

# Customer Feedback Policy

*Compliments, Comments, Complaints & Unreasonable Behaviour.*

<b>Policy Name</b>	<b>Customer Feedback Policy</b> <i>Compliments, Comments, Complaints &amp; Unreasonable Behaviour.</i>
<b>Effective Date(s)</b>	1 <sup>st</sup> September 2020
<b>Approved By</b>	
<b>Approval Date</b>	
<b>Policy Owner/Dept</b>	Paula Marshall – Director Customer Contact & Experience
<b>Policy Author</b>	Tracey Price - Head of Customer Insight & Experience
<b>Review Date</b>	July 2021
<b>Policy Framework Ref</b>	TBC
<b>Version Number</b>	V1

Your Housing Group Strategic Theme			
<b>Operational Excellence</b>	<input type="checkbox"/>	<b>Customer Experience</b>	<input checked="" type="checkbox"/>
<b>Growth and Financial Strength</b>	<input type="checkbox"/>	<b>People and Culture</b>	<input type="checkbox"/>

<b>Relevant National Standards or Regulation</b>	<p>Please State if the Policy aligns to any of the Regulators Standards:</p> <ul style="list-style-type: none"> <li>• Home Standard</li> <li>• <a href="#">Tenancy Standard - Complaints</a></li> <li>• <a href="#">Tenant Involvement &amp; Empowerment Standard</a></li> <li>• <a href="#">The Social Housing 'Green Paper'</a></li> <li>• <a href="#">Ombudsman Response To 'A New Deal For Social Housing' Green Paper</a></li> <li>• <a href="#">Housing Ombudsman Service (HOS)</a></li> <li>• <a href="#">HOS - Guidance For Landlords - Responding To Complaints</a></li> </ul>
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<b>Relevant Legislation</b>	<p>Please list any legislation applicable to the Policy; (e.g. Welfare Reform and Work Act; Equality Act 2010 etc.)</p> <ul style="list-style-type: none"> <li>• <a href="#">Housing Act 1996</a></li> <li>• <a href="#">Housing &amp; Regeneration Act 2018</a></li> <li>• <a href="#">Data Protection Act 2018</a></li> <li>• <a href="#">General Data Protection Regulation (GDPR)</a></li> <li>• <a href="#">Equality Act 2010</a></li> </ul>
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## 1. INTRODUCTION

Your Housing Group (YHG) is committed to consistently provide an excellent service to all our customers. We value all customer feedback about our services, whether a compliment, comment, suggestion or a complaint and use it to continually improve our services.

We hope there will be times when we exceed customer expectations and they want to share the positive experience they have had with us. We are always pleased to receive positive comments as it is useful for us to know when we have done a good job so that we can promote good practice throughout our organization and give credit to our people where credit is due.

However, we recognise that there are times when things don't go as well as we, or our customers would like, or when our service fails to meet the high standards we have set and when that happens we need to know about it, so we can take steps to 'put it right'. To support this, we have a mechanism in place to enable customers to provide Compliments, Comments & Suggestions or to raise a Complaint for a service we have provided.

## 2. PURPOSE

The purpose of this policy is to set out the Group's approach to dealing with customer feedback whether suggestions, complaints or compliments that are reported to Your Housing Group.

## 3. LEGISLATIVE & REGULATORY REQUIREMENTS

The Tenant Involvement & Empowerment Standard, set by the Regulator of Social Housing, specifies that registered providers shall:

- A. **PROVIDE CHOICES**, information and communication that is appropriate to the diverse needs of their tenants in the delivery of all standards
- B. **HAVE AN APPROACH TO COMPLAINTS** that is clear, simple and accessible that ensures that complaints are resolved promptly, politely and fairly.
- C. **MEET SPECIFIC EXPECTATIONS**. Registered providers shall publish information about complaints each year, including their number and nature, and the outcome of the complaints. Providers shall accept complaints made by advocates authorised to act on a tenant's/tenants' behalf.

