



Customer Complaints and Feedback Policy 2020

Author: Angela Aldis Operations Manager

Date Issued : 2020

Review date: 2022

Contents

Items	Page No
1 Introduction	3
2 Aims and Objectives	3
3 Definitions	3
4 Making a Complaint	5
5 Complaint Process	6
6 Service Standards and “goodwill” gestures	13
7 Comments and compliments	13
8 Learning from complaints and customer feedback	13

1.0 Introduction

1.1 HHAL is committed to delivering the best possible service for our customers and welcomes feedback from anyone who uses our services. HHAL views comments, compliments and complaints as a valuable source of information about what we are doing well and what we need to improve upon. This policy sets out how we will manage our complaints and other customer feedback, including how we learn from our mistakes so that we continually improve our services.

2.0 Aims and Objectives

2.1 In developing this policy HHAL aims to listen to individuals, treat them fairly, learn from what has happened and take any necessary action to put things right and prevent re-occurrence. HHAL will deal with complaints impartially, objectively and professionally. Staff will take ownership, apologise where we have made a mistake and aim to resolve the complaint to the customers satisfaction.

The objectives of the policy are: -

- To encourage feedback both positive and negative about our service.
- To provide a number of different ways to give feedback to us.
- To resolve issues at the first point of contact wherever possible and if not possible we will give reasonable timescales for when we expect to be able to do so.
- Use comments, complaints and compliments to help us to improve our service.

3.0 Definitions

3.1 As part of this policy HHAL will use the following definitions:-

Feedback	Definition	Action
Comments	A comment is positive or negative feedback about our service which does not require a formal response.	Noted within the comments log .HHAL will investigate a comment and will take action as required. Comments will be passed on to the CLC for information.
Complaints	A complaint is any expression of dissatisfaction, in any form, with the standard of our service, actions or lack of actions by the	

	<p><i>organisation, its staff or those acting on our behalf, affecting an individual resident or group of residents.</i></p> <p>These are situations where we have:-</p> <ol style="list-style-type: none"> 1. Failed to do something that we should have done. 2. Failed to follow our policies and procedures. 3. Done something that we should not have done. 4. Done something badly. <p>There are 2 types of complaints</p> <ul style="list-style-type: none"> • Informal complaint/ Quick fix; a complaint that can be resolved quickly at first contact. • Formal complaint. A complaint that cannot be resolved at first contact or is of a severe nature which requires a formal response under our complaints procedure 	<p>Noted on Complaints log and no written response required. Actions of the officer noted. A record/audit trail logged on system. These are shared for information with the CLC.</p> <p>Complaints Log updated and customer advised of formal log number and date full written response is due by. The CLC will be made aware of any resolved complaints.</p>
Compliments	A compliment is an unsolicited expression of gratitude or praise for a member of staff or service.	Compliments will be passed on to staff and will be used to identify areas of good practice that HHAL can learn from. Compliments will be shared with the CLC.
Service requests	A request for a service, such as a repair which has not been made previously or the logging of an ASB incident.	The customer is advised of the process in the service area.

3.2 What is not a complaint?

The policy has defined what will **not** be registered as a complaint. These are situations such as:-

- An initial request for information or an explanation.
- An appeal against action resulting in court proceedings or matters subject to ongoing court proceedings.
- Any matter in which there is an established internal or external appeals procedure allowing the complaint to be properly investigated and resolved by another route. Examples of this are service charge disputes with a homeowner and neighbour disputes (unless the complaint refers to our failure to deal with the disagreement appropriately).
- Appeals against policy decisions.
- Matters that are subject to an Insurance claim. HHAL will not consider the matter under the complaints procedure until this route has been exhausted and will use its discretion in whether to log the matter as a complaint.
- Complaints which are submitted anonymously (although we may still investigate).
- Dissatisfaction expressed through satisfaction surveys (these will however be followed up and used to improve services as part of our wider response to responding to customer feedback).
- Any matter where the complaint constitutes a refusal to accept a rule of law with which HHAL is complying.

