

## **Nehemiah Housing Complaints Handling Self-assessment 2024**

*Board members are aware that the Complaints Handling Code sets out the statutory requirements for landlords to respond to complaints effectively and fairly. This statutory code was issued following new powers given to the Housing Ombudsman under the Social Housing [Regulation] Act 2023. The Act also places a duty on the Ombudsman to monitor compliance with the Code. Non-compliance with the Code could result in a landlord, such as Nehemiah being issued with a Complaint Handling Failure Order. Nehemiah has completed our annual assessment against the new complaint handling code to demonstrate our compliance. Following this self-assessment Nehemiah was compliant with the Housing Ombudsman Complaints Handling Code. This self- assessment will be published on our website.*

*We will also be publishing on our website Nehemiah's Annual Complaints Performance and Service Improvement Report for 2023/24 together with the Board response to this report, as well as our Complaints, Compliments and Comments Policy.*

*Nehemiah's Tenant Satisfaction Measures (TSM) outcomes will submitted to the RSH (Regulator of Social Housing) by the 30<sup>th</sup> June 2024 deadline and this information has also been shared with our tenants in our effort to demonstrate transparency, influence and accountability.*

*The Board of Nehemiah -June 2024*

## Section 1: Definition of a complaint

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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 landlord, its own staff, or those acting on its behalf, affecting a resident or group of residents.'</i>	Yes	<ul style="list-style-type: none"> <li>Comments, Compliment and Complaint Policy Section 6.</li> <li><a href="https://nehemiah.co.uk/your-home/our-complaints-process">https://nehemiah.co.uk/your-home/our-complaints-process</a></li> </ul>	We have adopted the Housing Ombudsman definition of a complaint which is included in our Comments, Compliment and Complaint Policy.
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	<p>Comments, Compliment and Complaint Policy Section 6.</p> <p>Comments, Compliment and Complaint Policy Section 11.</p>	<p>A clear statement is included in our Comments, Compliment and Complaint Policy.</p> <p>We process all our complaints which includes from third parties, which is outline in our Comments, Compliment and Complaint Policy.</p>
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	Yes	Comments, Compliment and Complaint Policy Section 10.	We have a clear statement in our Comments, Compliments and Complaint Policy defining what a service request is.

	complaints, but must be recorded, monitored and reviewed regularly.			
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	Comments Compliment and Complaint Policy: Section 10	Our policy explains what a service request is and what a complainant should do if they are dissatisfied.
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	Comments Compliment and Complaint Policy: Section 10	Our policy includes statement under section 10 service request making tenants aware of the process to log a complaint.

## Section 2: Exclusions

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
2.1	Landlords must accept a complaint unless there is a valid reason not to do so. If landlords decide not to accept a complaint, they must be able to evidence their reasoning. Each complaint must be considered on its own merits	Yes	Comments Compliment and Complaint Policy: Section 9, 10 & 16 Insert policy	Our Comments, Compliment and Complaint Policy identifies when the complaint process should not be used; when the complaint raised is not a complaint; and what the process is for addressing unreasonable behavioural.
2.2	<p>A complaints policy must set out the circumstances in which a matter will not be considered as a complaint or escalated, and these circumstances must be fair and reasonable to residents. Acceptable exclusions include:</p> <ul style="list-style-type: none"> <li>• The issue giving rise to the complaint occurred over twelve months ago.</li> <li>• Legal proceedings have started. This is defined as details of the claim, such as the Claim Form and Particulars of Claim, having been filed at court.</li> <li>• Matters that have previously been considered under the complaints policy.</li> </ul>	Yes	<ul style="list-style-type: none"> <li>• Comments Compliment and Complaint Policy: Section 15 paragraph 1</li> <li>• Comments Compliment and Complaint Policy: Section 9</li> <li>• Comments Compliment and Complaint Policy Section 15 paragraph 1</li> </ul>	Our policy outlines the process to address complaints raised within 12 months; cases going through legal process; and matters that have previously been considered under our complaints policy.
2.3	Landlords must accept complaints referred to them within 12 months of the issue occurring or the resident becoming aware of the issue, unless they are excluded on other grounds. Landlords must consider whether to apply discretion to accept	Yes	<ul style="list-style-type: none"> <li>• Comments Compliment and Complaint Policy Section 15 paragraph 1</li> </ul>	A complaint raised where the incident is within the last 12 months will be investigated in line with our complaints.