The Housing Ombudsman Service (HOS) have outlined 3 guiding principles when dealing with complaints:

1. **Be Fair**
2. **Put things right**
3. **Learn from outcomes**

The Housing Act 1996 mandates we have to provide tenants a scheme for the investigation of their complaints to the Housing Ombudsman Service.

## 4. AIMS OF THE POLICY

- Deal with all customer feedback in strictest confidence.
- Offer a range of ways for customers to make a compliment, comment or complaint.
- Deal with all feedback fairly, honestly, consistently and appropriately.
- Recognise that all customers have a right to be heard, understood and respected.
- Keep customers informed throughout, use plain language and be open and transparent.
- Record and analyse all feedback.
- Identify opportunities for improvements and learning from where things have gone wrong.

## 5. WHO THIS POLICY COVERS

The policy covers all Your Housing Group's customers, including tenants, leaseholders and Right to Buy freeholders and complaints made by advocates authorised to act on a tenant/tenants' behalf. In exceptional circumstances, the policy may also apply to non-customers, subject to discretion. This policy applies to all staff and any member of staff responsible for managing a service must ensure they are familiar with this policy.

## 6. DEFINITIONS

### 6.1. Compliments, Comments & Suggestions:

A **compliment** is a polite expression of praise, admiration or gratitude about a service, contractor or member of staff. It's great when customers let us know what we are doing well, as we can learn and share best practice across YHG.

A **comment** or **suggestion** is a remark expressing an opinion, reaction or an idea for consideration, or negative feedback following an interaction. We have a strong reputation around involving our customers in shaping services and improving neighbourhoods. We value customer views and understand; our customers are at the heart of everything we do.

### 6.2. Complaints

A **complaint** is defined as "an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by us, our staff, or those acting on our behalf, affecting an individual resident or group of residents".

Complaints will not be considered for:

- Issues raised more than six months after the relevant events (unless it is an on-going issue YHG is aware of).
- Cases where a final decision has been made and no further appeal is possible.
- Cases where legal action is already being taken.
- Issues that have been reported to the Customer Services Team (not as a formal complaint) and are currently in progress of being resolved.
- Housing Benefit issues.
- Anti-Social Behaviour complaints which are investigated by the Housing Team and reported separately. *(unless the complaint is regarding a breach of the ASB policy or process).*
- Complaints regarding staff, if misconduct is discovered as a result of any investigation under this Policy, the Group's disciplinary procedure will be followed, this means the complainant would not be advised of the outcome under the Data Protection Act.

**This list is not exhaustive.**

Data Protection issues, including breaches under General Data Protection Regulations or relating to Subject Access Requests. These are handled under a separate process, investigated by the Data Protection Lead and reported separately.

## 7. HOW TO CONTACT US

We have a variety of ways to enable customers to provide us with their views or feedback;

- **Online** – via our Your Home HUB customer portal, or by completing our online form.
- **Mail** – by writing to us at Your Response, PO Box 593, Preston, PR2 2WU.
- **Telephone** - By calling Your Response on 0345 345 0272.
- **Face to face** – e.g. in person, to a member of staff or at one of our offices if you need assistance in raising your complaints.
- **EMAIL** – [Complaints@yourhousinggroup.co.uk](mailto:Complaints@yourhousinggroup.co.uk)

## 8. OUR COMPLAINT STAGES

### 8.1. 'Put things right' - *Informal Stage*

If you aren't happy with the service you've received our priority is to 'put things right' as quickly as possible. Our first step on receipt of your complaint is to find a quick and effective solution to resolve this within 2 working days.

**Once you raise an informal complaint we will:**

- Aim to resolve and close informal complaints within 2 working days.
- Consider if the complaint needs to move to 'Investigation' Formal Stage 1 if we are unable to resolve it within 2 working days.

### 8.2. 'Investigation' - *Formal Stage 1*

If we are unable to 'put things right' within 2 days or your complaint is more complex, we will conduct an investigation. We aim to resolve formal complaints within 10 working days.

