parties.	Yes	This is included in our response letter at both stage 1 & 2.

4.9	Communication with the resident should not generally identify individual members of staff or contractors.	Yes	This is currently the normal practice when handling a complaint, to align itself to our Data Protection policy
4.10	Landlords should keep residents regularly updated about the progress of the investigation.	Yes	See extract from our Comments, Compliment and Complaint Policy section 3.13 pg. 5: <b>Information for Customers</b> All customers will be kept informed of their complaint progress throughout the investigation. We will publish details of our complaints process including timescales for dealing with complaints. We will notify complainants if we are unable to meet the target response times.
4.16	Landlords should seek feedback from residents in relation to the landlord's complaint handling as part of the drive to encourage a positive complaint and learning culture.	Yes	See extract from our Comments, Compliment and Complaint Policy section 8 pg. 6: <b>8. Customer feedback</b> We will aim to obtain feedback from 20% of complainants about their experience of making a complaint to Nehemiah Housing. We will use the information collated in this survey to continually evaluate and improve the complaints service and will include the survey outcomes in our performance reports to Operations Committee and our customers
4.17	Landlords should recognise the impact that being complained about can have on future service delivery. Landlords should ensure that staff are supported and engaged in the complaints process, including the	Yes	<b>See extract from our Comments, Compliment and Complaint Policy section 9 pg. 6-7:</b> <b>9. Training and Support for Staff</b> All Nehemiah Housing staff will be fully supported in the operation of this policy through training on the policy principals, the procedure for implementing the policy, and use of IT to record, monitor and report on

	learning that can be gained	<p>complaints. Nehemiah will have a recognised Complaints Champion who will develop a level of expertise in dealing with complaints and enable staff to reflect on issues from a customer's point of view. The role of the Complaints Champion (Customer Engagement Officer) will be to help staff with specific complaints if required.</p> <p>And</p> <p>In our Learning from Complaints and Monitoring section of the Comments, Compliment and Complaints Policy. All comments, compliments and complaints will be logged on a data base to maintain a record for the organisation.</p> <ul style="list-style-type: none"> <li>• Every comment, compliment or complaint is a learning opportunity for Nehemiah Housing and should be encouraged.</li> <li>• We will record any service development or customer care issues identified during a complaint investigation. These will be recorded, and evidence gathered to support changes made or planned to improve our</li> </ul>
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			services and learn from complaints, comments, and compliments. • Where we have made changes to services or improvements as a result of complaints, comments or compliments we will report these to our customers in our annual report to customers. • Complaints data will be reported to Operations Committee.
<b>4.19</b>	Any restrictions placed on a resident's contact due to unacceptable behaviour should be appropriate to their needs and should demonstrate regard for the provisions of the Equality Act 2010.	Yes	Evidence located in our <b>Comments, Compliments and Complaints Policy</b> section 4 pg.5 Persistent, Unreasonable and Vexatious complaints Nehemiah Housing is committed to dealing with all complaints fairly and impartially. Staff are trained to respond with professionalism, patience, and empathy to the needs of all those making a complaint. However, staff or contractors are not expected to tolerate behaviour by complainants that are unreasonable, for example abusive, offensive, or threatening behaviour or a complainant makes many unreasonable and persistent demands. In these instances, we will reserve the right to restrict or change access to our complaints service. We will tell the person in writing why we have decided to restrict access, what the restrictions are and how long they will last. And Section 10. pg. 7 which mentions related policies/Acts: Anti-Social & Behaviour Policy • Equality Act 2010

**Section 5 - Complaint stages Mandatory**  
**'must' requirements Stage 1**

Code section	Code requirement	Comply: Yes/No	Evidence, commentary, and any explanations
5.1	Landlords must respond to the complaint <b><u>within 10 working days</u></b> of the complaint being logged. Exceptionally, landlords may provide an explanation to the resident containing a clear timeframe for when the response will be received. This should not exceed a further 10 days without good reason.	Yes	<p><b>Source: Comment, Compliments and Complaints Policy section 3.14 pg. 5</b>            3.14 Timescales</p> <p>We will not normally consider complaints regarding a problem that occurred more than 12 months prior to the complaint being made. - Logging and Acknowledging Complaint – 5 Working days - Stage 1 - 10 Working Days from receipt of complaint – if this is not possible, an explanation and a date for stage 1 will be sent to the customer. Where the complaint is complex for example involvement of a third party/ statutory agencies, we will try not to exceed a further 10 working days. The customer has 20 working days to appeal if they are not satisfied with the outcome</p>

