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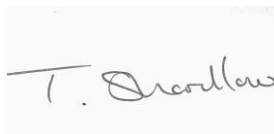
Date: 18<sup>th</sup> June 2024

Dear Sir/Madam,

**Cabinet – 19<sup>th</sup> June 2024**

I refer to the above meeting and attach **Item 6: Appendix A – Complaint Handling Code Self-Assessment & Housing Complaints Annual Report 2023/24 (Page 2)** report that was marked to follow on the agenda.

Yours faithfully,



Tom Shardlow

Chief Executive

To: Members of the Cabinet

Councillor C. Watkins (Leader of the Council and Housing)  
Councillor J. Sheppard (Deputy Leader and Environment and Public Services)  
Councillor S. Hey (Resources and Public Services)  
Councillor T. Jenkins (Leisure, Communities and Health)  
Councillor N. King (Business and Regeneration)  
Councillor R. Roze (Planning and Enforcement)

Observer

Councillor K. Wilson (Leader of the Main Opposition Party)

**ANNUAL HOUSING COMPLAINT  
PERFORMANCE & SERVICE  
IMPROVEMENT REPORT  
2023/24**



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# INTRODUCTION

This Annual Report provides analysis of the complaints and compliments received from tenants during the period 1<sup>st</sup> April 2023 to 31<sup>st</sup> March 2024.

Housing services are delivered by Nuneaton and Bedworth Borough Council to our tenants and their families living in **5,624** homes across the borough.



We are committed to meeting our obligations to be compliant with the Housing Ombudsman Complaint Handling Code 2024, and we want to achieve best practice in our complaint handling process and ultimately provide a better service to our tenants and leaseholders.

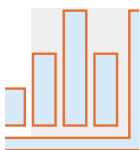
This report contains:



details of the council's housing complaint handling performance and compliance to the Housing Ombudsman's Complaint Handling Code 2022



areas of good practice



complaints themes and trends



areas of learning and improvement and recommended further actions to be taken to improve the Council's performance and services delivery

During 2023/24 complaints were handled under the Council's Complaint Handling Procedure which had regard to the Housing Ombudsman Complaint Handling Code 2022, however, during Quarter 4 of 2023/24, a review of the Council's complaint handling procedures was undertaken. As a result, a new Complaint Handling Policy & Procedure was approved and adopted in preparation for the implementation of the new Complaint Handling Code taking effect from 1<sup>st</sup> April 2024. Details of other changes and improvements made are provided in the final section of this report.

# OUR HOUSING STOCK

To provide context, the borough of Nuneaton and Bedworth is one of five local authorities in the county of Warwickshire, the others being Warwick, Stratford-on-Avon, Rugby, and North Warwickshire. It covers 79 square kilometres and is a completely urban authority having no rural villages within its boundaries. The borough has experienced an increase in population and a rise in demand for social housing. The current number of council homes available in Nuneaton and Bedworth is **5,624**. The table below gives a breakdown of the number and type of stock that is currently owned by the Council:

Type	Nuneaton	Bedworth	Total
<b>General Purpose Dwellings</b>			
Bedsitter	92	29	121
Bungalow	58	82	140
House	1,882	855	2,737
Flats	955	252	1,207
Maisonettes	96	153	249
<b>Total General Purpose</b>			<b>4,454</b>
<b>Independent Living</b>			
Bedsitter	94	121	215
Bungalow	179	235	414
House	5	1	6
Flats	366	169	535
<b>Total Independent Living</b>			<b>1,170</b>
<b>Total</b>			<b>5,624</b>

## Stock Condition

Most of the Council's housing stock is ageing. With a significant number of properties over 50 years old the properties have required major maintenance and repair. The Council has successfully modernised the vast majority of its stock by delivering the following projects:

- Roof renewals to houses and flat blocks.
- External wall and loft insulation works.
- Re-wiring of properties.
- Concrete structural repairs to flat blocks which also included new balconies and staircases.
- Lift renewals to flat blocks.
- Replacement of external doors to uPVC.

- A rolling programme of central heating installations, fire detection and alarm installations.
- Renewal and modernisation of kitchens and bathrooms.
- Providing provisions for scooter housing at Independent Living accommodation.
- Installation of walk-in showers for older and disabled tenants.

As a result of the above projects, a stock condition survey carried out in 2023 reported that **98.32%** of the Council's homes meet the Decent Homes Standard.

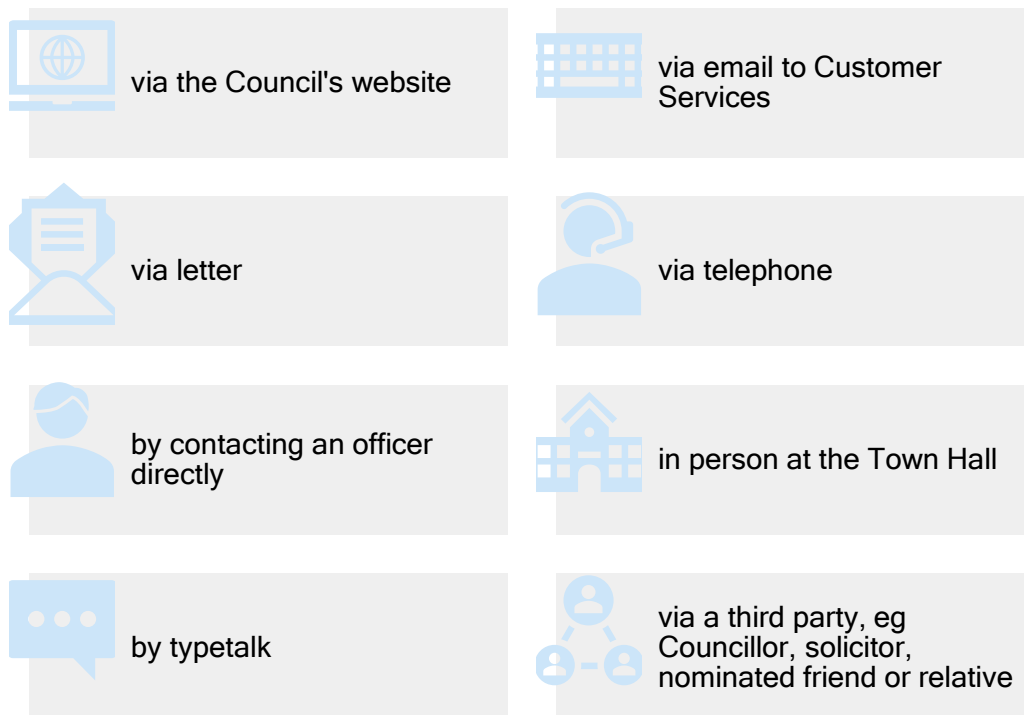
The Council is also continually looking for new acquisitions and new builds to replenish its housing stock.



# COMPLAINT HANDLING GOVERNANCE & PROCEDURES

## Policy & Procedure

The Council's [Housing Complaints Policy and Procedures](#) provide the framework for ensuring that formal complaints are handled consistently, fairly, effectively, confidentially and in a timely manner by competent complaint handling staff. Tenants can make a formal complaint to the Council through a variety of ways:



Good communication, both internally within the Council and externally with its tenants, is vital to our complaints service. It is important that our tenants understand what can or cannot be done in relation to a problem or complaint and our priority is to resolve concerns as soon as they come to our attention. The Council encourages any tenant or service user who has a concern to first approach the team or member of staff in the relevant service area or make a service request:

<p><b>CUSTOMER SERVICES</b> The corporate point of contact for all customer enquiries, feedback, notifications, comments, compliments and complaints.</p>	<p><b>HEART</b> Providing advice and assistance to deliver disabled adaptations and home improvements to keep tenants safe, secure and warm in their homes.</p>	<p><b>STRATEGIC HOUSING</b> Providing services such as homelessness, private sector housing and Housing Allocations.</p>	<p><b>LANDLORD SERVICES</b> Providing services such as tenancy management, estate management, anti-social behaviour, tenant support, tenant engagement and independent living.</p>	<p><b>PROPERTY SERVICES</b> Providing day to day repairs to the council's housing stock, including planned works, such as door and window replacements, kitchen and bathroom upgrades, roofing works, whilst ensuring homes are safe to live in.</p>
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If after raising concerns or requesting a service the tenant remains dissatisfied with the proposed resolution, tenants are then encouraged to make a formal complaint to the Council.

## Governance

Following the local elections on 2nd May 2024 and confirmed at the [Annual Meeting of the Council held on 15<sup>th</sup> May, 2024](#), the appointed Housing Portfolio Holder (who is also the new Leader of the Council) has taken over the responsibilities of the role of Member Responsible for Complaints (MRC).

