

Customer Feedback and Complaints Policy

Document Owner	Customer Services Manager
Frequency of Review	3 Years
Date Last Reviewed	July 2019
Date of current review	July 2022 /Amendment Sept 2022
Date of Next Review	July 2025
Approved By	CLT 25/10/22

1. Introduction

For the purposes of this policy, we have adopted the Housing Ombudsman's Code definition of a complaint as 'an expression of dissatisfaction however made about the standard of service, actions or lack of action by the organisation, its own staff or those acting on its behalf effecting an individual resident or group of residents'.

This Policy sets out how we enable customers to make a complaint. It describes an open and transparent approach to complaint management. We are committed to delivering a good outcome and to improve and learn from our customers' experiences.

2. Aims and Objectives

We are committed to working with customers to understand and manage their concern in a fair, impartial and timely manner. We look for and record learning from complaints, making changes to the way we work, and therefore improving services.

We will remove barriers to customers raising their concerns, giving feedback and making a complaint. We will ensure every customer knows how to make and escalate a complaint. We will work with customers where there is a need to put things right and we will act on it without undue delay.

We will make customers aware of independent representation and support when pursuing their complaint. This will include voluntary agencies and statutory bodies like the Housing Ombudsman Scheme or your MP or Local Councillor.

Many complaints can be resolved within the first contact. We will record this as 'feedback' from the customer and will use this as an opportunity for organisational learning.

3. Housing Ombudsman Complaint Code

This policy is based on the Housing Ombudsman complaint handling code and dispute resolution principles – be fair, put things right and learning from outcomes.

We have adopted the principles of the code and have aligned our practises to reflect this, including additional measures contained within the revised complaint handling code launched in March 2022.

4. Complaint Handling

Complaints are handled and managed by the Customer Service Team, whose role is to work as a liaison between the customer and the rest of the business, with an aim to resolve complaints promptly. The customer service team manages the complaints within the Housing Service to ensure responses answer all concerns raised, the customer is updated on the process and responses are sent to the customer efficiently.

5. Exclusions

Cottsway is committed to a fair and transparent feedback and complaints handling service. We will not normally accept complaints or offer escalation to the next stage of our complaint's procedure in the following circumstances:

A routine first-time request for a service, for example reporting a problem that needs to be repaired or initial action on anti-social behaviour.

Our policies and procedures that have a separate right of appeal.

Requests to reopen a previously concluded complaint or to have a complaint reconsidered where we have already given our final decision following a stage 2 investigation.

Where legal proceedings have started.

We may decline to investigate a complaint about a specific incident or service failure that occurred over 6 months prior to the complaint being made. Discretion will be used, particularly if there is evidence of a longstanding or continuing problem.

If we decide not to accept a complaint, for any of the above or any other reasons, we will explain why, and the customer will have the right to challenge this decision by bringing the matter to the Housing Ombudsman.

6. Feedback, complaints and escalation

Feedback cases are managed and completed at the first customer contact. These cases are logged and are visible to the service manager. If not satisfied, the customer may escalate their enquiry. Customers are notified of access to Housing Ombudsman Service at all stages of contact.

Feedback with investigation are cases that require further input and need investigation that is not possible within the first customer contact. A response is made within 2 working days of the first report. If not satisfied the customer may escalate to Stage 1. Customer notified of access to Housing Ombudsman Service.

Stage 1 Complaint. The complaint, earlier findings and any additional feedback from the complainant receives a full review. A response is made within 8 working days. If not satisfied the complainant can, within 5 days, escalate to Stage 2. Customer notified of access to Housing Ombudsman Service.

If a complaint has been logged and is currently at stage 1 of the complaint process, but additional complaint issues are raised by the customer, the complaint handler will incorporate these issues, if relevant, into the current stage 1 investigation and subsequent response. However, if the new issues will cause an unreasonable delay to the stage 1 response, or are raised during stage 2 or an escalation, then the complaint issues raised will be logged as a new complaint. The complaint handler will advise customers of this action.

Stage 2 Complaint. The complaint and any further feedback from earlier responses receives a further review from a service manager with oversight from the Head of Housing. The complaint will be responded to within 5 working days of the escalation. The outcome of Stage 2 ends our complaints process. The customer is notified of access to Housing Ombudsman Service.

