

# Customer Feedback Policy

<b>Policy Name</b>	<b>Customer Feedback Policy</b> <i>Complaints, Compliments &amp; Managing Unreasonable Behaviour</i>
<b>Effective Date(s)</b>	September 2022
<b>Approved By</b>	Risk & Compliance Group, Customer Services Committee
<b>Approval Date</b>	August 2022
<b>Policy Owner/Dept</b>	Paula Marshall – Director of Housing & Customer Service
<b>Policy Author</b>	Darren Shelley - Head of Customer Service
<b>Review Date</b>	May 2024
<b>Version Number</b>	V1

## Version Control

Version	Date	Changes	Approver
1.1	April 2023	Update to section 7.1 – Service requests.	DS/ELT

Your Housing Group Strategic Priorities			
Safe	<input type="checkbox"/>	Viability	<input type="checkbox"/>
Landlord	<input checked="" type="checkbox"/>	Growth	<input type="checkbox"/>
People	<input type="checkbox"/>	Technology	<input type="checkbox"/>

<b>Relevant Regulation or Legislation</b>	<ul style="list-style-type: none"> <li>• <a href="https://legislation.gov.uk/ukpga/2011/22">Localism Act 2011 (legislation.gov.uk)</a></li> <li>• <a href="https://legislation.gov.uk/ukpga/1996/42">Housing Act 1996 (legislation.gov.uk)</a></li> <li>• <a href="https://publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/671237/Tenant_Involvement_and_Empowerment_Standard.pdf">Tenant Involvement and Empowerment Standard.pdf (publishing.service.gov.uk)</a></li> <li>• <a href="https://legislation.gov.uk/ukpga/2018/12">Data Protection Act 2018 (legislation.gov.uk)</a></li> <li>• <a href="https://legislation.gov.uk/ukpga/2010/154">Equality Act 2010 (legislation.gov.uk)</a></li> <li>• <a href="https://housing-ombudsman.org.uk/">The Housing ombudsman's Complaint Handling Code (housing-ombudsman.org.uk)</a></li> </ul>
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## 1. INTRODUCTION

Your Housing Group (YHG) is committed to consistently provide an excellent service, treating residents fairly and recognising that sometimes things go wrong. We value all resident feedback regarding our services, whether a complaint, compliment, comment, or suggestion and respond

positively and swiftly to all. We aim to put things right first time and take the opportunity to rebuild trust between Your Housing Group and our residents, learning from outcomes and are committed to improving our services.

This policy is in line with the Housing Ombudsman Complaint Handling Code which aims to enable landlords to resolve complaints raised by their residents quickly and to identify and implement learning from complaints to drive service improvements.

## **2. PURPOSE**

The purpose of this policy is to set out the Group's approach to dealing with customer feedback whether complaints, compliments or comments 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:

### **Provide tenants with accessible, relevant and timely information about:**

- how tenants can access services
- the standards of housing services their tenants can expect
- how they are performing against those standards
- the service choices available to tenants, including any additional costs that are relevant to specific choices
- progress of any repairs work
- how tenants can communicate with them and provide feedback
- the responsibilities of the tenant and provider
- arrangements for tenant involvement and scrutiny

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 stipulates all social landlords have a duty to be a member of the Housing Ombudsman Scheme, which allows for the provision of an independent who can investigate complaints made to them when unhappy with the service they have received from their housing association.

## **4. AIMS OF THE POLICY**

- Record and address customer complaints and compliments, offering several different ways for customers to contact us.
- To ensure all complaints are treated fairly, efficiently, and as confidentially as possible, only disclosing information if necessary to properly investigate.
- Ensure customers are aware of how to raise a complaint with YHG and to ensure that customers are regularly kept updated of the progress of their investigation or outstanding actions in plain language.

- Record all feedback, communications, and investigations to allow for analysis and recommended service improvement.
- Identify learning from complaints.

## 5. WHOM THIS POLICY COVERS

The policy covers any customers and will include tenants, residents, leaseholders and freeholders or an advocate authorised to act on their behalf, who has experienced a service delivered by Your Housing Group, or one of its approved partners. This also includes MP's, Councillor's or any other advocate service authorised to act on the customer's behalf. Non-customers may also use the policy should they have been impacted by any decisions or actions taken by Your Housing Group and its contractors, when acting on their behalf.