	complaints made outside this time limit where there are good reasons to do so.			
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	Comments, Compliment and Complaint Policy. Complaint Procedure final section.	Our Complaint procedure explains the process we take to inform tenants when we will not be logging issues raised as a complaint. An explanation is given in writing and information is also recorded on our housing management system against the tenant's account.
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.		Comments, Compliment and Complaint Policy: Section 17	We adopt a positive approach to complaints and recognise when things go wrong. Our policy outlines a clear approach on how we handle complaints which includes a statement of Nehemiah's intent to review each complaint raised as a separate complaint.

### Section 3: Accessibility and Awareness

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
3.1	Landlords must make it easy for residents to complain by providing different channels through which they can make a complaint. Landlords must consider their duties under the Equality Act 2010 and anticipate the needs and reasonable adjustments of residents who may need to access the complaints process.	Yes	<ul style="list-style-type: none"> <li>• <a href="https://nehemiah.co.uk/">https://nehemiah.co.uk/</a></li> <li>• <a href="https://nehemiah.co.uk/your-home/our-complaints-process">https://nehemiah.co.uk/your-home/our-complaints-process</a></li> <li>• Comments, Compliment and Complaint Policy: Section 11</li> <li>• <a href="https://nehemiah.co.uk/admin/wp-content/uploads/2024/03/Nehemiah-Tenant-Handbook.pdf">https://nehemiah.co.uk/admin/wp-content/uploads/2024/03/Nehemiah-Tenant-Handbook.pdf</a></li> <li>• <a href="#">Nehemiah-Housing-Customer-Engagement-Strategy-2024-final.pdf</a></li> </ul>	<p>We have a user-friendly accessible website, with key functions for accessibility (Userway and translation located in the right-hand corner of our website main.</p> <p>We also offer a translation service, and tenants can request translation of key documents.</p> <p>Our Comments Compliment and Complaint Policy evidences the many different methods our tenants can engage with us to raise a complaint.</p> <p>Tenants are given a tenant handbook at the point of signing a new tenancy. This handbook is also available upon request. A copy of our Tenant Handbook is also located on our website. Tenants are notified of any updates/changes via text, letter etc.</p> <p>Our Customer Engagement Strategy also identifies the</p>

				many ways we engage with our tenants.
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	<ul style="list-style-type: none"> <li>• Comments Compliment and Complaint Policy: Section 11</li> <li>• <a href="https://nehemiah.co.uk/your-home/our-complaints-process">https://nehemiah.co.uk/your-home/our-complaints-process</a></li> <li>• <a href="https://nehemiah.co.uk/admin/wp-content/uploads/2024/05/Complaints-Leaflet-10.5.24-1.pdf">https://nehemiah.co.uk/admin/wp-content/uploads/2024/05/Complaints-Leaflet-10.5.24-1.pdf</a></li> <li>• <a href="https://nehemiah.co.uk/admin/wp-content/uploads/2024/03/Nehemiah-Tenant-Handbook.pdf">https://nehemiah.co.uk/admin/wp-content/uploads/2024/03/Nehemiah-Tenant-Handbook.pdf</a></li> </ul>	<p>Our Comments Compliment and Complaint Policy presents the many different methods our tenants can engage with us to raise a complaint.</p> <p>We also have a dedicated page on our website explaining our complaints process. which tenants can use to raise a complaint.</p> <p>Our complaint leaflet also explains the process. When a tenant raises a complaint, the leaflet is included in any response.</p> <p>Our Tenants Handbook also includes how to make a complaint.</p> <p>All staff are aware of our complaint process and work in line with our policy. All staff are briefed of any changes or update to our policy. All staff receive mandatory training (last training July 2023), and the complaint process is</p>