A new [Overview & Scrutiny Panel](#) has been established to provide more dedicated focus on Housing and Communities matters; this will not only give the opportunity for more detailed scrutiny of the Council's housing services, but also hopefully encourage increased tenant attendance and involvement. Quarterly complaint handling performance reports are to be submitted to the new Housing and Communities Overview & Scrutiny Panel providing details of key housing performance indicators, including:

- Number of complaints received.
- Percentage of complaints completed outside of the service level agreement.
- % of complaints responded to in full at Stage 1.
- % of complaints responded to in full at Stage 2.
- Number of complaints upheld.
- Housing Ombudsman cases.

Corporate complaint handling performance reports are presented quarterly to the Council's Senior Management Team consisting of the Chief Executive and four Strategic Directors. Detailed monthly complaint analysis reports are also reported to the Strategic Director for Housing & Community Safety and Assistant Directors for Housing, where complaint themes and trends are reviewed and any changes or improvement to service identified.





## Complaints Handling Team

The Council's chosen system for recording comments, complaints and compliments is the Granicus System. The corporate responsibility for administering the system is carried out by the Council's Information Technology & Communications Team. Corporate responsibility for system training and also monitoring the use of the system is held by the Customer Experience & Data Protection Officer. Complaint e-learning also forms part of the Customer Services staff mandatory induction training along with frontline staff communication training, covering how to communicate professionally with our customers, including those making complaints.

The Council's Complaint Handling Team consists of a combination of officers, with Customer & Client Services and Housing Services teams carrying out specific aspects of the 'Complaint Officer' role. The diagram below depicts the roles and responsibilities of individual members of the team.

### The Customer Experience & Data Protection Officer

Responsible for corporate Complaint Handling, performance reporting and overseeing the corporate use of the Granicus system. This role is also the Council's lead contact for the Housing Ombudsman & Local Government & Social Care Ombudsman.

### Customer Services Advisors

Responsible for logging complaints on the Granicus system and assigning complaints to the relevant service teams.

### Assistant Director of Social Housing & Community Safety

Responsible for assessing any themes or trends to identify potential systemic issues, serious risks, or policies and procedures that require revision and reporting to the governing body.

### Housing Team Leaders & Managers

Responsible for investigating and responding to complaints at Stage 1 and Stage 2.

### Housing Assistants

Responsible for assigning housing complaints to lead investigating officers, and monitoring progress of complaints through to response in line with complaint handling timeframes.

### Housing & Community Safety Business Performance officer

Responsible for analysing and reporting Housing complaint handling performance, trends and themes to Housing management.



# COMPLAINT HANDLING PERFORMANCE

From 1<sup>st</sup> April 2023 to 31<sup>st</sup> March 2024 the Council received **267** formal complaints from tenants – see Table 1 below.

	Total no. of complaints received	No. per 1,000 housing stock		Responded to within the Housing Ombudsman Complaint Handling timescales	
		Mid year	Year end	Mid year	Year End
<b>Stage 1</b>	267	53.80	47.5	79.9%	97%
<b>Stage 2</b>	35	8.17	6.2	71.7%	91%

Table 1: Housing Complaints 2023/24

Table 1 above indicates that there was a slight decrease in the number of formal complaints received during the second half of the 2023/24 reporting year.

Whilst eight Stage 1 and two Stage 2 complaints failed to be responded to within the complaint handling timeframes, figures also indicate that response performance against service level agreements improved during the second half of the year. The Council did not refuse to accept any formal complaints submitted during the 2023/2024 period.

The figures in Table 1 above also indicate a decrease in the number of formal complaints received from tenants and an improvement in the Council's complaint handling performance when compared with data from the previous reporting year, ie 1<sup>st</sup> April 2022 to 31<sup>st</sup> March 2023, as reported by Housemark – see Table 2.

	Total no. of complaints received	Responded to within the Housing Ombudsman Complaint Handling timescales	
		No.	%
<b>Stage 1</b>	303	242	79.87%
<b>Stage 2</b>	46	33	71.74%

Table 2: Housing Complaints 2022/23

### Stage 1 Complaints

Figure 1 shows the breakdown of complaints received by service area. By far the largest proportion of formal complaints (76%) were received for Property Services.

Figure 2 shows a breakdown of complaints received by theme. The chart below details the complaint trends for 2023/24. The top three areas requiring greater consideration and improvement are 1) repairs, 2) communication, and 3) officer conduct, behaviour and performance.

Figure 1: Complaints received by service area

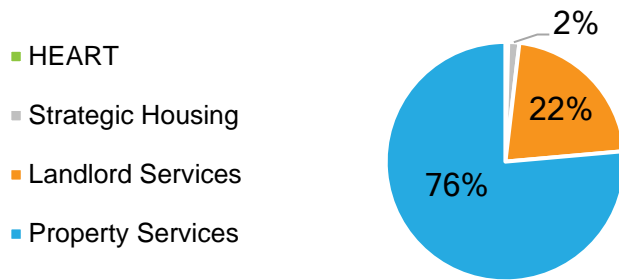
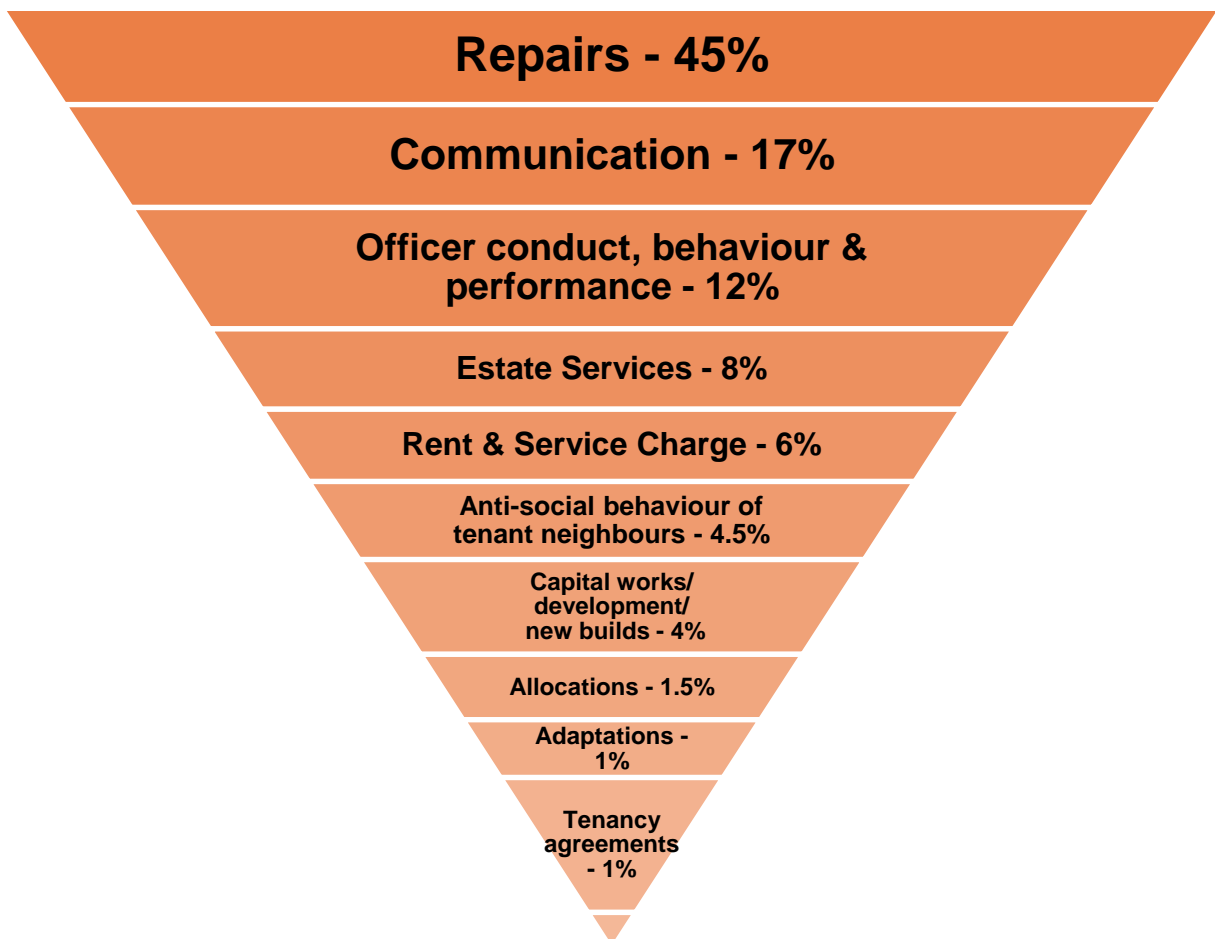
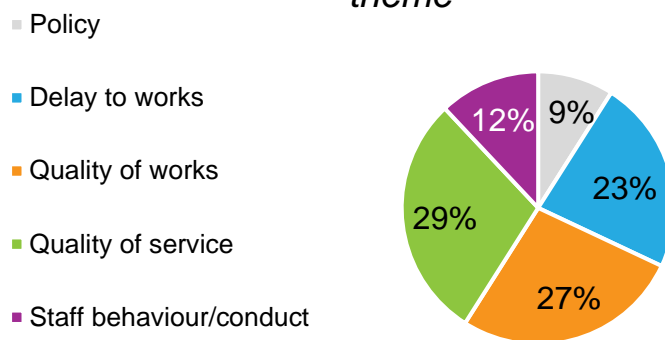


Figure 2. Complaints received by theme



32.2% of all formal Stage 1 complaints received were upheld/partially upheld. 60% of upheld complaints related to repairs, which included dissatisfaction with delays in works, the quality of works undertaken, and the quality of services provided.

