



NORTH STAR

Creating homes, building futures



Annual Complaints Performance and Service Improvement Report

2024/25



Foreword

As part of our continued commitment to the Housing Ombudsman's Code of Guidance, I'm pleased to share North Star's first Annual Complaints Report.

At North Star, we are committed to providing excellent services to all our customers. However, we recognise that there are times when we fall short of the high standards we set. When that happens, it's important that we listen, learn, and improve.

Like all social housing landlords, we are required to follow the Ombudsman's Complaint Handling Code. The Code promotes good practice in how complaints are managed and resolved. It supports landlords to respond to concerns fairly and promptly while using feedback to drive service improvement.

Learning from complaints is not just about reviewing data such as complaint volumes or response times. It's about identifying what went wrong, understanding why it happened, and taking action to prevent it from happening again.

This year, we have heard clearly from customers that repairs remain a concern, particularly around timeliness and quality of completion. Improving this will be a key priority for us over the coming year.

We also recognise that our complaints handling process itself can be improved. Your feedback is essential in helping us shape a more responsive, transparent, and customer-focused approach.

We remain fully committed to delivering high-quality, reliable services—and we know we can't do that without listening to you. Thank you for continuing to share your experiences and helping us to get better.

Sean Lawless
Director of Customer Experience & Transformation
North Star Housing Group



Board Comment

We are committed to using feedback from customers to improve what we do. Despite our passion and diligence, we know sometimes things go wrong. When they do, our priority is to work with the customer to resolve the issue in a timely and respectful manner.

The North Star Board received the annual complaints performance and service improvement report, and the annual self-assessment against the Complaint Handling Code on 17 June 2024. This is alongside the board receiving regular reports, meetings with staff and interacting with customers throughout the year. Their role is to scrutinise data, performance information and levels of customer satisfaction to provide assurance that North Star are managing complaints in line with our policy and the Ombudsman Complaint Handling Code. North Star's overall performance when considered against the Complaints Handling Code and our own internal expectations and values is good.

In line with North Stars' continuous improvement culture, a number of new methods, systems and contractors have been introduced which have resulted in improvements in consistency, communication, and the speed with which repairs can be completed. However, as clearly set out in the report, we have identified that more needs to be done to ensure we continue to improve communication and that our repairs service is delivering the best possible service.

The board has therefore approved a range of priorities including further investment in; contractor capacity, a clear focus on compensation, enhancement of customer feedback methods and analysis of data.

Nicki Clark
Board Member Responsible for Complaints
North Star Housing



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Context

The revised Housing Ombudsman Complaint Handling Code came into effect from 1 April 2024. Landlords must produce an annual complaints performance and service improvement report for scrutiny and challenge. The report must include:

- The annual self-assessment against the Code
- A qualitative and quantitative analysis of performance
- Summary of complaints refused
- Any findings of non-compliance
- Service improvements made from learning
- Relevant Ombudsman reports

This report is submitted to the Board and published online, alongside the Board's response.

Self Assessment against the Complaints Handling Code

The 2025 self-assessment is attached in Appendix One. North Star is fully compliant with the Code and there are no areas of non-compliance.

The responsible officer is the Director of Customer Experience and Transformatio

Complaints Performance

	2021/2022	2022/23	2023/24	2024/25
Number of formal complaints received during the year	120	186	143	174
Percentage of Stage 1 complaints responded to within target (The standard is 10 working days which can be increased to 20 with the agreement of the customer)	85.8%	82.3%	95.1%	98.3%
Percentage of complaints upheld	77%	83.3%	90.3%	81%
Number of complaints progressing to Stage 2	9	15	3	11
Percentage of Stage 2 complaints responded to within target - 10 working days	89%	100%	100%	100%

The increase in complaints (21%) was largely due to a rise in issues with the repairs service, particularly involving Ian Williams and 0800.

Performance against timescales has improved year-on-year, with 98.3% of Stage 1 responses meeting target. The small number that did not were due to either complexity or minor delays.

Complaints Performance

During 2024/25, scrutiny of complaint handling has remained strong, with continued emphasis on accountability, learning, and timely resolution. The complaints clinic—attended every six weeks by key Managers and Executive Directors—continues to provide valuable oversight. The group considers trends, response times, and learning, while also ensuring a fair distribution of complaints across teams. Constructive challenge remains a feature of these sessions, helping to improve consistency and performance.

The complaints module within the Housing Management System continues to support more effective oversight and alerting. Monitoring tools enable early intervention and improved adherence to response times, contributing to 98.3% of Stage 1 complaints being resolved within target.