4.0 Making a Complaint

4.1 Anyone who receives a service from HHAL can make a complaint to us; these include customers, applicants for rehousing of our properties and those customers and applicants from schemes that we manage on behalf of others.

A complaint can be made in the following ways:-

- Email – info@hhal.org.uk
- Letter
- Phone
- In person
- Via the contact form on our website: www.hhal.org.uk
- Via a friend or relative, agencies such as Citizens Advice Bureau, support workers, MPs and local councillors (HHAL will need to be satisfied that anyone representing a customer has permission to act on their behalf and we will ask to have this confirmed by the customer)

4.2 Support

If a complainant needs help to put their complaint in writing to us or needs an interpreter to help them make a verbal complaint we will make the necessary arrangements on request. Customers will be advised that they can approach the Housing Ombudsman at any point in the process for support and guidance that will assist in resolving the complaint. Similarly HHA may also approach the Ombudsman at any point for guidance on a complaint.

4.3 Time Scales

HHAL will be unable to investigate complaints relating to issues that are over 6 months old unless there are exceptional or extenuating circumstances. HHAL will use its discretion in its decision to investigate these matters.

4.4 Complaints about Staff

If a complaint is made about the conduct of a member of staff, their line manager will investigate. Acknowledgement of the complaint will be made however the details of individual performance management will not be discussed or responded back to the complainant.

4.5 Unacceptable Behaviour

HHAL staff will always treat customers with respect and expect that our staff will be treated with respect too.

Some situations are upsetting or distressing which may lead to a complaint. HHAL will not necessarily view this as unacceptable behaviour.

A customer may contact HHAL in connection with a complaint and whose actions or behaviour we consider unacceptable. A customer who is angry, abusive or persistent and whose actions place unreasonable demands on our staff's time or on our resources, then HHAL will take action to deal with such behaviour. Examples of what HHAL consider to be unacceptable behaviour include:-

- **Aggressive or abusive behaviour** – behaviour which includes threats, physical violence, personal abuse, derogatory or discriminatory remarks.
- **Unreasonable demands** – this covers customers who may make what we consider to be unreasonable demands through the amount of information they want from us, the nature and scale of service they expect or the number of times they contact us. Examples of this include asking for responses in an unreasonable timescale, continual phone calls, emails or letters or repeatedly changing the substance of the complaint or raising unrelated concerns.

- **Unreasonable Persistence** – Examples of this type of behaviour include a persistent refusal to accept a decision or persistent refusal to accept explanations about what we can or cannot do. A continual re raising of the same complaint once the complaints process has been exhausted.

4.6 Managing Unacceptable Behaviour

This will depend on the nature and extent of the unacceptable behaviour but HHAL retain the right, where we consider customers' behaviour to be unacceptable, to take appropriate measures that will allows us to manage the complaint and to deal with them through the complaints process, wherever possible. Examples of measures that may be put in place are:-

- **Restricting contact with complainant** – this may be through limiting the number of communications HHAL will have with the customer, limiting the type of contact such as letter only. It could also involve restricting access to the office.
- **Single Point of Contact** – we may consider nominating a person who will be responsible for all communication with the complainant.
- **Complaints service standards** – it is important in order to manage unacceptable behaviour that staff delivers responses in line with our service standards and procedure.
- **Alternative dispute resolution** – HHAL may consider using mediation to resolve a complaint. Any costs will be covered by HHAL. The customer is not obliged to agree to this and HHAL would make a decision on a case by case basis.

Decisions to restrict or change how HHAL manage customers who demonstrate unacceptable behaviour will be done after careful consideration by the Operations Manager.

Actions will be regularly reviewed by the Operations Manager and the customer will be kept informed about what action we are taking and why we are taking this action.

5.0 Complaints Process

5.1 The purpose of the complaints process is to support a “right first time” approach. HHAL will provide each customer making a complaint with a full, fair and honest response to the issues they have raised. If HHAL have got things wrong then we will apologise to the customer. If a complaint concerns a contractor instructed by HHAL, then we will take this as a complaint against their own service, the customer should not have to deal directly with the contractor.