### Stage 2 Complaints

Figure 3 shows the breakdown of Stage 2 complaints by service area. The largest number of escalated complaints were received by Property Services.

Figure 3: Escalated complaints by service area

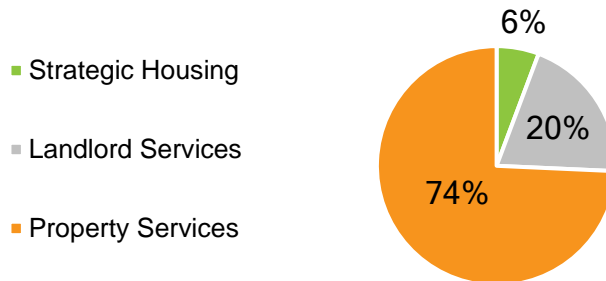
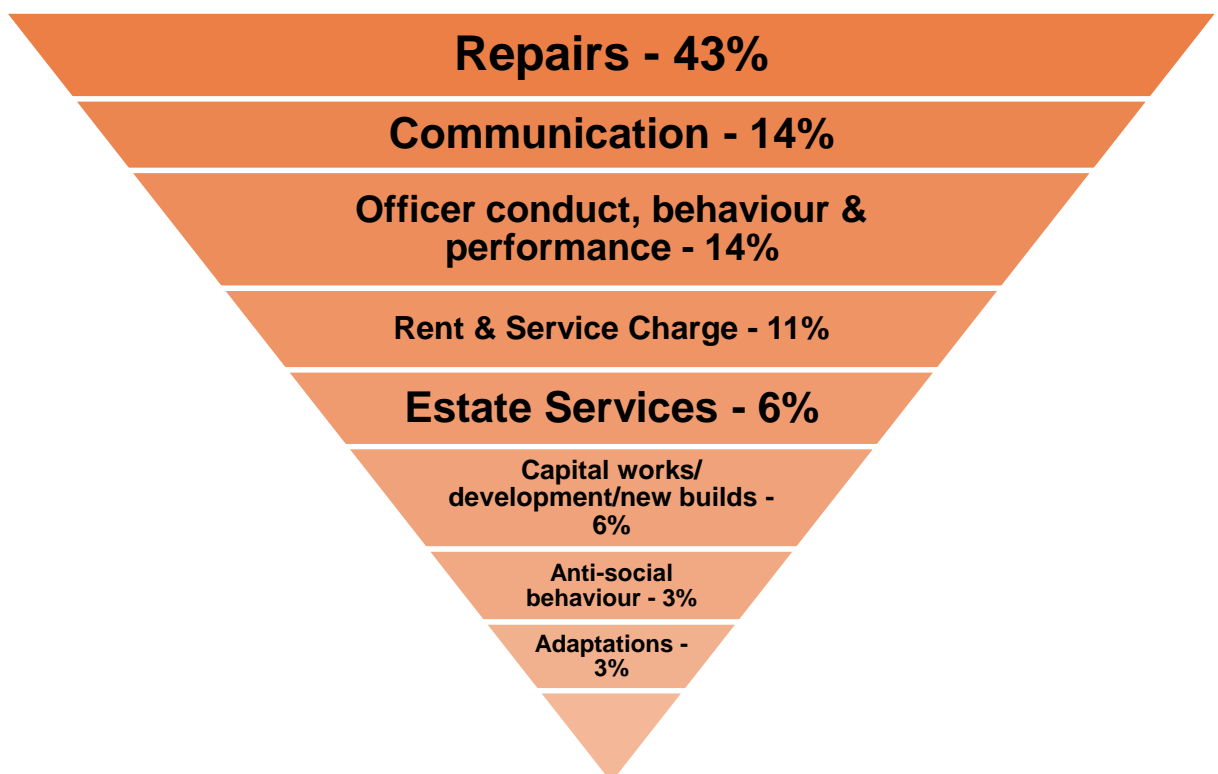
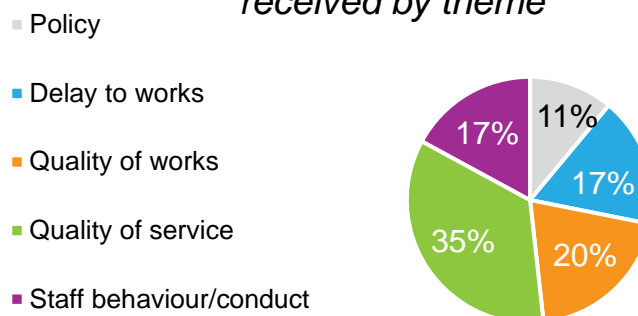


Figure 4 shows escalated complaints received by theme.

As with Stage 1, the top three areas requiring greater consideration and improvement are 1) repairs, 2) communication and 3) officer conduct, behaviour and performance.

Figure 4: Escalated complaints received by theme



## Complaints referred to the Housing Ombudsman

During 2023/24 six cases were investigated and concluded by the Housing Ombudsman. The Ombudsman found fault with two cases, both relating to repairs, and a total of **£3,095.94** was ordered to be paid by the Council in compensation.

The Complaint Handling Code Self-Assessment is attached at [Appendix A](#).

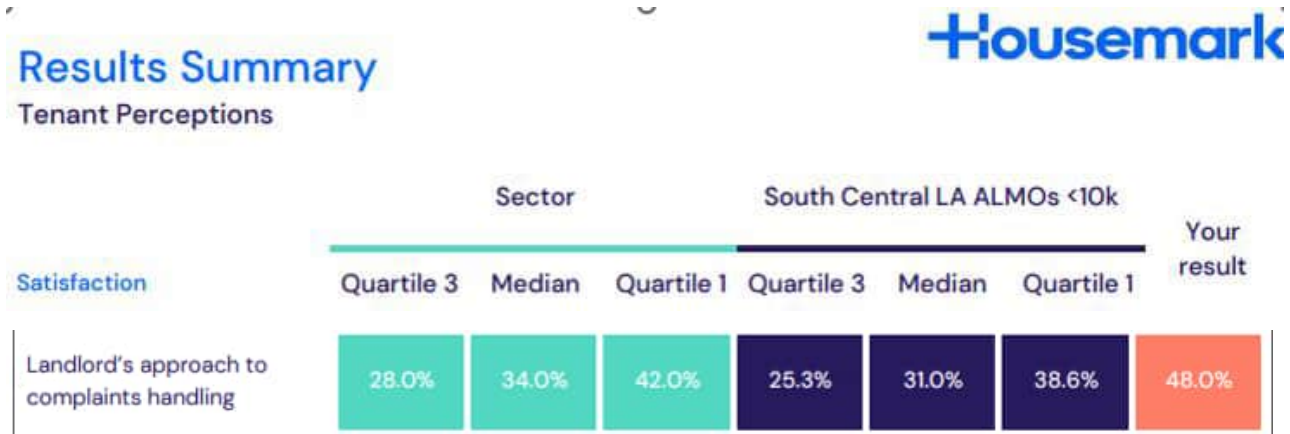


# LEARNING & IMPROVEMENT

Tenant Satisfaction Measures (TSM) indicate that **49.96%** of complainants were either very satisfied or fairly satisfied with the Council's approach to complaint handling throughout 2023/2024. The next Tenant Satisfaction Perception survey will be sent out to tenants in June 2024 with a closing date of September 2024.

## Benchmarking Against Peers

The Council is a member of [Housemark](#), which is a leading data and insight company for the UK housing sector. To help their members understand TSM results in context, they invited English registered providers to take part in a project to compare data during October 2023. In total, **189** landlords took part in this exercise, managing around 2.2 million properties – half of all social housing in England. Based upon results up to the **mid-point in the year (April-Sept 2023)**, the report is exclusive to participating landlords and shows our results compared to national figures and a peer group of similar organisations. The results relating to satisfaction with complaints handling are as follows:



This indicates that with a satisfaction result of **49.96%** Nuneaton and Bedworth Borough Council was exceeding top quartile performance at the mid-point in the year. However, the Council recognises that it has more to do to further improve its approach and learning in relation to complaints.



## Compliments

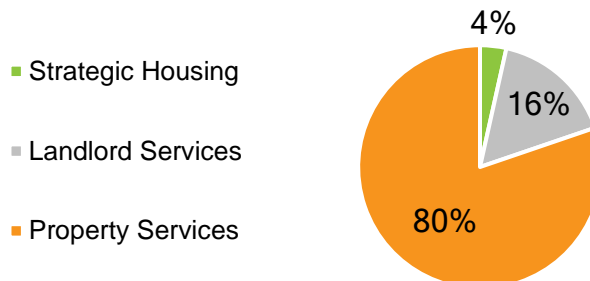
A total of **86** compliments were received during the period 1<sup>st</sup> April 2023 to 31<sup>st</sup> March 2024.

