

POLICY	Complaints and Customer Feedback
Date Adopted	July 2018
Date of Next Review	Not later than July 2021
Version	1.0
Responsible Officer	Company Secretary

1. Introduction

- 1.1 The Housing Plus Group (HPG) encourages all kinds of feedback. We use your feedback to help us understand what we do well and where things go wrong, so that we can learn and improve our services.
- 1.2 This policy is to ensure that we are consistent and fair and that complainants are listened to. We want to resolve complaints as quickly as possible and put right, where possible, what has gone wrong. We use complaints and feedback of any kind to prevent similar issues happening again and to improve our services.

2. What is a complaint

- 2.1 For the purposes of this policy, a complaint is defined as ‘an expression of concern or dissatisfaction, however made, which requires a response and is about something over which we, as a company, have direct control’.
- 2.2 Complaints, service queries and compliments can be made by anyone who receives a service from a Housing Plus Group member organisation or from a contractor used by the organisation to deliver a service to our customers.

3. How we manage complaints

- 3.1 When something has gone wrong, we will do all we can to resolve the issue straight away. If we cannot resolve the issue there and then due to its complexity, with the agreement of the complainant, we will raise a formal complaint.
- 3.2 We will accept complaints in any way the complainant wishes, for example by telephone, letter or email.
- 3.3 We understand that at times, a complainant may need the support of an advocate or may wish to appoint another person to act on their behalf. Where this is the case, we must receive or hold signed authority from the complainant in order to communicate with the complainant’s appointed advocate.
- 3.4 If a complainant requires any additional help in making a complaint we will provide help and support or, if preferred, complainants can seek assistance through external agencies, for example Citizens Advice.

4. Complaints not covered by this policy

- 4.1 Not every matter can be covered by the complaints policy and matters set out below are not an exhaustive list but are examples of when the policy **will not** apply.
- 4.2 If there is another appeal process already in place, (for example, the ending of a probationary tenancy). This would also apply if the matter relates to an insurance claim or if there are legal proceedings relating to it.
- 4.3 Problems between a complainant and a neighbour, or someone living close to the complainant, will be dealt with in accordance with our Anti-social behaviour policy.
- 4.4 Should a matter be raised by a Local Councillor, or Member of Parliament, this will be managed by a separate process and not through the complaints procedure.
- 4.5 If a complaint is received, with only minor differences to one that has been raised before and which has exhausted the complaints process, subject to the exercise of discretion, we will advise that the matter is closed.
- 4.6 If the complaint is about an issue that took place more than 12 months' ago.
- 4.7 We may refuse a complaint, at our absolute discretion, if, in our reasonable opinion, it is considered to be unreasonable. In this case, we will write to the complainant to explain the reasons why. In certain circumstances, usually linked to the raising of serial complaints, a complainant may be deemed to be vexatious, in which case, the complainant will be advised of the position and their complaint and any subsequent complaints, at the absolute discretion of the business, may be rejected.
- 4.8 If a complaint is a service query, it will not be taken through the formal process until we have tried to resolve the matter. This will be done at the first point of contact.
- 4.9 If a complaint is primarily about the behaviour, or conduct, of a member of staff, as appropriate at the absolute discretion of management, the matter will be dealt with through our internal human resources management arrangements in addition to and contemporaneously with the formal complaints process wherever possible.

5. How we will handle a complaint

- 5.1 If an issue cannot be addressed to the complainant's satisfaction on initial contact, then the formal complaint process will begin. The service standard timescales linked to the formal process are attached at Appendix 1.

- 5.2 **Stage One** – The allocated complaint investigator will look into the complaint and contact the complainant to understand the complainant’s expectations and propose a resolution within agreed timescales. If the complainant is dis-satisfied with the stage one response, they can ask for the matter to be reviewed again.
- 5.3 **Stage Two** - A Senior Manager will review the Stage One investigation and advise the complainant of their findings. If the complainant is dis-satisfied with the stage two response, they can ask for the matter to be reviewed again.
- 5.4 **Stage Three** – The complaint will be considered by a Panel, comprising three members, drawn from the Boards within the Housing Plus Group and customers serving on the Scrutiny Panel.
- 5.4.1 Complainants will be encouraged to attend Panel hearings and may be accompanied by one supporter who may be their nominated advocate. Panel hearings will be administered by members of the Legal Team or other allocated Housing Plus staff.
- 5.4.2 The Panel will review the information relating to the complaint and constructively challenge both sides in order to reach a final decision. The Panel has authority to make whatever investigations and decisions its members consider appropriate within the policy framework of the organisation in order to understand and resolve the complaint.
- 5.4.3 The complainant will be advised in writing of the Panel’s decision.
- 5.5 **Please note** that we may, under exceptional circumstances, at senior management’s absolute discretion, refuse to escalate a complaint to the next level, if the resolution required by the complainant, in the reasonable opinion of HPG management, is outside of the remit or responsibility of HPG, or is considered excessive given the service failure. In those circumstances the complaint process will be treated as having been ended and the complainant will be advised accordingly. This will be explained fully, in writing, to the complainant including via any nominated advocate or representative as appropriate.
- 6. Housing Ombudsman, Designated Person and Care Quality Commission (CQC)**
- 6.1 Once a Stage Three decision has been provided, as we will have exhausted our complaints process, we consider this brings the complaint to an end. If a complainant remains dis-satisfied with the outcome, they will be advised that they can take their case to the Housing Ombudsman, either independently, or seek resolution with the assistance of a designated person (usually a Councillor or Member of Parliament), or the CQC if the complaint is related to the provision of Care.

