

Introduction

This policy sets out the Group's approach to feedback made by customers and other stakeholders. For the purpose of this policy, '**customer**' refers to Great Places' existing tenants, former tenants, market rent tenants, leaseholders, shared-owners and housing applicants. Complaints will also be considered by non-tenants, if the issues concern Great Places services or residents.

Great Places is committed to providing high quality services and we want to hear from customers about the services we are providing. If customers are not happy with the quality of a service that they have received, or the way they have been treated by Great Places colleagues or our contractors, they have the right to complain.

The person who receives, or has received services from Great Places, or any person affected by Great Places actions, omissions or decisions can make complaints. This includes members of a person's family, or a person's representative/advocate.

This policy encourages all types of feedback and additionally, anyone who has a relationship with Great Places can pass on compliments, comments and suggestions.

Context

We aim to build on our reputation as an organisation, of being a provider of choice and excellence, ensuring we use customer feedback as a driver to deliver the improvements identified and that our customers want. We will inform our customers when they have influenced change to policy and improvements to services and publish our findings regularly on our website as well as annually in our Annual Report. Data on complaint handling will be considered alongside other management information at all levels throughout Great Places including board, executive, directors and colleagues.

Providing excellent customer services is one of our main corporate objectives and we aim to put the needs and aspirations of our customers at the heart of everything we do. This Customer Feedback policy complements our Customer Service principles:

- Get it right first time – We aim to exceed customer expectations with the services we provide.
- Keep our promises and do what we say we will
- Provide a timely response
- Keep our customers informed
- Show listening, empathy and understanding
- Access our services - at your convenience

Legal and Regulatory Context

The General Data Protection Regulation (GDPR) must be complied with at all stages of the Customer Feedback policy. GDPR is a legal framework that sets guidelines for the collection and processing of personal information from individuals.

Consideration has been given to the Social Housing White Paper 2020. This paper sets out the actions the government will take to ensure that residents in social housing are safe, are listened to, live in good quality homes, and have access to redress when things go wrong.

Additionally, in drafting this policy, consideration has been made in line with the Regulator of Social Housing's (RSH) regulatory framework, including the Tenant Involvement and Empowerment Standard. It also reflects the Housing Ombudsman Scheme which enables a more proactive approach to systemic issues and broadens the basis on which cases can be referred to the Regulator of Social Housing. The Scheme includes a new Complaint Handling Code with a self-assessment requirement for landlords, a new power to issue complaint handling failure orders and the ability to conduct systemic or thematic investigations beyond an individual complaint or landlord. The Housing Ombudsman Service now publish all decisions on cases investigated in addition to separate performance data reports on landlords to ensure transparency and learning.

Great Places has also signed up to the Chartered Institute of Housing (CIH) Complaints Handling Charter, which sets out the outcomes that an effective complaints handling service can achieve.

This policy is written in accordance with the Bribery Act 2010 and Equality Act 2010.

Aims and Objectives

Policy Aims - The aims of this policy are:

- To increase customer satisfaction by resolving complaints confidentially, promptly and fairly in a consistent manner and listening to all feedback
- To achieve continuous improvement by recording and reviewing areas of the service which cause dissatisfaction amongst customers and learning from the trends that are identified
- To ensure continuous improvement by learning from compliments and feedback

Policy Objectives:

- To set out a consistent framework for dealing with complaints, compliments and feedback
- To make the process accessible, customer focused and customer friendly
- To give colleagues and customers clear guidance as to how complaints, compliments and feedback will be dealt with
- To clarify who can make a complaint or give feedback and who will deal with complaints at the various stages
- To set out the procedures to be followed in complaints resolution

- To clarify what happens when the internal complaints process for Great Places has been exhausted with regard accessing the Housing Ombudsman Service
- To ensure complaints, compliments and feedback made to the Group are recorded and reported in compliance with the Customer Feedback procedure

What is a complaint?

In line with the Housing Ombudsman Service Complaints Handling Code, Great Places defines a complaint as, ***“an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the organisation, its own colleagues or those acting on its behalf, affecting an individual resident or group of residents”***.

Great Places welcomes feedback about its range of services and sees complaints as an opportunity to learn from the perspective of our customers. Great Places will accept a complaint unless there is a valid reason not to do so. A requirement of the Housing Ombudsman Code is to clearly set out the circumstances in which a matter will not be considered a complaint and these are outlined below.