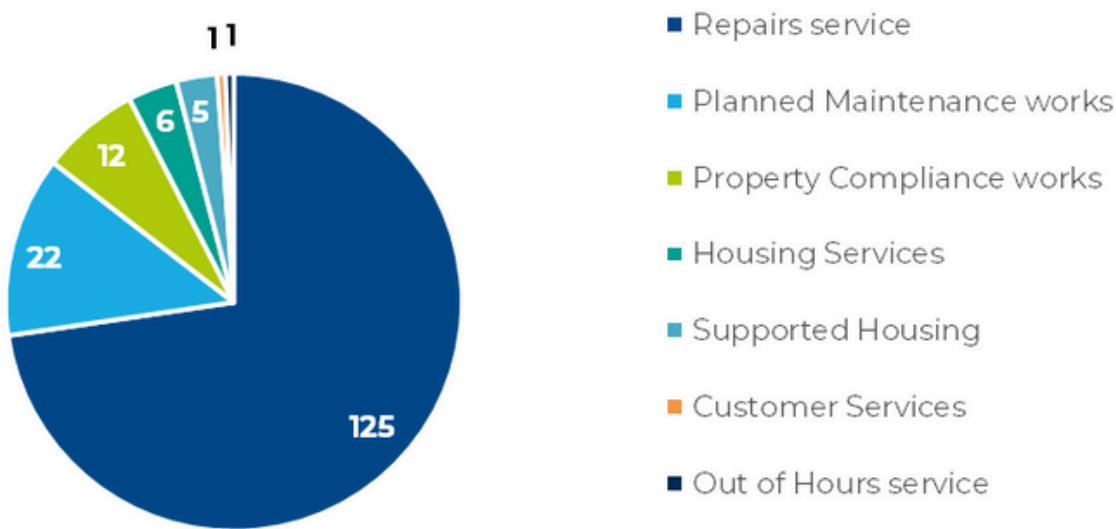
This year saw a reduction in the proportion of Stage 1 complaints upheld, from 90.3% to 81%. While this remains higher than the 70–75% average reported by peer organisations, it represents a step in the right direction. Initial analysis has been undertaken to explore the reasons behind the historically high uphold rate, including issues around repairs communication, timeliness, and recognition of vulnerability. Further work will take place during 2025/26 to deepen understanding and ensure our response remains proportionate, empathetic, and fair.



Stage One Complaints

Stage One Complaints by Service Area	2021/2022	2022/23	2023/24	2024/25
Supported Housing	2	2	2	5
Customer Services	14	6	4	2
Development	1	4	4	0
Housing	13	11	6	7
Compliance	9	9	10	12
Asset Management	8	19	12	22
Maintenance	73	135	105	125
TOTAL	120	186	143	173

Formal Complaints 2024-25

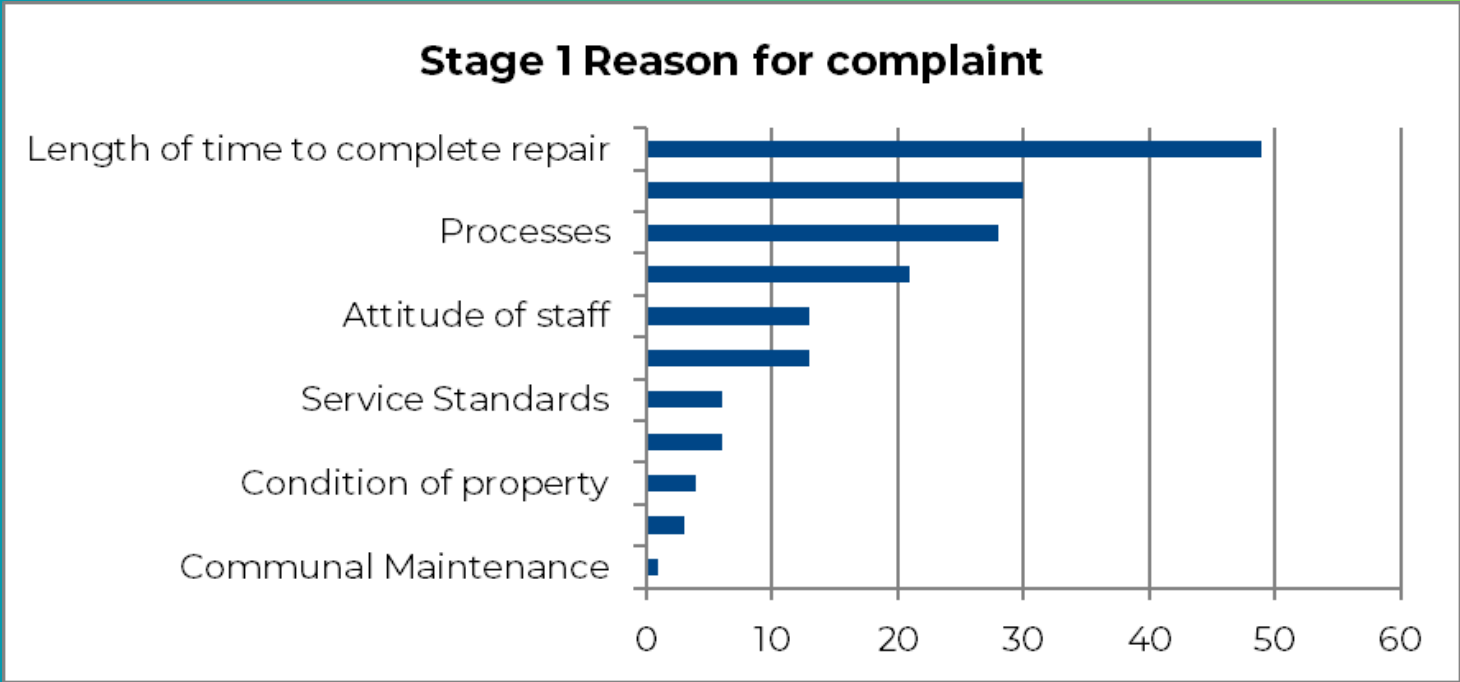


Stage One Complaints

The majority of complaints received during 2024/25 (73%) continue to relate to the repairs service. While the overall number of complaints increased by 21% compared to the previous year, the distribution of complaints by service area remains broadly consistent with previous years.

