



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 residents, former residents, market rent residents, leaseholders, shared-owners and housing applicants. Complaints will also be considered from non-residents, 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.

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 that is a provider of choice and excellence, ensuring we use customer feedback as a driver to deliver the improvements identified and that our customers want. Using a number of communication channels, we will inform our customers when they have influenced change to policy and improvements to services and publish our findings regularly via customer communications, our website as well as annually in the Housing Ombudsman Service self-assessment. Data on complaint handling will be considered alongside other management information at all levels throughout Great Places including Board, Executive, Directors and colleagues.

The Customer Feedback policy complements our Corporate objectives and Customer Experience principles as outlined in our Corporate Plan and Customer Experience Strategy.

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.



In drafting this updated policy, consideration has been given to the changes within the Social Housing (Regulation) Act 2023 which aims to deliver reforms as set out in the Social Housing White Paper. Consideration includes the Regulator of Social Housing's (RSH) regulatory framework, including the Transparency, Influence and Accountability Standard. It also reflects and aligns with the statutory Housing Ombudsman Service Complaint Handling Code which enables a more proactive approach to systemic issues and broadens the basis on which complaints can be referred to the Regulator of Social Housing. The Complaint Handling Code requires Landlords to carry out an annual self-assessment, which will be submitted to the Housing Ombudsman Service and published on the Great Places website, and provides the Housing Ombudsman Service the 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 publishes all decisions on cases investigated in addition to separate performance data reports on Landlords to ensure transparency and learning.

Additionally, the Housing Ombudsman Service expects Landlords to have a standard objective in relation to complaint handling for all relevant employees or third parties as part of encouraging a positive complaint handling culture.

Great Places has 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:

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

Policy Objectives:

- To set out a consistent framework for dealing with complaints, compliments and feedback and make the process accessible and customer focused



- 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 to customers accessing the relevant third party organisation
- To ensure complaints, compliments and feedback made to the Group are recorded and reported in compliance with the Customer Feedback procedure
- To encourage a positive complaints culture and ensure feedback leads to learning.

Definition of 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 Landlord, its own colleagues or those acting on its behalf, affecting a 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. A customer does not have to use the word **complaint** for it to be treated as such and Great Places will give customers the choice to make a complaint. A complaint that is submitted via a third party or representative will be handled in line with this policy.

Service request

A service request is a request from a customer to Great Places requiring action to be taken to put something right. Service requests are not considered to be complaints, however Great Places will record, monitor and review these requests regularly. Great Places will establish if a customer is raising a complaint or a service request and Great Places will log a complaint if the customer raises dissatisfaction with the response to their service request. We will not stop our efforts to address the service request if a complaint is raised.

Exclusions

Great Places will accept a complaint unless there is a valid reason not to do so. If Great Places decides not to accept a complaint we will provide evidence to support our reasoning



and we will ensure that each complaint raised is considered on its own merits and will not take a blanket approach to excluding complaints.

A requirement of the Complaint Handling code is to clearly set out the circumstances in which a matter **will not** be considered a complaint or escalated. Circumstances must be fair and reasonable and these are outlined below:

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

- Complaints submitted twelve 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
- A service request
- 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.
- 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
- An expression of dissatisfaction with services made through a survey, though Great Places will ensure customers completing surveys know how to pursue a complaint if they wish to
- Matters that have previously been considered under the Customer Feedback policy

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.

Please note that 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, the Grievance, Disciplinary and Capability policy may need to be invoked. Complaints against colleagues will be reviewed, logged and **acknowledged within five working days of receiving them**. Complaints about colleagues will be passed to the relevant 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. Customers can request a review of their complaint at Stage Two of the complaints process as outlined in the Complaint handling process section of this policy.

What is a compliment?

We define a compliment as:

- Feedback 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.

Accessibility and awareness

We make it easy for customers to pass on their feedback by providing a variety of different channels. Customers can pass on feedback in the following ways:

- Email
- Website
- Customer Portal
- Letter
- Text message
- Telephone
- In person to any colleague



- Via social media (although complaints via this channel can be taken offline to ensure confidentiality)
- Customer review sites

Reasonable adjustments

We will consider our duties under the Equality Act 2010 and we will anticipate needs and reasonable adjustments for customers accessing the complaints process. We will record any reasonable adjustments agreed as well as recording any disabilities a customer has disclosed. We will keep any agreed reasonable adjustments under active review.