**Upon receipt of your formal complaint we will:**

- Acknowledge receipt of the complaint within 2 working days, detailing the name of the person who will be dealing with the complaint.
- Discuss with you the nature of the complaint & desired outcome.
- Investigate actions required to resolve the complaint and advise of any timescales involved.
- Provide you with a formal response, which could be a letter or email, to briefly outline the nature of your complaint and any further information regarding actions to be taken to 'resolve' your complaint, within 10 working days.
- When we close your complaint, we will provide you with a final formal response, which could be letter or email outlining our investigation and details of how to request a review if you are not satisfied with the outcome.

### 8.3. 'Escalation' - *Formal Stage 2*

If you are not satisfied with the outcome of your complaint after formal 'investigation', you can ask for your complaint to be reviewed. For us to consider any request for escalation, you will need to contact us advising why you believe your complaint remains unresolved and the outcome that you wish to achieve. This will enable us to determine if a further review can be carried out. We aim to resolve complaint escalations within 15 working days.

**Upon receipt of your complaint escalation we will:**

- Assign your complaint to an appropriate senior member of staff who was not involved in the original complaint.
- Complete a further investigation to consider carefully the formal complaint outcome discussed with you.
- Provide you with a resolution to your complaint within 15 working days.
- When we close your complaint, provide you with a formal response, which could be a letter or email. This will briefly outline the reasons for your dissatisfaction and outstanding concerns. It will also detail any investigation or further actions taken and if you remain dissatisfied, details on how to refer your complaint to the Housing Ombudsman.

## 9. AVANTAGE COMPLAINT STAGES

**Stage 1-** Avantage complaint investigated by Scheme Manager/RLS Co-ordinator and acknowledgement within 2 working days – response within 10 working days.

**Stage 2-** Avantage complaint investigated by Operations Manager or RLS Manager - response is 15 working days.

**Stage 3** – Avantage Independent Panel Review - this will be made up of the Avantage Board and a YHG Director

The Panel to be convened within 25 working days with a response 10 days after the review

## 10. HOW WE DEAL WITH OTHER FORMS ENQUIRIES OR COMPLAINTS

### 10.1. MPs and Councillors enquiries

We recognise not all correspondence from MPs or Councillors sent on behalf of their constituents are complaints. They could be enquiries, requests for service or the reporting of a problem and will be treated as such. If the correspondence is deemed to be an official complaint, an acknowledgement letter will be sent to both the MP or Councillor and the complainant. In some circumstances, such as where the complaint is of a particularly sensitive nature, it may be more appropriate to correspond with the complainant directly. Where this is the case we may seek agreement with all relevant parties.

### 10.2. Petitions/Group complaints

Petitions or complaints raised by a group of people are not dealt with through the formal complaints process. These could be enquiries, requests for service or the reporting of a problem and will be treated as such. The YHG Customer Complaints Team will record these and liaise with the relevant Service Manager to determine the most appropriate way to consider and respond to the issue/s raised. Where one person is nominated as a representative, they will be corresponded with. Where this is not determined, all signatories may receive a response, if appropriate.

### 10.3. Anonymous complaints

Anonymous complaints will always be considered where the complainant provides sufficient information to identify the issue of concern. All anonymous complaints by nature precludes any response to the complainant. Anonymous complaints about our service should be sent to the YHG Customer Complaints Team who will record these and liaise with the relevant Service Manager to determine the most appropriate way to consider the point(s) of complaint. In some instances, we may deal with these under separate policies, e.g. YHG's Whistleblowing, Safeguarding, Anti-Fraud or Bribery Policies.