There was a notable reduction in the proportion of upheld stage one complaints this year, down to 81% from 90.3% in 2023/24. While this figure remains higher than the c.70–75% typically reported by our complaints peer group, it represents a positive shift. Work is ongoing to understand the reasons for the historically high uphold rate, as we continue to explore any underlying factors contributing to this.

The table below summarises the key themes identified through Stage One complaints and the actions taken in response to learning from these.



Stage One Complaints

Service Area	Themes arising from complaints and / or significant issues	Learning / improvements implemented
Planned maintenance (22 complaints)	Poor communication regarding planned works, delays in scheduling, and uncertainty about timescales.	Improved communication processes with customers regarding planned works. Introduced clearer scheduling updates and proactive engagement to manage expectations.
Property Compliance (12 complaints)	Issues related to delays in completing compliance works (e.g., lift repairs, boiler servicing), communication gaps.	Reviewed contractor management processes. Strengthened escalation procedures for overdue compliance works. Improved internal oversight and customer updates.
Property Compliance (10 complaints)	One complaint regarding delays in repairing a lift in an older person's service Remaining complaints were due to missed appointments, time taken to complete works and boiler issues.	We have reviewed and changed our protocols to manage any future breakdown of lifts more effectively. No theme with remaining complaints but issues are discussed in contractor meetings.
Maintenance (15 complaints)	Delays in completing repairs, repairs not being completed first time, poor communication about follow-on works.	Continued investment in subcontractor capacity to address repair backlogs. Further onboarding of specialist contractors for complex works. Enhanced van stock management to reduce delays. Introduced clearer follow-on and major works processes to improve customer communication.
Out of Hours (1 complaint)	Concern about the handling of an emergency repair reported via the out-of-hours service.	Reviewed call handling procedures with the out-of-hours provider. Reinforced training on appropriate triage and escalation of repairs to the relevant contractors and North Star staff for emergency repairs.

Stage One Complaints

Service Area	Themes arising from complaints and / or significant issues	Learning / improvements implemented
Customer services (2 complaints)	Concerns about initial communication at first point of contact, including tone and accuracy of information.	Delivered refresher training for the Customer Services Team on communication standards and managing expectations at first contact. Implemented recommendations from a customer group that reviewed a sample of calls integrated customer led suggestions for phone calls, following a customer review of recordings of calls.
Housing (7 complaints) and Supported Housing (5)	Complaints related to communication issues, decision-making around allocations, anti-social behaviour handling, and staff conduct.	No policy breaches identified, but continued focus on improving communication and explaining decisions clearly to customers. Training delivered where appropriate. Allocations decisions and ASB handling reviewed to ensure consistency and transparency.



Stage Two Complaints

In 2024/25, the number of complaints progressing to Stage 2 increased to 11, up from just 3 in the previous year. Although higher than in 2023/24, this remains below the 2022/23 total of 15. All Stage 2 complaints were responded to within the required 20-working-day target.

A review of the escalated cases identified that a number could have been prevented through more effective handling at Stage One. In response, we have shared learning with Stage One complaint managers, alongside strengthened guidance—particularly in relation to recognising vulnerability and ensuring agreed actions are followed through.

Stage Two Complaints by Service Area	2021/2022	2022/23	2023/24	2024/25
Asset Management	1	1	0	3
Customer Services	1	0	0	0
Housing	2	2	0	0
Maintenance	5	11	2	6
Supported Housing	0	1	0	2
Development	0	0	1	0
TOTAL	9	15	3	11

Key reasons for escalation to Stage Two included:

- Use of inappropriate language in the Stage One response, which did not reflect the customer’s health condition or personal circumstances.
- Customer concerns about safety in the home were not adequately addressed, with the Stage One reply lacking recognition of individual vulnerability and its impact.
- Incomplete responses at Stage One, failing to address all raised issues or acknowledge distress caused. In some cases, agreed outcomes—such as repair timescales—were not met.

Satisfaction with Complaint Handling

We assess customer satisfaction with complaints handling through two approaches:

1. The Tenant Satisfaction Measure (TSM TP09) – a perception survey conducted annually and reported to the Regulator of Social Housing (RSH).
2. A transactional survey completed by customers following the closure of their complaint.

Satisfaction Measure	2023
Satisfaction with North Star's approach to handling complaints – TSM TP09. Perception survey	56.2% (Top Quartile)
Satisfaction following with complaint handling following a complaint. Transactional survey.	66.2%

The TSM perception result of 56.2% places us in the national top quartile, highlighting that our overall approach to complaint handling is viewed positively by tenants. The transactional survey, which captures direct feedback from complainants, shows a satisfaction rate of 66.2%. While encouraging, this indicates there is still room to improve how individual complaints are managed and resolved.

We recognise that satisfaction with complaints handling is closely linked to performance in key service areas—particularly repairs, communication, and timely resolution. To address this, we are driving targeted improvements based on customer feedback. This includes refining our approach to compensation, ensuring remedies are fair and appropriate, and acknowledging the emotional impact of service failures.

Improving customer satisfaction remains a key priority for 2025/26. Insights from both TSM and Institute of Customer Service (ICS) surveys highlight the importance of a well-handled complaint: customers who feel their issue was resolved well report satisfaction levels of up to 80%, while poor complaint handling can reduce satisfaction to around 30%.

