

Self-assessment Action Plan

1	Definition of a complaint	Current position	Action required	Outcome/Evidence	Complete/In Progress/Not Started	Timescale
	<p>Does the complaints process use the following definition of a complaint?</p> <p><i>An expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the organisation, its own staff, or those acting on its behalf, affecting an individual resident or group of residents.</i></p>	<p>This definition is not included in current policy</p>	<p>This will be included in revised Complaints Policy</p>	<p>Added in Complaints Policy and guidance</p>	<p>Complete</p>	<p>February 2021</p>
	<p>Does the policy have exclusions where a complaint will not be considered?</p>	<p>Already in existing policy</p>	<p>Will be maintained in new policy so no specific actions/changes required</p>	<p>New policy has section around exclusions.</p>	<p>Complete</p>	<p>September 2020</p>
	<p>Are these exclusions reasonable and fair to residents?</p>	<p>Policy is agreed by tenant board, and agreement to its publication suggests satisfaction with its fairness. Additionally, the exclusions do not stop tenants making complaints, they only stop them</p>	<p>N/A</p>	<p>Tenant and Residents attended consultation events and feedback taken into account within Complaints Policy.</p>	<p>Complete</p>	<p>September 2020</p>

		making the same complaints again, or directs them to the relevant appeals process in place of a complaint				
2	Accessibility	Current position	Action required	Outcome/Evidence	Complete/In Progress/Not Started	
	Are multiple accessibility routes available for residents to make a complaint?	We already offer access to complaints by multiple channels – telephone, email, social media	Improve online availability by adding online complaint form to website. Leaflet also to be produced giving simple guide on complaint process	<p>Complaint form drafted and submitted to marketing, now live and in use on website.</p> <p>Leaflet to be produced in line with process from new policy following removal of in-person restrictions due to COVID-19.</p> <p>NCH Website has been updated to help customers with information and details relating to Complaints.</p> <p>A “contact us “ button has been included on social media sites to allow easier contact around making a complaint with us.</p>	Complete	February 2021
	Is the complaints policy and procedure available online?	Not available online	Add to website	Added to website by Marketing team, to be updated with new policy following final sign-off	Complete	March 2021
	Do we have a reasonable adjustments policy?	Yes/Equality Diversity and Inclusion (EDI) Strategy	Add to website	NCH EDI Strategy	Complete	October 2020
	Do we regularly advise residents about our complaints process?	Information is available in new tenants pack.	Communication plan to be made	Articles to be published in Tenants’ newsletters and	Complete	March 2021

		After that, only available online or on request	with Marketing to publicise more	<p>information on the NCH website.</p> <p>Provide regular feedback to tenants through newsletters/reports.</p> <p>Reports are presented to ALMO Board on Complaint performance and trends.</p> <p>NCH are in the process of undertaking a TPAS Review which will have cross cutting themes supporting this.</p> <p>Consultation events held February/March 2021 with involved tenants to discuss the Complaints Policy.</p>		
3	Complaints team and process	Current position	Action required	Outcome/Evidence	Complete/In Progress/Not Started	
	Is there a complaint officer or equivalent in post?	Yes	N/A	Provide details of team structure	Complete	N/A
	Does the complaint officer have autonomy to resolve complaints?	Yes	N/A		Complete	N/A
	Does the complaint officer have authority to compel engagement from other departments to resolve disputes?	Yes	N/A		Complete	N/A
	If there is a third stage to the complaints procedure are residents involved in the decision making?	No, the Complaints Policy	N/A	New Complaints Policy has 2 internal stages. The second stage review is undertaken by	Complete	February 2021

		is a 2 stage internal process		a Director and Customer Relations Team representative.		
	Is any third stage optional for residents?	No third stage	N/A	New Complaints Policy has 2 internal stages.	Complete	N/A
	Does the final stage response set out residents' right to refer the matter to the Housing Ombudsman Service?	Yes, details are provided at conclusion of both stage 1 and 2	N/A		Complete	September 2020
	Do we keep a record of complaint correspondence including correspondence from the resident?	Yes	N/A		Complete	September 2020
	At what stage are most complaints resolved?	Stage 1 99% of complaints for both 2018/19 and 2019/20	N/A	In 2018/19 2,243 complaints, 23 went to formal stage 2. In 2019/20 2,236 complaints, 25 went to formal stage 2. Annual report can be given as evidence as it shows these figures.	Complete	September 2020
4	Communication	Current position	Action required	Outcome/Evidence	Complete/In Progress/Not Started	
	Are residents kept informed and updated during the complaints process?	Communication with customer takes place at beginning of complaint and at conclusion of complaint in all cases, and during investigation in most cases	This is included within Complaints procedure	The Complaints procedure includes the stages at which the customer will be contacted and communicated with regarding the complaint.	Completed	March 2021
	Are residents informed of the landlord's position and given a chance to respond and challenge any area of dispute before the final decision?	This happens sometimes as part of communication during investigation, but	This is included within Complaint procedure.	This step is included in the new procedure including before a response is sent to a customer, that any outcomes the customer is seeking that	Completed	February 2021

