

# Compliments & Complaints Policy

## **Purpose**

- 1.1 The Selwood Housing and Silcoa recognise that helpful suggestions from our tenants and other customers are vital in helping us to achieve our objectives and provide excellent customer service.
- 1.2 We analyse the feedback we receive to identify what we are doing well and where improvements can be made. We welcome complaints as they provide an opportunity for us to learn from our mistakes and continually improve our services.
- 1.3 The purpose of this policy is to provide clear guidance on how Selwood Housing and Silcoa handle compliments and complaints for the benefit of everyone who receives services or comes into contact with the work we do.

## **Scope**

- 2.1 This policy applies to all staff and board directors of Selwood Housing and Silcoa.
- 2.2 This policy applies to all tenants, other customers, and people or organisations coming into contact with the work of Selwood Housing and Silcoa.
- 2.3 This policy covers complaints that can be escalated to the Housing Ombudsman and regulated complaints that can be escalated to the Financial Services Ombudsman.

## **Responsibility**

- 3.1 It is the responsibility of the Selwood Housing and Silcoa board directors to set and monitor the policy and ensure that support is provided to staff within Selwood Housing and Silcoa when required.
- 3.2 It is the responsibility of the leadership team to ensure the awareness of this policy, best practice and regulatory requirements. The leadership

team is also responsible for ensuring they guide their teams in its implementation.

- 3.3 It is the responsibility of all managers to ensure compliance with this policy and relevant processes and to act as a role model for their staff, demonstrating how it should be implemented in day-to-day operations.
- 3.4 It is the responsibility of all staff to respond to all feedback at the first point of contact with a tenant or other customer. If the nature of the feedback is dissatisfaction they must strive to resolve it within their delegated authority.

## **Policy principles**

### **Compliments**

#### 4.1 *Definition*

A compliment is feedback that is positive in its nature about the Selwood Housing and Silcoa, its staff, or individuals or organisations that deliver services on its behalf. This occurs when action taken or service provided generates a level of satisfaction that the customer believes is sufficient to warrant recognition or praise being made.

- 4.2 Compliments received will be recorded and passed to the member of staff or team being complimented.
- 4.3 Compliments may be received from any source. This could include letters, emails, telephone or face-to-face conversations, satisfaction surveys, Facebook or other social media.
- 4.4 Managers will acknowledge individuals or teams who receive compliments.
- 4.5 Compliment information will be reported to the Selwood and Silcoa board of management.
- 4.6 Compliments will be shared bi-annually at staff brief and managers are encouraged to celebrate them at team meetings.

## 5.0 Complaints

### 5.1 *Definition*

A complaint can be defined as 'an expression of dissatisfaction where a response is expected' (BS ISO: 10002 2004). The dissatisfaction could be with action we have taken or action we have failed to take or about the standard of service received, either from us or an individual or organisation acting on our behalf.

### 5.2 *What is not a complaint?*

For clarification, the following important topics are not covered by the scope of this policy:

#### *Enquiries*

A tenant, other customer or member of the public requests information about us or the services that we offer

#### *Service requests*

A tenant or other customer makes a request to access services we provide

#### *Reporting anti-social behaviour*

Notification by tenants, leaseholders or members of the public that anti-social behaviour is possibly occurring and requires attention is not treated as a complaint. However, complaints can be raised about how the ASB case is dealt with.

#### *Repair notification*

Request from a tenant that a defect within the property is addressed

#### *Claims for damages or insurance claims*

A direct claim for money not arising from a complaint following an event or incident for which they believe the Selwood Housing and Silcoa or its agents are responsible.

### *Legal claims*

A claim being pursued on behalf of a tenant, leaseholder, member of the public or a 3rd party seeking redress through the courts

### *Disputed contractual issues*

A contractor is unhappy with the way we are behaving or not delivering against a set of pre-agreed commitments

### *Staff grievance*

An employee feels they have a complaint to make about any aspect of their employment or how they have been treated whilst at work by anyone connected with the Selwood Housing and Silcoa.