Refused Complaints

During 2024/25 there were no complaints that we refused to take. We have a procedure for recording any refusals in line with section 8 of the Complaints Policy and the Housing Ombudsman Complaint Handling Code. These would be recorded as a refused complaint on the housing management system in the complaints module along with the correspondence with the complainant explaining the reason.

Update on Planned improvements for 2024/25

Service Improvement	Lead	Update
Evaluate the effectiveness of the complaints module to ensure it is meeting our requirements re reporting, monitoring and identification of themes	Director of Customers	The complaints module has been reviewed and continues to support effective oversight and reporting. Further improvements will be explored in 2025/26, including enhanced action tracking to ensure learning from themes and trends from complaints.
Carry out a review of Customer Services Team – Using customer insight to build on excellent customer satisfaction levels to improve communication, deal with issues right first time and avoid customers having the inconvenience to contact us again	Director of Insight and Transformation	Review completed with clear actions identified to improve first contact resolution and customer communication. Additional training delivered with a continued focus planned for 2025/26 to sustain improvements, these include better repair diagnostics and dynamic staff resourcing to align with call volume.

Service Improvement	Lead	Update
Implementation of HMS Endeavour within the Property Services Team. This will transform the oversight of the services delivered enabling improved communication and monitoring	Head of Property and Compliance	HMS Endeavour successfully implemented. Oversight of repairs and property services has improved, including better data visibility. Focus for 2025/26 will be on maximising system functionality and user confidence.
Carry out analysis on complaints upheld to understand why we are an outlier compared to others	Director of Customers	Initial analysis completed, highlighting key themes around repairs communication, timeliness, and recognition of vulnerability. Further detailed work planned for 2025/26 to deepen understanding and inform service improvements.
Regularly connect with customers who have made complaints to discuss their experience and enable us to learn and improve	Director of Customers	Ongoing conversations with complainants have been embedded as standard practice. Learning from these discussions has directly informed service changes. A good example of this has been inviting Commitment to further strengthen this process through Heartbeat activities
Develop systems and approaches to enable further analysis by geography and demography	Director of Customers	Work commenced to improve data collection and reporting by geography and customer characteristics. Further development will continue in 2025/26 to ensure insights drive service design and targeted action

Service Improvements 2025/26

Service Improvement	Lead
Our housing management system, will be evaluated to ensure it supports effective reporting, action monitoring, and theme identification, in line with the Heartbeat goal of delivering consistent, high-quality service.	Director of Customer Experience & Transformation
Our Compensation and Remedy Policy will be enhanced with clearer guidance for staff on assessing distress, disruption, and vulnerability. This includes refresher training for all complaint handlers.	Director of Customer Experience & Transformation
Where compensation is recommended by policy, it will be offered to all complainants. If fault lies with a contractor, we will seek to recover associated costs.	All managers
<p>Refresher training sessions for all managers will be scheduled to ensure confidence in the complaints process and system. These will cover:</p> <ul style="list-style-type: none"> • The role of tone, language, and empathy. • Emotional impact of service failure. • Resolving issues at first point of contact. 	Director of Customer Experience & Transformation
A detailed analysis of upheld complaints will be undertaken to understand our performance compared to peers. Findings will inform improvements to reduce avoidable complaints and strengthen overall satisfaction.	Director of Customer Experience & Transformation

Housing Ombudsman Determinations and reports

The Housing Ombudsman issues an annual Landlord Performance Report when a landlord has five or more cases determined by them in a financial year. North Star have not had any cases with the Housing Ombudsman during 2024-25 therefore we are under the threshold for receiving a performance report and have no determinations to report.

Appendix One

Guidance from The Housing Ombudsman Service.

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 of North Stars approach
1.2	A complaint must be defined as: <i>'an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the landlord, its own staff, or those acting on its behalf, affecting a resident or group of residents.'</i>	Yes	Section 1 of the Complaints Policy	Definition of a complaint in North Stars Complaints Policy is the same as the Housing Ombudsmans Service (HOS) definition.
1.3	A resident does not have to use the word 'complaint' for it to be treated as such. Whenever a resident expresses dissatisfaction landlords must give them the choice to make complaint. A complaint that is submitted via a third party or representative must be handled in line with the landlord's complaints policy.	Yes	Sections 6 and 7 of the Complaints Policy	If a customer gives permission, a complaint submitted via a third party or representative will be managed in line with the complaints policy. The customer does not need to use the word "complaint". We will try to resolve any expression of dissatisfaction with the service quickly and will give the customer a choice to make a complaint if they remain dissatisfied.
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	Definitions in sections 1 and 2 of the Complaints Policy. Service Requests are in section 9 of the Complaints Policy	The Policy includes the definitions of a complaint and a service request. Service requests are not recorded as a complaint but are recorded separately along with the actions taken. Service requests are monitored for trends and issues that will require further action.
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	Sections 7 and 9 of the Complaints Policy	Following completion of a service request, if the customer remains dissatisfied, the option to escalate the issue to a complaint will be offered.
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	Satisfaction surveys will now include this information from April 2024.	Satisfaction surveys will now include this information from April 2024.