What is not considered a complaint?

Examples of what is **not** considered a complaint include:

- Complaints submitted six months or more after the issue occurred (N.B. it may not be appropriate to rely on this exclusion where complaints concern safeguarding or health and safety issues.)
- Where a complainant is taking legal action against Great Places on the same issue or Great Places is taking legal action against the complainant on the same issue for which Great Places is not responsible
- An initial request for a service
- Asking for an explanation of a policy or an information leaflet
- A dispute with a neighbour which can be dealt with through the terms outlined in a tenancy agreement or the Anti-Social Behaviour (ASB) policy.
- MP, Councillor and Citizen Advice enquiries (these will be deemed separate enquiries handled by the Customer Feedback Team)
- Complaints relating to rent increases (where the rent increase is driven by government guidance/regulation)
- Initial reports of fly tipping or vandalism
- Complaints about the actions of an organisation that is not working for, or supported by Great Places

Although we do not treat these issues as a complaint under this Policy, we are committed to dealing with them in the appropriate manner. A detailed explanation should be provided to customers, setting out the reasons why the matter is not suitable for the complaints process whilst also explaining what action we can take, or have taken, outside of the complaints process.

Feedback addressed to the Chief Executive will be progressed in line with our Customer Feedback Policy

Complaints about colleagues

Depending on the severity of a colleague complaint, a Disciplinary or Capability procedure may need to be invoked. Complaints against colleagues will be received by the customer feedback team and passed to the individual's Line Manager who will investigate and respond within 10 working days. In these circumstances full details of any action taken against an individual colleague will not be disclosed to the complainant.

What is a compliment?

We define a compliment as:

- Where customers want to praise or highlight the service offered by a colleague and/or contractor

Compliments are passed on to colleagues and their Line Manager. Compliments are also logged centrally for sharing more widely, and are used to identify areas of good practice that Great Places can learn from.

Passing on comments and suggestions

There may be occasions when customers do not want to make a complaint but want to highlight something that Great Places could do differently or in a better way. Comments or suggestions from customers are invaluable and we encourage customers to let us have this feedback to help us to shape and improve the services we offer. Feedback should be provided to the Customer Feedback team to allow recording, review and learning.

How can customers make a complaint, pass on a compliment, comment or suggestion?

Customers can pass on feedback in the following ways:

- Email
- Website
- Letter
- Text message
- Telephone
- In person
- Via social media (although complaints via this channel will be taken offline to ensure confidentiality).

Advocates

A representative of a person may also make a complaint. The representative must be acting on behalf of a person who has a right to complain and where the person:

- Is unable to complain themselves because of physical incapacity or a lack of capacity within the meaning of the Mental Capacity Act 2005; or
- Has requested the representative to act on their behalf (proof must be provided in this instance); or
- Has died

The Complaints Resolution Process

Great Places acknowledges that sometimes we get things wrong or don't meet the high levels of service our customers expect. We want to ensure that we resolve customer complaints about service quality as quickly as possible and have therefore developed a simple and clear process for resolving complaints. The process adheres to the principles outlined in the Housing Ombudsman Service Complaint Handling Code regarding complaint resolution.

- NIP (Nip it in the Bud) – these are informal complaints that Great Places aim to resolve quickly and within 48 hours (2 working days) to prevent issues from escalating
- Stage one formal complaint - When a complaint is made formal, it will be acknowledged and logged at stage one of the complaints process. Great Places Customer feedback team will confirm their understanding of the complaint and the outcomes being sought with the customer and carry out an investigation into the complaint. Stage one decisions will be made, where possible, within 10 working days from receipt of the complaint. If this is not possible, an explanation and a date by when the stage one response should be received will be provided and this should not exceed a further 10 days without good reason.
- Stage two formal complaint - If a customer believes that Great Places have failed to fully address their complaint they may request escalation to stage two of the complaints process. This request must clearly outline the reasons why the complaint hasn't been fully considered and include any supporting evidence. Stage two decisions will be made, where possible, within 20 working days from receipt of the complaint. If this is not possible, an explanation and a date by when the stage two response should be received will be provided and this should not exceed a further 10 days without good reason. In the final decision response, Great Places will include information regarding the right to refer the complaint to the Housing Ombudsman Service.