Representatives

A representative of a customer may also make a complaint. The representative must be acting on behalf of the customer who has a right to complain. Great Places will seek the necessary authority before engaging with a representative. Representatives can make a complaint on behalf of a customer where the customer:

- 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 passed away

Customers can have a representative accompany them at meetings.

Complaint handling colleagues

Great Places has a dedicated Customer Feedback team who will review, investigate and respond to complaints. The team will liaise with the MRC, Housing Ombudsman Service and has access to staff at all levels to facilitate the prompt resolution of complaints. We call this team the **complaints officer**. The Customer Feedback team has authority and autonomy to act and resolve disputes promptly and fairly.

Positive culture

We prioritise complaints handling, harbour a positive culture around customer voice and consider complaint handling as a core service. We will provide service related training to all colleagues, which will include induction and refresher training as appropriate. Additionally,



specific skills and knowledge training for Stage Two complaint case reviewers will be delivered.

The complaint handling 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 early and as quickly as possible and have therefore developed a single policy and 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.

We will deal with complaints on their merits, act independently and have an open mind. We will ensure customers have the opportunity to set out their position, take measures to address any actual or perceived conflicts of interest and will consider all relevant information and evidence carefully. We will make it clear what aspects of the complaint we are, and are not responsible for.

Stage One complaints

When a complaint is made formal, it will be acknowledged and logged within **five working days of it being received**. Great Places Customer Feedback team will confirm their understanding of the complaint (complaint definition) and the outcomes being sought with the customer and will carry out an investigation into the complaint.

Stage One responses will be provided **within 10 working days from acknowledgment** of the complaint. If this is not possible and in-line with the Complaint Handling Code, an explanation and a date on which the Stage One response should be received will be provided and this should not exceed a further 10 working days without good reason. When we inform customers of an extension, we will provide the contact details of the Housing Ombudsman Service.

Where customers raise additional complaints during the Stage One investigation, these will be incorporated into the Stage One response if they are related and if the Stage One response has not been issued. Where the Stage One 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 will be logged as a new complaint.

Stage Two complaint

If a customer believes that Great Places has failed to fully address their complaint, they may request escalation to Stage Two of the complaints process. Customers are not required to



explain their reasons for requesting a Stage Two consideration. A Stage Two complaint will be acknowledged and logged within **five working days of it being received**. Stage Two complaints will be assigned to a senior leader to review and the complaint will not be assigned to the same person who investigated the complaint at Stage One. The Stage Two reviewer will confirm their understanding of the complaint (complaint definition) and the outcomes being sought with the customer and will carry out an investigation into the complaint.

Stage Two responses will be provided **within 20 working days from acknowledgment** of the complaint. If this is not possible and in-line with the Complaint Handling Code, an explanation and a date on which the Stage Two response should be received will be provided and this should not exceed a further 20 working days without good reason. When we inform customers of an extension, we will provide the contact details of the Housing Ombudsman Service.

Stage Two is the final stage in Great Places Customer Feedback policy and we will include information regarding the right to refer the complaint to the Housing Ombudsman Service or relevant third party organisation.

Putting things right

When something has gone wrong, Great Places will acknowledge and set out actions already taken, or that we intend to take to put things right. We aim 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:

- Apologising
- Acknowledging where things have gone wrong
- Providing an explanation, assistance or reasons why a certain approach was taken
- Taking action if there has been a delay
- Reconsidering or changing a decision
- Amending a record or adding a correction or addendum
- Providing a financial remedy
- Changing policies, procedures or practices

In our complaint responses we will clearly set out what will happen and by when in agreement with the customer, and any remedy proposed will be followed through to completion.



Independent resolution

If customers do not feel that our final resolution is fair and proportionate, customers have the option to refer their complaint for independent resolution. Customers can do this by referring the complaint to the relevant Ombudsman service:

The Housing Ombudsman

[Home - Housing Ombudsman \(housing-ombudsman.org.uk\)](https://www.housing-ombudsman.org.uk)

The Property Ombudsman

[The Property Ombudsman Website](https://www.propertyombudsman.org.uk)

The New Homes Ombudsman

<https://www.nhos.org.uk/>

If a complaint relating to structural failure and spread of fire (building safety risks) or the performance of an accountable person cannot be resolved, customers can refer their complaint to:

The Building Safety Regulator

[Contact the Building Safety Regulator - GOV.UK \(www.gov.uk\)](https://www.gov.uk)

Unacceptable Behaviour

There are rare occasions where Great Places considers the actions or behaviour of a customer unacceptable. 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. We acknowledge that customers will sometimes feel frustrated and aggrieved which we can be objective and empathetic about. However, we will not tolerate aggression, rudeness, inflammatory or disrespectful behaviour and language or unreasonable demands towards colleagues, contractors or partner agencies. These are unacceptable and we will take appropriate action to manage such behaviour.