Section 2: Exclusions

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation of North Stars approach
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	Section 8 of the Complaints Policy	The policy states that we will write and explain the reasons why we will not accept a complaint. Each case will be considered on its own merits.
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"> The issue giving rise to the complaint occurred over twelve months ago. Legal proceedings have started. This is defined as details of the claim, such as the Claim Form and Particulars of Claim, having been filed at court. Matters that have previously been considered under the complaints policy. 	Yes	Section 8 of the Complaints Policy	The exclusions included in the policy comply with the acceptable exclusions in the Complaint Handling Code
2.3	Landlords must accept complaints referred to them within 12 months of the issue occurring or the resident becoming aware of the issue unless they are excluded on other grounds. Landlords must consider whether to apply discretion to accept complaints made outside this time limit where there are good reasons to do so.	Yes	Section 8 of the Complaints Policy	Complaints regarding issues within the last 12 months will be accepted unless one of the exclusions in Section 8 applies but the decision to exclude it will be considered on its own merits.
2.4	If a landlord decides not to accept a complaint, an explanation must be provided to the resident setting out the reasons why the matter is not suitable for the complaints process and the right to take that decision to the Ombudsman. If the Ombudsman does not agree that the exclusion has been fairly applied, the Ombudsman may tell the landlord to take on the complaint.	Yes	Section 8 of the Complaints Policy	The customer will be contacted in explaining the reason for not accepting the complaint with information on how to contact the housing Ombudsman service if they do not agree with the decision.
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Yes	Section 8 of the Complaints Policy	The policy states that each case for excluding from the complaints procedure will be considered on its own merits.

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	Sections 7 and 15 of the Complaints Policy	Complaints are accepted through a variety of different channels to suit the customer. The policy also gives examples of some of the adjustments we will make to ensure no one is disadvantaged in being able to make a complaint. Complaints can be made in person, in writing, by telephone, by email, via our website, through another person or advocate, through our surveys and via social media.
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	Sections 3 and 7 of the Complaints Policy	Any member of staff will accept a complaint, record it and forward to the Complaints and Performance Coordinator for allocation. All front line housing and CST staff have received training on resolving complaints and systems. Training for none front line members of staff will be concluded by May 2024.
3.3	High volumes of complaints must not be seen as a negative, as they can be indicative of a well-publicised and accessible complaints process. Low complaint volumes are potentially a sign that residents are unable to complain.	Yes	Quarterly report to Board	Volume of complaints are monitored, trends analysed and levels are benchmarked against other providers. The detail is reported to Board
3.4	Landlords must make their complaint policy available in a clear and accessible format for all residents. This will detail the two-stage process, what will happen at each stage, and the timeframes for responding. The policy must also be published on the landlord's website.	Yes	Complaints Policy, North Star website	A leaflet setting out how the requirements of 3.4 is available on the website and a clear and simple poster with QR code link is displayed at supported housing schemes and in reception areas. The Complaints Policy is published on the complaints page of the North Star website and has a tool that enables translation, and access to a range of tools to provide support to people who have audio or visual needs. This meets the requirements of the Equality Act 2010
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	Sections 5 and 11 of the Complaints Policy	The policy sets out how we will publicise details of the complaints policy on the website, in the tenants' newsletter, leaflets, social media and at every supported housing service. The policy contains information about the HOS with its address and its website. Details on the Housing Ombudsman service are provided in all complaint's correspondence.
3.6	representative deal with their complaint on their behalf, and to be represented or accompanied at any meeting with the landlord.	Yes	Section 6 of the Complaints Policy	The policy states that a customer can have a representative to deal with their complaint on their behalf.
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	Sections 5 and 11 of Complaints Policy Website	The policy contains the Housing Ombudsman contact details, and all complaints correspondence informs the customer that they can contact the Housing Ombudsman for help and advice at any point during the complaints process.

Section 4: Compliant 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	The Head of Service is the "complaints officer"	The Director of Customers has overall responsibility for complaint handling, liaising with the Ombudsman and ensuring complaints are reported to the Board.
4.2	The complaints officer must have access to staff at all levels to facilitate the prompt resolution of complaints. They must also have the authority and autonomy to act to resolve disputes promptly and fairly.	Yes	Complaints records	The Director of Customers is highly experienced in handling complaints and has access to staff at all levels to ensure complaints are responded to in a timely manner. Service Managers dealing with complaints are experienced and are developed to deliver excellent customer service whilst also having the autonomy and authority to resolve complaints quickly and award compensation where appropriate.
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	Training records Complaints reporting to Board	The Director of Customers meets every six weeks with Service Managers to discuss any performance issues, emerging trends/patterns, and agree the action required and a timescale. The learning is shared across teams. Quarterly reporting to Board covers learning and actions from complaint handling. All staff receive complaints training every two years with the customer services team (CST) receiving more frequent training on service requests and complaints. Complaints training for CST was last carried out 12 th December 2023. Training for complaint investigation carried out March 2023.

