



Customer Compliments and Complaints Policy

COR-POL-06

Version 7.0

Date approved: 23 July 2019

Approved by: People and Places Committee

1. Introduction

- 1.1 Southway Housing Trust (Southway) is committed to providing excellent services to the tenants living within our communities. If there are occasions when our services do not meet the required standard, the way that we react to this, is important.
- 1.2 The policy explains how Southway receives, handles and learns from the feedback it receives from its customers, whether this is positive or negative.

2. Policy Objectives

- 2.1 To welcome and learn from all customer comments and feedback whether negative or positive and to seek feedback from all complainants.
- 2.2 To deal with complaints sensitively, sympathetically and in confidence and to do so in a fair and consistent manner and to deal with complaints within our published timescales.
- 2.3 To empower staff to take ownership of complaints, and resolve them in the manner most satisfactory to the customer.

3. Regulatory Requirements

- 3.1 The Standards set by the Regulator of Social Housing states that Registered Providers of Social Housing must:
 - (a) Offer a range of ways for tenants to express a complaint and set out clear service standards for responding to complaints, including complaints about performance against the standards, and details of what to do if they are unhappy with the outcome of a complaint.
 - (b) Inform tenants how they use complaints to improve their services. Registered providers shall publish information about complaints each year, including their number and nature, and the outcome of the complaints.
- 3.2 Additionally, Southway pays for membership of an Ombudsman service which can adjudicate when a tenant feels a complaint has not been properly addressed by Southway. The Ombudsman has the power to issue directives that Southway must follow and impose fines where it feels published policy and legislation have not been followed.

4. Definition of Terms

4.1 Complaint

A complaint is defined as an expression of dissatisfaction by a customer or their representative about action, lack of action or about the standard of service they have received.

It may include matters such as:

- Failure to keep appointments
- Unexplained delays in undertaking work
- Misleading or wrong advice
- Unequal or biased treatment
- Disagreement about the way a decision has been made
- An employee's behaviour or action that causes offence
- Discrimination

4.2 Service Failure

Southway has a number of service standards relating to all operational activities that it carries out (for example we promise to attend emergency repairs within twenty-four hours). When we do not meet our published service standards it is classed as a service failure.

4.3 Formal Complaints

A formal complaint is one which cannot be resolved at the first point of contact and requires further investigation.

4.4 Informal Complaints

An informal complaint can be resolved at the first point of contact (within 24 hours) and does not require further investigation.

5. Dealing with Complaints

How to make a complaint:

5.1 Southway wants to make it easy for its customers to tell us if they're not happy with our services, so there are lots of different ways to make a complaint.

5.2 Whilst Southway accepts complaints in any format, either directly from a complainant or from a representative on their behalf, it encourages

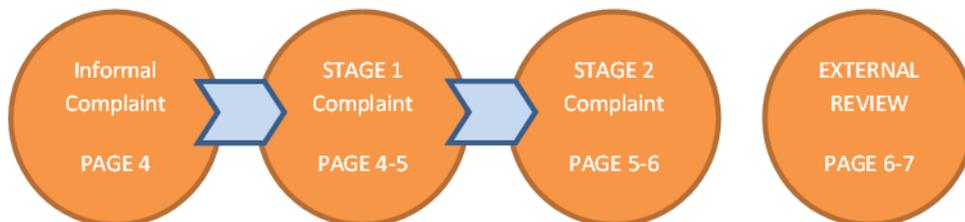
customers to ring the Customer Hub to discuss their issues with one of its trained customer service advisors. Southway believes this is the most effective approach in helping to fully understand the problem and allows us where possible to put things right immediately.

Key Points

- 5.3 Complaints received from a Councillor, MP or Southway Board or Committee Member on behalf of a customer will be dealt with in line with our Compliments and Complaints Policy, however the response will be sent to the addressee and a copy sent to the original complainant.
- 5.4 If requested, Southway will support complainants by giving them details of an independent Tenants’ Panel, representatives of which can advocate on their behalf.
- 5.5 When Southway receives a complaint about people of organisations over which it has no control, it will aim to assist the complainant by signposting them to the appropriate contact or, where appropriate, acting on their behalf.
- 5.6 Southway will investigate and respond to all complaints even if the source is unknown, therefore anonymous complaints will be dealt with using the normal complaints procedure and the outcome held on file.

6. Overview of the Complaints Process

Southway has a formal complaints process; however, from experience we know that the majority of customers who make a complaint just want to have their issue resolved as quickly as possible. For this reason, the process includes an ‘informal’ stage to attempt to resolve the issue quickly and informally.



Informal Complaints

6.2 All complaints (however they are received) are initially reviewed and evaluated by Southway's Complaints Team. It is often the case that a fault can be identified without having to carry out a detailed investigation. In these instances Southway will aim to make contact with the customer to try and resolve the issue 'informally', within one working day.

6.3 Resolving the issue 'informally' means that an acknowledgement letter or a formal written response is not provided and the issue is generally resolved via a conversation with the customer which allows it to be dealt with quickly.

Key Points

6.4 The target for resolving a complaint informally is 24 hours. If the complaint cannot be dealt with in this timescale then it will become a "formal" complaint.

