

# **Customer Feedback Policy**

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## 1 Policy Information

Date of issue	May 2024
Replacing/Updating	Customer Feedback Policy
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Reviewed by	Quality and Performance Manager Head of Governance and Assurance
Contributors	Customer Services Committee Senior and Executive Leadership Teams Scrutiny Panel Head of Governance and Assurance Quality and Performance Officer
Responsible Director	Executive Director of Finance
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## 2 Policy Statement

- 2.1 South Liverpool Homes' (SLH) Customer Feedback Policy (hereinafter referred to as the 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 listening to customer views and taking the appropriate action.
- 2.2 The policy sets out SLH's approach to managing complaints. It also details how complaints, suggestions and compliments will be used to inform continuous learning and improvement at SLH.
- 2.3 The policy has been written in conjunction with the Housing Ombudsman's Complaint Handling Code (April 2024)

## 3 Policy Aims

- 3.1 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 issues/queries and complaints at the first point of contact
  - 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 SLH will use it to improve its services
  - Record, monitor and analyse feedback in order to examine service performance and help to improve service delivery
  - Ensure that SLH is compliant with the Housing Ombudsman's Complaint Handling Code (April 2024)
  - Support delivery of the SLH corporate plan

## 4 Compliments and comments

- 4.1 SLH welcome compliments and comments about the services it provides 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 SLH 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
  - 4.2.1 SLH welcomes suggestions about how to improve. These will be logged and fed back to the customer whether or not the suggestion can be implemented.

## 5.1 Complaints

5.1.1 SLH aim to provide an outstanding service where all of our customers are treated fairly and with respect. SLH look to continually improve the services it provides and welcomes complaints as this helps to highlight issues it may not have been aware of. When this happens, SLH will investigate and resolve the issue pragmatically, learn from the experience and change the way it does things to ensure that it does not happen again.

5.1.2 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'.*

5.1.3 A customer does not have to use the word complaint for it to be treated as such. Whenever a resident expresses dissatisfaction, SLH will give them the choice to make complaint.

## 5.2 Who can make a complaint?

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

- SLH tenants or advocates/third party (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\*

5.2.2 SLH 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.

## 5.3 When this policy does not apply to complaints

5.3.1 SLH will always accept a complaint, unless there is a valid reason not to do so. This includes:

- Initial request for a service for example reporting a repair. A service request is a request from a resident to SLH requiring action to be taken to put something right. Service requests are not complaints, but will be recorded, monitored and reviewed regularly via the housing management system. 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 that occurred over twelve months ago. However, SLH will consider whether to apply discretion to accept complaints made outside this time limit where there are good reasons to do so
- Complaints that have already been dealt with under this policy

5.3.2 Each complaint will be considered on its own merits.

5.3.3 In cases when a complaint is not accepted, SLH will write to the customer advising them why SLH 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.

5.3.4 Any allegations about inappropriate conduct of SLH Board Members and / or the Executive Leadership Team (ELT) 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.

5.3.5 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.

5.3.6 An expression of dissatisfaction with services made through a survey is not defined as a complaint, however wherever possible, the person completing the survey will be made aware of how they can pursue a complaint if they wish to.

## **5.4 How to make a complaint**

5.4.1 Complaints can be made in a range of ways, with any member of staff, including in person, by telephone, email, online, via social media and in writing. A list of methods is included at section 3.1 of the customer feedback procedure.

## **5.5 Dissatisfaction**

5.5.1 Customers may express dissatisfaction with a service/area and SLH will give them the choice to make complaint.

5.5.2 If a customer does not want to make a complaint, details of the dissatisfaction will be recorded and referred to the relevant officer or manager dealing with the service

5.5.3 All recorded cases of dissatisfaction will be reviewed internally, to identify any learning and improvements SLH can make to its services.

## 5.6 Managing complaints

5.6.1 A two stage process is in place to try and resolve the complaint with emphasis on personal contact with the customer to try and resolve the matter.

5.6.2 The two stages are as follows:

Stage	Description	Complaint acknowledged within	Full response provided within	Extensions to timescales	Complaint Manager
1	Investigation	5 working days of the complaint being received	10 working days from date of acknowledgement	Must be no more than 10 working days.	Team Leader, Service Manager/ Lead or Head of Service
2	Review	5 working days of the escalation request being received	20 working days from date of acknowledgement	Must be no more than 20 working days	Complaints Review Panel

5.6.3 Where a response will fall outside the timescales above, the complaint manager must agree with the customer, suitable intervals for keeping them informed about their complaint. The resident will also be informed of the expected timescales for a response and the reason(s) why an extension is required.