HHAL staff will take ownership of a complaint and are empowered to make reasonable decisions to resolve the matter for the customer. HHAL will ensure that we maintain regular contact with our customer whilst dealing with their complaint.

If a complaint is not resolved at the end of our complaints procedure then the customer can:

- Refer the matter to a designated person OR
- Wait 8 weeks and refer the matter directly to the Housing Ombudsman.

5.2 Designated Person

Following the introduction of the Localism Act in 2011, tenants of housing associations are able to ask for their complaint to be considered by a “designated person” when the association’s internal complaint process has been exhausted.

A designated person can be an MP, a local councillor or a designated Tenant Panel (registered with the Housing Ombudsman)

5.3 The Complaint Process

A complaint about our service will be dealt with by housing officers. Our aim is to resolve problems and put them right with the minimum of delay. To manage our complaints we have the following process and stages;-

5.3.1 Informal Complaints

Some complaints can be resolved quickly and require only a verbal response. These informal complaints will be recorded internally for monitoring and learning purposes.

5.3.2 Formal Complaints – Resolution Stage

If a complaint cannot be resolved through the informal process we will aim to resolve this as quickly as possible. A set of service standards for formal complaints has been developed to ensure that our customers’ complaints are acknowledged and responded to within set timescales. In exceptional circumstances we may not be able to achieve these timescales.

In these situations we will write to the customer with an assessment of the situation so far and advise them of the reason why we are unable to achieve the response times and provide a timescale for a potential outcome resolution date and offer to move to the review stage. This stage is known as the Resolution stage of the process.

5.3.3 Formal Complaints – Review Stage

If a customer is dissatisfied with the outcome of their complaint they can ask for a review, giving the reasons why they are dissatisfied. This is the Review stage of the complaint process.

If the customer presents new relevant information at this point this may result in an investigation into the new circumstances as part of the Resolution stage. Any unrelated information will be dealt with as a new complaint.

A review of a complaint will be carried out by the Operations Manager unless they have been involved in the resolution stage. In these cases another officer not connected to the resolution stage will review the complaint. Complaints received about a tenancy related matter may be dealt with independently through the Customer Liaison Committee and customers are invited to attend to put their complaint to the panel. A customer may attend the Review meeting accompanied by one other person if they wish to do so for support.

When the review has been carried out a response in writing will be sent out in line with our service standards. If this is not possible then the reason why and new expected date for completing the review will be given.

On rare occasions HHAL may refuse a request for a review of a complaint. These will be for reasons such as:-

- All actions agreed with customer have been completed or where we are completing follow on works or actions and we have communicated this to the customer.
- The customer has failed to provide specific reasons for the review.
- The solution requested by the customer relates to something outside of our ability to change or influence.
- The customer has refused to engage with our staff in resolving the complaint through reasonable actions (see 4.3 Unacceptable Behaviour)

If we decide to take this action we will clearly explain our reasons why

The review stage is the completion of our internal complaints process.

A complaint will be closed when

- When the customer tell us that we have resolved the complaint **OR**
- If no response is received from the customer after 14 days of the completion of our investigation and its outcome communicated to the customer **OR**

- Following a review.

5.4 Designated Person Review

5.4.1 Customers who are still not satisfied with HHAL’s decision at the end of our internal process have the right to approach a designated person (see section 5.2) to review their case.

Customers will be made aware of their right to review by a designated person at the end of the internal complaints process. HHAL will give careful consideration to any findings or recommendations that are made as a result.

If the designated person decides not to review the complaint or refer it to the Housing Ombudsman then the customer can approach the Housing Ombudsman directly.

5.5 Complaints referred to the Housing Ombudsman. The Housing Ombudsman is not a regulator but encourages positive relationships between Landlord and Customer.

A customer can approach the Ombudsman directly without approaching a designated person but must wait 8 weeks after the completion of the HHAL internal complaint process before doing so.