				included in new staff induction.
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	<ul style="list-style-type: none"> <li>Complaints Dashboard contains information relating to complaints that is reported to Board with Key Performance Indicators (CC1 number of Complaints) quarterly and annually. Comments, Compliments and Complaints Policy: Section 21.</li> </ul>	<p>We monitor the number of complaints raised by our tenants however we do not have any Key Performance Indicators attached to the volume of complaint. The complaint monitoring is used to inform both our Board and tenants and used to log lessons learnt and identify service improvement.</p> <p>We have many different methods to raise complaints. Which ensures all our tenants can use a suitable method for raising dissatisfaction. We also conduct both internal and independent reviews of our service so we can capture any form of dissatisfaction.</p>
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	<p><a href="https://nehemiah.co.uk/your-home/our-complaints-process">https://nehemiah.co.uk/your-home/our-complaints-process</a></p> <p>Comments Compliment and Complaint Policy: Section Comments Compliment and Complaint Policy: Section: 15</p>	<p>We have a dedicated page for complaints on our website that is accessible in different languages using the language tool (world) in right hand corner of website.</p> <p>Our policy highlights the two stages of our complaint process.</p>



			<a href="https://nehemiah.co.uk/admin/wp-content/uploads/2024/05/Complaints-Leaflet-10.5.24-1.pdf">https://nehemiah.co.uk/admin/wp-content/uploads/2024/05/Complaints-Leaflet-10.5.24-1.pdf</a>	We also have a complaint leaflet, and the process is included in our Tenants Handbook.
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	Comments Compliment and Complaint Policy: Section 2 & 12	This is included in our Comments, Compliments and Complaint Policy.
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	Comments Compliment and Complaint Policy: Section 11  And Complaint Leaflet ( <a href="https://nehemiah.co.uk/admin/wp-content/uploads/2024/05/Complaints-Leaflet-10.5.24-1.pdf">https://nehemiah.co.uk/admin/wp-content/uploads/2024/05/Complaints-Leaflet-10.5.24-1.pdf</a> )	Our Comments, Compliments and Complaint Policy & Complaint Leaflet states tenants can use a someone else to represent them such as an advocate.
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	Comments, Compliments and Complaint Policy: Section 12	This is included in our Comments, Compliments and Complaint Policy and in our complaint leaflet.

## Section 4: Complaint Handling Staff

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
4.1	Landlords must have a person or team assigned to take responsibility for complaint handling, including liaison with the Ombudsman and ensuring complaints are reported to the governing body (or equivalent). This Code will refer to that person or team as the 'complaints officer'. This role may be in addition to other duties.	Yes	Comments , Compliments and Complaint Policy: Section 4	We have a lead complaint officer (Director of Operations) who takes responsibility for complaint handling, including liaising with the Housing Ombudsman and ensuring complaints are reported to Nehemiah's governing body.
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	Comments, Compliments and Complaint Policy: Section 4	Our Complaint Officer is a member of the Nehemiah Executive Team. This role reports directly to our governing body and is a senior member of the management team within Nehemiah which means they can resolve disputes quickly.
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	Comments, Compliments and Complaint Policy: Section 22	Complaint Handling Training is mandatory and all staff both frontline and back office have received complaint handling training. Last training session was completed on the 17 <sup>th</sup> July 2023. When policy is updated/amended briefing sessions are carried out internally.

## Section 5: The Complaint Handling Process

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
5.1	Landlords must have a single policy in place for dealing with complaints covered by this Code. Residents must not be treated differently if they complain.	Yes	<ul style="list-style-type: none"> <li>• Comments, Compliments and Complaint Policy: Section 15</li> </ul>	Our Comments, Compliments and Complaints Policy demonstrates we have a policy in place. Complaint investigations are carried by officers.
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	<ul style="list-style-type: none"> <li>• Comments, Compliments and Complaint Policy: Section 14 (for contractors) &amp; Section 15 for Nehemiah staff,</li> </ul>	We only have 2 stages in our complaints process, which is highlighted in our policy.
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	<ul style="list-style-type: none"> <li>• Comments, Compliments and Complaint Policy: Section 14 (for contractors) &amp; Section 15 for Nehemiah staff,</li> </ul>	We only have 2 stages in our complaints process, which is highlighted in our policy.
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	<ul style="list-style-type: none"> <li>• Comments, Compliments and Complaint Policy: Section 14 (for contractors)</li> </ul>	Our contractors/third parties have to follow the same process in terms of two stages which is included in our policy. <i>'When a managing agent or contractor deals with a complaint directly from a tenant, the process will not be more than two stages in line with the Complaint Handling Code'</i> .

