



Complaints and Compliments Policy

Policy statement

This policy aims to deliver an efficient and effective complaints process which is easily accessible to customers. Our approach focuses on early resolution with minimum customer effort. It ensures that we promote a strong problem-solving and service improvement culture and provide services that are customer focused, cost effective and meet current and future needs of our customers.

When customers wish to compliment us on our service, this policy also ensures that we recognise the staff member/team responsible and share good practice with all teams.

We encourage complaints and compliments and view them as opportunities to learn how to improve the quality of our services.

The policy also aims to empower our customers and their representatives to challenge decisions and question service quality and suitability where they have concerns.

Objective

To have an effective complaints management approach in place that is clear, simple and accessible, ensuring complaints are resolved promptly, politely and fairly.

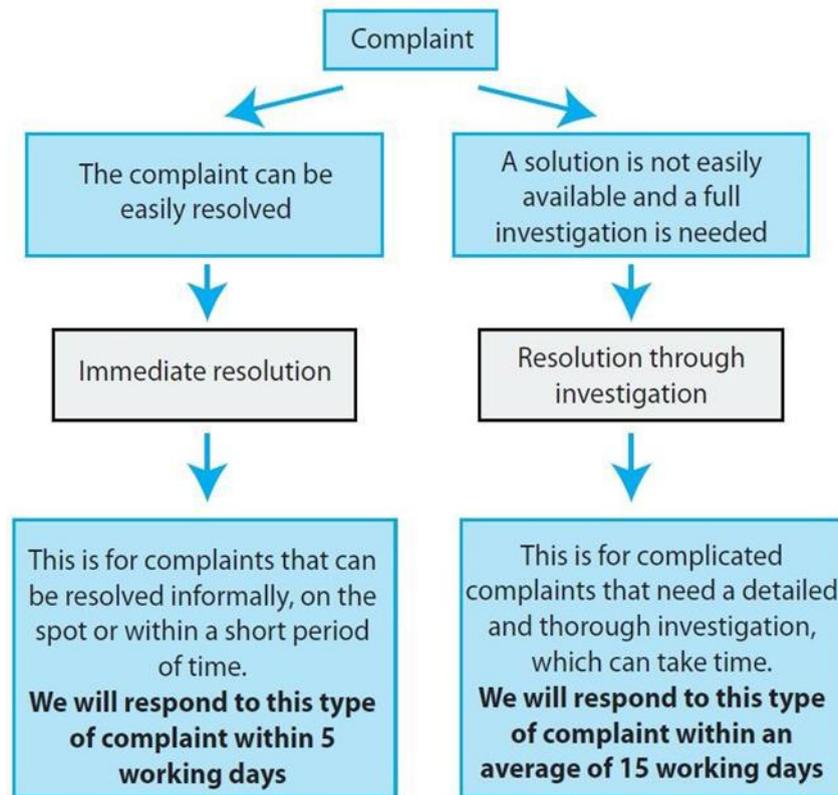
To have a complaints process which meets the requirements of the regulatory standards and the Housing Ombudsman service.

To recognise and implement service improvements by:

- identifying and correcting bad practice
- validating and promoting good practice
- improving customer confidence and satisfaction
- involving tenants and other customers in shaping services
- monitoring performance to enable continual improvement of services
- being responsive to changing needs and demands
- being open, accountable, fair and transparent in all areas of service delivery
- being accountable to customers for the services we provide
- ensuring customer feedback influences continuous improvement

Policy

The complaints process has two approaches to resolution. The adopted approach is determined based on the nature of the complaint and is agreed with customers from the outset:



When a complaint is received it will be allocated to the most appropriate complaint manager to resolve the matter. They will contact the customer within a maximum of two working days to discuss the issue, explain how they can help and set expectations as to how long it is likely to take them to deal with the matter. They will continue to liaise with the customer and keep them updated on progress until the complaint is resolved.

Please see **Appendix 1** for further guidelines on timescales for resolving complaints.

