

# Customer Feedback Policy

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## 1 Policy Information

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Contributors	Scrutiny Panel Quality and Performance Officer SLH Management team
Responsible Director	Director of Innovation, Technology & Risk
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## 2 Policy Statement

South Liverpool Homes' (SLH) Customer Feedback Policy has been designed to provide customers with an opportunity to tell us what they think about the service they receive from us in an easy, efficient and fair way. The policy provides SLH with the opportunity to continually improve as a result of enthusiastic listening to customer views and taking the appropriate action.

The policy sets out SLH's approach to managing informal complaints and the two stage process for formal complaints. It also details how complaints, suggestions and compliments will be used to inform continuous learning and improvement at SLH.

## 3 Policy Aims

The aims of this policy are to:

- Provide a fair and efficient approach to customer feedback that achieves high standards of delivery
- Welcome all customer feedback on the standards of our service and make it easy for this feedback to be provided
- Resolve all complaints at the first point of contact, informally, wherever possible
- Ensure that all complaints are dealt with efficiently and effectively within published timescales
- Give appropriate redress and awards for loss or inconvenience
- Learn from feedback and tell customers how we use it to improve our services
- Record, monitor and analyse feedback in order to examine service performance and help to improve service delivery
- Ensure that we are compliant with the Housing Ombudsman's Complaint Handling Code (April 2022)

## 4 Customer Feedback Policy

### 4.1 Compliments and comments

We welcome compliments and comments about the services we provide or about services provided by others on our behalf. They are an opportunity to feedback to colleagues about where things have gone well, as well as an opportunity to learn from what customers like about our services. All instances of compliments will be logged and fed back to relevant colleagues / teams. Any comments will be logged with action taken appropriate to the comment.

### 4.2 Suggestions

We welcome suggestions about how to improve. These will be logged and fed back to the customer whether or not the suggestion can be implemented.

### 4.3 Complaints

SLH aim to provide an outstanding service where all our customers are treated fairly. We look to continually improve the service we provide and welcome complaints as this helps to highlight issues we may not have been aware of.

When this happens, we will investigate and resolve the issue pragmatically, learn from the experience and change the way we do things to ensure that it does not happen again.

SLH define 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, affecting an individual resident or group of residents'.*

A customer does not have to use the word complaint for it to be treated as such.

#### **4.1.1 Who can make a complaint?**

Anyone who receives a service from SLH, or someone on their behalf, can make a complaint. This includes:

- SLH tenants or advocates (for example; friends or family acting on behalf of the tenant with their permission). The complaints procedure is not a legal process therefore solicitors may only act as an advocate and not as a legal representative
- SLH housing applicants
- Non-SLH tenants or members of the public who receive a service from us or are affected by a service delivered by us
- Councillors and MP's\*

We will investigate and respond to all complaints even if the source of the complaint is unknown. Therefore, anonymous complaints will be dealt with using the complaints process but without a formal response.

\*SLH will treat a Councillor or MP correspondence as an enquiry in the first instance unless they specifically request for the issue to be handled as a formal complaint. This type of enquiry will be acknowledged and responded to within the same timescales as a stage 1 complaint.

#### **4.1.2 When does the policy not apply?**

There are times when SLH will not consider complaints under this policy. This includes:

- Initial request for a service for example reporting a repair. A complaint can only be made after the issue has been reported and SLH has been given an opportunity to respond
- Complaints about anti-social behaviour (ASB) or nuisance, such complaints will be handled by SLH's Anti-Social Behaviour Policy. Complaints about ASB will only be accepted under the Customer Feedback Policy where someone is unhappy with the way SLH has dealt with a case of ASB
- Complaints from colleagues unless they are a tenant and it is a tenancy related issue
- Claims for compensation as these will be dealt with by SLH's insurers
- Complaints where the customer is taking legal action about the same issue as this will supersede this policy

- Complaints in relation to an issue over six months old
- Complaints that have already been dealt with under this policy

In such cases, we will write to the customer advising them why we are unable to handle the matter in line with this policy and advise them of their right to approach the Housing Ombudsman about this decision.

Any allegations about alleged inappropriate conduct of SLH Board Members and / or Executive Management Team (EMT) will be handled separately by the Chief Executive and or the Chair of the Board. Any allegations will be taken seriously and in severe cases investigated by an independent party.