5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Yes	<ul style="list-style-type: none"> <li>Comments, Compliments and Complaint Policy 2024.</li> </ul>	All our contractors and managing agents have received a copy of our Comments, Compliments and Complaint Policy, which includes the process in handling Complaints.
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	Templates are held on our public drive on our housing management system and all communication to tenants include final copies response letters are attached to tenant’s file.	We use the Housing Ombudsman letter as a template when responding to our tenants to ensure outcomes are included. This includes the definition of complaint, clarify tenant’s complaint, desired outcome, recommendations, if the complaint has been upheld and any lessons learnt etc...
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	Templates are held on our public drive on our housing management system and all communication to tenants include final copies response letters are attached to tenant’s file.	We have a template letter which is used to acknowledge all complaints. The template also has a section for staff acknowledging complaints to include complaint from tenant. If there is an issue raised that is not a complaint they will include clarification in the acknowledgement letter.
5.8	At each stage of the complaints process, complaint handlers must: <ul style="list-style-type: none"> <li>a. deal with complaints on their merits, act independently, and have an open mind;</li> <li>b. give the resident a fair chance to set out their position;</li> </ul>	Yes	Comments , Compliments and Complaint Policy: Section 2 & 17	Our staffing structure and the two stages of our complaints process enables officers and managers to deal with complaints raised around service delivery. This gives our tenants a fair chance to raise

	<p>c. take measures to address any actual or perceived conflict of interest; and</p> <p>d. consider all relevant information and evidence carefully.</p>			<p>their complaint. Staff have been trained in complaints handling and are aware of what they need to do when investigating a complaint. All staff complete a register of interest declarations form annually, declaring any conflict of interest. Once forms have been completed, any declaration of interest is monitored and a appropriate action is taken. This may include restricted access to tenant information and assigning another member of staff to work with tenant.</p>
5.9	<p>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.</p>	Yes	<ul style="list-style-type: none"> <li>• Comments, Compliments and Complaint Policy: Section 15; Complaint Procedure; Complaint Leaflet &amp; Nehemiah Tenant Handbook.</li> </ul>	<p>Our timescale to deal with a tenant's complaint is included in our policy and procedures for dealing with complaints.</p>
5.10	<p>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.</p>	Yes	<ul style="list-style-type: none"> <li>• Comments, Compliments and Complaint Policy: Section 16 &amp; 20</li> </ul>	<p>Making reasonable adjustment is included in our Comments, Compliments and Complaint Policy.</p>

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	<ul style="list-style-type: none"> <li>Comments, Compliments and Complaint Policy: Section 6 defines complaint; Section 9 sets out when we will not follow the complaints process; Section 16 unreasonable behaviour.</li> </ul>	Our Comment, Compliment and Compliant Policy evidence that we have met this section of the complaints handling code.
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	<ul style="list-style-type: none"> <li>Comments, Compliments and Complaint Policy: Section 21 Governance Oversight: Learning from Complaints and Monitoring.</li> </ul>	All Complaint correspondences are logged on our internal Housing Management System in the Complaints Management section.
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	<ul style="list-style-type: none"> <li>Comments, Compliments and Complaint Policy: Section 15</li> </ul>	Complaints are investigated by officers within departments where a complaint has been raised. Officers and Managers are authorised to make decisions based at their level of responsibility within the organisation.
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	<ul style="list-style-type: none"> <li>Comments, Compliments and Complaint Policy: Section 16</li> <li><a href="https://nehemiah.co.uk/your-home/tenant-wellbeing/anti-social-behaviour">https://nehemiah.co.uk/your-home/tenant-wellbeing/anti-social-behaviour</a></li> </ul>	<p>Within our Comments, Compliments and Complaint Policy we have a section that deals with unreasonable behaviour.</p> <p>We have an Anti- Social Behaviour Policy in place that tackle unacceptable behaviour.</p>

				Posters are also displayed within organisation premises, regarding zero tolerance of unacceptable behaviours towards staff.
5.15	Any restrictions placed on contact due to unacceptable behaviour must be proportionate and demonstrate regard for the provisions of the Equality Act 2010.	Yes	<ul style="list-style-type: none"> <li>Comments, Compliments and Complaint Policy: Section 16</li> </ul>	When a decision is made to restrict access a risk assessment must be carried out on the individual to ensure our decision is put in place fairly.