5.6.4 If an extension is required beyond 10 working days at stage 1 or 20 working days at stage 2, SLH will write to the resident explaining the reasons for the extension and confirming the date they can expect to receive a written response. The contact details of the Housing Ombudsman should also be provided in this letter.

5.6.5 SLH is committed to ensuring that complaints are dealt with efficiently. Therefore, a trigger is in place to alert the Head of Governance and Assurance of any complaint being responded to out of the above deadlines, who will ensure that the complaint is responded to promptly and the customer is kept up to date

- 5.6.6 Complex complaints will be dealt with by a Head of Service.
- 5.6.7 An acknowledgement letter will be sent on receipt of both stage 1 and stage 2 complaints from the complaints manager. The acknowledgement will include a brief summary of concerns raised and details of the customer's expectations. When a complaint is received but these details are not clear, the Quality and Performance Officer will contact the complainant to get an understanding of the issues they would like to raise and their expectations as a result of making the complaint.

## **5.7 Stage 1 complaints process**

- 5.7.1 A resident can raise a stage 1 complaint, or can choose to have a representative deal with their complaint, on their behalf, and to be represented or accompanied at any meeting with SLH.
- 5.7.2 A complaint response must be provided to the customer when the answer to the complaint is known, not when the outstanding actions required to address the issue are completed. Outstanding actions must still be tracked and actioned promptly with appropriate updates provided to the resident.
- 5.7.3 The complaints manager must address all points raised in the complaint definition and provide clear reasons for any decisions, referencing the relevant policy, law and good practice where appropriate.
- 5.7.4 Where a customer raises additional complaints during the investigation, these must be incorporated into the stage 1 response if they are related and the stage 1 response has not been issued. Where the stage 1 response has been issued, the new issues are unrelated to the issues already being investigated or it would unreasonably delay the response, the new issues must be logged as a new complaint.
- 5.7.5 The complaints manager must confirm the following in writing to the resident at the completion of stage 1 in clear, plain language:
  - a) the complaint stage;
  - b) the complaint definition;
  - c) the decision on the complaint;
  - d) the reasons for any decisions made;
  - e) the details of any remedy offered to put things right;
  - f) any lessons learned as a result of the complaint,
  - f) details of any outstanding actions; and
  - g) details of how to escalate the matter to stage 2 if the individual is not satisfied with the response.

## **5.8 Stage 2 complaints process**

- 5.8.1 If all or part of the complaint is not resolved to the customer's satisfaction, the customer can request to have their complaint reviewed by the Complaints Review Panel (stage 2) but only after a full response has been provided at the investigation stage (stage 1).



- 5.8.2 The customer's request should be made within 10 working days of the stage 1 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, SLH will write to the customer advising them of this and advise them of their right to approach the Housing Ombudsman about this decision. SLH will take into account extenuating circumstance if the aforementioned timescale is not adhered to.
- 5.8.3 The customer is not required to explain their reasons for requesting a stage 2 consideration. The resident can also choose to have a representative deal with their complaint, on their behalf, and to be represented or accompanied at any meeting with SLH.
- 5.8.4 The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.
- 5.8.5 The complaints review panel will be made up of an SLH Board member and an SLH Executive Director.
- 5.8.6 The panel will seek to determine the following matters:
- The procedure has been followed correctly
  - The investigation has been conducted thoroughly
  - The customer has been treated fairly
  - That SLH's response at the investigation stage was reasonable
- 5.8.7 A complaint response must be provided to the resident when the answer to the complaint is known, not when the outstanding actions required to address the issue are completed. Outstanding actions must still be tracked and actioned promptly with appropriate updates provided to the resident.
- 5.8.8 The complaints review panel must address all points raised in the complaint definition and provide clear reasons for any decisions, referencing the relevant policy, law and good practice where appropriate.
- 5.8.9 The complaints review panel must confirm the following in writing to the resident at the completion of stage 2 in clear, plain language:
- a) the complaint stage;
  - b) the complaint definition;
  - c) the decision on the complaint;
  - d) the reasons for any decisions made;
  - e) the details of any remedy offered to put things right;
  - f) any lessons learned as a result of the complaint,
  - g) details of any outstanding actions; and
  - h) details of how to escalate the matter to the Ombudsman Service if the individual remains dissatisfied.
- 5.8.10 Stage 2 is SLH's final response and must involve all suitable staff members needed to issue such a response.