SLH reserve the right not to deal with complaints under this policy, where the complainant is persistent with their contact or in raising issues with SLH. Their enquiries will still be responded to but SLH cannot deal with multiple consistent complaints from the same customer.

#### 4.1.3 How to make a complaint

Complaints can be made easily in a range of ways, including in person, by telephone, email, online, via social media and in writing.

#### 4.1.4 Informal complaints

SLH will do everything we can to resolve the issue at the first point of contact through an informal route. We will try to sort out the problem straight away, or will refer to the relevant officer or manager dealing with the service.

Informal complaints are recorded and reviewed internally and with our Scrutiny Panel to identify any learnings and improvements we can make to our services.

#### 4.1.5 Formal complaints

Where a complaint cannot be resolved informally or where a customer requests for their complaint to be logged formally, a two stage process will be used to try and resolve the complaint with emphasis on personal contact with the customer to try and resolve the matter.

The two stages are as follows:

Stage	Description	Complaint acknowledged within	Full response provided within	Complaint Manager
1	Investigation	2 working days	10 working days	Service Manager/ Lead or Head of Service
2	Review	2 working days	20 working days	Complaints Review Panel

SLH is committed to ensuring that complaints are dealt with efficiently. Therefore, a trigger is in place to alert the Director of Innovation, Technology & Risk of any complaint being responded to out of the above deadlines, who will ensure that the complaint is responded to promptly.

A customer can choose to have their complaint reviewed by the Complaints Review Panel but only after a full response has been provided at the investigation stage.

The customer will be asked to provide the reason why they remain dissatisfied. The customer's request should be made within 10 working days of the investigation response being sent. SLH will close the case if no response is made within the 10 days and reserve the right not to reopen it. In such cases, we will write to the customer advising them of this and advise them of their right to approach the Housing Ombudsman about this decision.

#### **4.1.6 Redress**

The redress needs to be appropriate to the complaint. SLH will ask the customer at the start of the complaint how they would like things put right. As far as possible, the customer should be put in the position they would have been in, had things not gone wrong.

#### **4.1.7 SLH Complaints Review Panel**

In the unlikely event that the customer remains unhappy and requests a review, a Complaints Review Panel will be convened.

The panel will be made up of an SLH Board member and an SLH Director.

The panel will seek to determine the following matters:

- The procedure has been followed correctly
- The investigation has been conducted thoroughly
- The complainant has been treated fairly
- That SLH's response at the investigation stage was reasonable

Following the panels hearing of the complaint, at which the customer and a representative can attend, they will issue a full response to the customer confirming their response to the complaint which will include a final determination.

This is the final stage of SLH's complaints process. After receiving the panel's response, the customer will be informed that SLH's process is over and will be advised that they can go directly to the Housing Ombudsman if they remain dissatisfied at the end of the complaints process.

Once SLH's formal complaints process has been exhausted, no further communication on the subject will be issued by SLH so as to be clear that the complaint and the issue has been resolved.

#### **4.1.8 Learning from complaints**

SLH view complaints as an opportunity for organisational learning. When lessons have been learnt as a result of a complaint the complainant will be told

and advised of any changes that have been made to prevent the problem recurring.

Feedback to all customers will be provided through Your Bulletin and on social media on how we learn from complaints to raise confidence in customers reporting issues to us.

Customer Feedback reports will be produced on a monthly basis for SLH colleagues and will be reviewed by Scrutiny Panel at each meeting which will identify any trends which will support service improvements.

#### **4.1.9 Awards for loss or inconvenience**

SLH accept that there will be occasions when mistakes will cause:

- Specific and reasonable financial loss which is not covered by insurance
- Exceptional worry, distress or inconvenience

Where this is identified during a complaint, the Complaint Manager will consider offering a financial award to the customer. The award will be decided on a case by case basis taking due account of the individual circumstances.

The customer will always be asked at the start of their complaint what they would like to happen so that we are clear from an early stage where customers are seeking compensation to resolve their complaint.

Every effort will be made to resolve a complaint by empowering colleagues at the first point of contact to resolve the complaint immediately; the officer will consider whether an award is appropriate up to a value of £20. An example could be where an appointment is missed by SLH; the customer may be satisfied with an apology and a gesture of good will which is a more efficient response than starting SLH's complaints process.

Through the formal complaint process, an award of up to £500 can be made at stage 1. At stage 2, up to £5000 can be awarded (approval will be sought from EMT). In the unlikely event that any award is made over this value, Board approval will be sought. In all cases a clear rationale behind the compensation will be provided to the customer.