5.5	<p>A complaint response must be sent to the resident when the answer to the complaint is known, not when the outstanding actions required to address the issue, are completed.</p> <p>Outstanding actions must still be tracked and actioned expeditiously with regular updates provided to the resident.</p>	Yes	<p>The complaint response is given once the outcome is made apparent. This information can be found in our Comments, Compliments and Complaints Policy under section <b>3.13 Information for Customers</b></p> <p>‘All customers will be kept informed of their complaint throughout the investigation. We will publish details of our complaints process including timescales for dealing with complaints. We will notify complainants if we are unable to meet the target response times.’</p>
5.6	<p>Landlords must address all points raised in the complaint and provide clear reasons for any decisions, referencing the relevant policy, law and good practice where appropriate.</p>	Partially	<p>Complaint template used to ensure that there is consistency in our responses to our complainants. Template to be reviewed to ensure relevant points are considered.</p>
5.8	<p>Landlords must confirm the following in writing to the resident at the completion of stage one in clear, plain language:</p> <ul style="list-style-type: none"> <li>• the complaint stage</li> <li>• the decision on the complaint</li> <li>• the reasons for any decisions made</li> <li>• the details of any remedy offered to put things right</li> <li>• details of any outstanding actions</li> <li>• details of how to escalate the matter to stage two if the resident is not satisfied with the answer</li> </ul>	Partially	<p>Example of the template used when responding to our complaints.</p> <p>Ensuring that all the relevant details are included. To be reviewed to ensure all relevant points are considered.</p>

## Stage 2

Code section	Code requirement	Comply: Yes/No	Evidence, commentary, and any explanations
5.9	<p>If all or part of the complaint is not resolved to the resident's satisfaction at stage one it must be progressed to stage two of the landlord's procedure, unless an exclusion ground now applies.</p> <p>In instances where a landlord declines to escalate a complaint it must clearly communicate in writing its reasons for not escalating as well as the resident's right to approach the Ombudsman about its decision.</p>	Yes	Complaint letter template is used by staff. We remind all staff that they should use template to ensure all relevant points are addressed.
5.10	<p>On receipt of the escalation request, landlords must set out their understanding of issues outstanding and the outcomes the resident is seeking. If any aspect of the complaint is unclear, the resident must be asked for clarification and the full definition agreed between both parties.</p>	Yes	This is included in stage 2 response letter
5.11	<p>Landlords must only escalate a complaint to stage two once it has completed stage one and at the request of the resident.</p>	Yes	<p>Yes, this is included in our Comments, Compliments and Complaints Policy pg. 4 section 3.9:</p> <p><b>Stage 1 – Investigation</b> A Senior Officer/Manager will take responsibility for investigating the complaint and advising the customer of the outcome.</p> <p><b>Stage 2 – Review</b> Where a customer is unhappy with the outcome at stage 1, they can appeal to a member of the senior management team or Executive Team who will review the initial resolution.</p> <p>For example, if the complaint is in relation to a member of staff or service in our sheltered and supported housing the first stage will be the Senior Supported Housing Officer and then this will escalate to the Housing Services Manager at stage 2.</p>

5.12	The person considering the complaint at stage two, must not be the same person that considered the complaint at stage one.	Yes	This is made clear in our complaints process see Comments, Compliments and Complaint Policy pg. 4 section 3.9:
5.13	Landlords must respond to the stage two complaint <b>within 20 working days</b> of the complaint being escalated. Exceptionally, landlords may provide an explanation to the resident containing a clear timeframe for when the response will be received. This should not exceed a further 10 days without good reason.	Yes	<b>Source:- Comments, Compliments and Complaint Policy</b> 3.14 Timescales - Stage 2 – 20 Working days from request to escalate, if this is not possible an explanation and a date for stage 2 will be sent to the customer. - If customer is unhappy with decision at Stage 2 they should contact the Housing Ombudsman 8 weeks after the final decision is made.
5.16	Landlords must confirm the following in writing to the resident at the completion of stage two in clear, plain language: <ul style="list-style-type: none"> <li>• the complaint stage</li> <li>• the complaint definition</li> <li>• the decision on the complaint</li> <li>• the reasons for any decisions made</li> <li>• the details of any remedy offered to put things right</li> <li>• details of any outstanding actions</li> </ul> <b>and</b> <ul style="list-style-type: none"> <li>• if the landlord has a third stage, details of how to escalate the matter to stage three</li> <li>• if this was the final stage, details of how to escalate the matter to the Housing Ombudsman Service if the resident remains dissatisfied.</li> </ul>	Yes	Stage 1 or Stage 2 complaint letter template is used to ensure a level of consistency when handling complaints