### Section 6: Complaints Stages

#### Stage 1

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
6.1	Landlords must have processes in place to consider which complaints can be responded to as early as possible, and which require further investigation. Landlords must consider factors such as the complexity of the complaint and whether the resident is vulnerable or at risk. Most stage 1 complaints can be resolved promptly, and an explanation, apology or resolution provided to the resident.	Yes	Comments, Compliment and Complaint Policy Section: 15	We follow the recommended time to deal with complaints in line with the Housing Ombudsman timeframe. If a case is likely to be resolved outside of the recommended time. We will contact our tenant to explain and ask for an extension.
6.2	Complaints must be acknowledged, defined and logged at stage 1 of the complaints procedure <b><u>within five working days of the complaint being received.</u></b>	Yes	Comments, Compliment and Complaint Polic: Section 15 & <a href="https://nehemiah.co.uk/your-home/our-complaints-process">https://nehemiah.co.uk/your-home/our-complaints-process</a>	This is included Section 15 of our Comments, Compliments and Complaints Policy and on our Complaint Leaflet.

6.3	Landlords must issue a full response to stage 1 complaints <b><u>within 10 working days</u></b> of the complaint being acknowledged.	Yes	Comments, Compliment and Complaint Polic: Section 15 ; Complaint Procedure & <a href="https://nehemiah.co.uk/your-home/our-complaints-process">https://nehemiah.co.uk/your-home/our-complaints-process</a>	This is included Section 15 of our Comments, Compliments and Complaints Policy and on our Complaint Leaflet.
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	Complaint Procedure	We understand that some complaints can be very complex, and the investigation may involve us liaising with external statutory bodies. In these cases, we will contact our tenant to request an extension.
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	Comments, Compliment and Complaint Policy: Section 12	The Housing Ombudsman details are included in our response letter/email.
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	This is included on the response given at stage 1. Complaint Process	We ensure the complainant is aware of the outcomes and include any outstanding actions in our final response at both stage 1.
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	Stage 1 templates are used to respond to complaints.	We use the recommended complaint response template provided by the Housing Ombudsman which lays out all areas we need to cover in the complaint response letter.



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	Comments, Compliment and Complaint Policy: Section 15	Nehemiah's Comments, Compliment and Complaint Policy clarifies what we will do if/when a tenant raises a new issue whilst we are already investigating a complaint.
6.9	Landlords must confirm the following in writing to the resident at the completion of stage 1 in clear, plain language: <ul style="list-style-type: none"> <li>a. the complaint stage;</li> <li>b. the complaint definition;</li> <li>c. the decision on the complaint;</li> <li>d. the reasons for any decisions made;</li> <li>e. the details of any remedy offered to put things right;</li> <li>f. details of any outstanding actions; and</li> <li>g. details of how to escalate the matter to stage 2 if the individual is not satisfied with the response.</li> </ul>	Yes	Complaint Procedure Stage 1	Nehemiah response letters are created in line with the Housing Ombudsman. Our procedure highlights all areas that will be included in the final response letter.

### Stage 2

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
6.10	If all or part of the complaint is not resolved to the resident's satisfaction at stage 1, it must be progressed to stage 2	Yes	Complaint Procedure.	This is included in Nehemiah's Complaint Procedure.

	of the landlord's procedure. Stage 2 is the landlord's final response.			
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	<ul style="list-style-type: none"> <li>• Comments, Compliment and Complaint Policy: Section 15 &amp; Complaint Procedure.</li> <li>• <a href="https://nehemiah.co.uk/your-home/our-complaints-process">https://nehemiah.co.uk/your-home/our-complaints-process</a></li> </ul>	This code provision requirement is included in our policy, which is also located on Nehemiah's website.
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	<ul style="list-style-type: none"> <li>• Complaint Procedure Stage 2</li> <li>• <a href="https://nehemiah.co.uk/your-home/our-complaints-process">https://nehemiah.co.uk/your-home/our-complaints-process</a></li> </ul>	We have updated our policy to ensure tenants and staff understand this process. All staff acknowledging and logging complaints at stage 2 have been briefed and understand what to do when a tenant wants to escalate their complaint from stage 1.
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Yes	Comments, Compliments and Complaints Policy: Section 15	Our Comments, Compliments and Complaints Policy explains the role and responsibilities of the investigating officer and who the person will be if complaint escalates.
6.14	Landlords must issue a final response to the stage 2 <b>within 20 working days</b> of the complaint being acknowledged.	Yes	<ul style="list-style-type: none"> <li>• Comments, Compliments and Complaints Policy: Section 15</li> <li>• Complaint Procedure</li> <li>• Complaint Leaflet</li> <li>• <a href="https://nehemiah.co.uk/your-home/our-complaints-process">https://nehemiah.co.uk/your-home/our-complaints-process</a></li> </ul>	The timeframe is included in our Comments, Compliments and Complaints Policy.