Figure 5 shows a breakdown of compliments received by service area.

**51%** of compliments received related to the quality of works.

**49%** of compliments received related to good customer care.

*Figure 5: Compliments received by service area*



## Complaint Handling Improvements

During 2023/24, internal complaint handling procedures and processes were reviewed against the Housing Ombudsman's Complaint Handling Codes 2022 and 2024. As a result the Council has:

- reviewed and updated its complaint handling policy and procedures;
- provided additional resources to carry out more in-depth analysis and reporting of complaint handling performance, themes and trends;
- provided additional training to complaint handlers;
- improved the quality of responses;
- improved communications to tenants;
- improved system reporting capabilities; and
- introduced a reporting suite of KPI's so that complaint trends can be scrutinised.

## Service Area Improvements

The Council seeks to learn from complaints and pursues the implementation of service improvements/changes following complaint outcomes. During 2023/24 the following service improvement actions were carried out by the various housing teams.



## **LANDLORD SERVICES**

- In August 2023, the Housing Ombudsman ordered the Council to pay two of its tenants compensation as we failed to meet some of our repair obligations. In addition, our handling of those complaints was unsatisfactory. Those complaints highlighted the need for the Council to introduce a new [Decant Policy](#) so that all staff and tenants have a clear understanding of when a move to another property will be offered and in what circumstances. This provides clarification for our tenants and a better understanding for staff. This policy is now published on the Council's website.
- Following noise complaints at a particular block of flats, the Council introduced noise assessments to understand the noise transference between properties. In addition, we improved the sound proofing insulation to minimise disturbance. This will ensure that any current tenants and new tenants moving into the block of flats, will have minimal disturbance from tenants living in the flat above them.
- The team have received an increased amount of hoarding complaints which have also resulted in unkempt gardens. As a result, the Council has facilitated external training for the Landlord Services Team, in order to assist in the knowledge of dealing with these sometimes very complex cases. This will also ensure that cases such as these are dealt with efficiently and effectively to improve the wider neighbourhood and offer support to those tenants who are struggling to maintain their tenancies.

## **PROPERTY SERVICES**

- Following a complaint from a tenant who complained that the Council had failed to take account of his working pattern when scheduling the work required to the building; failed to understand the impact those works had upon him personally, causing suffering and loss of income; failed to discuss any appropriate alternative accommodation arrangements that may have alleviated the disruption he experienced; failed to communicate satisfactory and failed to address any of our tenants concerns in a timely and appropriate manner, the Council recognised the following learning points and made the following changes to our service:



- Letters advising tenants of works to buildings will now ask them to contact us directly if they believe those works will interrupt their daily life/work needs. This will allow for an early conversation to identify appropriate mitigations for the tenant, particularly where works to buildings are expected to continue for an elongated period of time. We will also arrange information sessions for tenants out on site providing an opportunity for tenants to ask questions, raise any concerns they may have, and allow us to ensure we are able to take account of those issues when undertaking any works.



Supporting Tenants Around Neighbourhoods  
STAN vehicle

- Ongoing Complaint Handling training for all relevant staff to be undertaken to ensure an improved response from the Council when tenants raise concerns; a quality check of those responses will be undertaken to ensure they are appropriate and properly address the concerns raised.
- As a result of complaints made from several tenants living in one particular block of flats, in respect of the Council's operatives leaving their work vans in the car park when they are not working onsite, a meeting was held with the Tenancy Management Officers and Tenancy Management & Engagement Team Leader, the Performance Officer and the relevant tenants to discuss the issues. Following the meeting new signage was erected in the car park and instructions were given to all operatives to advise them not to park there when carrying out works nearby. This ensured that tenants were able to park their vehicles without obstruction.
- The third most common complaint the Council received in 2023/2024 was in connection with the attitude, conduct and behaviour of some of the Council's operatives. In order to improve in this area, all operatives have attended Front Line Communication training to further develop their communication skills and emotional intelligence so that they are equipped to deal with difficult conversations and situations.

Further training such as ‘*Understanding your customer and the experience they need*’ is planned throughout 2024/2025.

## **CUSTOMER SERVICES**

- In October 2023, the Council’s Customer Service team was awarded Customer Service Excellence accreditation. The [Customer Service Excellence](#) quality mark aims to make a tangible difference to service users by encouraging organisations to focus on their individual needs and preferences. The Council’s Customer Service team was recognised as achieving Customer Service Excellence assessed against the five accreditation criteria outlined below:
  - Customer Insight.
  - The Culture of the organisation.
  - Information and access.
  - Delivery.
  - Timeliness and quality of service.



Nuneaton & Bedworth



Working in partnership,  
restoring pride in our borough

## 2024/25 Improvement Action Plan

Action Ref.	Improvement Action	Officer Responsible	Completion Deadline
1.	Carry out a programme of training for all housing staff to undertake and in house refresher customer services training.  Officers dealing with complaints are to receive external complaint handling training, e.g. Mary Gober, Housing Quality Network, Dispute Resolution (Housing Ombudsman Centre for Learning / Landlord Learning Hub).	Assistant Director of Social Housing & Community Safety	30 <sup>th</sup> September 2024
2.	Utilise the Supporting Tenants Around Neighbours (STAN) vehicle to engage with tenants in their communities. This will provide tenants with an opportunity to express views on any issues of concern, but also for council staff to discuss things such as building investment work including roofing programmes, window and door programmes, and paying rent, etc.	Landlord Services Manager / Tenancy Management & Engagement Team Leader / Tenant Engagement Officers	30 <sup>th</sup> September 2024
3.	Introduce a Housing Complaint Remedy & Compensation Policy	Assistant Director of Social Housing & Community Safety	30 <sup>th</sup> September, 2024
4.	Carry out a review of the process/handling of formal complaints made via Councillors through the Member Enquiry online portal.	Assistant Director of Social Housing & Community Safety	30 <sup>th</sup> September 2024
5.	Establish a group of tenants to review complaint outcomes and advise whether remedies have been satisfactory.	Landlord Services Manager / Tenancy Management & Engagement Team Leader / Tenant Engagement Officers	31 <sup>st</sup> December 2024
6.	Introduce a new Tenant Engagement Strategy, following consultation throughout July.	Landlord Services Manager	31 <sup>st</sup> March 2025
7.	Preparatory work towards Tenant Participation Advisory Service Accreditation.	Landlord Services Manager	31 <sup>st</sup> March 2025

8.	Undertake work required to achieve anti-social behaviour Resolve Standard Accreditation.	ASB Team Leader	31 <sup>st</sup> March 2025
9.	Review the complaint handling ITC system to identify improvements to reporting capabilities.	Business Performance Officer	31 <sup>st</sup> March 2025

## Appendix A: Self-assessment form

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

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

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

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

### Section 1: Definition of a complaint

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
1.2	<p>A complaint must be defined as:</p> <p><i>‘an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the landlord, its own staff, or those acting on its behalf, affecting a resident or group of residents.’</i></p>	Yes	<p><a href="#">NBBC Complaint Policy &amp; Procedure – Section 4.1</a></p> <p>Tenant Newsletter June 2024</p> <p><a href="#">NBBC Website – Council Housing Complaint Page</a></p>	<p>The Council recognises the difference between a complaint and service request, ie where a resident is unhappy with a situation that they wish to have rectified or complaint about a service they have or have not received.</p> <p>This is clearly set out in Section 4.1 of the Housing Complaints Policy and Procedure which is available on the Council’s website and last updated in March 2024.</p> <p>Definitions are outlined on page 7 of the Council’s tenant newsletter, InHouse - June 2024 edition.</p> <p>Definitions are published on the Council’s Housing Complaint web page.</p>
1.3	A resident does not have to use the word ‘complaint’ for it to be treated as such. Whenever a resident expresses	Yes	<a href="#">NBBC Complaint Policy &amp; Procedure – Section 4.7</a>	This is clearly set out in Section 4.7 of the Housing Complaints Policy and

	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.			Procedure which is available on the Council's website and last updated in March 2024.
1.4	Landlords must recognise the difference between a service request and a complaint. This must be set out in their complaints policy. A service request is a request from a resident to the landlord requiring action to be taken to put something right. Service requests are not complaints, but must be recorded, monitored and reviewed regularly.	Yes	<a href="#">NBBC Complaint Policy &amp; Procedure – Sections 4.1 and 4.4</a>  <a href="#">NBBC Website – Council Housing Complaint Page</a>  Tenant Newsletter June 2024	<p>The Council recognises the difference between a complaint and service request where a resident is unhappy with a situation that they wish to have rectified and complaint about a service they have or have not received.</p> <p>This is clearly set out in Sections 4.1 and 4.4 of the Housing Complaints Policy and Procedure which is available on the Council's website and last updated in March 2024.</p> <p>Definitions are outlined on page 7 of the Council's tenant newsletter, InHouse - June 2024 edition.</p> <p>Definitions are published on the Council's Housing Complaint web page.</p>

