

# Review into Communication in the Complaint Handling Process

May 2020 - November 2020  
(covering complaints made from July 2019 to July 2020)

Prepared by: Scrutiny Team

## **Introduction and Objectives**

The key areas of interest for this review were how communications are managed within the complaints process, to understand the outcome of this process with customers who make a complaint and to assess the quality and quantity of that communication with regard to customer expectations.

A previous scrutiny review of complaints was carried out in 2015 but did not include detail of the customer journey.

The Scrutiny team recognised that there was a lot going on during this review in relation to complaints, namely the internal audit and the launch of the new Handling Code from the Housing Ombudsman in July 2020. However, the decision was taken to continue as the focus was on the customer journey.

Areas identified were:

- Policies and procedures around communication with customers.
- Ease of making a complaint
- Customer journey end-to-end
- Regulatory standards

There were 6 points of focus:

- Review of existing Selwood complaints policy and procedure
- Examine complaints statistics and internal audit
- Benchmarking against other housing associations regarding ease of making a complaint

- Scrutiny of information on Selwood website
- Staff interviews with Customer Support and Service managers
- Customer interviews

We were interested in the way processes operated, balancing the business need and legal requirements for complaint resolution, with an understanding of the information available to customers and customer satisfaction with communication throughout the journey of their complaint.

### **Objectives:**

- a) To inspect all relevant documents including Compliments and Complaints Policy, Complaints training, Compliance, Together with Tenants Charter and the New Complaints Handling Code from the Housing Ombudsman.
- b) To examine available statistics from the Internal Audit, Annual Report and CSN
- c) To carry out a benchmarking exercise with a selection of other housing association websites
- d) To look into the customer information available online to establish effectiveness, ease of use, clarity, objectivity, accessibility and fairness.
- e) To talk to Service managers and Customer Support personnel to examine their methods and gain their views of the processes.
- f) To carry out telephone customer interviews
- g) For the scrutiny team to draft a final board report with recommendations and produce an action plan in partnership with the Service Manager of Customer Support and the Group People Director.
- h) For learning outcomes from the review to be fed back to the relevant areas of the organisation.

- i) For any action plan to be monitored by the relevant Selwood team and the scrutiny team.

## **Review Process**

The Scrutiny Team undertook the following actions:

1. The team explored in detail the existing written policies and procedures, customer support training materials, sample letters and regulatory standards in relation to complaints as well as looking at the Together with Tenants charter and the new Complaints Handling Code from the Housing Ombudsman.
2. Scrutiny team examined complaints statistics, annual report and the internal audit.
3. The team examined the ease of use of website information provided for customers.
4. A benchmarking exercise was undertaken in order to identify positives and negatives against housing associations either local or of a similar size.
5. The team interviewed the Customer Support Managers, Complaints Resolution Coordinator and Service Managers.
6. The team interviewed a cross section of Customers.

## **Findings / Observations**

### **1. Policy, Processes, Training and Regulatory Standards**

1.1 The team scrutinised the Compliments and Complaints Policy document which raised queries on the execution of some of the details.

1.1.1 The Complaints Process 8.2 of the Policy – *‘the details of the conversation can be confirmed in writing if the customer advises they would like this’*

Questioned as to whether written details were always offered, there was a disparity in staff answers with some saying they should always be offered but most reporting it is usually only when the customer asks.

Of the customers questioned, only 1/14 said they were offered this facility with the rest saying they were neither offered nor were aware this was available.