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	<ul style="list-style-type: none"> <li>• Comments, Compliments and Complaints Policy: Section 15 stage 2.</li> <li>• Complaint Procedure stage 2.</li> </ul>	We understand that some complaints can be very complex, and the investigation may involve us liaising with external statutory bodies. In these cases, we will contact our tenant to request an extension.
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	Comments, Compliment and Complaint Policy: Section 12.	The Housing Ombudsman details are included in our responses letter/email.
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	This is included on the response given at Stage 2. Complaint Process	We follow the Housing Ombudsman guidelines within the complaint handling code and ensure all concerns raised by tenants in a complaint is answered including recommendations. We ensure the tenants are made aware of the outcomes and include any outstanding actions in our final response at both stage 2.
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	Stage 2 templates are used to respond to complaints.	We use the recommended complaint response template provided by the Housing Ombudsman which lays out all areas we need to cover in the complaint response letter.
6.19	Landlords must confirm the following in writing to the resident at the completion of stage 2 in clear, plain language:	Yes	Complaint Procedure Stage 2	Our Complaint Procedure outlines the categories that

	<p>a. the complaint stage;</p> <p>b. the complaint definition;</p> <p>c. the decision on the complaint;</p> <p>d. the reasons for any decisions made;</p> <p>e. the details of any remedy offered to put things right;</p> <p>f. details of any outstanding actions; and</p> <p>g. details of how to escalate the matter to the Ombudsman Service if the individual remains dissatisfied.</p>			are included in our response letter.
6.20	Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.	Yes	Comments, Compliment and Complaint Policy: Section 15 and Complaints Procedure Stage 2	Our investigating staff members are all Officers and Managers who have line management or contract management responsibility.

### Section 7: Putting things right

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
7.1	<p>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:</p> <ul style="list-style-type: none"> <li>• Apologising;</li> <li>• Acknowledging where things have gone wrong;</li> <li>• Providing an explanation, assistance or reasons;</li> </ul>	Yes	<ul style="list-style-type: none"> <li>• Comments, Compliments and Complaint Policy: Section 1 &amp; 19.</li> <li>• <a href="https://nehemiah.co.uk/your-home/our-complaints-process">https://nehemiah.co.uk/your-home/our-complaints-process</a></li> <li>• Nehemiah Compensation Policy</li> </ul>	<p>Our opening section of our Comments, Compliments and Complaint Policy acknowledge our committee to address when things go wrong.</p> <p>Compensation Policy (Discretionary Payment</p>

	<ul style="list-style-type: none"> <li>• Taking action if there has been delay;</li> <li>• Reconsidering or changing a decision;</li> <li>• Amending a record or adding a correction or addendum;</li> <li>• Providing a financial remedy;</li> <li>• Changing policies, procedures or practices.</li> </ul>		<ul style="list-style-type: none"> <li>• Newsletter section: Lessons Learnt <a href="https://nehemiah.co.uk/admin/wp-content/uploads/2024/03/Nehemiah-Newsletter-Spring-2024-ONLINE.pdf">https://nehemiah.co.uk/admin/wp-content/uploads/2024/03/Nehemiah-Newsletter-Spring-2024-ONLINE.pdf</a></li> <li>• Response final Letters Stage 1 &amp; 2</li> <li>• Complaint Review Meeting</li> </ul>	<p>Procedure updated May 2024 approved by Board June 2024).</p> <p>We identify lessons learnt in our publications to tenants.</p> <p>Our response letters at each stage ensures we demonstrate that we address when things go wrong.</p> <p>Complaint Review meetings are held regularly with Complaint Officer and Customer Engagement Officer. All cases and their actions are reviewed. Lessons learnt and identified actions are included in action plan and monitored.</p>
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Yes	<ul style="list-style-type: none"> <li>• Final response letter to tenants at stage 1&amp;2</li> <li>• Compensation Policy</li> <li>• Comments, Compliments and Complaint Policy: Section 19</li> </ul>	The process is identified in Nehemiah's Compensation Policy.
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	Yes	<ul style="list-style-type: none"> <li>• Final response letter to tenants at stage 1&amp;2</li> </ul>	All cases and their action are reviewed. Lessons learnt and identified actions are included in