### Stage 3

Code section	Code requirement	Comply: Yes/No	Evidence, commentary, and any explanations
5.17	Two stage landlord complaint procedures are ideal. This ensures that the complaint process is not unduly long. If landlords strongly believe a third stage is necessary, they must set out their reasons for this as part of their self-assessment. A process with more than three stages is not acceptable under any circumstances.	Yes	We have adapted a 2-stage approach when handling our complaint. Which is included in our Comments, Compliments and Complaint Policy pg. 4 section 3.9, in our tenants' handbook and complaints leaflet.
5.20	Landlords must confirm the following in writing to the resident at the completion of stage three in clear, plain language: <ul style="list-style-type: none"> <li>• the complaint stage</li> <li>• the complaint definition</li> <li>• the decision on the complaint</li> <li>• the reasons for any decisions made</li> <li>• the details of any remedy offered to put things right</li> <li>• details of any outstanding actions</li> </ul> details of how to escalate the matter to the Housing Ombudsman Service if the resident remains dissatisfied	No	We do not have a stage three in our complaint procedure.

## Bestpractice 'should' requirements

### Stage 1

Code section	Code requirement	Comply: Yes/No	Evidence, commentary, and any explanations
5.2	If an extension beyond 20 working days is required to enable the landlord to respond to the complaint fully, this should be agreed by both parties.	Yes	Source-: Comments, Compliments and Complaint Policy 3.14 Timescales - Stage 2 – 20 Working days from request to escalate if this is not possible an explanation and a date for stage 2 will be sent to the customer. - If customer is unhappy with decision at Stage 2, they should contact the Housing Ombudsman 8 weeks after the final decision is made. Details to be given
5.3	Where agreement over an extension period cannot be reached, landlords should provide the Housing Ombudsman's contact details so the resident can challenge the landlord's plan for responding and/or the proposed timeliness of a landlord's response.	Yes	Source-: Comments, Compliments and Complaint Policy 3.14 Timescales - Stage 2 – 20 Working days from request to escalate if this is not possible an explanation and a date for stage 2 will be sent to the customer. - If customer is unhappy with decision at Stage 2, they should contact the Housing Ombudsman 8 weeks after the final decision is made. Details to be given
5.4	Where the problem is a recurring issue, the landlord should consider any older reports as part of the background to the complaint if this will help to resolve the issue for the resident.	Yes	If applicable when we look at any previous complaints during our investigation.
5.7	Where residents raise additional complaints during the investigation, these should be incorporated into the stage one response if they are relevant, and the stage one response has not been issued. Where the stage one response has been issued, or it would unreasonably delay the response, the complaint should be logged as a new complaint.	Yes	This is part of our complaint process. Once case is closed if something else is raised a new complaint is opened.

## Stage 2

Code section	Code requirement	Comply: Yes/No	Evidence, commentary, and any explanations
5.14	If an extension beyond 10 working days is required to enable the landlord to respond to the complaint fully, this should be agreed by both parties.	Yes	Stage 2 – 20 Working days from request to escalate if this is not possible an explanation and a date for stage 2 will be sent to the customer. - If customer is unhappy with decision at Stage 2, they should contact the Housing Ombudsman 8 weeks after the final decision is made.
5.15	Where agreement over an extension period cannot be reached, landlords should provide the Housing Ombudsman's contact details so the resident can challenge the landlord's plan for responding and/or the proposed timeliness of a landlord's response	Yes	Stage 2 – 20 Working days from request to escalate if this is not possible an explanation and a date for stage 2 will be sent to the customer. - If customer is unhappy with decision at Stage 2, they should contact the Housing Ombudsman 8 weeks after the final decision is made.