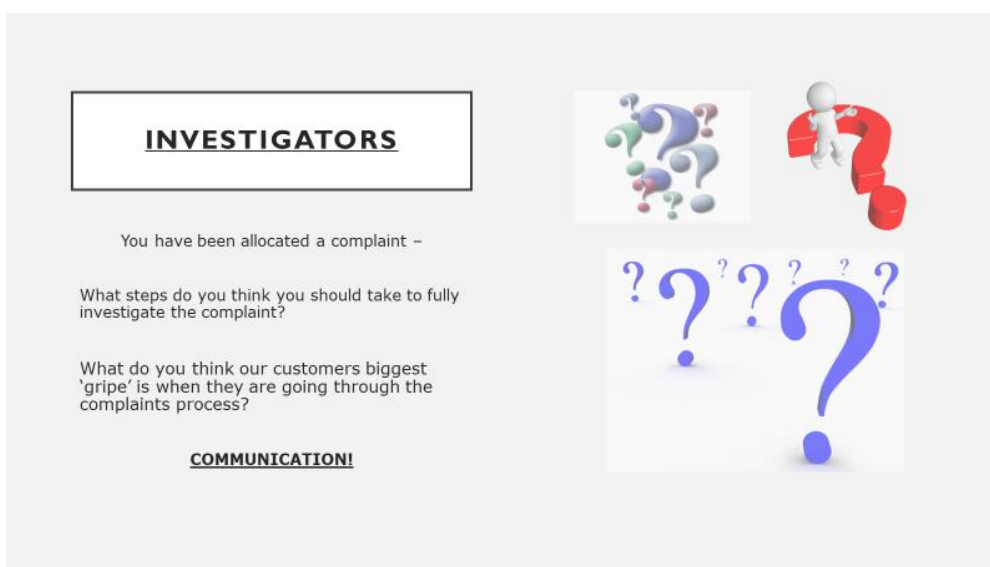
1.1.2 Correspondence and Feedback 16.1 of the Policy – *‘an EOD (Expression of Dissatisfaction) can be withdrawn if at least 3 attempts, on 3 different days, at 3 different times have been made to contact the customer’*.

Questioned as to whether a customer is informed that their complaint has been officially closed after 3 attempts at contact, one staff member said they would leave a voicemail to this effect but other staff members reported they would not leave a final message. Scrutiny was told that the customer would be informed of the procedure earlier in the process.

### **1.2 Complaints Manual/Complaints Training**

The team was provided with comprehensive information regarding the Complaints Manual and associated training.

It was interesting to note that one of the training slides states ‘What do you think our customer’s biggest ‘gripe’ is when they are going through the complaints process? COMMUNICATION!’



The scrutiny team finds the training materials to be appropriate and thorough on paper but less effective in practice as will be borne out by the results of customer interviews detailed below.

The team was sent several anonymised letter examples by the Complaints Coordinator and found them to be extremely thorough and explanatory.

### 1.3 Regulatory Standards

1.3.1 The Scrutiny team acknowledges the Board report Compliance with regulatory standards of May 2020 which shows that Selwood is compliant with the Tenant Involvement and Empowerment Standard which states they shall:

- *provide choices, information and communication that is appropriate to the diverse needs of their tenants in the delivery of all standards*
- *have an approach to complaints that is clear, simple and accessible that ensures that complaints are resolved promptly, politely and fairly.*

[www.gov.uk/government/publications/regulatory-standards](http://www.gov.uk/government/publications/regulatory-standards)

**1.3.2 Together with Tenants Charter** – the team has also noted the Commitments in the Revised Plan July 2019 of this charter which include – *Communication, Voice & Influence and When Things go Wrong*. However the team has since learned that Selwood has not adopted this charter at this moment in time  
**see Appendix 1**

**1.3.3 The New Complaint Handling Code** – the team has studied this code from the Housing Ombudsman published in July 2020, in particular selecting the following key points:

- Providing easy access to the complaints procedure and ensuring residents are aware of it, including their right to access the Housing Ombudsman Service.
- The structure of the complaints procedure – only two stages necessary and clear timeframes set out for responses.
- Ensuring fairness in complaint handling with a resident-focused process.
- Creating a positive complaint handling culture through continuous learning and improvement

Quote from Richard Blakeway, Housing Ombudsman –

*“The code responds to resident concerns about the consistency and accessibility of complaint procedures. An effective complaints process will help to create a positive complaint handling culture, benefitting both landlord staff and residents.”*

The Scrutiny team finds that the common thread from the regulatory standards are requirements for ease of access, regular communication and awareness. Whilst accepting that Selwood is officially compliant, our findings are that there is room for improvement in these areas

## **2. Statistics**

2.1 **Internal Audit** of July 2020 looked at ‘the arrangements for monitoring complaints received and ensuring that appropriate action is taken in a timely manner’. The audit found this to be compliant with the regulatory standards and published on the website.