Aggressive, abusive or unreasonable behaviours may feature:

- Swearing or unacceptable language during telephone contacts, by email, by social media, or face to face



- Racist, sexist, homophobic or otherwise offensive language during telephone contacts, by email, by social media, or face to face
- Any form of harassment or personal physical or verbal attack
- Aggressive, intimidating, threatening or violent words or behaviour, including actual or attempted physical attack
- Repeated and excessive contacts into the business

Reports of this type of behaviour will be investigated and managed via our Service with Respect policy. This policy considers our duties under the Equality Act 2010.

Unreasonable and persistent contacts and complaints

A small minority of customers make unreasonable demands on colleagues that are unreasonably persistent or aggravating. This can place a strain on time and resources and can cause unnecessary pressure for colleagues. Examples of this behaviour may include:

- Unreasonable demands (requesting large volumes of information, asking for responses within a short space of time, refusing to speak to an individual or insisting on speaking with another)
- Unreasonable persistence (refusing to accept the answer that has been provided, continuing to raise the same subject matter without providing any new evidence, continuously adding to or changing the subject matter of the complaint)
- Overload of letters, calls, emails or contact via social media (this could include the frequency of contact as well as the volume of correspondence received, as well as the frequency and length of telephone calls)

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.

Reports of this type of behaviour will be investigated and managed via our Service with Respect policy. This policy considers our duties under the Equality Act 2010.

Self-assessment, reporting and compliance

Great Places will produce an annual complaint performance and service improvement report, which will include:

- The Housing Ombudsman Service annual self-assessment



- Qualitative and quantitative analysis of our complaint handling performance which will include a summary of the types of complaints Great Places has refused to accept;
- Any findings of non-compliance with the Complaint Handling Code
- Service Improvements made as a result of learning from complaints
- Any annual report about Great Places from the Housing Ombudsman Service
- Any other reports or publications produced by the Housing Ombudsman relating to Great Places

This report will be reported to the Board and will be published on the Great Places Customer Feedback webpages. The Board will publish their response to the report alongside it.

The **Director of Customer Experience** is the senior lead person appointed as accountable for complaint handling. They will assess themes and trends to identify potential systemic issues, serious risks or policies and procedures that require revision.

Great Places has appointed a member of the governing body as the Member Responsible for Complaints (MRC) to have lead responsibility for complaints. This member is responsible for ensuring the governing body receives regular information on complaints that provides:

- Regular updates on volume, categories and outcomes of complaints, alongside complaint handling performance
- Regular reviews of issues and trends arising from complaint handling
- Regular updates on outcomes of the Housing Ombudsman Services investigations and progress made with complying with orders related to severe maladministration findings
- Annual complaints performance and service improvement reporting

If Great Places is unable to comply with the Complaint Handling Code, we will inform the Housing Ombudsman Service, customers who may be affected and will publish the details on the Great Places website. We will provide a timescale for returning to compliance with the Complaint Handling Code.

Customer Involvement

We are committed to ensuring that customers are involved in overseeing the Customer Feedback service by supporting Great Places in regularly reviewing the policy, procedures and service performance. The Customer Feedback Community will offer Great Places assurance that the voice of the customer is being heard and that it is influencing continual service improvement. By acting as a direct link to the MRC they will assure the business that

Great Places Group Customer Feedback Policy



the Customer Feedback policy is fair, accessible and complies with the Housing Ombudsman Complaint Handling Code.

Measuring satisfaction

Customers will be given the opportunity to tell us about their experience at the end of the Customer Feedback process. We will ensure that the learning identified is reviewed and the necessary improvements implemented, to ensure that the policy continues to meet the needs of customers and complies with the Complaints Handling Code.

Related policies, strategies, and procedures

Customer Experience Strategy
Remedies and Resolution Policy
Data Protection Policy
Service with Respect Policy
ASB Policy

Policy approval date:	March 2024
Equality impact assessment date:	February 2021/TBC
Reducing carbon impact assessment date:	N/A
Safeguarding/Modern Slavery impact:	N/A
Policy review date:	October 2022 (read over 2022) Full review March 2024
Lead team:	Customer Feedback
Level of authorisation required:	Directors
Please record all authorisation meetings, with dates and details	Approval at Directors 12 March 2024