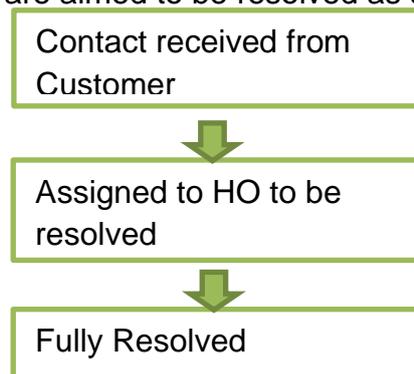
HHAL will provide information to all customers about both designated persons and the Housing Ombudsman through our website and customer leaflets.

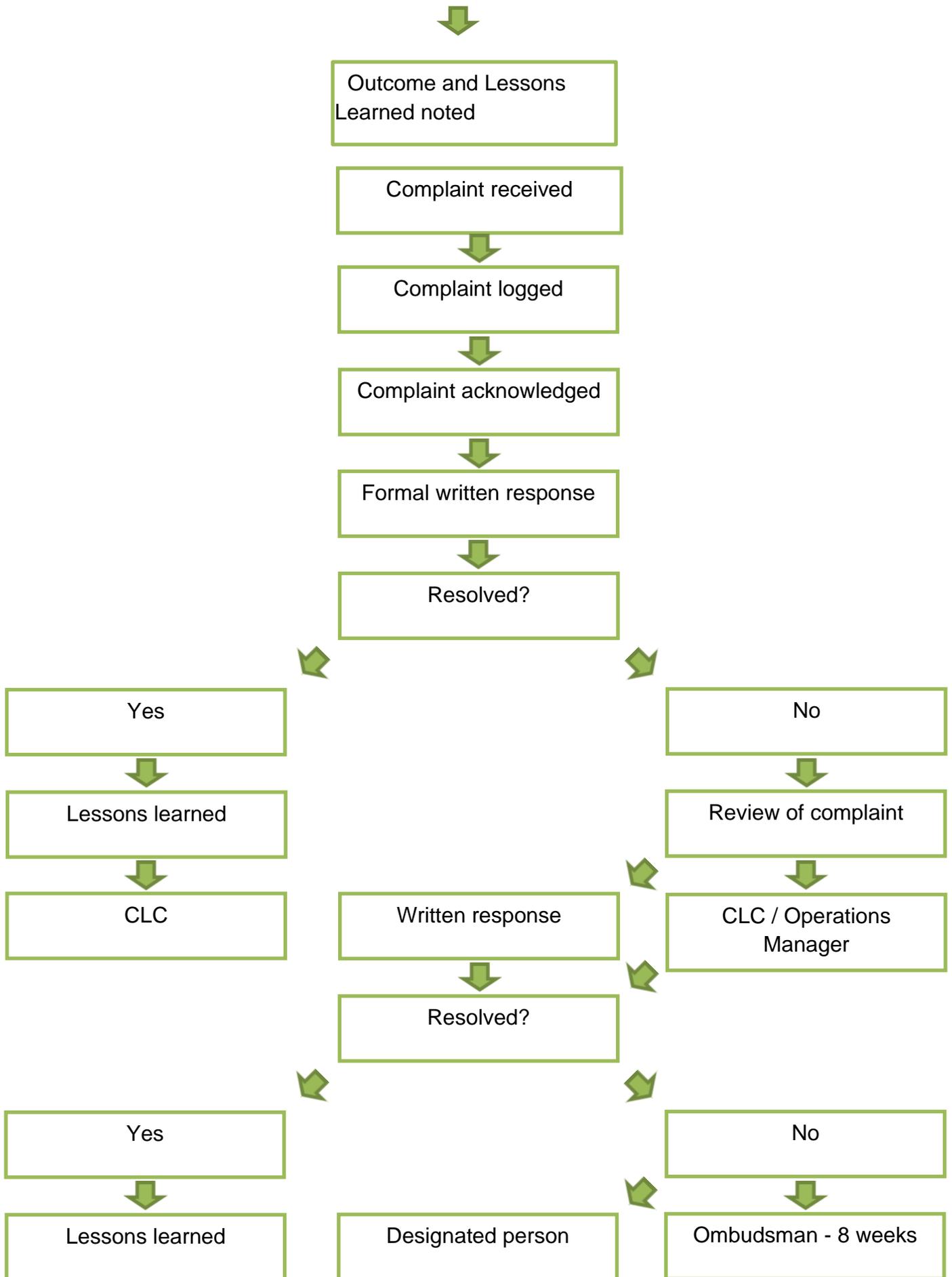
5.6 Complaints from Homeowners – properties managed by HHAL Homeowners can use the HHAL complaints procedure and approach a designated person and the Housing Ombudsman if they are not satisfied with the outcome of the complaints process. Depending on the complaint the Housing Ombudsman will refer homeowners to the First -Tier Tribunal (Property Chamber) the complaints referred will be