## 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

The Housing Ombudsman defines a complaint 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:

- A request for service, or query to YHG. For example, where an appointment has not been kept, this would be a query and our team would look to re-arrange the appointment to suit the customer.
- Issues raised more than six months after the relevant events (unless it is an on-going issue YHG is aware of).
- Matters that have previously been considered under this policy and as such exhausted Your Housing Group's complaints procedure.
- Cases where legal proceedings have started, or a final legal decision has been made.
- Housing Benefit issues.
- Reports of Anti-Social Behaviour (unless regarding an alleged breach of ASB policy or process)
- Complaints regarding serious allegations against staff which would be more appropriate to be investigated through the Group's disciplinary procedure. Such outcomes would not be shared with the complainant under GDPR.
- Allegations of Data Breaches or issues relating to Subject Access Requests are managed through GDPR and investigated by Your Housing Group's Data Protection Lead and reported where necessary to the ICO.

**This list is not exhaustive.**

Should Your Housing Group decide not to accept a complaint, a detailed explanation will be provided setting out the reasons why the matter is not suitable for the complaints process and the right to take that decision to the Housing Ombudsman Service.

## 7. HOW TO CONTACT US

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

- **Online** – through our website or via the Your Home HUB customer portal and completing the online form.
- **Mail** – by writing to us at Your Housing Group’s Complaints Department, Youggle House, 130 Birchwood Boulevard, Birchwood, WA3 7QH.
- **Telephone** - By calling Your Response on 0345 345 0272.
- **Face to face** – e.g., in person, to a member of staff or at of our offices if you need assistance in raising your complaints.
- **Email** – [Complaints@yourhousinggroup.co.uk](mailto:Complaints@yourhousinggroup.co.uk)
- **Social Media**- These will be directed through to the Complaints Department to be recorded and actioned accordingly.

We will make our customers aware of our Complaints Policy by publicising in our newsletters and other campaigns, to ensure that customers know how to make a complaint, compliment or raise a query with us.

### 7.1. Service Requests

When a customer makes a service request, they will be contacted within 2 working days to agree how this will be managed.

## 8. OUR COMPLAINT STAGES

### 8.1. Formal Stage 1

A complaint is recorded at Stage 1, should a formal written response be required. In addition, a customer can escalate their complaint should they not be completely happy with the outcome of a previous Informal Complaint. A full investigation will be conducted, and we will aim to provide a written response within 10 working days of the complaint being recorded. On occasion, it may not be possible to provide our response within this time and as such, we will write to the customer to advise of the delay. We will ensure our response is no later than an additional 10 working days.

#### **Upon receipt of a Stage 1 complaint, we will:**

**8.2.** Acknowledge receipt within 5 working days, providing a unique reference number and date for when a response will be received by.

**8.3.** Make contact with the customer via the phone, or their chosen method of communication, to discuss the complaint and desired outcome.

**8.4.** Customers will be treated fairly, empathetically and by the relevant staff member that has authority and autonomy to resolve the dispute quickly.

**8.5.** Investigate in an impartial manner, seeking sufficient, reliable information from all parties, making appropriate recommendations to resolve the complaint, providing realistic timescales and to manage customers’ expectations.

**8.6.** Contact you to discuss the outcome of our investigation.

**8.7.** Confirm in writing the outcome of your complaint within 10 working days, along with any proposed actions, any offers of remedy to put things right and details of how to escalate the matter to the next stage, should you not be happy with the outcome.

Should any actions remain outstanding after the complaint is closed, regular contact will be maintained to ensure these are completed in the timescales we have set.

Once a complaint has been closed at Stage 1, the customer has a maximum of 8 weeks to escalate their complaint to the next stage of the complaints process.

## **9. Formal Stage 2**

If a customer is not happy with the outcome of their complaint, they can ask for it to be reviewed at Stage 2 within 8 weeks of the Stage 1 complaint response. The customer should detail which aspects of the complaint that they remain unhappy with the outcome they are seeking. We aim to resolve Stage 2 complaints within 20 working days. On occasion, it may not be possible to provide our response within this time and as such, we will write to the customer to advise of the delay. We will ensure our response is no later than an additional 10 working days.