- All complaints (formal and informal) are recorded on Southway's systems and are included in our performance reporting.
- Informal complaints may be dealt with by either a member of the Complaints Team (located within the Customer Hub) or a relevant manager.
- If a customer is unhappy with the response to their informal complaint, they have the right to refer their complaint to Southway's formal process. They must provide reasons and evidence to support why they believe that the informal response did not satisfactorily resolve their complaint.

6.5 Some complaints are complex in nature and it may not be possible to offer a quick solution. In this scenario the 'formal' complaints process will be followed. Southway's formal complaints procedure has two internal stages.

Stage 1 Complaints

6.6 A customer's first complaint will be classed as a Stage 1 complaint. Under normal circumstances the complaint response will be dealt with by the manager of the relevant service.

Key Points

6.7 Within two working days of Southway receiving the complaint, an acknowledgement will be sent to the customer including details of the officer who will be dealing with their complaint.

- 6.8 The investigating officer will ensure that personal contact is made with the complainant to ensure the full facts are known. This may take the form of a home visit or telephone call.
- 6.9 A full response will be issued within ten working days of receipt of the initial complaint advising of the way in which the complaint has been investigated, whether it has been upheld or not and how to escalate to Stage 2 if the complainant is unhappy with the outcome.

Stage 2 Complaints

- 6.10 If a customer is unhappy with the response to their Stage 1 complaint, they have the right to refer their complaint to Stage 2. They must provide reasons why they believe that the Stage 1 response did not satisfactorily resolve their complaint.
- 6.11 Stage 2 complaints will be investigated and responded to by a Senior Manager.

Key Points

- 6.12 The Manager will consider whether the complaint and the original response was sufficient or if they intend to carry out further investigation.
- 6.13 The Stage 2 complaint will be acknowledged within two working days and responded to within 15 working days of receipt, advising of the way in which the complaint has been investigated and the outcome. The response will also advise how to escalate the complaint further if the customer remains dissatisfied.

Complaint Outcomes

- 6.14 The decision made about any complaint will be recorded as follows:
- Not Upheld. This means it has been deemed that the service provided has been of a standard that can be reasonably expected and meets our policy and standards;
 - Part Upheld. This means the outcome of the investigation has found partly in the customers favour and action to resolve the situation will be taken;
 - Upheld. This means the outcome of the investigation has found in the customers favour and action will be taken to resolve the situation.
- 6.15 If a complaint is upheld at any stage of the process, Southway will:

- Apologise to the customer for the inconvenience caused
- Take some practical action to put things right
- Ensure that the same situation does not happen again
- Offer compensation in some circumstances

External Review

- 6.16 If a customer remains dissatisfied following the Stage 2 response, they may choose to have their complaint reviewed by an external panel or designated person.
- 6.17 There are several ways to do this:
- (a) Contact the Housing Ombudsman-The Ombudsman will only investigate complaints eight weeks after they have been through an organisation's internal complaints process. In Southway's case this means 8 weeks after the date of the Stage 2 review decision letter.
 - (b) Ask a 'Designated Person' to review the complaint. A Designated Person can be a Councillor, MP or recognised tenant panel who can be contacted by a complainant once they have exhausted a landlord's internal complaints procedure.
 - (c) Southway utilises the services of a Complaint Review Panel called Independent Tenant Solutions. This is a group of tenants who are independent of Southway. They fulfil the role of a designated person referred to above. If the tenant chooses this option, Southway will assist in arranging the complaint review.
- 6.18 The external panel or designated person may carry out the following actions:
- Investigate whether the landlord has been fair and comprehensive in the management of a complaint.
 - Seek redress for the customer for any mishandling of the complaint and make recommendations to prevent future service failure(s).
 - Refer the complaint to the Ombudsman with the written consent of the customer.

7. Exceptions

- 7.1 There are some service areas and issues that sit outside of this complaints policy and therefore will be dealt with in a different way.

ASB Complaints

- 7.2 Southway has a comprehensive policy and procedure which details how it tackles anti-social behaviour. Complaints from a customer about anti-social behaviour from another tenant or resident will be dealt with under the terms of the Anti Social Behaviour (ASB) policy.
- 7.3 Any complaints received about the outcome or handling of an ASB case will be dealt with via an ASB case review. This will normally be conducted by an ASB officer with no prior involvement in the case.
- 7.4 The investigating officer will have the ability to reopen an investigation if they deem that this is necessary. They will record the actions taken and the reasons for the decisions taken. If the complainant is unhappy with the outcome of this review they will be given appropriate advice on how to seek redress via a designated person, or the Ombudsman.

Commercial or Legal Complaints

- 7.5 Southway may receive complaints that relate to matters of legislation over which Southway has no control (such as Right to Buy), financial transactions (such as the sale of incidental pieces of land) or commercial services offered by Southway outside of its core landlord activities.
- 7.6 Southway's aim when dealing with complaints of this nature is not to discount them but to ensure that the customer is advised of the most suitable route to deal with their issue.