- When deciding liability for payment of service charges and
- When settling disputes about the Landlord’s choice of insurer.

5.7 Flowcharts of the Informal and formal complaint process. Below are flowcharts that indicate the process that will be followed in the complaints process

5.7.1 Informal Complaints: the chart below shows how the process will work for Informal complaints, which are aimed to be resolved as soon as possible:





6.0 Service Standards and Goodwill Gestures

6.1 As part of the process of improving our service to customers, HHAL have set out a series of standards that advises clearly what our customers can expect from us. HHAL will aim to resolve a complaint as quickly as possible through the informal stage. If a complaint cannot be resolved through this stage and HHAL need more time to look into it then the following service standards will apply as part of the formal complaint process:-

Process	Timescales	Action
Complaint received and acknowledged	Within 2 working days	Admin will log complaint on the system and generate log no, provide acknowledgement to customer and advise who will be dealing with the complaint.
Written Response – <i>Resolution Stage</i>	Within 10 working days	Officer to provide a full written response to the customer
If the complaint is not resolved then the complaint will be reviewed by either the Operations Manager/ the Customer Liaison Committee (tenancy related matters) <i>Review stage</i>	Written response from Operations Manager within 10 working days. CLC complaint panel within 21 working days Outcome of hearing will be communicated to the customer within 10 working days	Progress to review stage following confirmation from customer. Admin will set up a Complaint Panel Meeting for CLC and invite customer to attend

A satisfaction survey will be carried out after all complaints have been fully resolved.

6.2 Goodwill Gestures

6.2.1 When our repairs service fails, HHAL will operate their compensation process which is highlighted in our Repairs and Maintenance Policy, a copy of which can be found on the website, ww.hhal.org.uk. Where customers have experienced inconvenience that has resulted in a complaint being made, HHAL will consider making a gesture of goodwill to the customer. These will be a reasonable offer taking into account the circumstances of each case. Goodwill gestures are not necessarily a monetary gesture and HHAL will make an appropriate offer on a case to case basis.

6.2.2 Payment of any monetary gestures or compensation via our Repairs and Maintenance Policy will be off –set against any other debt including rent arrears and recharges.

6.2.3 When assessing redress to the customer HHA will take into consideration:-

1. What has happened and the time taken to resolve it?
2. What expenses have they incurred?
3. Any stress or anxiety as a result of raising the issue and /or any cumulative impact on the customer
4. Are any statutory payments due?
5. What is reasonable?

7.0 Comments and Compliments

7.1 All comments and compliments will be logged internally. The Operations Manager will ensure any actions are carried out. The Customer Liaison Committee (CLC) will be presented with any comments and compliments logged.

7.2 HHAL will ensure that any good practice and service improvement issues identified by the comments or compliments process are shared and used to improve service to customers and will feedback to customers through the Customer Newsletters.

8.0 Learning from Complaints and Customer Feedback

8.1 The Operations Manager will be responsible for monitoring the complaint process, trends and reporting. Completing the Self-Assessment form and publishing this to Board and the Customer Liaison Committee.

8.2 The Customer Liaison Committee will receive feedback reports on any comments, compliments and resolved informal and formal complaints. They will look at:-

- Patterns in complaints or other feedback
- Performance in dealing with complaints
- Satisfaction information about the complaints handling
- Review learning from complaints and other feedback
- Use the information to inform scrutiny service reviews.