However the audit also points out there was a total of 704 complaints received by Selwood in 2019/20 compared to 460 in the previous year which scrutiny finds concerning.

In talking to customers the team was not concerned with the level or nature of the complaint, only the responses, timeliness and communications received from Selwood.

So whilst we accept the information from the **Annual Report** that only 109 formal complaints were managed, the remaining 595 Expressions of Dissatisfaction were still complaints as far as the customers were concerned and required action and communication.

2.2 **Tenant Conversation.** Figures were also noted from the three-year Tenant Conversation of January 2019 where 68% of customers surveyed said they did know how to make a complaint (or compliment), 13% said they did not know how and 19% were unsure.

The team considers this lack of awareness is at odds with the ideals of customer satisfaction.

### 3. **Selwood Website**

The Scrutiny Team looked in detail at the website, concentrating in particular on the ease of finding the complaints area and the Compliments and Complaints Policy document.

There is no direct access to Compliments and Complaints area from the Home page. A customer either needs to enter their choice into the search bar, or click Menu – Contact Us or scroll to the foot of the Home page to find Contact Us. This then provides a link to ‘Make a Complaint’. From this page the customer is also able to ‘Read more about our Complaints Process’ but even then, there is no link to the full Compliments and Complaints Policy document. This is to be found under Documents and Policies but it is not readily obvious.

#### 4. Benchmarking

During the Scrutiny Team benchmarking exercise, a number of other housing association websites were explored and the general feeling was that many were easier to navigate than Selwood's when accessing the relevant area for making a complaint, (or paying a compliment) and finding policies. Examples include:

- Saffron Housing <https://www.saffronhousing.co.uk/>
- Bolton at Home <https://www.boltonathome.org.uk/>
- Curo <https://www.curo-group.co.uk>

All three associations include a Live Chat facility and all provide a link to an online form for complaints either direct from their home page, from one click on Help and Advice or from the customer's own account area.

#### 5. Staff Interviews

One member of the Scrutiny team interviewed Customer Support Managers, the Complaints Resolution Coordinator, Service Managers and Group Research Analyst.

The questions can be found in **Appendix 2**

The team learned that customer support is the first point of contact and if an adviser is able to solve the issue they will, otherwise the matter will be passed to the relevant department. All advisers are trained by the team managers.

Decisions on whether an Expression of Dissatisfaction should be escalated to Stage 1 can be made by any adviser with manager assistance if needed

All customer support staff indicated that written details of the initial complaint are not offered, but reliant upon the customer asking for the information to be relayed by the medium of their choice, email or letter.

The Scrutiny team asked if telephone calls were recorded for the purpose of accuracy in providing written details and were assured that calls to the office are recorded and details kept for 7 days. Working from home during the pandemic lockdown meant recording calls was not possible although one manager told us the IT department was looking into this.



Departmental Service managers were interviewed and all reported that they telephoned customers and made home visits (when possible) by way of investigating the complaint and would keep in touch by the customer's preferred means, - telephone or email - on a weekly basis.

The Group Research Analyst was asked whether customer satisfaction surveys included questions on communication. The reply was that currently this is not the case. The team also heard that there is no survey underway at the moment although it is in the pipeline and a consultation on complaint handling will be brought in.

In customer satisfaction surveys a score of 1 being bad to 5 being happy is used.