If an ongoing complaint should fall into one of the above categories, the complaints process will be split and any element relating to the above will be dealt with separately and not form part of the complaint process.

## **6.0 Accessibility**

- 6.1 The Selwood Housing and Silcoa will take steps to ensure that all tenants are aware of the policy and take action to ensure the policy is accessible to all service users.
- 6.2 The Selwood Housing and Silcoa will ensure that anyone who feels they have a complaint to make can do so easily.
- 6.3 Complaints can be made by whatever method the complainant feels is appropriate for them. This could be in writing, by email, by telephone, by visiting the office or during a home visit.
- 6.4 To help enable people to make complaints, Selwood Housing and Silcoa can provide interpreters at all stages of the complaint process. However, we require that customers explore all other forms of advocacy support first - family members, organisation or appropriate internet translation service to assist the customer through the complaints process, prior to an interpreter being engaged.

- 6.5 For any complaints that go through to the panel stage, we will meet reasonable expenses such as taxi or child care costs for complainants attending the panel hearing.

## **7.0 Customer care**

- 7.1 Selwood Housing and Silcoa will manage the Selwood Housing and Silcoa complaints procedure objectively and within the timescales stated.
- 7.2 No matter how the complaint is made, staff will be consistent and courteous in their response and approach.
- 7.4 All staff will treat any complaint objectively and will demonstrate their understanding through attentive listening and sensitive questioning.
- 7.5 Staff are expected to treat each complaint with respect. They will be careful not to patronise or use jargon.
- 7.6 Staff are not expected to endure abusive language or aggressive behaviour and may refuse to deal with a complainant if this occurs.
- 7.7 If the behaviour does not change, the complainant will be told, dependant on the circumstances of how the complaint is being made, that the phone will be put down, to leave the building and advised that the meeting is terminated.

## **8.0 The complaints process**

- 8.1 All complaints should be logged in the contact management system (CMS). The complaint manual which gives full instructions on how to do this can be found on the Shed.
- 8.2 The person investigating a complaint should speak to the complainant in the first instance either over the phone or in person; the details of this conversation can be confirmed in writing if the customer advises that they would like this.
- 8.3 All written correspondence, incoming or outgoing must be saved in the complaints note screen in CRM.

## **Stages of the complaints procedure**

Informal stage

### **9.0 Expressions of dissatisfaction (EOD)**

- 9.1 All dissatisfaction should be treated as a complaint and logged on CMS usually as an EOD in the first instance. However, in some instances depending on the nature of the complaint, the investigator may start the complaint at stage 1 of the complaints process.
- 9.2 All staff must try to resolve the complaint at this stage. This allows us to tackle the issues that have caused the dissatisfaction at the earliest possible opportunity.
- 9.3 Once action has been taken to resolve an EOD, the complaint should be closed on CMS. However, customers should always be asked if they would like written confirmation of what has been agreed.
- 9.4 Most dissatisfaction can be dealt with in this way. However, any dissatisfaction that cannot be resolved at the first point of contact should be escalated to a stage 1 complaint.
- 9.5 In agreement with their manager, complaint investigators or the person delegated to complete the investigation can escalate a complaint to stage 1 if they feel that the nature of the complaint requires a formal investigation.

### **10.0 Stage 1**

- 10.1 Complaints at stage 1 must be recorded and monitored in the complaints module of the CMS system.
- 10.2 If a complaint has been closed at EOD stage but it subsequently needs to be escalated to stage 1, a new stage 1 complaint should be logged in the CMS system. It is not possible to re-open a complaint that has been closed.
- 10.3 Team managers are responsible for the investigation of stage 1 complaints. They may delegate responsibility to specific individuals to

carry out the investigation but they retain overall accountability for complaint resolution.

- 10.4 Team managers must log accurate records. Ensuring notes, supporting evidence, telephone conversations and written correspondence are recorded in the complaints maintenance screens. Concluding with an explanation for their decision on the outcome of the complaint. Depending on the nature of the complaint this may not be a weighty document. However, it is important to document the investigation whilst memories are fresh.
- 10.5 The written response to the complainant must always come from the team manager.