In cases where a customer owes money on their account, the award may be credited to their account, where this happens the customer will be informed.

[Appendix A](#) provides further guidelines to follow when awarding compensation to ensure that a consistent approach is taken across SLH.

Compensation due to tenants in respect of delays in carrying out repairs under "Right to Repair" and for possible reimbursements under the "Right to Compensation for Improvements" will be dealt with under the relevant policy, if the policy applies to the tenancy.

#### **4.1.10 Dealing with unacceptable behaviour**

Clear distinctions will be made between customers who make a number of complaints because they really think things have gone wrong and people whose complaints are unreasonable. The merits of each case must be considered rather than the attitude of the complainant.



We do not view behaviour as unacceptable just because someone is assertive or determined. There may have been upsetting or distressing circumstances leading up to a customer making a complaint and people may act out of character. However, the actions of some customers who are angry or persistent may result in unreasonable demands on, or behaviour towards our staff and we will take appropriate action to manage such behaviour. We have grouped the behaviour under two broad headings:

## **Aggressive or abusive behaviour**

We understand the difference between anger and aggression. For example, many complainants feel angry about the events that resulted in them contacting us. However, it is not acceptable when anger escalates into aggression towards our colleagues. SLH will respond to instances of aggressive or abusive behaviour through the Tenancy Agreement. This will not prevent an issue being pursued under this policy.

## **Unreasonable demands**

Customers may make, what we consider, unreasonable demands if they impact substantially on our work through the amount of information they seek or provide, the nature and scale of service they expect, or the regularity or number of approaches they make. Examples of this behaviour include:

- Asking for responses within an unreasonable timescale
- Insisting on communicating with a particular member of staff
- Continual phone calls, emails, or letters
- Repeatedly changing the substance of the complaint or raising unrelated concerns

We also consider that customers who will not or cannot accept that SLH is unable to assist them further or provide a level of service other than that provided are making unreasonable demands. Examples of this behaviour include:

- Persistent refusal to accept explanations relating to what SLH can or cannot do
- Continuing to pursue a case without presenting any new information

The way in which these customers approach us may be reasonable, but it is their persistent behaviour in continuing to do so that is not.

Where a complainant is deemed to be making unreasonable demands SLH will take action to limit the contact to them. The Service Manager / Lead will contact the complainant, to explain why their behaviour is causing concern and ask them to change their behaviour.

If the disruptive behaviour continues, the Head of Service / Director of Service will intervene and advise the complainant, preferably in person, that we will be imposing restrictions on the way in which they contact us.

How we manage unreasonable behaviour will depend on the nature and extent of it and will be agreed on an individual basis, however steps we may take include, separately or in combination:

- Restricting contact in person, by telephone, letter or electronically or by any combination of these
- Restricting the frequency of contact
- Refusing to deal with the complaint
- Replying to correspondence in timescales outside of the usual standards that SLH provide (this could be to respond to multiple contacts from the customer which are batched and dealt with in response)

These steps will only be taken after careful consideration by a Director. We may seek legal advice.

## **4.2 Satisfaction**

Whilst the other elements of this policy are proactive, the collection of satisfaction data is a reactive process where we seek feedback from customers about both their relationship with SLH and their experience of receiving our services. A Satisfaction Framework exists to manage the collection of this data and detail how it is used to support performance improvement.

## **5 Customer Standards & Performance Monitoring**

### **5.1 Satisfaction monitoring**

At the end of the formal complaints procedure, we will contact the customer by their preferred method to seek feedback on how satisfied they were with the way their complaint was handled and the final outcome.

### **5.2 Monitoring and Review**

All elements of Customer Feedback will be prepared by the Performance Officer and reported to the Scrutiny Panel at each meeting. The panel reviews complaints against performance and satisfaction data and uses the information to make recommendations to SLH's Board and EMT for service improvements. This report is also published to colleagues on a monthly basis.

SLH's Customer Feedback Committee will receive a quarterly complaints report, this will enable them to provide assurance to SLH's Board that there are effective mechanisms in place for SLH to respond to customer views and feedback and implement continuous improvement actions.

We will publicise our performance annually in Your Bulletin, and more regularly on social media.

We will carry out a self-assessment against the Housing Ombudsman's Complaint Handling Code; this will be published on our website.

The Quality and Performance Team complete a number of quality checks to ensure compliance with the policy for both informal and formal complaints.