5.8.11 If the resident is not satisfied following the stage 2 stage, they can contact the Housing Ombudsman directly. Details of how to do so are included in the response letter and customer feedback leaflet.

## **6 Putting things right**

6.1 Where something has gone wrong, SLH will acknowledge this and set out the actions it has already taken, or intends to take, to put things right. These can include:

- Apologising;
- Acknowledging where things have gone wrong;
- Providing an explanation, assistance or reasons;
- Taking action if there has been delay;
- Reconsidering or changing a decision;
- Amending a record or adding a correction or addendum;
- Providing a financial remedy;
- Changing policies, procedures or practices and implementing any lessons learned

6.2 Any remedy offered must reflect the impact on the customer as a result of any fault identified. 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.

6.3 The remedy offer must clearly set out what will happen and by when, in agreement with the customer where appropriate. Any remedy proposed must be followed through to completion.

6.4 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

6.5 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.

6.6 Through the 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 ELT). 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.

6.7 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.

- 6.8 The customer feedback procedure provides further guidelines to follow when awarding compensation to ensure that a consistent approach is taken across SLH.
- 6.9 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.

## **7 Learning and improving as a result of complaints**

- 7.1 SLH has a positive complaint handling culture that is integral to the effectiveness with which SLH will resolve disputes. SLH will use complaints as a source of intelligence to identify issues and introduce positive changes in service delivery.
- 7.2 SLH views complaints as an opportunity for organisational learning. When lessons have been learnt as a result of a complaint the customer will be told and advised of any changes that have been made to prevent the problem recurring.
- 7.3 Feedback to all customers will be provided through Your Bulletin and on social media on how SLH learn from complaints to raise confidence in customers reporting issues.
- 7.4 To ensure accountability and transparency, customer Feedback reports will be produced on a monthly basis for SLH colleagues and will be reviewed by the executive leadership team and customer services committee.
- 7.5 A quality and performance team is in place, including the head of governance and assurance, quality and performance manager and quality and performance officer. The team is responsible for complaint handling, with the quality and performance officer responsible for the day to day management of complaints. The team assess any themes or trends to identify potential systemic issues, serious risks, or policies and procedures that require revision.
- 7.6 The Senior Independent Director (board member) has been appointed to have lead responsibility for complaints to support a positive complaint handling culture. This person is referred to as the Member Responsible for Complaints (‘the MRC’).
- 7.7 The MRC is responsible for ensuring the SLH board receives regular information on complaints that provides insight on SLH’s complaint handling performance. The MRC will have access to suitable information and staff to perform this role and report on their findings.
- 7.8 As a minimum, the MRC and the board will receive:
  - a) regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance;

- b) details of lessons learned as a result of complaints and how these will be embedded within the organisation
- c) regular reviews of issues and trends arising from complaint handling;
- d) regular updates on the outcomes of the Ombudsman's investigations and progress made in complying with orders related to severe maladministration findings; and
- e) the annual complaints performance and service improvement report.

7.9 SLH has a standard objective in relation to complaint handling for all relevant employees or third parties that reflects the need to:

- a) have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments;
- b) take collective responsibility for any shortfalls identified through complaints, rather than blaming others; and
- c) act within the professional standards for engaging with complaints as set by any relevant professional body.

## **8.1 Dealing with unacceptable behaviour**

8.1.1 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 customer.

8.1.2 SLH 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 staff and SLH will take appropriate action to manage such behaviour.

8.1.3 Any restrictions placed on contact due to unacceptable behaviour will be proportionate and demonstrate regard for the provisions of the Equality Act 2010.

## **8.2 Aggressive or abusive behaviour**

8.2.1 SLH understands the difference between anger and aggression. For example, many customers feel angry about the events that resulted in them contacting SLH. However, it is not acceptable when anger escalates into aggression towards 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.