## 11. TIME LIMIT FOR MAKING COMPLAINTS

A complaint will be considered if it is made within 6 months after the point at which the issue became known to the complainant. This is because complaints that involve issues that happened more than six months previously, are often difficult or impossible to investigate in a prompt, full or fair manner. However, the decision whether or not to consider the complaint will be made on a case by case basis. Possible reasons for accepting the complaint, beyond the six-month time limit are:

- The complainant had good reason for not making the complaint within the time limit.
- It is still possible to investigate the complaint effectively and fairly to all parties involved.

## 12. OMBUDSMAN COMPLAINT

If you remain dissatisfied, you can refer your complaint to the Housing Ombudsman. (Approaching the Ombudsman directly can only take place 8 weeks from the time in which a final decision on your complaint has been made by YHG).

There are 2 ways you can do this:

1. Through a 'designated person'. This can be an MP or Local Councillor who may help to resolve the complaint directly or refer the complaint to the Housing Ombudsman on your behalf.
2. Alternatively, you may approach them yourself in writing to: Housing Ombudsman Service, PO Box 152, Liverpool L33 7WQ, or contact them on telephone number 0300 111 3000.

## 13. UNREASONABLE BEHAVIOUR OR DEMANDS

Our aim is to deal with comments, suggestions, complaints or general contacts in an open, fair and impartial way. Staff will respond professionally and sympathetically to all customers and work positively with them to resolve issues and explain the reason for their outcome. There are occasions when there is nothing further that can reasonably be done to rectify a perceived problem, or further assist, and recognise that this or other distressing circumstances can cause a customer to act out of character. However, if a customer because of their actions and behaviour, or nature and frequency of their contacts with us, hinders theirs, or other people's interactions with us, or delays our ability to investigate the complaint, we will consider such behaviour to be unreasonable.

### 13.1. Examples of unreasonable behaviour or demands may include;

- Raising the same issue, complaint or similar complaint many times when this is already being managed through YHG Complaints or other procedure which has already concluded.
- Contentiously raising an issue or complaint without having sufficient grounds, refusing to specify the grounds or having no grounds.
- Constantly introducing new information whilst a complaint is being investigated, which is not significant or relevant.
- Refusing to accept the answer that has been provided, continuing to raise the same subject matter without providing any new evidence, continuously adding to or changing the subject matter of the complaint.
- Refusing to accept the outcome of the complaint process after its conclusion. (although you may have recourse to the Housing Ombudsman)
- Making persistent and unreasonable demands of staff, or the complaints process, or persistent or unreasonable contact by any means for example out of hours telephone calls, overload of letters, calls, emails or contact via social media.
- Verbal abuse, inappropriate language in any format, inclusive of harassment, aggression, violence, this is not just limited to actual physical or verbal abuse but can include derogatory remarks, rudeness, inflammatory allegations and threats of violence.
- Electronically record meetings without prior consent of the other party.
- Social media 'trolling'. Posting inflammatory, offensive, abusive or confidential comments or information online.

**This list is not exhaustive.**

### **13.2. How we will deal with unreasonable behaviour or demands.**

We have to act when unreasonable behaviour impairs the functioning of YHG. We aim to do this in a way that allows a customer to progress through our processes. We will try to ensure that any action we take is the minimum required to solve the problem, considering relevant personal circumstances including the seriousness of the issue or complaint and the needs of the individual. The threat or use of physical violence, verbal abuse or harassment towards our staff is likely to result in a termination of all direct contact with the customer. Incidents may be reported to the police. This will always be the case if physical violence is used or threatened.

We will not accept any correspondence that is abusive to staff or contains allegations that lack substantive evidence. We will tell the customer that we consider their language offensive, unnecessary and unhelpful and ask them to stop using such language. We will state that we will not respond to their correspondence if the action or behaviour continues.