SLH's Customer Services Committee will review and approve the Customer Feedback Policy every three years to provide assurance to SLH Board that we continue to operate an effective customer-focused complaints process.

Customer Feedback is a regular agenda item for discussion at service area and departmental team meetings; in order to identify trends and ensure that we learn

from them to increase customer satisfaction and continually improve our services.

## **6 Policy Review Considerations**

### **6.1 Equality Analysis**

An Equality Analysis was completed to identify and respond to any adverse impacts the policy would have on particular groups. Outcomes have been included within this document and within the procedural guide for colleagues.

### **6.2 Policy Risk Assessment**

In order to achieve our corporate objectives, SLH places a high importance on the effective management of risk. All risks associated with the handling of complaints both strategically and operationally have been assessed, quantified and minimised. SLH is committed to being proactive to prevent risk rather than reacting to remedy it. The overall risk factor is low and not considered business significant.

### **6.3 Customer Influence**

Customers have been fully involved in developing this policy. As detailed earlier, SLH's Scrutiny Panel made up of SLH tenants will review on-going performance against the policy.

### **6.4 Statutory and Legislative Framework**

SLH Customer Feedback Policy is not a legal process. This policy meets the requirements of the Localism Act 2011, the Independent Housing Ombudsman's Complaint Handling Code 2022 and best practice guidance issued by the Housing Quality Network.

The policy also adheres to the Housing Act 1996, Section 51 and Schedule 2, which makes it a duty for all Registered Social Housing Associations to be members of any approved Ombudsman Schemes.

The policy complies with the regulatory requirements of the Tenant Involvement and Empowerment Standard, and the provisions of the Data Protection Act 2018 and the General Data Protection Regulation.

### **6.5 Links to other policies**

This policy directly links to all customer facing policies. The Customer Feedback Policy is a mechanism for customers who have received a service, to provide feedback on that service.

SLH's Equality, Diversity & Inclusion Policy details our commitment to working towards the reduction and elimination of any disadvantage that particular groups within the communities we serve may experience and how we will achieve this, such as providing information in alternative formats on request.

## Appendix A Guidelines for discretionary compensation in relation to customer feedback

By asking customers at the start of their complaint what they would like to happen, we are clear from an early stage if customers are seeking compensation to resolve their complaint. However there may be occasions when compensation has not been sought, but upon investigation by the Complaint Manager, it is warranted. Should a complaint progress to The Housing Ombudsman, they will look to ensure that the level of compensation offered was proportionate, so it is important to consider the below, even if compensation is not being sought by the complainant.

### What to consider

The Complaint Manager should consider compensation based on two factors when there has been a service or policy failure:

- Has the complainant experienced worry, distress or inconvenience?
- Has the complainant experience specific and reasonable financial loss which is not covered by insurance?

### Distress or inconvenience experienced by complainant

If the customer has been caused distress and / or inconvenience as a result of a service or policy failure by SLH then we should consider compensation as a way of making things right. The below table provides guidelines to follow to ensure that a consistent approach is adopted across the business:

Impact	Distress or inconvenience experienced by complainant	Compensation	Value
Low level	Customer is caused mild worry, distress and / or inconvenience on one occasion due to a service or policy failure by SLH	Gesture of good will	Up to £50
Medium level	Customer is worried, distressed and / or inconvenienced on more than one occasion due to a service or policy failure by SLH	Financial or equivalent	£50 - £100
High level	Serious or prolonged worry, stress and / or inconvenience caused due to a service or policy failure by SLH	Financial or equivalent	Over £100

### Putting them back in the same financial position had things not gone wrong

In addition, customers should not be out of pocket due to a service or policy failure. Therefore, there may be times when compensation is awarded to replace damaged items or reimbursement for loss of earnings. The Complaints Manager should seek evidence of loss before awarding, for example, assessing the extent of any damage during a home visit or requesting that the customer provide confirmation from their employer on loss of earnings.

### Types of compensation

Compensation does not necessarily need to be paid as cash or gift vouchers. Alternative compensation can be offered, where appropriate, which complainants may prefer and offers more value for money by helping to keep the £ in SLH. The below details some suggestions of alternative forms of compensation, along with their value:

- One year's free home contents insurance (variance in costs based on the sum insured)
- Free skip hire

It is imperative that the compensation offered is appropriate to the situation and circumstances of the customer. In all cases a clear rationale behind the compensation should be provided to the customer.