If dissatisfied, the complainant may take up the matter through the Housing Ombudsman Scheme. We will make the customer aware of their right to access this scheme at all stages of the issue being raised. Alternatively, the complainant may escalate the complaint to their local MP or councillor.

7. Enabling Complaints

Staff will be trained to recognise when a complaint is being made. Each will take a personal responsibility for seeking to resolve the matter at the first point of contact.

Where a complaint is received on behalf of a customer from a third-party, MP or councillor, it must always be reported to the Customer Service Team. We will make reporting a complaint easy, providing customers with accessible information about how to make a complaint.

We will do this via all communication channels including online, telephone, web, social media, in person or in writing and will periodically publish learning from complaints and actions taken toward improvement including in our annual report, customer newsletter, and website.

8. Compensation

There may be occasions where, if we feel there has been a failure in our service, we *may* consider a financial remedy by way of compensation.

When offering compensation or gestures of goodwill, the complaint handler will consider:

- Delays
- Impact (e.g. Inconvenience, distress)
- Incurred costs
- Loss of value (valuables that have been damaged that are not insured)

Compensation payments will be administered by the Customer Services Manager. Authorisation limits are in line with Cottsway's Financial Regulations and delegated authorities.

9. Managing, monitoring and reporting complaints

We will manage and monitor complaints against published service standards. We will periodically review these, with customers, to ensure they meet their expectations and publish performance.

We will make sure we have staff trained to handle complaints effectively.

We will organise learning from complaints and feedback cases and make recommendations to drive service improvement across Cottsway. We will publish improvements made as a result.

We will ask customers how satisfied they are with how we handled their complaint through an independent service provider and use this feedback to improve the complaints service.

We will benchmark our complaints service and performance with other housing providers.

We will provide complaints performance to our Board on a quarterly basis.

We will review the quality of responses to the formal complaint stages, as well as reviewing trends and themes with 'designated' Board members.

We will share performance through the Customer Insight Group (CIG) to analyse data and improve our service delivery to our customers.

10. Self-Assessment

We will undertake a yearly self-assessment of our complaint handling process against the Housing Ombudsman complaint code, or sooner should the need arise, to gauge how we are performing and to identify learning and trends. Publication of the review shall be made available to our Customers via our website.

11. Publication

We will make the feedback and complaints policy available in a clear and accessible format for customers including publicising the policy on our website and through regular correspondence with customers to ensure our customers understand how to make a complaint.

We will publish our performance in our annual report with learning outcomes.

We will share information on our internal communication channels to enable wider organisational learning.

12. Equality, Diversity & Inclusion

We recognise we may need to adapt our policies, procedures or processes to accommodate the different needs of our customers. We will readily make reasonable adjustments to our ways of working to achieve equal and fair treatment of all

customers. All customers will have access to this Complaints Policy and an explanation of our process, either through the customer website or on request.

We will treat all customers with fairness and respect. We recognise that we have an ethical and a legal duty (through the Equalities Act 2010) to advance equality of opportunity and prevent discrimination on the grounds of age, sex and sexual orientation, disability, race, religion or belief, gender reassignment, pregnancy and maternity, marriage and civil partnership.

13. Associated Documents

Feedback and complaints factsheet - procedure

Policy changes:

July 2019	All third-party and designated person complaints on behalf of a customer must be reported to Customer Service Team. Staff will be trained to recognise a complaint.
December 2020	Adoption of Housing Ombudsman Complaint Code definition. Introduction of new step informing customers of access to the Housing Ombudsman service at all stages. Publication of self-assessment against the Code.
August 2022	Section 3 - Revision of policy to align with updated Code
August 2022	Section 4 - New Section created – Complaint handling
August 2022	Section 5 – New section created - Exclusions
August 2022	Section 6 - Inclusion of additional matters into stage 1 investigation and outcome. Stage 1 – reduction of days from 10 to 5 days for the customer to escalate to next stage.
August 2022	Section 7 - New section created – Enabling Complaints
August 2022	Section 8 - New section created – Compensation
August 2022	Section 10 – New section created – Self Assessment
August 2022	Section 11 - Inclusion of ways for the customer to make a complaint and channels in which learning outcomes will be published.
August 2022	Section 12 – EDI statement refreshed (includes reference to equalities act)
September 2022	Removal of 'designated person' as per HO guidance