### **13.3. Actions we may take include;**

- Limit contact via telephone calls at set times on set days.
- Request a suitable advocate to be nominated to act on behalf of the customer.
- Restrict contact to a nominated member of staff who will deal with future calls or correspondence from the customer or their nominated advocate.
- Restrict contact from the customer to writing only.
- Return any documents to the customer or, file them and not respond.
- Take any other action that we consider appropriate.
- Where we consider continued correspondence on a wide range of issues to be excessive, we will tell the customer that only those matters within our remit will be considered.
- In exceptional cases, we reserve the right to refuse to consider a complaint or future complaints from an individual.
- We will always formally write to the customer to tell them what actions we are taking and why.
- When and where applicable, we will ensure that all appropriate referrals have been made and correct support is in place for individuals who we propose action against for unreasonable behaviours.

## **14. RESPONSIBILITIES UNDER THIS POLICY**

The Head of Customer Insight & Experience is the responsible Policy Author. The Policy Owner is the Director Customer Contact & Experience. All YHG staff have personal responsibility for their own behaviour in relation to this policy and are responsible for ensuring that their conduct is in line with the standards set out in this policy.

## **15. RISK MANAGEMENT**

There are reputational risks to the business in relation to managing complaints effectively. This policy will operate alongside our Governance, Risk & Assurance Policies in providing a consistent approach to addressing those risks.

Complaints data is reviewed and analysed on a regular basis by the Head of Customer Insight & Experience and actions are taken to address any issues arising. YHG is also committed to learning from our complaints process, and we will ensure that appropriate processes are in place in order to do this.

## **16. DATA PROTECTION, RECORD STORAGE AND RETENTION**

Any complaints reported under this policy will be managed via our housing management systems, Orchard, Service Now and CRM. These systems are GDPR compliant.

This policy considers any issues of data protection in relation to the processing of personal data under GDPR and is compliant with the Data Protection policy.

Complaints relating directly to Data Protection or the potential mishandling of customer data are excluded from this policy and are investigated by the Data Protection Lead in line with YHG's Data Protection Policy and in line with the requirements of Information Commissioners Office.

## **17. EQUALITY AND DIVERSITY**

YHG operates an Equality & Diversity policy, and this applies to all aspects of its services. We will ensure that no customer, resident or service user is treated less favourably on the grounds of age, ethnicity, religion or belief, disability, gender, gender reassignment, sexual orientation, pregnancy or maternity, marriage or civil partnership status. This policy, and all related information, can be made available in different formats and languages on request. This policy complies with the requirements of the Equality Act 2010 and has been Equality Impact Assessed.

## **18. COMMUNICATION**

This policy along with the Customer Feedback Service Standard, is also published on our website, [www.yourhousinggroup.co.uk](http://www.yourhousinggroup.co.uk).

This policy is published on our intranet 'Youngle' for internal staff and is a mandatory read for all staff who manage complaints.

We will publish annual results on the website in line with the regulatory Tenant Involvement & Empowerment Standard. This will include the number and nature of complaints and how we have performed against our key performance indicators.

## **19. LEARNING AND DEVELOPMENT**

This policy along with the Compensation Amounts Procedure – Staff Guidance will form part of the induction process for any new staff who manage complaints and compensation claims. Staff are also briefed on any changes made following the bi-annual review.

## **20. REVIEW OF THIS POLICY**

This policy will be reviewed in July 2021 by the Head of Customer Insight & Experience.



## Related Documents

Document Type	Name
<b>Connected Policies and Procedures</b>	Compensation Policy - <a href="#">Compensation Policy with Compensation Amounts Procedure Staff Guidance</a> Equality & Diversity - <a href="#">Equality Diversity &amp; Inclusion Policy - March 2018</a> ASB Policy - <a href="#">ASB &amp; Hate Crime Policy - July 2017</a> Data Protection Policy – June 2019- <a href="#">Data Protection Policy</a>
<b>Forms and Letters</b>	<a href="#">Complaints Letter Templates and Processes - Staff Intranet - Youggle</a>
<b>Leaflets/Publicity Material</b>	A YHG - SERVICE STANDARD - Customer Feedback is available as part of this policy.
<b>Training Materials Available</b>	To be developed
<b>Intranet/ Website Page</b>	TBC