Customer service staff working in reception – outside pandemic restrictions of course – were asked if interview rooms were available for customer privacy when making a complaint in person. The team learned this is possible once the nature of the complaint has been established and the relevant department notified, whereupon a manager may come to reception.

## **6. Customer Interviews**

Two team members undertook telephone calls to a total of 14 Selwood customers. Those interviewed were a good representative cross-section of customer profile and included whether their complaint was before or during the coronavirus pandemic.

Ten questions were asked of customers – see **Appendix 3**.

All but one customer used the telephone to register a complaint, the other chose to use email.

It appeared the reason the vast majority favoured telephone contact was that this gave an immediate response

Some customers stated that the customer support staff were sympathetic to their complaint, although five expressed a view that they were 'most unhelpful'. This was particularly the case when using the out of hours service.

With out of hours complaints, the customer is unaware they are not speaking directly to Selwood staff in Trowbridge. This can complicate the issue when customers are giving details of their particular accommodation and location adding frustration to an already anxious situation.

The lack of knowledge, and often what appears to be a dismissive attitude by Tunstall call operators, creates undue stress especially in an emergency context.

Some customers stated there had been no promised call-back by Selwood after the weekend, putting the onus on the customer to make repeated calls.

The team was told in 2019 that Tunstall was then in year 4 of 5 of providing this out of hours service.

Many of the customers contacted felt they were not being listened to throughout the handling of their complaint.

No customers reported that they were offered details of their initial conversation in writing.

Two customers stated that their complaint was resolved quickly and as a result of their initial telephone call.

Only in one case was the complaint process and timescale explained to the customer.

In no cases was the customer informed that they were entitled to take their complaint to the Housing Ombudsman, with most saying they were completely unaware of this facility.

The majority of customers complained they were not kept updated on the progress of their complaint.

The satisfaction level of communication from Selwood was judged to be – where 1 is bad and 10 is excellent:

- 0-2 65%
- 3-5 21%
- 6-10 14%

The satisfaction level of customer support staff attitude:

- 0-2 50%
- 3-5 28.5%
- 6-8 7%
- and just 2 customers registering 9-10

## **Recommendations**

- 1.** Scrutiny recommends that customer support staff should ensure they offer the details of the customer conversation in writing, rather than rely on customers requesting this.  
This communication should also include an explanation of the process, an estimate of the timescale where possible, information on access to the Housing Ombudsman and/or direction to the Selwood website for further information.
- 2.** Scrutiny recommends that a letter, or email where preferred, be sent to customers informing them that their Expression of Dissatisfaction has been closed following the accepted procedure set out in Findings 1.1.2 above.
- 3.** The scrutiny team feels that Selwood should make more use of social media to promote the information available on the website around the Complaint Policy and Process and access to the Housing Ombudsman.

4, The scrutiny team would like to see a more easily accessible route to the complaints area of the website from the home page with emphasis on complaints being a positive force for improvement of services.

5. The team would like Selwood to consider the introduction of a Live Chat facility as noted from benchmarking. This is an increasingly popular method of live communication where perhaps the telephone is less favourable for some customers in the event of hearing or confidence issues.

This additional service could have the potential to speed up the complaint handling process and give customers an added option in live communication with Selwood, with the extra benefit of a transcript being available.

6. The scrutiny team is most concerned about the standard of communication and attitude from the out of hours service provider. The team recommends that Selwood considers introducing their own in-house out of hours service, which would increase customer confidence and raise the profile of Selwood with regard to communication.

7. The scrutiny team feels that the fact many customers believe they are not being listened to is a major issue, adversely affecting the image of Selwood as a caring provider of homes. The team recommends that staff who deal directly with complaints have further training on telephone approach and attitude.

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The scrutiny team would like to acknowledge and thank all staff and customers who gave their time and information willingly and cooperatively to this review, especially in the face of the coronavirus pandemic, the restrictions of working from home and virtual meetings.