### Stage 3

Code section	Code requirement	Comply: Yes/No	Evidence, commentary, and any explanations
5.18	Complaints should only go to a third stage if the resident has actively requested a third stage review of their complaint. Where a third stage is in place and has been requested, landlords must respond to the stage three complaint <b><u>within 20 working days</u></b> of the complaint being escalated. Additional time will only be justified if related to convening a panel. An explanation and a date for when the stage three response will be received should be provided to the resident.	N/A	We do not have a stage 3 - If customer is unhappy with decision at Stage 2, they are advised contact the Housing Ombudsman 8 weeks after the final decision is made.
5.19	Where agreement over an extension period cannot be reached, landlords should provide the Housing Ombudsman's contact details so the resident can challenge the landlord's plan for responding and/or the proposed timeliness of a landlord's response.	N/A	We do not have a stage 3

## Section 6 - Putting things right

### Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary, and any explanations
6.1	Effective dispute resolution requires a process designed to resolve complaints. Where something has gone wrong a landlord must acknowledge this and set out the actions it has already taken, or intends to take, to put things right.	Partially	Section 2 pg. 1-2 of our Comments, Compliments and Complaints Policy acknowledge what we do when we get something wrong: ' <i>what We know that on occasions sometimes things go wrong, and customers may be dissatisfied and wish to complain. Comments, compliments, and complaints give us valuable customer 2 feedback which we use to develop and improve our services. We will listen to our customers and address issues where our customers are unhappy with our services</i> '. This is also included in stage 1-2 letters:
6.2	Any remedy offered must reflect the extent of any service failures and the level of detriment caused to the resident as a result. A landlord must carefully manage the expectations of residents and not promise anything that cannot be delivered or would cause unfairness to other residents.	No	Our Compensation Scheme Policy sets out the Procedure for our tenants to claim compensation: This is included in our procedure under section: 3.0 Failure to complete responsive repairs 4.0 Failure to complete Right to Repair 5.0 Damage to the possessions of a customer 6.0 Poor Quality Workmanship 7.0 Claims with no material or financial loss 8.0 Payment of Compensation
6.5	The remedy offer must clearly set out what will happen and by when, in agreement with the resident where appropriate. Any remedy proposed must be followed through to completion.	No	To be incorporated with the complaint procedure/policy.

<b>6.6</b>	In awarding compensation, a landlord must consider whether any statutory payments are due, if any quantifiable losses have been incurred, the time and trouble a resident has been put to as well as any distress and inconvenience caused.	Partly	Compensation policy to be reviewed to align with the complaint process across all services
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**Best practice ‘should’ requirements**

<b>Code section</b>	<b>Code requirement</b>	<b>Comply: Yes/No</b>	<b>Evidence, commentary, and any explanations</b>
<b>6.3</b>	Landlords should look beyond the circumstances of the individual complaint and consider whether anything needs to be ‘put right’ in terms of process or systems to the benefit of all residents.	Yes	This is considered at both levels of the complaint and can be evidenced in our induction process, supervision with staff and when we review our policies. This is also discussed in our Customer Satisfaction Working Group and any listens learnt are shared with Nehemiah Staff and included in our policies when reviewed which is then shared with tenants.
<b>6.7</b>	In some cases, a resident may have a legal entitlement to redress. The landlord should still offer a resolution where possible, obtaining legal advice as to how any offer of resolution should be worded.	Partially	We have a compensation policy). When any complaint gets to the stage legal advice is needed, we communicate with solicitors. We will review policy and tenants’ complaint form to include information.

**Section 7 - Continuous learning and improvement Mandatory**

**‘must’ requirements**

<b>Code section</b>	<b>Code requirement</b>	<b>Comply: Yes/No</b>	<b>Evidence, commentary, and any explanations</b>
<b>7.2</b>	Accountability and transparency are integral to a positive complaint handling culture. Landlords must report back on wider learning and improvements from complaints in their annual report and more frequently to their residents, staff and scrutiny panels.	Yes	Evidence: Accountability and transparency display through the display of complaints handling and outlining our learning in our annual tenant report.  Tenant forum established to discuss repairs performance on a bimonthly basis.

**Best practice ‘should’ requirements**

Code section	Code requirement	Comply: Yes/No	Evidence, commentary, and any explanations
7.3	<p>A member of the governing body should be appointed to have lead responsibility for complaints to support a positive complaint handling culture. This role will be responsible for ensuring the governing body receives regular information on complaints that provides insight to the governing body on the landlord's complaint handling performance.</p>	Yes	<p>Complaints are reported quarterly to Operations Committee as part of the Housing Service Report by the Housing Service Manager.</p>
7.4	<p>As a minimum, governing bodies should receive:</p> <ul style="list-style-type: none"> <li>• Regular updates on the volume, categories and outcome of complaints, alongside complaint handling performance including compliance with the Ombudsman's orders</li> <li>• Regular reviews of issues and trends arising from complaint handling.</li> <li>• The annual performance report produced by the</li> <li>• Ombudsman, where applicable Individual complaint outcomes where necessary, including where the Ombudsman made findings of severe maladministration or referrals to regulatory bodies. The implementation of management responses should be tracked to ensure they are delivered to agreed timescales. The annual self-assessment against the Complaint Handling Code for scrutiny and challenge.</li> </ul>	Yes	<p>Monthly Complaints Dashboard are created outlining our performance in handling complaints also outlined within our quarterly engagement reporting.</p> <p>Trends/movement are discussed during Customer Satisfaction Working Group.</p> <p>Information is shared with staff in relation to any updates. staff are encouraged to sign up to Housing Ombudsman newsletters/email to get regular up to date information.</p> <p>Self-assessment is reviewed annually, and any changes are uploaded on to our website and shared with Nehemiah Board.</p>