Where a customer remains unhappy following a complaint investigation, we will ask the customer what they remain unhappy with and what resolution they are seeking. The Customer Experience Team may liaise with the investigating complaint manager to ascertain whether there is anything further we can do to resolve the complaint or escalate the complaint for a Director to review.

At Director review stage, the investigating Director will decide if other steps can be taken to resolve the complaint. The Director review will then set out any next steps available for the customer should they remain unhappy with the outcome. This may include the offer of an appeal via our Appeals Panel if they feel this would be beneficial for both parties. If an appeal is not offered, the customer will be advised that our internal complaints process has been exhausted and that they now have the right to escalate their complaint to a Designated Person (MP or local Councillor) or the Housing Ombudsman.

Any Appeal panel will be made up of two Board members, one of whom will chair the appeal hearing. A member of the Executive Team will facilitate the appeal panel hearing but not the Director of the investigating service area.

Compliments

This policy ensures that when a compliment is received it is passed directly to the member of staff or relevant team. We also use the feedback to improve services and celebrate success.

<p>Scope</p>	<p>This policy applies to current tenants, former tenants (in relation to their period as a tenant only), prospective tenants (only in relation to their customer relationship with us), shared owners, leaseholders and landlords.</p> <p>We will accept and log complaints from non-tenants, individuals and members of the public.</p> <p>Complaints from Corporate bodies will be dealt with as per contractual agreements.</p>
<p>Roles and Responsibility</p>	<p>Assistant Director – Customer Experience and Service Improvement is responsible for:</p> <ul style="list-style-type: none"> • Having the resources in place to deliver an effective complaints process across the organisation • Overseeing complaints including our relationship with the Housing Ombudsman; ensuring the process is robust, responsive, and timely with a focus on extracting learning to drive consistency and continuous improvement in our offering to customers. <p>Customer Insight and Experience Manager is responsible for:</p> <ul style="list-style-type: none"> • Overseeing the development and implementation of the organisations complaints policy, systems, training and key performance indicators ensuring high standards are maintained • Overseeing the day to day management of complaints for the business ensuring these are progressed in-line with policy, process and timescales • Ensuring all MP, Ombudsman and final stage complaints are minimised and managed effectively, providing professional advice in the management of complex complaints as and when required • Ensuring there is a structured approach in place to ensure learning from complaints and wider customer feedback to support the business to identify priority areas for service improvement • Ensuring the Complaints Policy is reviewed regularly • Providing the Executive Team with complaint KPI information <p>Customer Experience and Insight team are responsible for:</p> <ul style="list-style-type: none"> • Processing and allocating complaints to investigating complaint managers in a timely manner • Monitoring complaints and working with complaint managers to ensure they are progressing to resolution in line with process and timescales • Working with the business to analyse complaints across all business areas identifying overarching themes and making recommendations for wider service improvement • Acting as an independent point of contact for the customer throughout a complaint investigation • Managing escalated or complex matters relating to the management of complaints • Coordinating Director Review complaints, or Ombudsman enquiries and investigations • Regularly preparing and delivering complaints and compliments reports to Management Team, Service Managers, Board and any appropriate customer panels/forums highlighting trends, activity and performance • Ensuring regular communication updates are published to the business and customers, demonstrating complaints performance progress, learnings and improvements made to services as a result of customer feedback.