		is not mandated in policy		we cannot meet are explained in detail, with reasons why.		
	Are all complaints acknowledged and logged within five days?	Yes	N/A		Complete	September 2020
	Are residents advised of how to escalate at the end of each stage?	Yes, details of escalation options are included in every complaint response	N/A		Complete	September 2020
	What proportion of complaints are resolved at stage one?	99% in 2018/19 and 2019/20	N/A	Provide copy of 2019/20 annual report which shows this data	Complete	September 2020
	What proportion of complaints are resolved at stage two?	Almost all Complaints are resolved at Stage 1. As above of those which are escalated to Stage 2 almost all are resolved.	N/A	Provide copy of 2019/20 annual report which shows this data	Complete	September 2020
	What proportion of complaint responses are sent within Code timescales? <ul style="list-style-type: none"> • Stage one • Stage one (with extension) • Stage two • Stage two (with extension) 	2019/20 figures Stage One 2,237 complaints In target – 1,707 (with ext) – 1,826 Stage Two No set timeframe for stage 2 under the old procedure as it is conducted by a Tenant Panel			Complete	September 2020
	Where timescales have been extended did we have good reason?	Yes, extensions are agreed only when necessary to ensure the customer can be given a full and	N/A	Included in new policy	Complete	September 2020

		comprehensive response and these are agreed with Customer directly and confirmed in writing with reason for extension request.				
	Where timescales have been extended did we keep the resident informed?	Yes, customers are advised either by the Resolution Officer, or by means of an 'Interim letter'	N/A	Included in new policy	Complete	September 2020
	What proportion of complaints do we resolve to residents' satisfaction?	Not available	Complaint handling satisfaction survey to be sent at closure of complaint process from April 2021	Customers will be sent a short survey requesting feedback on the handling of their complaint. Information will be fed back into the Corporate performance plan and used for benchmarking purposes.	Completed	March 2021
5	Cooperation with Housing Ombudsman Service	Current position	Action required	Outcome/Evidence	Complete/In Progress/Not Started	
	Were all requests for evidence responded to within 15 days?	Yes, requests are monitored and responded within requested timeframes	N/A		Complete	September 2020
	Where the timescale was extended did we keep the Ombudsman informed?	Yes, if delays are expected the Ombudsman are informed at the soonest opportunity	N/A		Complete	September 2020

6	Fairness in complaint handling	Current position	Action required	Outcome/Evidence	Complete/In Progress/Not Started	
	Are residents able to complain via a representative throughout?	Yes, we take complaints from anyone able to act on a customer's behalf	N/A	Also included in new policy.	Complete	September 2020
	If advice was given, was this accurate and easy to understand?	Yes, we use clear simple wording and avoid unnecessary jargon and offer follow-up communication if anything is unclear	N/A	Also included in new policy.	Complete	September 2020
	How many cases did we refuse to escalate? What was the reason for the refusal?	In last 18 months, only 4 cases have been refused escalation. Two were due to being requests only for compensation (these were directed to compensation team to assist). The other two were refused by the panel themselves on the grounds that the escalation related to matters beyond the scope of the initial complaint	N/A	Also included in new policy.	Complete	September 2020
	Did we explain our decision to the resident?	Yes, when escalation is	N/A	Also included in new procedure.	Complete	September 2020

		refused a letter is sent to explain				
7	Outcomes and remedies	Current position	Action required	Outcome/Evidence	Complete/In Progress/Not Started	
	Where something has gone wrong are we taking appropriate steps to put things right?	Yes, one of the four key areas considered as part of an investigation is what steps we are taking to put it right	N/A	Included in new procedure.	Complete	September 2020
8	Continuous learning and improvement	Current position	Action required	Outcome/Evidence	Complete/In Progress/Not Started	
	What improvements have we made as a result of learning from complaints?	Learning data is recorded on each complaint and fed back to relevant teams	N/A	Learning Outcomes continue to be embedded within the new procedure. Information and learning from the data will be shared with all areas of the business to improve service delivery and customer experience.	Completed	March 2021
	How do we share these lessons with: a) residents? b) the board/governing body? c) In the Annual Report?	We currently share learning data with board and in quarterly/annual reports, but not with customers	Start showing improvements via 'You Said, We Did' on social media and/or NCH news for customer awareness	Produce quarterly performance EMT reports Monthly pivot information to CR&M re trends and changes in improvements/adjustments made Annual Complaints report.	Completed	March 2021
	Has the Code made a difference to how we respond to complaints?	Has provided greater focus and spotlight particularly around accessibility and communication.		The publication of the Complaint Handling Code and Social Housing White Paper has assisted the business in reviewing our approach to	Complete	December 2020