7.5	Any themes or trends should be assessed by senior management to identify potential systemic issues, serious risks or policies and procedures that require revision. They should also be used to inform staff and contractor training.	Yes	Complaints outcomes are discussed at our internal Customer Satisfaction Working Group and included in end of year reports where applicable.
7.6	<p>Landlords should have a standard objective in relation to complaint handling for all employees that reflects the need to:</p> <ul style="list-style-type: none"> <li>• have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments</li> <li>• take collective responsibility for any shortfalls identified through complaints rather than blaming others</li> <li>• act within the Professional Standards for engaging with complaints as set by the Chartered Institute of Housing.</li> </ul>	Yes	<p>Colleagues work together. Collecting information from required departments in order to best respond to the complainant. Identifying any gaps within our given process and providing solutions as a preventative measure for future complaints of a similar nature. Complaints are reported to Operations Committee quarterly.</p> <p>Nehemiah's complaint process is included in the Comment, Compliment and Complaints Policy</p> <p>How we handle complaints is included in our induction of all new staff and regular refresher training is available to existing staff</p> <p>We have a Complaint Officer who is able to address, any queries relating to complaints and works across all departments.</p> <p>We also have a Customer Satisfaction Working Group that meets bi-monthly and reviews open and closed cases of complaints.</p> <p>We have a Customer Engagement Officer that reviews complaints and contact tenants once complaint has been closed to establish if complaints was dealt with satisfactory.</p>

**Section 8 - Self-assessment and compliance**  
**Mandatory 'must' requirements**

Code section	Code requirement	Comply: Yes/No	Evidence, commentary, and any explanations
8.1	Landlords must carry out an annual self- assessment against the Code to ensure their complaint handling remains in line with its requirements.	Yes	A self-assessment review is carried out each year and results are displayed on our website <a href="https://www.nehemiah-ucha.co.uk/images/documents/Self%20Assessment%20Complaint%20Handling%20-%20update%20January%202022%20(006)%20word.pdf">https://www.nehemiah-ucha.co.uk/images/documents/Self%20Assessment%20Complaint%20Handling%20-%20update%20January%202022%20(006)%20word.pdf</a>
8.2	Landlords must also carry out a self-assessment following a significant restructure and/or change in procedures.	Yes	Where there has been a significant change to the self-assessment or organisational structure. A further self-assessment is carried out and updated on our website:  <a href="https://www.nehemiah-ucha.co.uk/images/documents/Self%20Assessment%20Complaint%20Handling%20-%20update%20January%202022%20(006)%20word.pdf">https://www.nehemiah-ucha.co.uk/images/documents/Self%20Assessment%20Complaint%20Handling%20-%20update%20January%202022%20(006)%20word.pdf</a>
8.3	Following each self-assessment, a landlord must: <ul style="list-style-type: none"> <li>• report the outcome of their self- assessment to their governing body. In the case of local authorities, self-assessment outcomes should be reported to elected members</li> <li>• publish the outcome of their assessment on their website if they have one, or otherwise make accessible to residents</li> <li>• include the self-assessment in their annual report section on complaints handling performance</li> </ul>	Yes	Once the self-assessment is reviewed the document is shared with Nehemiah’s governing body at Board and Operational Committee  Reviewed copy is shared on Nehemiah's website <a href="https://www.nehemiah-ucha.co.uk/images/documents/Self%20Assessment%20Complaint%20Handling%20-%20update%20January%202022%20(006)%20word.pdf">https://www.nehemiah-ucha.co.uk/images/documents/Self%20Assessment%20Complaint%20Handling%20-%20update%20January%202022%20(006)%20word.pdf</a>  The self-assessment will be included in the next annual report

<b>Document Title</b>	Complaint Handling Self-Assessment Revised
<b>Date Adopted</b>	December 2020
<b>Review Date</b>	September 2022
<b>Next review date</b>	September 2023