### **Upon receipt of your complaint Stage 2 complaint, we will:**

**9.1.** Assign your complaint to an appropriate senior member of staff who was not involved in the original complaint.

**9.2.** Complete a full investigation to the initial complaint and how the Stage 1 was addressed.

**9.3.** Customers will be treated fairly, empathetically and by the relevant staff member that has authority and autonomy to resolve the dispute quickly.

**9.4.** Investigate in an impartial manner, seeking sufficient, reliable information from all parties, making appropriate recommendations to resolve the complaint, providing realistic timescales and manage customers' expectations.

**9.5.** Provide a formal response within 20 working days, which could be a letter or email, which will detail an outline of the complaint, the outcome which may include outstanding actions, any offers of remedy to put things right and details of how to escalate the complaint to the Housing Ombudsman.

## **10. EXECUTIVE COMMUNICATIONS**

All correspondence sent to Your Housing Group Executives will be redirected to the appropriate team to provide a response. Where the communication relates to dissatisfaction, this will be investigated as part of a new complaint or will be included as part of an existing complaint which we are already investigating, in line with this policy.

## **11. AVANTAGE COMPLAINT STAGES**

Avantage is a wholly owned subsidiary of YHG delivering housing management and support services via a private finance initiative agreement in 4 retirement living schemes in Cheshire East and Cheshire West & Chester; Hazelmere, Hollymere, Oakmere, Willowmere, (plus Beechmere when rebuilt)

**Stage 1-** Avantage complaint investigated by Scheme Manager/Retirement Living Scheme (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

## **12. HOW WE DEAL WITH OTHER COMPLAINTS**

### **12.1. Petitions/Group complaints**

Complaints raised by a group of people where there is no nominated lead representative will be recorded and responded to within 10 working days and all signatories where a name and address is provided will receive acknowledgment and response. This will be recorded as a petition and not a formal complaint.

Where a complaint is raised by group of people with a nominated lead, a Stage 1 complaint will be recorded and will follow the formal complaints process. This is line with the Housing Ombudsman’s Guidance on Group Complaints in accordance with paragraph 19 which states there is no provision to consider complaints from groups of residents however a complaint will be accepted should a group complaint have a lead complainant and clearly representing named individuals.

### **12.2. 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 Complaints & Customer Feedback 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.

## **13. TIME LIMIT FOR MAKING COMPLAINTS**

A complaint will only be considered if it is made within 6 months of the initial incident taking place. This is to ensure a thorough investigation can be completed with all relevant notes and documentation.

This decision is made on a case-by-case basis, taking into account individual circumstances and if it is still possible to be able to provide a full investigation.

## **14. OMBUDSMAN COMPLAINT**

Customers can contact the Housing Ombudsman at any stage of their complaint to receive impartial advice.

Should a customer remain dissatisfied with the outcome of their complaint, they can escalate the matter to the Housing Ombudsman after 8 weeks have passed from the date of the final response and up to 2 years after.

The Housing Ombudsman can be contacted via

- their website, <https://www.housing-ombudsman.org.uk/contact-us/>
- by email [info@housing-ombudsman.org.uk](mailto:info@housing-ombudsman.org.uk)
- writing to: Housing Ombudsman Service, PO Box 152, Liverpool, L33 7WQ
- or contact them on telephone number 0300 111 3000.

Alternatively, customers can request a designated person, such as an MP or local councillor, to refer their complaint to the Housing Ombudsman straight away and without the need to wait until 8 weeks has passed from the time of the last response.

## **15. 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.

### **15.1. Examples of unreasonable behaviour or demands may include;**

**This list is not exhaustive.**

- 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.

## **15.2. 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.

## **15.3. 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.

## **16. RESPONSIBILITIES UNDER THIS POLICY**

The Head of Customer Service is the responsible Policy Author. The Policy Owner is the Director Housing & Customer Service. 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.

## **17. 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.



Complaint's data is reviewed and analysed on a regular basis by the Head of Customer Service 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.