		Addressed current Policy and process to have 2 internal stages for resolution as proposed in draft Policy.		<p>complaint handling and aided - in ensuring we are both compliant and following best practice.</p> <p>The process is customer centric and there is additional focus around early resolution and keeping the customer up to date with the case through increased communication</p>		
	What changes have we made?	Amended current Policy and stages, increased communication and signposting around how to complain. More social media and digitally friendly for customers to be informed and make contact in their preferred method.		<p>New 2 stage internal Complaints Policy implemented which includes a Stage 2 Review by a Director and Customer Relations Team representative.</p> <p>The Complaints Policy is focussed around keeping the customer up to date with their complaint throughout the process and aiming to ensure early resolution and putting things right which they are satisfied with.</p>	Completed	March 2021

Equality Impact Assessment Form

1. Document Control

Control Details:

Title:	Complaints Policy and Procedure
Author:	Jacque Beacroft
Director:	Jo Clifford
Department:	Corporate Services
Service Area:	Customer Experience
Contact details:	Jacque.beacroft@nottinghamcityhomes.org.uk
Strategic Budget EIA: Y/N (Does this EIA have an impact on the budget)	N
Exempt from publication: Y/N (Exemption criteria is available on the EIA section on the Intranet)	N

2. Document Amendment Record:

Version	Author	Date	Approved
1	George Pashley/Jacque Beacroft	3/3/2021	

5. Summary

(Please provide a brief description of proposal / policy / service being assessed)

The current Complaints Comments and Compliments(3C's) Policy has not been reviewed since 2015. During that time new guidance and legislation in regard to complaint handling and tenant satisfaction has been released. This makes some of our existing processes set within current policy non-compliant in relation to the Housing Ombudsman Complaint Handling Code 2020 . The Code requires Social Landlords to publish a self- assessment against the code to ensure it is following all recommendations. The Code requires social landlords to publish a 2 stage internal complaints process which no longer requires the role of a designated person(s) which was introduced in the Localism Act 2021. This has now been superseded by the White Paper: Social charter for tenants. The new policy and procedure follows the guidance and requirements set within the White Paper and Housing Ombudsman Code.

6. Information used to analyse the effects on equality:

(Please include information about how you have consulted/ have data from the impacted groups)

The following data has been used to analyse possible effects on equality:

- Complaints Data
- Members Casework Data
- Housing Ombudsman Case findings and recommendations
- Consultation with involved tenant groups
- Consultation with ALMO Board

7. Impacts and Actions:

	Could particularly benefit	May adversely impact
	X	X
People from different ethnic groups.	<input type="checkbox"/>	x <input type="checkbox"/>
Men	<input type="checkbox"/>	<input type="checkbox"/>
Women	<input type="checkbox"/>	<input type="checkbox"/>
Trans	<input type="checkbox"/>	<input type="checkbox"/>
Disabled people or carers.	<input type="checkbox"/>	x <input type="checkbox"/>
Pregnancy/ Maternity	<input type="checkbox"/>	<input type="checkbox"/>
People of different faiths/ beliefs and those with none.	<input type="checkbox"/>	<input type="checkbox"/>
Lesbian, gay or bisexual people.	<input type="checkbox"/>	<input type="checkbox"/>
Older	<input type="checkbox"/>	x <input type="checkbox"/>
Younger	<input type="checkbox"/>	<input type="checkbox"/>
Other (e.g. marriage/ civil partnership, looked after children, cohesion/ good relations, vulnerable children/ adults).	<input type="checkbox"/>	<input type="checkbox"/>
<i>Please underline the group(s) /issue more adversely affected or which benefits.</i>		

<p>How different groups could be affected (Summary of impacts)</p>	<p>Details of actions to mitigate, remove or justify negative impact or increase positive impact (or why action isn't possible)</p>
<p>Provide details for impacts / benefits on people in different protected groups.</p> <p>Note: the level of detail should be proportionate to the potential impact of the proposal / policy / service. Continue on separate sheet if needed (click and type to delete this note)</p> <p>People from different Ethnic Groups</p> <p>People from different Ethnic Groups may not feel as comfortable about raising complaints and issues directly . This may be due to reasons such as:</p> <p>English not first language</p> <p>Cultural differences and beliefs</p> <p>Lack of support and confidence to discuss issues either directly over the telephone or through online pro forma.</p> <p>Awareness of complaints process/accessibility</p>	<p>Continue on separate sheet if needed (click and type to delete this note)</p> <p>People from different Ethnic Groups</p> <p>Increase positive impact:</p> <p>Provision of a language translation service to support telephone communication to help understand complaint issues and explain process.</p> <p>Increase visibility and awareness of complaints policy and process via website/training for customer facing NCH colleagues to act as customer ambassadors/advocates</p> <p>Customers can have advocates acting on their behalf to raise and handle any complaints directly.</p>

Policy and procedure is published in plain English on NCH Website. May impact those customers who

Have no access to internet

Disabled People or Carers.