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	<p><a href="#">NBBC Complaint Policy &amp; Procedure – Section 4.4</a></p> <p>A sample of cases on the housing management system can be accessed as evidence if necessary.</p>	<p>This is clearly set out in Section 4.4 of the Housing Complaints Policy and Procedure which is available on the Councils website. It was last updated in March 2024</p> <p>The Council's Housing Management system can evidence that a service request continues to be delivered when a customer has a complaint logged.</p>
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	<p><a href="#">NBBC Complaint Policy &amp; Procedure – Section 5</a></p> <p>ASB Surveys</p> <p>Email footer</p>	<p>This is clearly set out in Section 5.0 of the Housing Complaints Policy and Procedure which is available on the Council's website and was last updated in March 2024.</p> <p>A TSM survey is scheduled to be circulated in June 2024 will contains details for residents on how to pursue a complaint. Anti-social behaviour surveys also carry the same information.</p> <p>Officer email footers provide details of how to contact the</p>



				Housing Ombudsman and how to complain to the Council.
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## Section 2: Exclusions

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
2.1	Landlords must accept a complaint unless there is a valid reason not to do so. If landlords decide not to accept a complaint they must be able to evidence their reasoning. Each complaint must be considered on its own merits	Yes	<a href="#">NBBC Complaint Policy &amp; Procedure – Section 4.5 and 4.6</a>  Annual Housing Complaint Performance & Improvement Report 2023/24.	This is clearly set out in Sections 4.5 and 4.6 of the Housing Complaints Policy and Procedure which is available on the Council's website and was last updated in March 2024.  As reported in the Annual Housing Complaint Performance & Improvement Report, all submitted complaints in 2023/24 were investigated and none rejected.
2.2	A complaints policy must set out the circumstances in which a matter will not be considered as a complaint or escalated, and these circumstances must be fair and reasonable to residents. Acceptable exclusions include: <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</li> </ul>	Yes	<a href="#">NBBC Complaint Policy &amp; Procedure – Section 4.5</a>	This is clearly set out in Sections 4.5 of the Housing Complaints Policy and Procedure which is available on the Council's website and was last updated in March 2024.

	<p>Particulars of Claim, having been filed at court.</p> <ul style="list-style-type: none"> <li>Matters that have previously been considered under the complaints policy.</li> </ul>			
2.3	<p>Landlords must accept complaints referred to them within 12 months of the issue occurring or the resident becoming aware of the issue, unless they are excluded on other grounds. Landlords must consider whether to apply discretion to accept complaints made outside this time limit where there are good reasons to do so.</p>	Yes	<p><a href="#">NBBC Complaint Policy &amp; Procedure – Section 4.5</a></p>	<p>This is clearly set out in Section 4.5 of the Housing Complaints Policy and Procedure which is available on the Council's website and was last updated in March 2024.</p> <p>Complaint investigators are given discretion to consider complaints on an individual basis.</p>
2.4	<p>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.</p>	Yes	<p><a href="#">NBBC Complaint Policy &amp; Procedure – Section 4.5</a></p> <p>Annual Housing Complaint Performance &amp; Improvement Report 2023/24.</p>	<p>As reported in the Annual Housing Complaint Performance &amp; Improvement Report all submitted complaints during 2023/24 were investigated and none rejected, however this is clearly set out in Section 4.5 of the Housing Complaints Policy and Procedure which is available on the Council's website and was last updated in March 2024.</p>

2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Yes	<a href="#">NBBC Complaint Policy &amp; Procedure – Section 4.5</a> Annual Housing Complaint Performance & Improvement Report 2023/24	As reported in the Annual Housing Complaint Performance & Improvement Report all submitted complaints during 2023/24 were investigated and none rejected, however this is clearly set out in Section 4.5 of the Housing Complaints Policy and Procedure which is available on the Council's website and was last updated in March 2024.
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### Section 3: Accessibility and Awareness

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
3.1	Landlords must make it easy for residents to complain by providing different channels through which they can make a complaint. Landlords must consider their duties under the Equality Act 2010 and anticipate the needs and reasonable adjustments of residents who may need to access the complaints process.	Yes	<p><a href="#">NBBC Complaint Policy &amp; Procedure – Section 5</a></p> <p>Annual Housing Complaint Performance &amp; Improvement Report 2023/24</p> <p><a href="#">NBBC Website – Council Housing Complaints Page</a></p> <p>Tenant Newsletter June 2024</p> <p>Equality Impact Assessment - Screening</p> <p><a href="#">Vulnerable Persons Policy</a></p>	<p>Details of how to make a formal complaint to the council are published on the Council's website, included as standard in newsletters, in email footers and via the tenant portal.</p> <p>This is clearly set out in Section 5 of the Housing Complaints Policy and Procedure which is available on the Council's website and was last updated in March 2024.</p> <p>The Council has a process for identifying vulnerable persons and will ensure that communication needs are met.</p>
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	<p><a href="#">NBBC Complaint Policy &amp; Procedure – Section</a></p> <p>Staff training records</p>	<p>Complaint e-learning forms part of the Customer Services staff mandatory induction training along with frontline staff communication training covering how to communicate professionally</p>

				<p>with our customers, including those making complaints.</p> <p>Our front-line teams are trained to recognise what is a request for service compared to where there has been a potential service failure. If in any doubt, this can be checked with our Customer Experience Officer, who will confirm this.</p>
3.3	<p>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.</p>	Yes	<p>Annual Housing Complaint Performance &amp; Improvement Report 2023/24</p> <p>Tenant Newsletter June 2024</p> <p><a href="#">NBBC Website – Make Things Right</a></p>	<p>We welcome feedback from our customers, including complaints and compliments and carry out STAR surveys, TSM Surveys and other perception surveys</p> <p>The Council is supporting the Governments ‘Make Things Right’ campaign by improving the layout of information available on our website so complaint information is easily found.</p>
3.4	<p>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</p>	Yes	<p><a href="#">NBBC Complaint Policy &amp; Procedure – Section 6</a></p>	<p>This is clearly set out in Section 6 of the Housing Complaints Policy and Procedure which is available on the Council’s</p>

	timeframes for responding. The policy must also be published on the landlord's website.			website and was last updated in March 2024.
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	<a href="#">NBBC Complaint Policy &amp; Procedure – Sections 1.2 &amp; 7</a> <a href="#">NBBC Website – Council Housing Complaints Page</a>	This is clearly set out in Sections 1.2 and 7 of the Housing Complaints Policy and Procedure which is available on the Council's website and was last updated in March 2024.
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	<a href="#">NBBC Complaint Policy &amp; Procedure – Section 4</a>	This is clearly set out in Section 4 of the Housing Complaints Policy and Procedure which is available on the Council's website and was last updated in March 2024.
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	<a href="#">NBBC Complaint Policy &amp; Procedure – Section 7</a> <a href="#">NBBC website – Customer Feedback Page</a> Housing InHouse Newsletter – page 7. Surveys Response letter templates Email banner	This is clearly set out in Section 7 of the Housing Complaints Policy and Procedure which is available on the Council's website and was last updated in March 2024. The Housing Ombudsman Service contact details are also included on the Housing page of Council's website, on surveys, letter templates and on officer email signatures.

#### 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	Annual Housing Complaint Performance & Improvement Report 2023/24 Cabinet agenda and minutes Job descriptions	The 'complaint officer' role is fulfilled by a team of officers.  The Assistant Director of Social Housing & Community Safety is responsible for ensuring complaints are reported to MRC, Housing & Communities Overview & Scrutiny Panel, Leadership Board & Senior Management Team.  The Corporate Customer Experience Officer acts as the corporate lead contact with the Housing Ombudsman and Local Government & Social Care Ombudsman.
4.2	The complaints officer/team must have access to staff at all levels to facilitate the prompt resolution of complaints. They must also have the authority and	Yes	Annual Housing Complaint Performance & Improvement Report 2023/24	All complaints are investigated by Team Leaders at stage one and Managers/Head of Services/ Directors at stage



	autonomy to act to resolve disputes promptly and fairly.		Service Manager/Team Leaders have the authority.	two. The Customer Experience Officer and Housing & Community Safety Business Performance Officer act in supporting capacity and monitor that complaints are resolved promptly and fairly.
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	<a href="#">NBBC Complaint Policy &amp; Procedure – Sections 2, 3 &amp; 8.</a>	<p>This is clearly set out in Sections 2, 3 and 8 of the Housing Complaints Policy and Procedure which is available on the Council's website and was last updated in March 2024.</p> <p>All housing managers and team leaders have attended dispute resolution training via the Housing Ombudsman Service.</p> <p>Complaint Handling training for all staff will be completed by the end of Q2 2024/2025.</p>