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	Complaints Policy	North Star has a single complaints policy and procedure for all complaints.
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	Complaints Policy Complaints and Service request records on the system	North Star has a two-stage complaint process as per the Complaints Handling Code. Service requests are monitored to ensure that they are not used to prevent issues progressing to complaints.
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	Complaints Policy	North Star has a two-stage complaint process as per the Complaints Handling Code.
5.4	Where a landlord's complaint response is handled by a third party (e.g. a contractor or independent adjudicator) at any stage, it must form part of the two stage complaints process set out in this Code. Residents must not be expected to go through two complaints processes.	Yes	Complaints Policy Complaints records	All complaints are handled by North Star managers and if input from a third party i.e., contractor is required, this will be included in the managers investigation and completed within North Stars two stage complaints process. Customers would not need to go through the contractors' complaints process.
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Yes	Complaints Policy	Complaints are handled by a North Star manager and not passed to third parties to handle the complaint.
5.6	When a complaint is at Stage 1 or 2 landlords must set out their understanding of the complaint and the outcomes the resident is seeking.	Yes	Section 11 of the Complaints Policy	Staff are trained to clarify what the complaint is about and the outcome that is being sought. Managers handling the complaint will contact the resident to discuss the complaint and the outcome they are seeking.
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	Acknowledgement letters Section 8 of the Complaints Policy	Acknowledgement letters clarify the complaint and any areas that North Star is not responsible for would be stated. If the whole complaint was for a service not provided by North Star, the resident would be informed in writing as per Section 8 of the Complaints Policy.
5.8	At each stage of the complaints process, complaint handlers must: a. deal with complaints on their merits, act independently, and have an open <u>mind</u> ; b. give the resident a fair chance to set out their <u>position</u> ; c. take measures to address any actual or perceived conflict of interest; and d. consider all relevant information and evidence carefully.	Yes	Sections 10 and 11 of the Complaints Policy	Managers and Directors of North Star have developed a framework in which complaints will be managed. This covers expectations, behaviours and stresses the importance of effective resolution and learning. At each stage of complaints handling, the manager will contact the customer to discuss the complaint and the outcome the customer is seeking and record this. Managers will handle complaints fairly and consider information and evidence carefully. Any actual/perceived conflict of interest will be discussed with the Complaints Officer and allocated to an alternative manager if appropriate.
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	Section 11 of the Complaints Policy	The policy states that the resident must be contacted to agree any extension to the timescales and agree intervals to keep them informed of progress.
5.10	Landlords must make reasonable adjustments for residents where appropriate under the Equality Act 2010. Landlords must keep a record of any reasonable adjustments agreed, as well as a record of any disabilities a resident has disclosed. Any agreed reasonable adjustments must be kept under active review.	Yes	Section 15 of the Complaints Policy. Housing System Tenancy records	The policy states that North Star will provide any necessary adjustment possible such as interpreter, large print, extra time to respond and additional support as required. This will be noted on the complaints record and the housing system can record any disability the resident discloses. A review date can be added as a prompt to review this data.
5.11	Landlords must not refuse to escalate a complaint through all stages of the complaints procedure unless it has valid reasons to do so. Landlords must clearly set out these reasons, and they must comply with the provisions set out in section 2 of this Code.	Yes	Section 8 of the Complaints Policy	The policy states the exceptional reasons for not accepting or escalating a complaint for both stages of the complaints process.
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	Individual complaints records recorded on the Complaints section of the Housing system.	A new housing system was implemented in 2023 which includes a complaints module. Full complaints records are recorded linked to the tenants' records and includes relevant dates, supporting documents, letters, and outcomes.

Section 5: The Complaint Handling Process

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	Complaints Policy Compensation and Remedy Policy	The policy and staff training focuses on complaint resolution at any stage of the process from taking a service request to a stage two complaint. Resolving the issue is the priority.
5.14	Landlords must have policies and procedures in place for managing unacceptable behaviour from residents and/or their representatives. Landlords must be able to evidence reasons for putting any restrictions in place and must keep restrictions under regular review.	Yes	Unreasonable Customer Behaviour and Persistent Complaints Policy	North Star has an Unreasonable Customer Behaviour and Persistent Complaints Policy to manage any unacceptable behaviour from customers or their representatives. Para 4.3 of the policy states review periods will be provided to the tenant.
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	Unreasonable Customer Behaviour and Persistent Complaints Policy	The Unreasonable Customer Behaviour and Persistent Complaints Policy has a section on equality and has regard for the Equality Act 2010.

Section 6: Complaint 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	Section 11 of the Complaints Policy	When a manager receives a complaint that is complex and identifies that it will take longer than the 10 working days to respond, we will inform the customer at the earliest opportunity to agree a revised timescale with the customer. This action is recorded on the complaints record and the target date adjusted on the system.
6.2	Complaints must be acknowledged, defined and logged at stage 1 of the complaints procedure within five working days of the complaint being received.	Yes	Section 11 of the Complaints Policy	Complaints are logged onto the system and acknowledged within two working days. This is recorded and assurance obtained through regular reports.
6.3	Landlords must issue a full response to stage 1 complaints within 10 working days of the complaint being acknowledged.	Yes	Section 11 of the Complaints Policy Complaints system records	All final response letters are recorded on the system. If a response cannot be made within 10 days this is discussed with the customer. Assurance is obtained through regular reports. Training on the new code was completed in March 2024. Response times will be an area of focus.
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	Section 11 of the Complaints Policy Complaints system records	The policy states that any extensions must be explained and agreed with the customer. This is recorded on the complaints system. Any extension beyond a further 10 days must be approved by a Director/Head of Service and must have good reason that has been explained and agreed with the customer. This would only happen in complex cases.
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	Section 11 of the Complaints Policy Complaints system records	All complaints correspondence and leaflets have a paragraph informing the customers of their right to contact the Housing Ombudsman and include the link to the HOS website.
6.6	A complaint response must be provided to the resident when the answer to the complaint is known, not when the outstanding actions required to address the issue are completed. Outstanding actions must still be tracked and actioned promptly with appropriate updates provided to the resident.	Yes	Section 11 of the Complaints Policy Complaints system records	The policy states this and any outstanding actions should be entered as tasks on the complaint record on the system and followed up to ensure the actions/work have been completed.
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	Section 11 of the Complaints Policy	The Complaints Policy states that all issues raised will be investigated and responded to separately within the investigation and in the final response letter.
6.8	Where residents raise additional complaints during the investigation, these must be incorporated into the stage 1 response if they are related and the stage 1 response has not been issued. Where the stage 1 response has been issued, the new issues are unrelated to the issues already being investigated or it would unreasonably delay the response, the new issues must be logged as a new complaint.	Yes	Section 11 of the Complaints Policy	The policy states where additional complaints are raised during the stage one investigation, they will be incorporated within the complaint response if they are related. If the response has been issued or it would unreasonably delay the response or its unrelated then they are recorded as a new complaint.
6.9	Landlords must confirm the following in writing to the resident at the completion of stage 1 in clear, plain language: a. the complaint stage; b. the complaint definition; c. the decision on the complaint; d. the reasons for any decisions made; e. the details of any remedy offered to put things right; f. details of any outstanding actions; and g. details of how to escalate the matter to stage 2 if the individual is not satisfied with the response.	Yes	Section 11 of the Complaints Policy	These are listed in the stage 1 guidance of the policy