Documents and easy to follow guides around complaints can be translated and issued to customers in a written format in a different language at their request.

Document to be available in printed version to be sent/available upon request or downloadable. Have leaflet explaining process and policy in clear easy steps. Can access by use of mail/email/phone or in person to make a complaint

Reduce Negative Impact:

Use customer profile information and complaint trends to target key groups/sections ensuring raising awareness/providing further information and support to those groups who are less likely to access process and be comfortable about using it.

Provide examples and feedback to customers ensuring cross section of complaints and customers are highlighted.

Work alongside National and local campaigns including Housing Ombudsman around raising awareness.

Positively target key groups who are under represented in complaint information

Increase positive Impact

Documents can be published upon request in large print/braille.

Have access to discuss face to face using British Sign Language interpreters.

Use of induction hearing loops in key buildings.

There may be barriers in allowing easy access to raising complaints by those who have disabilities/vulnerabilities.

These may involve

Have sight or hearing loss

Unable to directly access process

Have vulnerabilities which cause additional anxiety and distress in a confrontational situation

More information and communication will be available to explain process and stages, enabling them to research and understand what the process involves.

Customer advocates/representatives can act on behalf of customers (with authorised permission)

Dedicated Customer Relations Team who are trained to support and act as customer ambassadors to extract issues and actions to be addressed. Key contact in process.

New process will have assigned Resolution Officer (RO) who will speak with the customer explain they are investigating case and be a point of contact to support with complaint.

Reduced timescales for customers to receive early response.

Provision of on line form/access to raise complaint no need for face to face/direct contact to log complaint, more flexibility and options for customers to access.

All written communication in plain English.

Provides customer with information to inform their decisions and understand what the process will entail. All information including regular updates on performance and outcomes will be published on several social platforms.

Customers have the ability to access service via phone or on line and explain in own words what they feel and would like to resolve situation they are faced with.

Reduce Negative Impact:

Provide regular updates to customer on case

Regular published information regarding complaints and feedback on changes resulted from learning.

Analyse data regularly and take pro-active measures if key groups/characteristics underrepresented in accessing service.

Customer complaint handling satisfaction survey,review information from responses.

Older Persons

Increase Positive Impact:

More accessibility and routes available to raise a complaint either directly or someone on their behalf.

Increased awareness and information around complaint process both using social media but also in regular features in newsletters.reports

Encourage cases which profile older persons and positive outcomes of being listened to

Reduce Negative Impact.

More accessibility

More information and feedback on how we are handling complaints.

Support from carers/advocates to support them raising issues

National campaigns to raise awareness for customers such as Housing Ombudsman services.

Resolution Office investigating case will be communicating directly with customer

Older Persons

Older persons are less likely to complain and just accept the situation and poor service they experience.

Have difficulty accessing service either on line or telephone

Do not wish to complain directly

Are not sure if they can complain about an issue

8. Arrangements for future monitoring of equality impact of this proposal / policy / service:

To be reviewed alongside HO Code self-assessment to ensure compliance /feedback from customer satisfaction service quarterly reports outlining trends and analysis of customer insight characteristics from those engaging with the service/process.

9. Outcome(s) of equality impact assessment:

<input checked="" type="checkbox"/>	No major change needed	<input type="checkbox"/>	Adjust the policy/proposal
<input type="checkbox"/>	Adverse impact but continue	<input type="checkbox"/>	Stop and remove the policy/proposal

10. Approved by (manager signature) and Date sent to equality team for publishing:

Approving Manager: The assessment must be approved by the manager responsible for the service/proposal. Include a contact tel & email to allow stakeholder feedback on proposals.	Date sent for advice: Send document or Link to: Rebecca.dennis@nottinghamcityhomes.org.uk
Approving Manager Signature:	Date of final approval:

Before you send your EIA to the Equality, Diversity & Inclusion Manager for scrutiny, have you:

1. Read the guidance and good practice EIA's
2. Clearly summarised your proposal/ policy/ service to be assessed.
3. Hyperlinked to the appropriate documents.
4. Written in clear user-friendly language, free from all jargon (spelling out acronyms).
5. Included appropriate data.
6. Consulted the relevant groups or citizens or stated clearly, when this is going to happen.
7. Clearly cross-referenced your impacts with SMART actions.

PLEASE NOTE: FINAL VERSION MUST BE SENT TO THE EDI MANAGER OTHERWISE RECORDS WILL REMAIN INCOMPLETE.