## **11. Financial services complaints – regulated complaints**

- 11.1 Complaints about our financial services or regulated complaints (which will include complaints about hire agreements) should always be logged at stage 1 of the complaints process to the income and money advice manager.
- 11.2 The complaint should be acknowledged as detailed above and cannot proceed beyond stage 2 of our complaints process.
- 11.3 Stage 2 complaints will be investigated by the group housing director and Silcoa group asset director
- 11.4 Financial service complaints must be concluded within 8 weeks of the commencement of the initial complaint start date and includes stage 2 investigation of the process.

The response must either:

- Accept the complaint and, where appropriate, offer redress or remedial action
- Offer redress or remedial action without accepting the complaint
- Reject the complaint and gives reasons for doing so

It must also contain:

- A copy of the Financial Ombudsman Services standard explanatory leaflet
- The website address of the Financial Ombudsman Service

And advise:

- The complainant that if they remain dissatisfied with the response they can refer their complaint to the Financial Ombudsman service; and
- Indicate whether or not the respondent consents to waive the relevant time limits (must contact ombudsman within 6 months of our response)

## **12 Silcoa expressions of Dissatisfaction & stage 1 complaints**

- 12.1 Dissatisfaction or complaints related to our repairs maintenance service need to be raised in the contact management system in exactly the same way as any other complaint.
- 12.2 Complaints about operatives, a repair or planned works should be raised to the relevant Silcoa contract manager.
- 12.3 If an investigation discovers that the complaint is about policy the complaint will revert to the policy complaints process as detailed in section 16 of this policy.

## **13 Stage 2 complaints**

- 13.1 The investigator of the stage 1 complaint should escalate to stage 2 and assign to either the customer support manager who will consider who is best placed to investigate or a member of the leadership team.
- 13.2 People who are not eligible to take their complaint to the Housing Ombudsman can only take complaints up to stage 2. This would be people who have no relationship with us as a landlord, such as private home owners (who may or may not receive services from us).

## **14.0 Stage 3 complaints**

- 14.1 The final stage of the complaints process is an appeal to be considered by the complaints panel, which is made up of 3 board directors.

- 14.2 Anyone who has a relationship with us as a landlord can escalate their complaints to stage 3. This includes applicants for housing.
- 14.3 The manager escalating the complaint should record it on the CMS system as a stage 3 complaint. The PA's will take over the administration of stage 3 complaints.
- 14.4 The complainant will be invited to attend the hearing and may bring a relative or other advocate with them for support.
- 14.5 Once the panel has considered the appeal and made its decision, a letter will be sent to the complainant confirming the decision.

### **15.0 Housing Ombudsman**

- 15.1 The stage 3 letter should confirm that the panel is the final stage of the internal complaints process and explain that the complainant can contact the Housing Ombudsman and how to do that.

### **16.0 Correspondence and feedback**

- 16.1 All dissatisfaction considered at the first stage (EOD) and raised via telephone or email should be responded to within 2 working days, If no significant investigation is required. An EOD can be withdrawn if at least 3 attempts on 3 different days at 3 different times have been made to contact the customer. All attempts to make contact must be logged in CRM.
- 16.2 In instances where dissatisfaction is expressed by letter, staff should consider whether it is to be treated as an EOD or stage 1 complaint (this is likely to depend on who the letter is addressed to and the nature of the dissatisfaction). If it is to be treated as a stage 1, 2 or 3 complaint then the letter should be acknowledged within 5 working days.
- 16.3 Staff should also respond to dissatisfaction expressed in satisfaction surveys within 5 working days of it being received.
- 16.4 The workflows in CMS are set for 5 working days to allow for acknowledgement of complaints in writing. Staff need to be aware of this and adhere to the timescales set out in this policy.

16.5 It is not expected that whatever has caused the complaint will necessarily be resolved within these timescales. For example, an appointment not kept by a contractor may need to be re-booked for a later date. The key point is that an action to resolve the complaint has been taken. It is also acceptable to advise a complainant that more time is needed to respond. However, the complainant should be given a date by which they can expect to hear back from us.