	<p>Complaint Managers are responsible for:</p> <ul style="list-style-type: none"> • Taking complaints seriously • Investigating complaints thoroughly, promptly, politely and fairly ensuring all matters raised are responded to • Adhering to all timescales set out within the complaints policy and process keeping customer regularly updated during complaint investigations • Minimising complaint escalations via thorough and fair investigation of stage 1 complaints • Listening to trends identified via complaints and implementing actions to drive service improvements identified via complaints and wider customer feedback <p>Directors are responsible for:</p> <ul style="list-style-type: none"> • Leading a service improvement culture within the organisation that takes complaints seriously • Ensuring their teams are adhering to the complaints policy and process • Monitoring complaints for their service areas to ensure Key Performance Indicators are achieved • Investigating escalated Director Review complaints thoroughly, fairly and impartially providing full responses to complaints at the required level • Determining when a Director Review complaint has exhausted the complaints process and clearly communicating the next steps for the customer including offering an Appeals Panel and/or escalation to a Designated Person or the Housing Ombudsman • Driving continuous service improvements from trends and themes identified from complaints and wider customer feedback <p>Appeals panel will be responsible for:</p> <ul style="list-style-type: none"> • Reviewing all history to a complaint investigation thoroughly, fairly and impartially • Determining the outcome of the Appeal Panel hearing based on all evidence presented • Providing a full and detailed response to the customer and setting out the customers next steps
<p>Monitoring / Reporting and Assurance Controls</p>	<p>Key Performance Indicators (KPIs) used to measure the effectiveness of this policy are:</p> <ul style="list-style-type: none"> • resolve all complaints within an average of 15 working days • less than 62% complaints upheld • 30 complaints logged per thousand units <p>This policy places greater emphasis on learning from complaints and addressing these through service improvements. To achieve these, we will:</p> <ul style="list-style-type: none"> • train staff in successful complaint management and root cause analysis • have enhanced IT systems to capture outcomes and learnings • hold case review meetings following complex or serious complaints to ensure learnings and service improvements are made • provide service leads and the business with in depth quarterly reports on trends to aid learning • Provide staff with a complaint resolution timeframe guidance document showing the length of time it should take to investigate/resolve a complaint
<p>Cross References</p>	<p>The policy is supported by:</p> <ul style="list-style-type: none"> • Compensation Policy • Unacceptable Behaviour Policy • Customer Care Standards

Policy Owner	Assistant Director – Customer Experience and Service Improvement
Prepared by	Customer Insight and Experience Manager
Approved by	Amalgamated Board
Date of Board approval	January 2020
Effective date	January 2020 (interim update)
Review date	September 2020 (full review)
Version control	V2 - supersedes V1 dated 2014

Appendix 1: Complaints Resolution Timeframe Matrix

The below matrix provides a guide for staff investigating complaints regarding the length of time that may be required to resolve these issues. This guide is a tool to assist staff in setting customer expectations, but we would always expect complaints to be dealt with as soon as possible.

Type of Complaint	Examples	Number of Working Days to Resolve
<p>A complaint that:</p> <ul style="list-style-type: none"> • can be resolved on the spot or within a very short period of time • has resulted from a very recent event • requires limited investigation • can be resolved informally through telephone conversations, offering simple explanations and an apology if appropriate 	<p><i>Boiler breakdown, customer unhappy with five day priority time and appointment that has been provided by CSA</i></p> <p><i>No response to a voicemail message left for a call back. Easy to check the system, see if a call has been made and follow up with conversations with Officer who didn't return the call within customer care standard</i></p> <p><i>Complaint about a rent payment not displaying on our system and an arrears letter has been received. Liaison with Finance and confirmation obtained that the Housing Officer had collected rent and that we would confirm when it was credited</i></p>	<p style="text-align: center;">Less than 5</p>
<p>A complaint that:</p> <ul style="list-style-type: none"> • requires a more extensive investigation to establish the facts and history relating to the complaint • may have resulted from a series of events or occurred over a period of time • requires full Investigation which may include a review of the history, potential customer visits, conversations with other staff members involved • requires a carefully considered written response that addresses all points raised 	<p><i>A repair job that has gone wrong over a period of time or where multiple appointments have been required and works remain outstanding</i></p> <p><i>Where a repair has not been completed to the customers satisfaction and requires an assessment of the quality of the repair</i></p> <p><i>Customer felt that a member of staff was rude and impatient during a recent telephone discussion. Investigation to include a meeting with the member of staff concerned to address the issues raised and listen to their version of events before concluding the appropriate resolution</i></p>	<p style="text-align: center;">6 - 10</p>
<p>A complaint that:</p> <ul style="list-style-type: none"> • is complex and may cut across more than one service area or issue • requires an in-depth investigation which is likely to require a face to face interaction with the customer • may require a discussion with a number of staff involved to understand events • may require more than one team or staff member to be involved in the resolution of the complaint • has a complex history that will require time to audit and understand • requires a carefully considered written response that addresses all points raised 	<p><i>Dispute about works required prior to a tenant vacating a property at the end of their tenancy. Investigation needed into what works were required, what the property was like when the tenant moved in, a visit to reassess condition of property, liaison with various departments and a visit to inspect works completed to confirm if up to required standard</i></p> <p><i>Complex complaint involving housing and repairs. Detailed investigation required into what repairs have been completed, what sub-contractors have said to the resident and review of their reports, conversations with various staff members and follow up about our insurance policy</i></p>	<p style="text-align: center;">11 - 15</p>
<p>A complaint that:</p> <ul style="list-style-type: none"> • requires in-depth investigation as it is very complex, high risk and/or contains more than one issue • multi- faceted, with more than one complex issue that needs addressing • requires more than one meeting with the customer/ staff involved • relates to a major incident • may involve more than one resident • relies on 3rd party cooperation • may require us to seek legal advice • requires meetings to be held with key staff/agencies in order to find a suitable resolution • requires wider consultation in relation to our formal response from Paradigm as an organisation 	<p><i>Complaint about a breach of data protection (please refer to the "Data Protection Policy" for details on what constitutes a data protection breach) and harassment from a member of staff.</i></p> <p><i>Severe complaint with potential legal implications. Various meetings and liaison with other agencies required, including the Local Authority, Police, a number of Paradigm staff members, alongside liaison with our Solicitors on various issues</i></p> <p><i>Severe water leak causing extensive damage to ceiling and customer's belongings. Ceiling that collapsed contains a risk of asbestos. Specialist asbestos removal company required to empty contains of the room before repairs works could be carried out. Full investigation required into why the leak was deemed safe at a previous visit, face to face meetings with the customer on-site and a number of meetings with staff involved. Full management of works required, alongside a substantial claim of compensation and a potential liability claim via our insurers</i></p>	<p style="text-align: center;">15 - 25</p>