## **8.3 Unreasonable demands**

8.3.1 Customers may make, what SLH consider, unreasonable demands if they impact substantially on its 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
- 8.3.2 SLH 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
- 8.3.3 The way in which these customers approach SLH may be reasonable, but it is their persistent behaviour in continuing to do so that is not.
- 8.3.4 Where a customer is deemed to be making unreasonable demands SLH will take action to limit the contact to them. The Service Manager / Lead will contact the customer, to explain why their behaviour is causing concern and ask them to change their behaviour.
- 8.3.5 How SLH manages unreasonable behaviour will depend on the nature and extent of it and will be agreed on an individual basis, however steps SLH 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)
- 8.3.6 These steps will only be taken after careful consideration by a member of the Executive Leadership team and legal advice may be sought.

## **9 Customer Standards & Performance Monitoring**

### **9.1 Satisfaction monitoring**

- 9.1.1 At the end of the formal complaints procedure, SLH 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.
- 9.1.2 Satisfaction with complaint handling is measured by IFF through the relationship based tenant satisfaction survey. This information is collected and submitted as part of SLH's Tenant Satisfaction Measure (TSM) submission.

## 9.2 Monitoring and Review

- 9.2.1 SLH will produce an annual complaints performance and service improvement report for scrutiny and challenge, and will include:
- a) the annual self-assessment against the Housing Ombudsman Complaint Handling Code to ensure this policy remains in line with its requirements.
  - b) a qualitative and quantitative analysis of SLH's complaint handling performance, including a summary of the types of complaints SLH has refused to accept;
  - c) any findings of non-compliance with the Housing Ombudsman Complaint Handling Code by the Ombudsman;
  - d) the service improvements made as a result of the learning from complaints;
  - e) any annual report about SLH's performance from the Ombudsman; and
  - f) any other relevant reports or publications produced by the Ombudsman in relation to the work of SLH.
- 9.2.2 The annual complaints performance and service improvement report will be reported to the SLH board and published on the SLH website. The SLH Board's response to the report will be published alongside this.
- 9.2.3 Details of the Housing Ombudsman, a copy of the Complaint Handling Code and SLH's self-assessment against this will be published on the SLH website.
- 9.2.4 SLH will also publicise its performance annually in Your Bulletin, and more regularly on social media.
- 9.2.5 The Quality and Performance Team complete a number of quality checks to ensure compliance with the policy for both informal and formal complaints. Results from the compliance checks are monitored by the executive leadership team.
- 9.2.6 SLH's Customer Services Committee will review and approve the Customer Feedback Policy as a minimum, every three years to provide assurance to SLH Board that we continue to operate an effective customer-focused complaints process.
- 9.2.7 Customer feedback is a regular agenda item for discussion at service area and departmental team meetings; in order to identify trends and ensure that SLH learn from them to increase customer satisfaction and continually improve its services.
- 9.2.8 SLH will carry out a self-assessment following a significant restructure, merger and/or change in procedures.
- 9.2.9 SLH may be asked to review and update the self-assessment following an Ombudsman investigation.



9.2.10 If SLH is unable to comply with the Housing Ombudsman Complaint Handling Code due to exceptional circumstances, such as a cyber incident, it will inform the Ombudsman, provide information to residents who may be affected, and publish this on its website, including a timescale for returning to compliance with the Code.

## **10 Policy Review Considerations**

### **10.1 Equality Analysis**

10.1.1 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.

10.1.2 SLH will make reasonable adjustments for residents where appropriate under the Equality Act 2010. SLH will keep a record of any reasonable adjustments agreed, as well as a record of any disabilities a resident has disclosed. Any agreed reasonable adjustments will be kept under active review.

### **10.2 Policy Risk Assessment**

10.2.1 In order for SLH to achieve its corporate objectives, it places a high importance on the effective management of risk. All risks associated with the handling of complaints both strategically and operationally are captured on the SLH risk register and 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.

### **10.3 Customer Influence**

10.3.1 Customers have been fully involved in developing this policy. SLH's Customer Services Committee, inclusive of SLH tenant members will review on-going performance against the policy.

### **10.4 Statutory and Legislative Framework**

10.4.1 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 2024.

10.4.2 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.

10.4.3 The policy complies with the regulatory requirements of the transparency, influence and accountability and the provisions of the Data Protection Act 2018 and the General Data Protection Regulation.

### **10.5 Links to other policies**

10.5.1 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.

10.5.2 SLH's equality, diversity and inclusion policy details its 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.