## 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	<a href="#">NBBC Complaint Policy &amp; Procedure</a> <a href="#">NBBC Website - Customer Feedback</a> Housing InHouse Newsletter – page 7.	The Council's Housing Complaints Policy and Procedure is available on the Council's website and was last updated in March 2024.
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	<a href="#">NBBC Complaint Policy &amp; Procedure – Section 6</a>	This is clearly set out in Section 6 of the Housing Complaints Policy and Procedure which is available on the Council's website and was last updated in March 2024.
5.3	A process with more than two stages is not acceptable under any circumstances as this will make the complaint process unduly long and delay access to the Ombudsman.	Yes	<a href="#">NBBC Complaint Policy &amp; Procedure – Section 6</a> Housing InHouse Newsletter – page 7.	This is clearly set out in Section 6 of the Housing Complaints Policy and Procedure which is available on the Council's website and was last updated in March 2024.
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	Yes	<a href="#">NBBC Complaint Policy &amp; Procedure – Section 4.7</a>	This is clearly set out in Section 4.7 of the Housing Complaints Policy and Procedure which is available on the Council's

	expected to go through two complaints processes.			website and was last updated in March 2024.
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Yes	<a href="#">NBBC Complaint Policy &amp; Procedure – Section 4.7</a>	This is clearly set out in Section 4.7 of the Housing Complaints Policy and Procedure which is available on the Council's website and was last updated in March 2024.
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	Response letter templates  <a href="#">NBBC Complaint Policy &amp; Procedure – Section 6.6 &amp; 6.12</a>	Letter templates have been updated to ensure that the Council understands the nature of the complaint and the outcome the tenant is seeking.  This is clearly set out in Sections 6.6 and 6.12 of the Housing Complaints Policy and Procedure which is available on the Council's website and was last updated in March 2024.
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	Response letter templates  <a href="#">NBBC Complaint Policy &amp; Procedure – Section 6.5</a>	Letter templates have been updated to ensure that the Council clarifies their understanding of the nature of the complaint.  Clarification can also be sought from the tenant by the complaint investigator.

				This is clearly set out in Section 6.5 of the Housing Complaints Policy and Procedure which is available on the Council's website and was last updated in March 2024.
5.8	<p>At each stage of the complaints process, complaint handlers must:</p> <ol style="list-style-type: none"> <li>deal with complaints on their merits, act independently, and have an open mind;</li> <li>give the resident a fair chance to set out their position;</li> <li>take measures to address any actual or perceived conflict of interest; and</li> <li>consider all relevant information and evidence carefully.</li> </ol>	Yes	<p><a href="#">NBBC Complaint Policy &amp; Procedure – Section 2</a></p> <p>NBBC Values</p> <p>Declarations of Interest Form</p> <p><a href="#">NBBC Privacy Notice</a></p>	<p>This is clearly set out in Section 2 of the Housing Complaints Policy and Procedure which is available on the Council's website and was last updated in March 2024.</p> <p>The Council's Values are included in mandatory training for all staff and are:</p> <ul style="list-style-type: none"> <li>• Service for our customers</li> <li>• Integrity in our actions</li> <li>• Accountability for performance</li> <li>• Cooperation with Councillors, colleagues &amp; partners</li> <li>• Objectivity in our decisions</li> <li>• Efficiency to keep costs down</li> </ul>

				<ul style="list-style-type: none"> <li>Confidence to try new things out</li> </ul> <p>All colleagues will receive customer service training by the end of Q2 2024/2025 and will be empowered to put things right through taking responsibility and ownership.</p> <p>The Housing &amp; Community Safety Business Performance Officer reviews all complaint responses. All investigations and responses have independent oversight and quality assurance.</p> <p>All colleagues make an annual declaration of any potential conflicts of interest.</p>
5.9	Where a response to a complaint will fall outside the timescales set out in this Code, the landlord must agree with the resident suitable intervals for keeping them informed about their complaint.	Yes	<a href="#">NBBC Complaint Policy &amp; Procedure – Section 6</a>	This is clearly set out in Section 6 of the Housing Complaints Policy and Procedure which is available on the Council's website and was last updated in March 2024.
5.10	Landlords must make reasonable adjustments for residents where	Yes	<a href="#">NBBC Complaint Policy &amp; Procedure – Sections 1 &amp; 3</a>	This is clearly set out in Sections 1 and 3 of the

	<p>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>		<p><a href="#">NBBC Website - Customer Feedback</a></p> <p><a href="#">Vulnerable Persons Policy</a></p> <p>Reasonable Adjustment Policy</p>	<p>Housing Complaints Policy and Procedure which is available on the Council's website and was last updated in March 2024</p> <p>The Council has also implemented a Vulnerable Persons Policy to ensure that the voices of vulnerable customers are heard and that vulnerabilities and special communication needs are managed efficiently on the Housing Management System.</p> <p>A reasonable adjustment policy is in the process of being drafted and will be operational by the end of 2024.</p> <p>A working group has been set up to ensure that the record of vulnerable customers is reviewed and updated on a regular basis.</p>
5.11	<p>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</p>	Yes	<p><a href="#">NBBC Complaint Policy &amp; Procedure – Section 4</a></p>	<p>This is clearly set out in Section 4 of the Housing Complaints Policy and Procedure which is</p>

	clearly set out these reasons, and they must comply with the provisions set out in section 2 of this Code.			available on the Council's website and was last updated in March 2024.
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	Evidence available from systems.	All complaints are logged on the Granicus System. All exchange of contacts are recorded on this platform throughout the complaints process, however telephone calls received etc are logged on the Housing Management System or on the Council's content management system.
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	<a href="#">NBBC Complaint Policy &amp; Procedure – Section 8</a>	This is clearly set out in Section 8 of the Housing Complaints Policy and Procedure which is available on the Council's website and was last updated in March 2024.  The Council is in the process of drafting a remedy policy, which should receive a Cabinet decision by end of July 2024.
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	Yes	<a href="#">NBBC website – Report Anti-social behaviour</a>  <a href="#">Anti-social Behaviour Policy</a>	The Council's tenancy agreement highlights that it will deal with any anti-social behaviour displayed by their

	putting any restrictions in place and must keep restrictions under regular review.		<a href="#">Anti-social Behaviour Strategy</a> <a href="#">Tenancy Agreements</a> <a href="#">NBBC Website – Equality &amp; Diversity</a>	<p>tenants or their representatives.</p> <p>The new ASB Policy and Strategy are currently being reviewed and will be operational by the end of August 2024.</p> <p>For persistent behaviour the Equality Safeguarding Officer will write to the complainant/tenant to explain that they will be monitor all responses going forward and will be provided with a single point of contact for all ongoing correspondence.</p>
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	<a href="#">NBBC Website – Equality &amp; Diversity</a>	<p>For persistent behaviour the Equality Safeguarding Officer will write to the complainant/tenant to explain that they will be monitor all responses going forward and will be provided with a single point of contact for all ongoing correspondence.</p> <p>The Council is aware of it's responsibilities under the</p>



				<p>Equality Act 2010 and is committed to equality, diversity and inclusion. We will endeavour to provide a service that seeks to meet the needs of a particular individual or household and ensure no one is disadvantaged in accessing our services. We recognise that some of our customers may have permanent or transitory vulnerabilities and where customers require additional support, we will endeavour to make reasonable adjustments.</p>
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## Section 6: Complaints Stages

### Stage 1

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
6.1	Landlords must have processes in place to consider which complaints can be responded to as early as possible, and which require further investigation. Landlords must consider factors such as the complexity of the complaint and whether the resident is vulnerable or at risk. Most stage 1 complaints can be resolved promptly, and an explanation, apology or resolution provided to the resident.	Yes	<a href="#">NBBC Complaint Policy &amp; Procedure – Section 6</a>	<p>This is clearly set out in Section 6 of the Housing Complaints Policy and Procedure which is available on the Council's website and was last updated in March 2024.</p> <p>The Housing Management System will be checked when responding to a complaint to determine if a tenant has any recorded vulnerabilities before a response is sent.</p>
6.2	Complaints must be acknowledged, defined and logged at stage 1 of the complaints procedure <b><u>within five working days of the complaint being received.</u></b>	Yes	<a href="#">NBBC Complaint Policy &amp; Procedure – Section 6.2</a>  Response letter templates  Performance Reports	<p>This is clearly set out in Section 6.2 of the Housing Complaints Policy and Procedure which is available on the Council's website and was last updated in March 2024.</p> <p>Reports from the system can demonstrate this is being achieved.</p>