Complaints about Financial Advice

- 7.7 Southway offers a free debt advice service to its tenants. If complaints about this service cannot be resolved in line with this Policy complainants will be advised of the opportunity to seek redress through the Financial Ombudsman Service, enclosing a copy of the Financial Ombudsman Services standard explanatory leaflet and the contact details of the Financial Ombudsman Service.

Complaints about the Regulator of Social Housing Standards

- 7.8 Southway Housing Trust adheres to the consumer standards as set out by the housing regulator. The standards cover a range of issues around quality of accommodation and tenancy management.
- 7.9 Whilst the Regulator does not monitor compliance, tenants have the right to report alleged breaches for the regulator to investigate.
- 7.10 Further details can be found by visiting <https://www.gov.uk/government/organisations/regulator-of-social-housing/about/complaints-procedure>

Unreasonable Complaints

- 7.11 Occasionally complaints are received from people who are unwilling to accept the outcome of an investigation, even after the complaints procedure has been exhausted. There are also some customers who persistently make complaints that are without foundation.
- 7.12 All complaints will be considered carefully. If, however, the subject has already been exhausted or the complaint is deemed unreasonable, the matter will be discussed with the appropriate line manager and Director and dealt with outside the normal complaints procedure.
- 7.13 A letter of warning will be issued to the complainant advising of the consequences of this behaviour continuing. If the situation persists certain sanctions can be imposed.
- 7.14 Options that are available include:
- Insisting that contact is in a particular form (for example by letter)
 - Requiring contact to take place with a named officer
 - Restricting contact to specified dates and times
 - Asking the complainant to enter into an agreement about their future conduct
 - In exceptional circumstances, the use of legal sanctions

The customer will be advised in writing of when and how to appeal against these restrictions which will be reviewed regularly to assess whether or not the sanction is still warranted.

8. Learning from Complaints

- 8.1 Southway strives to enhance and improve the way it delivers services and feedback from customers provides a valuable opportunity to do this.
- 8.2 The feedback offered within complaints is particularly useful as it can indicate where we may be getting things wrong.
- 8.3 Complaints concerning a particular staff member are routinely discussed at individual performance review sessions and any relevant training put in place
- 8.4 Broader issues around the delivery of our services are presented for discussion at relevant team meetings. The emphasis is on identifying how to prevent further occurrences of any issues identified.

Complaints Service Improvement Group

- 8.5 The Complaints Service Improvement Group is a group of independent Southway tenants who meet quarterly to review and discuss a selection of randomly selected complaints.
- 8.6 The group may make recommendations as a result of these review meetings. For example if the group felt that a particular policy is creating justified complaints, they can recommend to Southway's People and Places Committee that it be reviewed.

9. Performance Reporting

- 9.1 Officers will collect a wide range of statistical data about complaints and share this regularly with both staff and customers. This will include:
 - (a) The number of complaints received at each stage and whether these were dealt with within timescales
 - (b) The number of complaints upheld at each stage
 - (c) The number of cases referred to the Independent Housing Ombudsman and the outcome of these
 - (d) Customer satisfaction with the way complaints were handled
 - (e) Lessons learned and service improvements actioned
 - (f) Compliment details
 - (g) Comparative benchmarking with other RSL's to compare trends and review best practice
 - (h) The work of the Complaints Service Improvement Group
 - (i) Performance information regarding the Independent Tenant Panel

9.2 Southway will publicise details of the improvements that we make to our services based on the feedback that we receive from our customers. These can be found on our website and publications such as Southway Stories under the banner of YOU SAID WE DID.

10. Praise and Compliments

10.1 Southway welcomes praise and compliments from its customers. It tells us what we are doing well, where we are providing a good service. All praise and compliments received will be recorded and passed on to relevant officers.

11. Equality and Diversity

11.1 Southway will ensure this policy is applied fairly to all our customers and will not directly or indirectly discriminate against any person or group of people because of their race, religion, age, gender, sexual orientation, disability or other grounds set out in our Single Equalities Scheme.

11.2 Officers will monitor service delivery and feedback against protected characteristics and take any actions necessary to ensure equality of access and customer service.

11.3 This policy and any other related Southway publications can be provided on request in other formats (e.g. in an alternative language, in large print or Braille, on tape).

12. Related Policy Documents

- Customer Care (Everyone Matters) Policy
- Responsive Repairs Policy
- Customer Compensation Policy
- Insurance Procedures

POLICY REVIEW HISTORY	
<i>To be completed during each review</i>	
<p>Previous versions (version number – approved by – approval date – title if different)</p> <p>V1 – Shadow Board – 19/06/2007 – Customer Complaints, Compliments and Suggestions Policy V2 – Board – 25/02/2009 V3 – Performance and Resources Committee – 15/05/2012 V4 – Board – 17/09/2013 V5 – Board – 02/06/2015 V6 – People and Places Committee – 25 July 2017</p>	
Date of last EIA:	14 July 2017.
Review lead by:	Luke Benfield, Head of Customers and Communications
Main points or amendments made and reasons	
<ul style="list-style-type: none"> ▪ Minor amendments to terminology. ▪ Change in regulator. 	
Next review due:	Q2 2020/21
Approval level:	People and Places Committee