Section 6: Complaint Stages

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	Section 11 of the Complaints Policy	The stage one final response letter provides escalation details should they remain dissatisfied with the stage one outcome. Stage two is the final stage in North Star's Complaints Policy.
6.11	Requests for stage 2 must be acknowledged, defined and logged at stage 2 of the <u>complaints</u> procedure within five working days of the escalation request being received.	Yes	Section 11 of the Complaints Policy	North Star's policy is to record and acknowledge receipt of a stage two complaint within two working days and within the guidance set out in the Complaint Handling Code.
6.12	Residents must not be required to explain their reasons for requesting a stage 2 consideration. Landlords are expected to make reasonable efforts to understand why a resident remains unhappy as part of its stage 2 response.	Yes	Section 11 of the Complaints Policy	The policy asks officers to understand the issues the customer is unhappy about and the outcomes they are seeking but we would not refuse to escalate to stage two if they did not give this to us. Saying they are unhappy with the outcome and that they want to escalate to next stage is sufficient to progress to stage two.
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Yes	Section 11 of the Complaints Policy	The policy states that it will be considered by a Head of Service, Director or Executive Director that has not been involved in the stage one investigation.
6.14	Landlords must issue a final response to the stage 2 within 20 working days of the complaint being acknowledged.	Yes	Section 11 of the Complaints Policy	North Star's policy is to investigate and respond to a stage two complaint within 10 working days therefore within the guidance set out in the Complaint Handling Code.
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	Section 11 of the Complaints Policy	North Star's policy states that an extension of 10 working days can be agreed with the customer if the review cannot be concluded within the initial timescale. We are therefore within the timescale set out with the Complaint Handling Code of an additional 20 working days.
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	Section 11 of the Complaints Policy	The acknowledgement letter for a stage two complaint includes the Housing Ombudsman's contact details and the customer's rights to contact them for advice at any stage of the landlord's complaints process. It also contains the HOS website link.
6.17	A complaint response must be provided to the resident when the answer to the complaint is known, not when the outstanding actions required to address the issue are completed. Outstanding actions must still be tracked and actioned promptly with appropriate updates provided to the resident.	Yes	Section 11 of the Complaints Policy	This applies to both stages in the complaints procedure and is stated in the policy. As per 6.6 above, actions are tracked using the complaints system.
6.18	Landlords must address all points raised in the complaint definition and provide clear reasons for any decisions, referencing the relevant policy, <u>law and good practice where appropriate</u> .	Yes	Section 11 of the Complaints Policy	The Complaints Policy states that all issues under a complaint will be investigated and responded to separately within the investigation and in the final response letter.
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 <u>complaint</u> ; d. the reasons for any decisions <u>made</u> ; e. the details of any remedy offered to put things <u>right</u> ; f. details of any outstanding actions; and g. details of how to escalate the matter to the Ombudsman Service if the individual remains dissatisfied.		Section 11 of the Complaints Policy	These are listed in the stage two guidance of the policy.
6.20	Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.	Yes	Section 11 of Complaints Policy	The stage two review will be completed by a Head of Service, Director or Executive Director and will involve relevant staff needed to make a final response. The relevant Executive Director has oversight of the stage two process and the final response.

Section 7: Putting things right

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
7.1	Where something has gone wrong a landlord must acknowledge this and set out the actions it has already taken, or intends to take, to put things right. These can include: <ul style="list-style-type: none"> • <u>Apologising</u>; • Acknowledging where things have gone <u>wrong</u>; • Providing an explanation, assistance or <u>reasons</u>; • Taking action if there has been <u>delay</u>; • Reconsidering or changing a <u>decision</u>; • Amending a record or adding a correction or <u>addendum</u>; • Providing a financial <u>remedy</u>; • Changing policies, <u>procedures</u> or practices. 	Yes	Complaints Policy	This is covered in the expected responses in the stage one or two outcome letters. Our focus is to put things right to the satisfaction of the customer. Letters will include an apology when something has gone wrong and set out the actions to remedy this and include any financial compensation. Any change in policies and procedures will also be recorded on the complaints system for follow up action.
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Yes	Complaints policy Compensation and Remedy Policy Repairs Handbook	A remedy will be agreed with the customer and will reflect the impact on the customer. Any compensation/remedy will be awarded in line with the Compensation and Remedy Policy.
7.3	The remedy offer must clearly set out what will happen and by when, in agreement with the resident where appropriate. Any remedy proposed must be followed through to completion.	Yes	Complaints policy Compensation and Remedy Policy	Remedies are discussed and agreed with the customer prior to the response letter being sent. The response letter will give details of remedies and dates/amounts/work agreed. Any outstanding works will be recorded on the system and a task raised to ensure completion is followed through.
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes	Complaints and Remedy Policy	The latest guidance from the Ombudsman is reflected in our <u>policy</u>