	must be followed through to completion.			action plan and monitored.
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes	<ul style="list-style-type: none"> <li>• Comments, Compliments and Complaint Policy: Section 12</li> <li>• <a href="https://www.housing-ombudsman.org.uk/reports/complaint-handling-failure-order-reports/">https://www.housing-ombudsman.org.uk/reports/complaint-handling-failure-order-reports/</a></li> </ul>	We refer to the Complaints Handling Code, any lessons learnt during the investigation process and any cases shared by the Housing Ombudsman

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

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
8.1	Landlords must produce an annual complaints performance and service improvement report for scrutiny and challenge, which must include: <ol style="list-style-type: none"> <li>the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements.</li> <li>a qualitative and quantitative analysis of the landlord's complaint handling performance. This must also include a summary of the types of complaints the landlord has refused to accept;</li> <li>any findings of non-compliance with this Code by the Ombudsman;</li> <li>the service improvements made as a result of the learning from complaints;</li> </ol>	Yes	<p>Complaint Dashboard submitted to Board quarterly/annually.</p> <p>Comments, Compliments and Complaint Policy: Section 21 Governance Oversight</p> <p><a href="#">Nehemiah-Tenants-Report-2023-Online-1.pdf</a> (page 9)</p> <p>Housing Ombudsman Newsletter</p>	<p>A self-assessment review is carried out each year and results are displayed on our website.</p> <p>A complaint dashboard is produced on a quarterly/annual basis is presented to Nechemiah's Governing Bodies.</p> <p>Tenant Report includes statistics and how we can improve services.</p> <p>Key staff have signed up to Housing Ombudsman and receive regular newsletters. All</p>

	<p>e. any annual report about the landlord's performance from the Ombudsman; and</p> <p>f. any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord.</p>			updates are shared across staff teams.
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	Nehemiah submits a Complaints Dashboard to Board monthly/annually. This is an agenda item at both Board and Operations Committee meetings.	Our Complaint Handling performance is monitored by our KPI's and Complaint Cases and are shared with over governing Board quarterly and annually.
8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	Yes	<a href="https://nehemiah.co.uk/your-home/our-complaints-process">https://nehemiah.co.uk/your-home/our-complaints-process</a>	We revisit our self-assessment following any significant changes. We have updated our complaints process in line with the Complaints Handling Code April 2024.
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	Yes	<ul style="list-style-type: none"> <li>• Comments, Compliments and Complaint Policy.</li> <li>• <a href="https://nehemiah.co.uk/your-home/our-complaints-process">https://nehemiah.co.uk/your-home/our-complaints-process</a></li> </ul>	We have not been asked to revisit our self-assessment by the Housing Ombudsman. However, we have noted recommendations and included when reviewed our complaint process.
8.5	If a landlord is unable to comply with the Code due to exceptional circumstances, such as a cyber incident, they must inform the Ombudsman, provide information to residents who may be affected, and publish this on their website Landlords	Yes	<a href="https://www.housing-ombudsman.org.uk/landlords-info/membership/">https://www.housing-ombudsman.org.uk/landlords-info/membership/</a>	Membership of the Scheme is compulsory for social landlords, who are or have been registered with the

	must provide a timescale for returning to compliance with the Code.			<p>Regulator of Social Housing (RSH).</p> <p>As a social landlord Nehemiah Housing is a member of the Housing Ombudsman scheme for landlords so has signed up to follow code and meet required compliances identified. We understand if we are unable to meet standards we will contact the Housing Ombudsman.</p>
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### Section 9: Scrutiny & oversight: continuous learning and improvement