6.3	Landlords must issue a full response to stage 1 complaints <b><u>within 10 working days</u></b> of the complaint being acknowledged.	Yes	<a href="#">NBBC Complaint Policy &amp; Procedure – Section 6.4</a>  Annual Housing Complaint Performance & Improvement Report 2023/24.  Housing InHouse Newsletter – page 11.  Performance Reports	This is clearly set out in Section 6.4 of the Housing Complaints Policy and Procedure which is available on the Council’s website and was last updated in March 2024.  Reports from the system can demonstrate this is being achieved.
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	Extension letter template  Annual Housing Complaint Performance & Improvement Report 2023/24.  <a href="#">NBBC Complaint Policy &amp; Procedure – Section 6.4</a>	This is clearly set out in Section 6.4 of the Housing Complaints Policy and Procedure which is available on the Council’s website and was last updated in March 2024.
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	Extension letter template  <a href="#">NBBC Complaint Policy &amp; Procedure – Section 6.4</a>	This is clearly set out in Section 6.4 of the Housing Complaints Policy and Procedure which is available on the Council’s website and was last updated in March 2024.
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	Yes	<a href="#">NBBC Complaint Policy &amp; Procedure – Section 6.4</a>	This is clearly set out in Section 6.4 of the Housing Complaints Policy and Procedure which is

	the issue are completed. Outstanding actions must still be tracked and actioned promptly with appropriate updates provided to the resident.		Annual Housing Complaint Performance & Improvement Report 2023/24.	available on the Council's website and was last updated in March 2024.  This is demonstrated through the response times of Stage 1 and Stage 2 complaints as detailed in the Annual Housing Complaint Performance & Improvement Report 2023/24.
6.7	Landlords must address all points raised in the complaint definition and provide clear reasons for any decisions, referencing the relevant policy, law and good practice where appropriate.	Yes	<a href="#">NBBC Complaint Policy &amp; Procedure – Section 6.6</a>  Response letter templates	This is clearly set out in Section 6.6 of the Housing Complaints Policy and Procedure which is available on the Council's website and was last updated in March 2024.  The revised complaint letter response templates ensure that all elements of the complaint are investigated and provide a clear reasons for decisions made.
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	Yes	Can be evidenced through a sample of cases	The complaint handling team will check the Granicus system to see if there are any open Stage 1 complaints and if new information is related then

	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.			this will be passed on to the investigating officer. If any new issues are raised after a Stage 1 has been issued, then a new Stage 1 complaint will be opened.
6.9	<p>Landlords must confirm the following in writing to the resident at the completion of stage 1 in clear, plain language:</p> <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	<p><a href="#">NBBC Complaint Policy &amp; Procedure – Section 6.6</a></p> <p>Response letter templates</p>	<p>This is clearly set out in Section 6.6 of the Housing Complaints Policy and Procedure which is available on the Council's website and was last updated in March 2024.</p> <p>The Council follows the Housing Ombudsman Service complaint response templates guidance and ensures comprehensive response is shared with the customer.</p> <p>Each response includes</p> <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> </ul>

				<p>f. details of any outstanding actions; and g. details of how to escalate the matter to stage 2 if the individual is not satisfied with the response.</p> <p>Templates provide a framework to ensure key information is included. Complaint responses are all individual.</p>
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### Stage 2

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
6.10	If all or part of the complaint is not resolved to the resident's satisfaction at stage 1, it must be progressed to stage 2 of the landlord's procedure. Stage 2 is the landlord's final response.	Yes	<a href="#">NBBC Complaint Policy &amp; Procedure – Section 6.9 &amp; 6.14</a> Response letter templates	<p>This is clearly set out in Section 6.9 and 6.14 of the Housing Complaints Policy and Procedure which is available on the Council's website and was last updated in March 2024.</p> <p>The response letter states that it is the final response at Stage 2.</p>
6.11	Requests for stage 2 must be acknowledged, defined and logged at stage 2 of the complaints procedure	Yes	<a href="#">NBBC Complaint Policy &amp; Procedure – Section 6.10</a> Response letter templates	<p>This is clearly set out in Section 6.10 of the Housing Complaints Policy and Procedure which is</p>

	within five working days of the escalation request being received.			available on the Council's website and was last updated in March 2024.  Reports from the system can demonstrate this is being achieved.
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	<a href="#">NBBC Complaint Policy &amp; Procedure – Section 6.9</a>  Response letter templates	This is clearly set out in Section 6.9 of the Housing Complaints Policy and Procedure which is available on the Council's website and was last updated in March 2024.
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Yes	<a href="#">NBBC Complaint Policy &amp; Procedure – Section 6.9</a>	This is clearly set out in Section 6.9 of the Housing Complaints Policy and Procedure which is available on the Council's website and was last updated in March 2024.  This can be evidenced through a sample of cases on request.
6.14	Landlords must issue a final response to the stage 2 <b><u>within 20 working days</u></b> of the complaint being acknowledged.	Yes	<a href="#">NBBC Complaint Policy &amp; Procedure – Section 6.11</a>  Annual Housing Complaint Performance & Improvement Report 2023/24.	This is clearly set out in Section 6.11 of the Housing Complaints Policy and Procedure which is available on the Council's website and was last updated in March 2024

			Housing InHouse Newsletter – page 11.	Reports from the system can demonstrate this is being achieved.
6.15	Landlords must decide whether an extension to this timescale is needed when considering the complexity of the complaint and then inform the resident of the expected timescale for response. Any extension must be no more than 20 working days without good reason, and the reason(s) must be clearly explained to the resident.	Yes	<a href="#">NBBC Complaint Policy &amp; Procedure – Section 6.11</a>  Extension letter templates  Annual Housing Complaint Performance & Improvement Report 2023/24.	This is clearly set out in Section 6.11 of the Housing Complaints Policy and Procedure which is available on the Council's website and was last updated in March 2024.  Reports from the system can demonstrate this is being achieved.
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	<a href="#">NBBC Complaint Policy &amp; Procedure – Section 6.14</a>  Extension letter templates	This is clearly set out in Section 6.14 of the Housing Complaints Policy and Procedure which is available on the Council's website and was last updated in March 2024  Reports from the system can demonstrate this is being achieved.
6.17	A complaint response must be provided to the resident when the answer to the complaint is known, not when the outstanding actions required to address the issue are completed. Outstanding actions must still be tracked and	Yes	<a href="#">NBBC Complaint Policy &amp; Procedure – Section 6.11</a>  Annual Housing Complaint Performance & Improvement Report 2023/24.	This is clearly set out in Section 6.11 of the Housing Complaints Policy and Procedure which is available on the Council's



	actioned promptly with appropriate updates provided to the resident.		Evidence available from systems.	website and was last updated in March 2024.  This is demonstrated through the response times of Stage 1 and Stage 2 complaints as detailed in the Annual Housing Complaint Performance & Improvement Report 2023/24.
6.18	Landlords must address all points raised in the complaint definition and provide clear reasons for any decisions, referencing the relevant policy, law and good practice where appropriate.	Yes	<a href="#">NBBC Complaint Policy &amp; Procedure – Section 6.12</a>  Response letter templates  Can be evidenced through a sample of cases	This is clearly set out in Section 6.12 of the Housing Complaints Policy and Procedure which is available on the Council's website and was last updated in March 2024.
6.19	Landlords must confirm the following in writing to the resident at the completion of stage 2 in clear, plain language: a. the complaint stage; b. the complaint definition; c. the decision on the complaint; d. the reasons for any decisions made; e. the details of any remedy offered to put things right; f. details of any outstanding actions; and g. details of how to escalate the matter to the Ombudsman	Yes	<a href="#">NBBC Complaint Policy &amp; Procedure – Section 6.12</a>  Response letter templates	This is clearly set out in Section 6.12 of the Housing Complaints Policy and Procedure which is available on the Council's website and was last updated in March 2024.  The Council follows the Housing Ombudsman Service complaint response templates guidance and ensures comprehensive

	Service if the individual remains dissatisfied.			<p>response is shared with the customer.</p> <p>Each response includes</p> <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;</li> <li>and g. details of how to escalate the matter if the individual is not satisfied with the response.</li> </ul> <p>Templates provide a framework to ensure key information is included. Complaint responses are all individual</p>
6.20	Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.	Yes	<p><a href="#">NBBC Complaint Policy &amp; Procedure – Section 6.14</a></p> <p>Can be evidenced through a sample of cases</p>	<p>This is clearly set out in Section 6.14 of the Housing Complaints Policy and Procedure which is available on the Council's website and was last updated in March 2024</p>

## 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> <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>	Yes	<p><a href="#">NBBC Complaint Policy &amp; Procedure – Section 8</a></p> <p>Response letter templates</p> <p>Dispute resolution online training.</p> <p>Remedy Policy</p>	<p>This is clearly set out in Section 8 of the Housing Complaints Policy and Procedure which is available on the Council's website and was last updated in March 2024.</p> <p>The Council is in the process of drafting a remedy policy, which should receive a Cabinet decision by end of July 2024.</p>
7.2	<p>Any remedy offered must reflect the impact on the resident as a result of any fault identified.</p>	Yes	<p><a href="#">NBBC Complaint Policy &amp; Procedure – Section 8</a></p> <p>Remedy policy needed to bring consistency and training</p>	<p>This is clearly set out in Section 8 of the Housing Complaints Policy and Procedure which is available on the Council's website and was last updated in March 2024</p> <p>In order to ensure consistency of outcomes,</p>

				the Council is in the process of drafting a remedy policy, which should receive a Cabinet decision by end of August 2024.
7.3	The remedy offer must clearly set out what will happen and by when, in agreement with the resident where appropriate. Any remedy proposed must be followed through to completion.	Yes	Response letter templates	In order to ensure consistency of outcomes, the Council is in the process of drafting a remedy policy, which should receive a Cabinet decision by end of August 2024.
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes	Remedy Policy	In order to ensure consistency of outcomes, the Council is in the process of drafting a remedy policy, which should receive a Cabinet decision by end of August 2024.