Great Places aims to ensure that any remedy offered in response to a complaint reflects the extent of any and all service failures, and the level of detriment caused to the resident as a result. These may include:

- acknowledging where things have gone wrong
- providing an explanation, assistance or reasons why a certain approach was taken
- apologising
- taking action if there has been a delay
- reconsidering or changing a decision

- amending a record
- providing a financial remedy
- changing policies, procedures or practices

Persistently unreasonable or vexatious complaints

Great Places is committed to providing a Customer Feedback service that is accessible to all customers, however, on the rare occasion that it is identified that a customer's actions are unacceptable, we reserve the right to restrict or change this access.

Unacceptable Behaviour

Unfortunately there are rare occasions where Great Places considers the actions or behaviour of a customer unacceptable. The following section explains how Great Places will deal with the very few occasions when this issue arises. 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 approaching Great Places 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 colleagues we will take appropriate action to manage such behaviour. We have grouped the behaviour under two broad headings:

Aggressive or abusive behaviour

Our colleagues 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. Aggression is not restricted to acts that may result in physical harm but also includes behaviour or language that may cause colleagues to feel afraid, threatened, or abused.

Examples of aggressive behaviour include:

- threats
- physical violence
- personal abuse
- derogatory or discriminatory remarks
- rudeness
- inflammatory statements and unsubstantiated allegations

Reports of this type of behaviour will be investigated and managed by our Managing Abusive and Aggressive Behaviour 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 colleague
- continual phone calls, emails, or letters
- repeatedly changing the substance of the complaint or raising unrelated concerns
- refusal to co-operate with the complaint investigation process while still requesting their complaint be resolved
- persistent refusal to accept a decision
- persistent refusal to accept explanations relating to what Great Places can or cannot do
- continuing to pursue a complaint 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.

How we manage unreasonable demands will depend on the nature and extent of it. Steps we may take include, separately or in combination:

- restricting method of contact
- restricting the frequency of contact
- restricting access to the complaints process in future

Customers will be informed in writing of any decision to invoke these steps and the customer can appeal the decision by writing to the Customer Voice Manager.

Compensation

Where financial compensation is requested or is being considered, each case will be reviewed on its merits. In line with the Housing Ombudsman code, in awarding compensation, Great Places will consider whether any statutory payments are due, if any quantifiable losses have been incurred as well as the time and trouble a resident has been put to and any distress and inconvenience caused.

Learning from Complaints and feedback

Great Places will look at complaints received, their outcome and proposed changes as part of its reporting and planning process. It will ensure feedback at an operational level to service managers to ensure immediate learning on individual cases - such as training or record keeping. The Customer Feedback Team will also produce regular reports that will be shared with Managers, Senior Management and Directors, Customer Insight Group, Exec and Board that highlight themes or trends and that allow senior management to review and identify any systemic issues, serious risks or areas for organisational improvement. Annual reporting to board will include the Ombudsman's annual landlord performance report.

Great Places will inform our customers when they have influenced change to policy and improvements to services and publish our findings regularly on our website as well as annually in our Annual Report.

Who will be involved?

- Frontline colleagues will be our customers' first point of contact and will try to resolve informal complaints where possible within 48 hours
- If our frontline colleagues are unable to resolve complaints at the informal/NIP stage, the Customer Feedback Team will carry out thorough, timely and fair investigations at stage one
- The Customer Voice Manager will provide strategic management of the Customer Feedback policy and procedures
- Senior Management will carry out reviews at stage two
- Formally involved customers may support Senior Management to carry out reviews at stage two
- The Customer Voice Manager will review and respond to Housing Ombudsman complaints

Roll out of this policy will include initial training for relevant colleagues, followed by refresher training as appropriate.

Great Places can exercise discretion in how to respond to a complaint and may deal with a complaint differently where individual circumstances merit it. This may include not escalating complaints where a customer provides no clear reason for disagreeing with a decision at stage one of the process. Where a complaint is not escalated, the customer will be deemed to have exhausted the Great Places complaints process and will be advised of their options to escalate to the Housing Ombudsman Service.

Equality Impact Assessment - Attached separately

Policy Approval Date:	March 2021
Equality Impact Assessment Date:	February 2021
Safeguarding Impact:	
Policy Review Date:	Annual March 2022 & 2023 Full review 2024
Lead Team	Customer Experience
Level of Authorisation Required:	Operational Directors