Appendix 2: Further Guidance

A complaint could be:

- not providing services to agreed policies
 - not providing services in accordance with our published standards
 - not responding within agreed timescales
 - where the quality of the service provided falls below required standards
 - the behaviour of staff or contractors acting on our behalf
 - not following through with agreed actions.
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- **Matters that will not be handled as a complaint:**
 - an initial enquiry or request for a service
 - a report of anti-social behaviour of another resident – this is dealt with under the ASB policy
 - where we are not responsible for delivering the service – e.g. Local Authority decisions about nominations or housing benefit claims
 - tenant disputes over signed terms and conditions within their tenancy agreement
 - landlord disputes over signed terms and conditions within their contractual agreements
 - where legal action has been taken by the customer
 - recruitment matters and internal grievances

Policy complaints:

We would not wish to discourage customers from challenging our policy decisions, as this feedback is useful and may lead to a policy review. However, after an initial investigation and response we will restrict access to progress a policy related complaint further, for example to an Appeal, where this will not provide a different outcome.

- **The complaints process may not apply when:**
- the complaint is made more than 3 months after the matter came to the complainant's attention
- the complainant refuses to reasonably engage with us, is abusive to staff or acts unreasonably. In this instance the complaint will be logged but may not be responded to or pursued.
- Paradigm feel that a more appropriate avenue is required to resolve the dispute e.g. via court or a tribunal.

Version Control

Version control	<p>Updated to be in line with the revised “Data Protection Policy”, which itself has been updated for GDPR compliance:</p> <p>1) Page 6, “Appendix 1: Complaints Resolution Timeframe Matrix”; Last row, 2nd column under “Examples” – amended sentence “<i>Complaint about a breach of data protection and harassment from a member of staff.</i>” To read “<i>Complaint about a breach of data protection (please refer to the “Data Protection Policy” for details on what constitutes a data protection breach) and harassment from a member of staff.</i>”</p>
V2	<p>Interim policy update from January 2014 version</p> <p>Removed reference to Housing Corporation and statement stating Residents Forum have been involved in reviewing of this policy as this forum no longer exists.</p> <p>Clarity over Appeal Panel role and responsibility</p> <p>Policy author and owner details updated</p>