16.6 We should investigate and respond to complaints at stage 1 and 2 within 10 working days of the date of acknowledgement.

16.7 Anyone making a complaint that goes to stage 1 or 2 can expect:

- Acknowledgement in writing setting out our understanding of the complaint and the date by which they can expect a response. There may be occasions when we are unable to meet this date; for example, if we need to carry out further investigation. If this is the case, we should write to the complainant within the 10 working days explaining why we need more time and advising them of the date by which they should expect a response.
- A response letter, which sets out our findings, whether we uphold, partially uphold, or do not uphold the complaint and details of any action we propose to resolve the complaint.
- The response letter should explain that the complainant may escalate the complaint to the next stage and how this can be done. Complainants should be given 28 days to do this or the complaint will be closed. However, this period can be extended in cases where any agreed actions, such as repair work, cannot happen within that time.
- If we are not advised within that timescale that the complainant wishes to escalate the complaint, a letter should be sent explaining that the complaint has been closed and that the complaint cannot be re-opened. However, it should explain that the complainant can refer their complaint to the Housing Ombudsman and how to do that.

16.8 Anyone making a complaint that goes to stage 3 can expect:

- An acknowledgement letter confirming that a complaints panel hearing will be arranged and that we will contact them again to confirm a mutually agreed time and date for that hearing.
- A letter inviting the complainant to attend the panel hearing, setting out what the complainant can expect at the hearing will be sent. We try to hold the hearing within 30 days of the date of acknowledgement of the stage 3 complaint. If at the request of the complainant the hearing date changes, a final date will be agreed and the hearing will go ahead in their absence if they are unable to attend.
- A pack containing all the evidence that the panel will consider when making its decision. This should be sent 14 days in advance of the hearing. It should be made clear that the complainant has the opportunity at this stage to provide further evidence in support of their complaint and that the panel will not consider any evidence that is not provided at least 7 days in advance of the hearing, unless agreed by the Chair of the panel in exceptional circumstances.
- A letter informing the complainant of the panel's decision and explaining the reasons for that decision should be sent within 5 working days of the date of the hearing. The letter should also explain that the panel is the final stage of the complaints process and its decision closes the complaint. However, it should explain that the complainant can refer their complaint to the Housing Ombudsman and how to do that.

## **17.0 Complaints about members of staff**

- 17.1 Dissatisfaction with a member of staff will in the first instance be investigated by their line manager.
- 17.2 The CMS 'investigate complaint' action should be allocated to the member of staff's manager who will then investigate the complaint ensuring accurate records are kept and confidentiality is maintained.

17.3 If the complaint is about a member of staff who reports directly into a member of the leadership team, the complaint should start at stage 1 of the complaints process.

## **18.0 Complaints about policy content**

18.1 If a complaint is received that appears to be about policy, it should be escalated to the policy owner.

18.2 All complaints about policy should be reviewed by the policy owner to establish whether or not the policy has been followed. If it is found that the complaint relates to the implementation of a policy, then the complaint should be progressed through the complaints process. The review will take the place as a stage 1 investigation.

18.3 If the review concludes that the policy has been followed correctly and that the complaint is about the policy itself, the policy owner should ask for approval from their executive director to close the complaint. Policy complaints cannot progress past stage 1.

18.4 The policy owner or person delegated to investigate it should write to the complainant explaining that the complaint has been closed and that this is the end of the internal complaints process.

18.5 Policy complaints should be reviewed by the executive team to determine if there are any that prompt a review of the policy. Any changes to policy should be made under the usual delegated authority. In addition, a summary of policy complaints should go to the board of directors every 6 months.

18.6 Individual complainants will not receive any further feedback on their complaint unless it is decided that the policy they have complained about should be amended. In that case, the policy owner or person delegated to deal with the complaint should write to the complainant within 10 working days of the decision to either uphold or not uphold the complaint.

## **19.0 Closure and completion**

19.1 Complainants will be given 28 days following our response of a complaint, at stage 1 or 2 to confirm that they are satisfied with the outcome or

request that the complaint is escalated to the next stage. This period can be extended in cases where the agreed action cannot happen within that time. Reminders should be set in outlook calendars as a prompt.