**Scrutiny members invested 370 hours on this review**

## **Appendix 1**

### **Extract from the Together with Tenants Charter Revised Plan**

**July 2019**

#### **Commitments**

**Communication** – Tenants and residents will receive clear, accessible and timely information from their Housing Association on the issues that matter to them including important information about their homes and local community, how the organisation is working to address problems, how the organisation is run and information about performance on key issues.

**Voice and Influence** – Views from tenants and residents will be sought and valued and this information will be used to inform decisions. Every individual tenant will feel listened to by their housing association on the issues that matter to them and can speak without fear.

**When things go wrong** – Tenants and residents will have simple and accessible routes for raising issues, making complaint and seeking redress. Tenants and residents will receive timely advice and support when things go wrong.

## **Appendix 2**

### **Staff Questions for Review into Communication in the Complaint Handling Process**

**CS – Customer Support**

**SM – Service Managers/Department representatives**

**GA - Group Analyst**

- CS** 1. Are all communications kept within customer support or delegated to individual departments?
- 1b. At what point is the Customer passed on to the relevant department?
- CS** 2. Within the customer support department, are there nominated individuals who deal with different types of complaint- ie someone who specialises in rent, repairs etc?
- CS** 3. How is the complaint process explained to the customer, including timescale expectations, particularly if they do not have access to the internet/website?
- CS** 4. Whose decision is it as to whether a complaint is an EOD or higher?
- CS** 5. If the customer support representative decides the 'complaint' is actually an enquiry, how is this communicated to the customer in a sympathetic manner?
- CS** 6. With reference to item 8.2 in the Compliments and Complaints Policy, *'the details of this conversation can be confirmed in the writing if the customer advises that they*

*would like this'* – is this readily offered to the customer or reliant upon customer request?

**6b** Also are phone-calls recorded for accuracy for the purpose of a letter?

**CS/DM** 7. How often are customers updated on the progress of their complaint and by what means?

**CS/DM** 8. With reference to item 16.1 of Compliments and complaints policy '*an EOD (Expression of Dissatisfaction) can be withdrawn if at least 3 attempts on 3 different days at 3 different times have been made to contact the customer*' - is the customer informed that this is the case and is the customer informed of the withdrawal once it has happened?

**CS** 9. In the last review on Complaints in Feb 2015, reference the action plan item 22 - *Comments cards should be created - it says 'Current 'Tell Us About It' pads to be reviewed to see if they can incorporate the information recommended'*, Lyn Collins was due to action this - has this been done?

**CS/R** 1. How do you approach and handle a complaint on a face to face basis at reception?

2. Is there an option for the customer to be seen in a private space rather than openly in public view and hearing?

- GA**
1. What questions are currently asked through CSN, to ascertain customer satisfaction and do they include questions on communication?
  2. How do you measure if the customer was satisfied with the communication throughout the process?



### **Appendix 3**

#### **Customer Questions – including whether the complaint had been before or during the current pandemic**

1. How long have you been a customer of Selwood housing?
  
2. Were you aware of the different ways of making a complaint and which method did you use?
  
3. Was the customer support representative you first spoke to sympathetic towards your complaint?
  
4. Were you offered the details of your conversation in writing?
  
5. Was your complaint resolved from that first contact or was it referred on to the relevant dept?
  
6. If the complaint was referred on, was the complaint process and timescale fully explained to you and did you find this satisfactory?
  
- 6a. Also were you informed the in the event of an unsatisfactory outcome, you are entitled to take your complaint to the Housing Ombudsman?

7. **If the complaint was referred on** – how often were you kept updated with progress and by what means?

8. On a scale of 1-10 where 1 is low, how would you rate the level of communication you received throughout your complaint journey?

8a **dependent on score below 5**– what would help you to give a higher score?

9. On a scale of 1-10 where 1 is low, how would you rate the attitude of the members of staff you dealt with?

9a **dependent on score below 5** – what would help you to give a higher score?