## Section 8: Putting things right

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
8.1	<p>Landlords must produce an annual complaints performance and service improvement report for scrutiny and challenge, which must include:</p> <ul style="list-style-type: none"> <li>a. the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements.</li> <li>b. a qualitative and quantitative analysis of the landlord's complaint handling performance. This must also include a summary of the types of complaints the landlord has refused to accept;</li> <li>c. any findings of non-compliance with this Code by the Ombudsman;</li> <li>d. the service improvements made as a result of the learning from complaints;</li> <li>e. any annual report about the landlord's performance from the Ombudsman; and</li> <li>f. any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord.</li> </ul>	Yes	<p><a href="#">NBBC Complaint Policy &amp; Procedure – Section 10</a></p> <p>Nuneaton and Bedworth Borough Council Annual Housing Complaint Performance &amp; Improvement Report</p> <p><a href="#">Housing &amp; Communities Overview &amp; Scrutiny agenda &amp; minutes – 6<sup>th</sup> June 2024.</a></p> <p><a href="#">Cabinet agenda &amp; minutes – 19<sup>th</sup> June 2024.</a></p>	<p>This is clearly set out in Section 10 of the Housing Complaints Policy and Procedure which is available on the Council's website and last updated in March 2024.</p> <p>The Council's Annual Complaint Handling Performance &amp; Improvement report is available from the Council's website.</p> <p>The report has been scrutinised by the Portfolio Holder for Housing (MRC), considered by the Housing &amp; Communities Overview &amp; Scrutiny Panel and the Council's Executive at a Cabinet meeting held on 19th June 2024.</p>
8.2	The annual complaints performance and service improvement report must be reported to the landlord's governing	Yes	<a href="#">NBBC Complaint Policy &amp; Procedure – Section 10</a>	This is clearly set out in Section 10 of the Housing Complaints Policy and

	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.		<p>Nuneaton and Bedworth Borough Council Annual Housing Complaint Performance &amp; Improvement Report</p> <p><a href="#">Cabinet agenda &amp; minutes – 19<sup>th</sup> June 2024.</a></p>	<p>Procedure which is available on the Council's website and last updated in March 2024.</p> <p>The Council's Annual Complaint Handling Performance &amp; Improvement report is available from the Council's website.</p> <p>The Annual Report was presented for consideration to the Executive at its Cabinet meeting held on 19<sup>th</sup> June 2024.</p> <p>The response from the Executive is also published on the Council's website.</p>
8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	Yes	<p><a href="#">NBBC Complaint Policy &amp; Procedure – Section 10</a></p> <p>Nuneaton and Bedworth Borough Council Annual Housing Complaint Performance &amp; Improvement Report</p>	<p>This is clearly set out in Section 10 of the Housing Complaints Policy and Procedure which is available on the Council's website and last updated in March 2024.</p> <p>A self-assessment has been carried out on two previous</p>

				occasions in 2022/2023 and 2023/2024.  Further self-assessments will be carried out as and when required.
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	Yes	Noted	Should this be requested by the Housing Ombudsman, the Council will carry out the required review and update of the self-assessment.
8.5	If a landlord is unable to comply with the Code due to exceptional circumstances, such as a cyber incident, they must inform the Ombudsman, provide information to residents who may be affected, and publish this on their website Landlords must provide a timescale for returning to compliance with the Code.	Yes	<a href="#">Latest news – Nuneaton and Bedworth Borough Council</a>  <a href="#">Nuneaton &amp; Bedworth Borough Council   Nuneaton   Facebook</a>	Should the situation arise, tenants will be informed via the Council's website and social media, and also via the Tenant Portal once live.

### 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	Nuneaton and Bedworth Borough Council Annual Housing Complaint Performance & Improvement Report	<p>Service improvement results from complaints are included in the Annual Housing Complaint Performance &amp; Improvement Report.</p> <p>An improvement action plan for 2024/25 is also included in the Annual Report. The action plan will be monitored on a monthly basis to ensure actions are completed.</p>
9.2	A positive complaint handling culture is integral to the effectiveness with which landlords resolve disputes. Landlords must use complaints as a source of intelligence to identify issues and introduce positive changes in service delivery.	Yes	<p>Nuneaton and Bedworth Borough Council Annual Housing Complaint Performance &amp; Improvement Report</p> <p>Monthly Complaint Analysis Reports</p> <p>Departmental Management Team Minutes</p>	<p>Service improvements resulting from complaints are included in the Annual Housing Complaint Performance &amp; Improvement Report.</p> <p>An improvement action plan for 2024/25 is also included in the Annual Report. The action plan will be monitored to ensure actions</p>



				are completed on a monthly basis.  Monthly analysis of housing complaint performance and trends are considered by the Housing Senior Management Team and any improvement suggestions are shared at Team Meetings.
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	<a href="#">Cabinet agenda &amp; minutes – 19<sup>th</sup> June 2024.</a>  Quarterly Complaint Handling Analysis Overview & Scrutiny Reports  Tenant Newsletter June 2024 page 11.	Complaint Handling Performance and trends are presented for quarterly scrutiny to the MCR and Housing & Communities Overview & Scrutiny Panel.  Complaint performance statistics are also reported in tenant newsletters and to resident panels.
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	Departmental MT Minutes  Monthly Analysis Report	The Assistant Director of Social Housing & Community Safety is the senior lead person accountable for complaint handling within the Council's housing service.  Complaint Performance data is analysed on a

				monthly basis to identify themes, trends and issues and risks.
9.5	In addition to this a member of the governing body (or equivalent) must be appointed to have lead responsibility for complaints to support a positive complaint handling culture. This person is referred to as the Member Responsible for Complaints ('the MRC').	Yes	<a href="#">Cabinet agenda &amp; minutes – 19<sup>th</sup> June 2024.</a> MRC Induction Pack Portfolio Holder Training	The delegated Housing Portfolio Holder (who is also the Leader of the Council) is appointed as Member Responsible for Complaints. Training has been carried out with the member on the role of MRC.
9.6	The MRC will be responsible for ensuring the governing body receives regular information on complaints that provides insight on the landlord's complaint handling performance. This person must have access to suitable information and staff to perform this role and report on their findings.	Yes	Monthly Complaint Analysis Report <a href="#">Housing &amp; Communities Overview &amp; Scrutiny agenda &amp; minutes – 6<sup>th</sup> June 2024.</a> <a href="#">Cabinet agenda &amp; minutes – 19<sup>th</sup> June 2024.</a> MT Integrated Performance Report	The Assistant Director for Social Housing & Community Safety meets on a monthly basis with the Portfolio Holder for Housing where complaint handling performance and trends are discussed. The Portfolio Holder for Housing provides the Housing & Communities Overview and Scrutiny Panel with complaint performance data on a quarterly basis. This data is also presented to the Senior Management Team and Cabinet.

				The Housing Portfolio Holder is provided administrative support from Committee Services and also has access to Housing Officers at all levels.
9.7	<p>As a minimum, the MRC and the governing body (or equivalent) must receive:</p> <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	<p>Monthly Complaint Analysis Report</p> <p><a href="#">Housing &amp; Communities Overview &amp; Scrutiny agenda &amp; minutes – 6<sup>th</sup> June 2024.</a></p> <p><a href="#">Cabinet agenda &amp; minutes – 19<sup>th</sup> June 2024.</a></p>	<p>The Assistant Director for Social Housing &amp; Community Safety meets on a monthly basis with the Portfolio Holder for Housing where complaint handling performance and trends are discussed.</p> <p>The Portfolio Holder for Housing provides the Housing &amp; Communities Overview and Scrutiny Panel with complaint performance data on a quarterly basis. This data is also presented to the Senior Management Team and Cabinet.</p>
9.8	<p>Landlords must have a standard objective in relation to complaint handling for all relevant employees or third parties that reflects the need to:</p> <ul style="list-style-type: none"> <li>a. have a collaborative and co-operative approach towards resolving complaints, working</li> </ul>	Yes	<p><a href="#">NBBC Complaint Policy &amp; Procedure</a></p> <p><a href="#">Cabinet agenda &amp; minutes – 19<sup>th</sup> June 2024.</a></p>	The Housing Complaints Policy and Procedure has been adopted by staff in all housing service areas and compliance is monitored.

	<p>with colleagues across teams and departments;</p> <p>b. take collective responsibility for any shortfalls identified through complaints, rather than blaming others; and</p> <p>c. act within the professional standards for engaging with complaints as set by any relevant professional body.</p>			
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