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

Any complaints reported under this policy will be managed via our housing management systems, Orchard, 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.

## **19. 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.

## **20. 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.

## **21. 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. They are also briefed on any changes made following the bi-annual review.

## **22. REVIEW OF THIS POLICY**

This policy will be reviewed in July 2024 by the Head of Customer Service.

## Related Documents

Document Type	Name
<b>Connected Policies and Procedures</b>	Compensation Policy - <a href="#">Compensation+Policy+--+Nov+2021 (3).pdf (uconnect.internal)</a> Equality & Diversity - <a href="#">Equality, Diversity and Inclusion Policy - May 2022 - Youggle (interactgo.com)</a> ASB Policy - <a href="#">ASB+and+Hate+Crime+Policy+2022.pdf (uconnect.internal)</a> Data Protection Policy 2022- <a href="#">Data Protection Policy 2022</a>
<b>Leaflets/Publicity Material</b>	A YHG - SERVICE STANDARD - Customer Feedback is available as part of this policy.
<b>Training Materials Available</b>	Complaints Handler Process & Principles Training Guide on Youggle Complaints Handler Training on Helix- in production

## Checklist

(To be completed as far as possible by the Policy Author before submission for quality checking by Research and Policy Manager prior to Risk and Compliance Group)

<b>Policy Name: Customer Feedback Policy</b>	
<b>Version No:</b> V1	<b>Effective Date:</b> September 2022
<b>Status:</b> Full Review	
<b>Previous Policy Name (where appropriate)</b> n/a	
<b>Brief Summary of Changes from Previous Version:</b> Updated with changes to the Housing Ombudsman's Complaint Handling Code, and general review of content in line with latest legislation, roles and responsibilities.	
<b>Internal Consultation Groups:</b>  Equality Impact Assessors Group	<b>Customer Consultation:</b> <input checked="" type="checkbox"/>
	<b>Date of Customer Consultation:</b>
	<b>Customer Consultation Brief Details:</b>  26/05/22 – Customer Focus Group 10/06/22 – Customer Connect Panel
<b>Link to Consultation Document(s):</b>	
<b>Date Initial Equality Impact Assessment Undertaken:</b> 30/06/2022	<b>Equality Impact Assessor name(s):</b> Michelle Morgan
<b>Reason for Decision:</b> Reviewed within past 2 years	
<b>Date Full Equality Impact Assessment Undertaken:</b> n/a	
<b>Brief Outline of any Changes Recommended from EIA:</b> In regard to face to face meetings, suggested that any accessibility issues can be raised and will be accommodated (section 7) and in 8.2 with the outcome, suggest adding that different formats of the outcome can be provided on request.	
<b>Data Protection/ GDPR Implications:</b> <input type="checkbox"/>	
<b>Brief Outline of Data Protection/GDPR Implications:</b>	
<b>Legal Implications:</b> <input type="checkbox"/>	<b>Legal Panel Consulted:</b> <input type="checkbox"/> <b>Date:</b>
<b>Risk Implications:</b> <input type="checkbox"/>	<b>Risk Logged on Datix:</b> <input type="checkbox"/> <b>Date:</b>
<b>Resource Implications</b>	<b>People:</b> <input type="checkbox"/> <b>Finance:</b> <input type="checkbox"/> <b>Asset:</b> <input type="checkbox"/> <b>Other:</b> <input type="checkbox"/>
<b>Brief Summary of how Resource Implications have been addressed:</b>	
<b>How will communication on this Policy take place: (please delete as appropriate)</b> Intranet/ YHG Website/ E-Learning/ Email/ Face to Face Training	
<b>Policy Owner: (Department) Customer Contact &amp; Experience</b>	<b>Policy Author: Darren Shelley – Head of Customer Service</b>
<b>Policy Signed Off by: (service manager or sponsor): Director of Customer Contact &amp; Experience</b>	<b>Date:</b> 30/05/22
<b>Policy Quality Checked by Research and Policy Manager:</b>	<b>Date:</b> 30/05/22
<b>Policy Approved by Risk and Compliance Group:</b>	<b>Date:</b> 12/07/22
<b>Policy Approved by Customer Services Committee:</b>	<b>Date:</b> 04/08/22