- 19.2 In instances where a complaint is completed because the Selwood Housing and Silcoa believes it cannot do any more to resolve the issue or that the outcome will not change if the complaint is progressed to the next stage, the complainant, where appropriate, should be advised how to contact the Housing Ombudsman.

## **20.0 Learning from complaints**

- 20.1 When closing a complaint at any stage any learning must be logged on the CMS
- 20.2 When a stage 2 complaint has been closed, the complaint investigator must complete a learning from complaint form, which highlights any learning or actions that need to be carried out because of the complaint.

## **20.0 Vexatious and serial complaints**

- 20.1 A small number of people may persist unreasonably with their complaints or make complaints in order to make life difficult for the Selwood Housing and Silcoa rather than to resolve a genuine grievance. This may also involve making serial complaints about different matters over and over again.
- 20.2 If a member of staff believes that a complaint falls within this category, they should discuss it with their manager, who in turn will raise the issue with their executive director.
- 20.3 Only the executive team can take the decision to treat a complaint as vexatious.
- 20.4 All staff must take account of the following safeguards if the executive team makes the decision to treat a complaint as vexatious:
- It should not be assumed that the complainant's next complaint is vexatious - each complaint should be considered on its merits.

- New evidence that is presented about a matter should be considered at the appropriate complaints stage - staff must not simply ignore a complaint because it has exhausted our complaints process.
- Restricting contact does not mean that correspondence should not be read and acknowledged - any future correspondence from the customer should be read in case it contains any significant new information.
- Where vexatious or abusive complaints occur on social media, the Selwood Housing and Silcoa reserves the right to remove them from the public domain.
- Staff should always make it clear that a tenant has the right to appeal to the Financial or Housing Ombudsman, whatever our decision may be.
- Staff need to be aware that mental health issues may be causing particular behaviour - where there is any cause for concern about a customer's vulnerability, this must be raised with your line manager or executive team member.
- When a decision is made to treat a complaint as vexatious, the customer should be told, in writing, why a decision has been made, what the restricted contact arrangements are and the length of time that these restrictions will remain in place.

## **21.0 Anonymous complaints**

21.1 Managers should be made aware of anonymous complaints and initiate an investigation as far as it is practical for them to do so. However, the processes described in this policy will not apply to anonymous complaints. Some anonymous complaints may be covered by the Whistle blowing for tenants policy.

## **22.0 Compensation and Gestures of goodwill**

Please refer to the Claims, goodwill, regulatory and statutory payments policy for further information.

- 22.1 Complainants may seek to obtain redress of what they consider to be a legitimate claim for compensation or damages through court action. If this occurs, the guidance within the claims, goodwill, regulatory and statutory payments policy should be considered. Decisions to make payments of this kind can only be made by the leadership team.
- 22.2 Where elements of the complaint are related to claims for damages or court action, Selwood Housing and Silcoa's solicitors or insurers will deal with these separately from the complaints process. Remaining issues not linked to claims for damages or court action will be dealt with under the complaints process.

### **23.0 Training**

- 23.1 All the Selwood Housing and Silcoa staff will be trained in this policy and its associated processes.
- 23.2 All Selwood and Silcoa board directors will be made aware of this policy and its relevant processes.

### **24.0 Monitoring**

- 24.1 Managers are responsible for monitoring their compliments and complaints information and will monitor trends and initiate service improvements within their area of responsibility.
- 24.2 The group people director will oversee the production of a six-monthly report, which will be presented to the Selwood Housing and Silcoa board of directors. This report will document compliments and stage 1 -3 complaints including causes, apparent trends and goodwill payments made, as well as any learning from the complaint and complaints about policy.

### **25.0 Equality and diversity**

- 25.1 Selwood Housing is committed to equality and diversity in both the delivery of services to tenants and other customers. We recognise that we provide services to a wide range of tenants and other customers who have diverse needs and our aim is to offer services that take individual needs into account in all of its work, the Selwood Housing and Silcoa will take into consideration its policy relating to equality and diversity.