- 6.2 We will co-operate with the Housing Ombudsman/Designated Person and CQC as required (i.e. responding to requests for information, or explaining decisions). It should be noted that the Housing Ombudsman and CQC operate their own timescales and targets for responding to queries and we will respond as required within these.

7. Learning lessons from complaints

- 7.1 To learn from mistakes and continually improve, we review the type of complaints we receive to identify any trends and decide what action is to be taken to improve the service. This helps prevent similar issues recurring. The Boards within HPG maintain general oversight of complaints, assisted by the Customer Panel as appropriate.

8. Learning from positive customer feedback

- 8.1 Anyone who has a relationship with Housing Plus Group can also compliment a member of staff, a team, or the organisation. Compliments are used to identify areas of good practice and learn from them. Compliments can be submitted in person, by telephone, letter, email, or social media.

9. Consultation and Customer Engagement

- 9.1 The Customer Panel has led on developing this policy.

10. Regulation

- 10.1 The Regulator for Social Housing requires the Housing Plus Group to have a Complaint Policy and to be members of the Independent Housing Ombudsman Service. The Care Quality Commission, the Regulator for the Care sector, expects care service providers to have an appropriate complaints process in place.

11. Links to Other Policies, Procedures or Documents

- 11.1 The following policies are linked to the Complaints Policy: Safeguarding, Data Protection, Unacceptable Behaviours and Actions, Access to Services policy.

Appendix 1

Complaint Timescales

Level 1

Complaint received. This should be **acknowledged within 2 working days**. Investigator should then contact complainant to get further information in relation to the complaint and to understand the outcomes the complainant is looking for.

A response letter should be sent within ten working days. If it is anticipated that there will be a delay in providing a response, in exceptional cases, a holding letter will be sent advising of a new response date.

Complainants are advised that they have 28 calendar days in which to respond if they wish to escalate their complaint (within stage one letter) to the next level.

Level 2

Complaint received. This should be **acknowledged within 2 working days**.

The complaint will be passed to the investigating officer's manager, either a Head of Service or Assistant Director and the Director from the business area will be copied into the allocation of the complaint.

The Senior manager will contact the complainant to get further information in relation to the complaint in order to understand the outcomes the complainant is looking for.

A response letter will be sent within ten working days, a copy being sent to the director for the area. If it is anticipated that the senior manager cannot reply within this time they will arrange for a holding letter to be sent advising the complainant of the reason for the delay and the revised response date; simultaneously, the director for the area will be informed of the delay.

Complainants are advised that they have 28 calendar days in which to respond if they wish to escalate their complaint to the next stage (within stage two response letter).

Level 3

If a complainant advises that they wish to escalate their complaint to a level 3 Complaint, the complainant will be contacted by telephone within **two working days** of receipt of the escalation request. The purpose of this contact call is to clarify reasons why the complainant wishes to escalate the complaint and outline to the complainant what happens next.

Written confirmation of the telephone call will be sent to the complainant and will enclose a Stage 3 form which the complainant needs to complete and return within 28 calendar days of receipt.

On receipt of the completed form, a Director will decide within ten working days whether to arrange a Panel hearing to review the complaint.

a) If the Panel hearing is to go ahead we will:

- Arrange and hold a Panel hearing within 30 working days of receiving the completed Stage 3 form.
- Invite the complainant to attend along with their advocate or someone to support them if desired
- Provide all relevant paperwork to the Panel and the complainant
- At the conclusion of the Panel hearing, we will write to the complainant with the Panel decision within ten working days of the date of the Panel hearing

b) If it is decided that a Panel hearing will not proceed (usually where our policies and procedures HAVE been complied with, and it is considered that a Panel hearing would not change past decisions) we will contact the complainant to explain the position within ten working days of receiving the Stage 3 Form.

When the complainant has been advised of the outcome of the Stage 3 process, although the complaint at this stage will have exhausted our internal complaints process, we will advise the complainant what the next options are should they remain dis-satisfied with the outcome: namely the complainant can contact:

- If it is a housing related matter - a designated person or the Housing Ombudsman; or
- If it is a care related matter - the Care Quality Commission.