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
9.1	Landlords must look beyond the circumstances of the individual complaint and consider whether service improvements can be made as a result of any learning from the complaint.	Yes	<p>Newsletter section: Lessons Learnt <a href="https://nehemiah.co.uk/admin/wp-content/uploads/2024/03/Nehemiah-Newsletter-Spring-2024-ONLINE.pdf">https://nehemiah.co.uk/admin/wp-content/uploads/2024/03/Nehemiah-Newsletter-Spring-2024-ONLINE.pdf</a></p>	All complaint outcomes are review by our Complaint and Customer Engagement Officer. All responses at stage 1 and 2 include recommendation, service improvement and lesson learnt are used to improve any service delivery for all our tenants.
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	Yes	<ul style="list-style-type: none"> <li><a href="https://nehemiah.co.uk/admin/wp-content/uploads/2022/12/Nehemiah-Newsletter-Autumn-2022-WEB.pdf">https://nehemiah.co.uk/admin/wp-content/uploads/2022/12/Nehemiah-Newsletter-Autumn-2022-WEB.pdf</a></li> </ul>	All complaint outcomes are review by our Complaint and Customer Engagement Officer. All responses at stage 1 and 2 include



	issues and introduce positive changes in service delivery.		<ul style="list-style-type: none"> <li>• <a href="#">Nehemiah-Tenants-Report-2023-Online-1.pdf</a></li> <li>• Policy update (Compensation Policy updated 2024)</li> </ul>	recommendation, service improvement and lessons learnt are used to improve any service delivery for all our tenants.
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	<ul style="list-style-type: none"> <li>• <a href="https://nehemiah.co.uk/your-home/get-involved">https://nehemiah.co.uk/your-home/get-involved</a></li> <li>• <a href="#">Nehemiah-Tenants-Report-2023-Online-1.pdf</a></li> <li>• Comments, Compliments and Complaint Policy. Section 1</li> </ul>	We the valuable contribution of customer feedback contributing to the development and improvement of our services. Nehemiah publishes our performance in the Tenants Annual Report and how our tenants' voices have impacted on service improvements and lessons learnt from complaints. Nehemiah Housing welcomes all feedback from customers.
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	Comments, Compliments and Complaint Policy: Section 4	Nehemiah has a lead Complaint Officer (Operations Director) who is responsible for complaint handling, which includes monitoring trend and identifying risk.
9.5	In addition to this a member of the governing body (or equivalent) must be appointed to have lead responsibility for complaints to	Yes	Comments, Compliments and Complaint Policy: Section 4	Nehemiah has a MRC. This person was elected and agreed at the Operations Committee Meeting held in

	support a positive complaint handling culture. This person is referred to as the Member Responsible for Complaints ('the MRC').			June 2024. The MRC is the Chair of Operations Committee who also is a member of our Nehemiah's Board.
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	<ul style="list-style-type: none"> <li>• Comments, Compliments and Complaint Policy: Section 21</li> <li>• Complaint Dashboard</li> </ul>	As an existing member of the Board this role already receives quarterly and annual reports about complaint cases.
9.7	As a minimum, the MRC and the governing body (or equivalent) must receive: <ul style="list-style-type: none"> <li>a. regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance;</li> <li>b. regular reviews of issues and trends arising from complaint handling;</li> <li>c. regular updates on the outcomes of the Ombudsman's investigations and progress made in complying with orders related to severe maladministration findings; and</li> <li>d. annual complaints performance and service improvement report.</li> </ul>	Yes	<ul style="list-style-type: none"> <li>• Comments, Compliments and Complaint Policy: Section 21</li> <li>• Complaint Dashboard</li> </ul>	Reports are submitted quarterly/ annually to both the Board and Operations Committee. The Report includes all key areas relating to volume, categories 'trend, housing ombudsman maladministration findings etc...
9.8	Landlords must have a standard objective in relation to complaint	Yes	<ul style="list-style-type: none"> <li>• Comments, Compliments and Complaint Policy: Section 2, 3, 4 &amp; 21</li> </ul>	This objective is demonstrated in our

	<p>handling for all relevant employees or third parties that reflects the need to:</p> <ul style="list-style-type: none"> <li>a. have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments;</li> <li>b. take collective responsibility for any shortfalls identified through complaints, rather than blaming others; and</li> <li>c. act within the professional standards for engaging with complaints as set by any relevant professional body.</li> </ul>		<ul style="list-style-type: none"> <li>• Complaint Dashboard Section 21</li> </ul>	<p>Comments, Compliments and Complaint Policy. All staff are inducted in line with the Complaint Handling Code, and we have a policy that sets out a clear statement on how complaints will be handled within our organisation.</p>
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