Section 8: Self-assessment, reporting and compliance

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
8.1	Landlords must produce an annual complaints performance and service improvement report for scrutiny and challenge, which must include: <ol style="list-style-type: none"> a. the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements; b. a qualitative and quantitative analysis of the landlord's complaint handling performance. This must also include a summary of the types of complaints the landlord has refused to accept; c. any findings of non-compliance with this Code by the Ombudsman; d. the service improvements made as a result of the learning from complaints; e. any annual report about the landlord's performance from the Ombudsman; and f. any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord. 	Yes	Annual Complaints Performance and Service Improvement Report 2023-24 Complaint Handling Code Self-Assessment 2024 Board Performance Reports Website	This is a new requirement of the code. The Annual Complaints and Service Improvements report will be reported to Board on 17 th June 2024. The self-assessment for April 2024 was approved by Board on 18 th March 2024 and published on the website. An updated version is included in the report with an update to sections 8 and 9, now the annual report has been produced. In previous years we have completed the annual self-assessment against the Complaint Handling Code, and this has been reported to Board and published on the website for customers/stakeholders. Complaints are reported quarterly to Board on numbers and outcomes along with actions taken to resolve themes in complaints. The Annual Complaints Performance and Service Improvement report will be published following the Board meeting along with Boards response on North Stars website and submitted to the HO by 30 th June 2024. The report will also be shared with the Tenants Performance Group.
8.2	The annual complaints performance and service improvement report must be reported to the landlord's governing body (or equivalent) and published on the on the section of its website relating to complaints. The governing body's response to the report must be published alongside this.	Yes	The report will be brought to Board in June 2024	The report will cover all relevant expectations defined in the code. Report including response by responsible Board member to be published on website by 30 th June 2024.
8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	N/A		
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	N/A		
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.	N/A		

Section 9: Scrutiny & oversight

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	Recorded on the Complaints system	Managers cannot close a complaint on the system unless they input any service improvements/actions to be taken. This is included in a monitoring report to the Head of Service and shared with Managers
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	Recorded on complaints system	Monthly reports are produced for the Complaints Lead with details of complaints by department, type, and contractor. Director of Customers regularly meets with Customer Services Team to understand data/intelligence from front line services. Regular meetings are held between Director of Customers and relevant service managers who manage stage one complaints to identify any issues and trends to make positive changes and share best practice and learning. Quarterly updates are shared with Board and SMT. These include actions taken to address emerging issues and changes to service delivery. The Complaints and Performance co-ordinator meets with contractors on a weekly basis to discuss complaints, share best practice and identify any learning to improve service delivery.
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	Annual Complaints Performance and Service Improvements Report 2023-24 Board Performance Reports	Quarterly and annual Performance reports to Board give a summary of complaints with comments on complaints issues by service area and learning and improvements. Information is also shared in the tenant newsletter, and on the website. The Tenants Performance Group receive quarterly information on complaints and actions taken to improve.
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		Complaints handling performance comes under the remit of the Executive Director of Customers. All Heads of Service/ Directors take responsibility for actioning any systemic issues, risks and changes to policy that arise.
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	Board volunteers have been sought	The MRC is Nicki Clark and was appointed in March 2024.
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		The appointed member, Nicki Clark has access to the appropriate staff and will ensure that the governing body received regular information on complaints.
9.7	As a minimum, the MRC and the governing body (or equivalent) must receive: a. regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance; b. regular reviews of issues and trends arising from complaint handling; c. regular updates on the outcomes of the Ombudsman's investigations and progress made in complying with orders related to severe maladministration findings; and d. annual complaints performance and service improvement report.	Yes	Annual Complaints Performance and Service Improvement Report Board Performance report	Quarterly Performance reports to Board give a summary of complaints with comments on complaints issues by service area which will include any learning and improvements. Any Housing Ombudsman investigations concluded are also reported in the quarterly performance reports. North Star has had one investigation since 2020 and the outcome was reported to Board in the quarter 3 Performance Report 2023-24. The Annual Complaints performance and service Improvements report will go to Board in June 2024.
9.8	Landlords must have a standard objective in relation to complaint handling for all relevant employees or third parties that reflects the need to: a. have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments; b. take collective responsibility for any shortfalls identified through complaints, rather than blaming others; and c. act within the professional standards for engaging with complaints as set by any relevant professional body.	Yes	Section 3 of the Complaints Policy	These standard objectives have been incorporated into our principles for complaint handling.

North Star Housing

Endeavour House
St Marks Court
Thornaby
Stockton-on-Tees
TS17 6QN

w: customer.services@northstarhg.co.uk

t: 03000 11 00 11

