

# Customer Complaints and Feedback Policy

<b>Policy name;</b>	<b>Customer Complaints and Feedback</b>
<b>Executive responsible;</b>	Chief Executive
<b>Review by;</b>	Director of Housing
<b>Tenant involvement:</b>	Yes, Resident Engagement Panel review
<b>Type of review;</b>	Full
<b>Authority to amend;</b>	Board
<b>Supporting Documents;</b>	Complaints Leaflet and website information for residents), Housing Ombudsman Complaint Handling Code, Compensation Policy.
<b>Frequency of review;</b>	Every three years
<b>Last review;</b>	March 2024
<b>Next review;</b>	March 2027
<b>Strategy;</b>	Customer Strategy
<b>Associated risk;</b>	Risk 4 Loss of key stakeholder support and reputation (cause and control), Risk 5 Data quality and data management is not sufficient to support the business (inaccurate recording of complaints data is a risk), Risk 8 Inadequate and ineffective customer service and/or engagement (control and source of assurance),
<b>Health &amp; safety;</b>	Breach of this policy unlikely to have direct impact on H&S.
<b>Equality &amp; diversity;</b>	See Appendix A for reasonable adjustments
<b>VFM &amp; benchmarking;</b>	None

VERSION CONTROL			
Version Number	Sections Amended	Date of update	Approved by
1.0	First issue in new template	11/12/13	Board
1.1	General review	29/03/17	Board
1.1	Definition as per ombudsman code	Dec 2020	Board
2.0	Full review	17 Mar 2021	Board
3.0	Full review following new HO Code	20 Mar 2024	Board

## **WHAT IS FEEDBACK?**

This is when a customer provides a comment or view on something. Feedback can be positive, such as compliments, or it could be a response to a survey or suggestions for improvement.

These are not complaints but they will be recorded and learned from. Staff will be recognised for good service and suggestions for improvement will be collated and reviewed.

## **WHAT IS A COMPLAINT?**

A complaint is an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the landlord, its own staff, or those acting on its behalf, affecting a resident or group of residents.

The customer does not need to ask to make a complaint or use the word 'complaint', we will aim to recognise what a complaint is from talking to them. We will record and monitor all expressions of dissatisfaction (EOD) and we will give customers the choice of making a complaint or not.

A complaint can be made by any method of communication we normally use including:

- Telephone - 01392 273462
- Online - [www.cornerstonehousing.net/make-a-complaint-feedback-compliment/](http://www.cornerstonehousing.net/make-a-complaint-feedback-compliment/)
- Email - [complaints@cornerstonehousing.net](mailto:complaints@cornerstonehousing.net)
- Letter - Cornerstone House, Western Way, Exeter, EX1 1AL
- In person

We take complaints made via social media but we will deal with them privately and not publicly. Complaints made via other media, for example the press, will be logged and this policy will be followed.

Customers can make a complaint via a third party, for example friends or family, a neighbour, their MP, a Councillor or another advocate. These will be logged and this policy followed.

## **WHAT IS NOT A COMPLAINT?**

We will accept a complaint unless there is a valid reason not to do so. The following will generally not be considered a complaint but each complaint will be considered on its own merits.

- A service request, this is a request from a resident requiring action to put something right (see Appendix B for more guidance). For example, a customer calls to report an issue with their boiler, our Repairs Policy will be followed in this example. A complaint will be raised if the customer is dissatisfied with our response to their service request, even if the handling of their service request is ongoing.
- Complaints from one resident about another, the customer should be referred to the housing team for advice on neighbour disputes.
- Issues regarding anti-social behaviour (ASB), these will be dealt with under our ASB policy. We will manage complaints about how we are handling the ASB process under this policy.

- Issues regarding safeguarding, these will be dealt with under our safeguarding policies. We will manage complaints about how we are handling safeguarding matters under this policy.
- Where issues giving rise to the complaint occurred over twelve months ago, although we will consider the individual circumstances of each complaint
- Disagreement with a decision we have made where there is already an appeal process, for example a letting decision or a dispute about service charges.
- Feedback about our policies and procedures from customers or other parties, these will be noted and taken into account for future reviews.
- Dissatisfaction expressed in surveys, although we will aim to signpost to the complaints policy,
- Issues we received in an unreasonable manner or where the customer is behaving unacceptably<sup>1</sup> towards Cornerstone, a member of staff or our representatives.
- Where legal action has begun in relation to the issue, and details have been submitted to court.
- Liability or personal injury claims.
- An issue that is being investigated or reviewed by other agencies, for example a police investigation, serious case review or fatal fire review.
- An issue already being dealt with by the Housing Ombudsman service.
- Any complaint that has already been dealt with under this policy unless:
  - There are issues ongoing related to the complaint – e.g. repairs or ASB.
  - An MP or the Housing Ombudsman has asked us to review the complaint.

Expressions of dissatisfaction (EOD) will be logged and resolved by one of our teams where possible. If it hasn't been resolved and the resident chooses to make a complaint this will be recorded. We will explain to the customer the reasons why the issue is not suitable for the complaints process if we decide not to accept it as a complaint.

## **OUR COMPLAINTS STANDARDS**

We will provide a quality service by:

- welcoming and encouraging feedback and complaints
- making it easy for customers to contact us about their issue
- making reasonable adjustments<sup>2</sup> to ensure this policy is accessible and inclusive
- being friendly, respectful and professional
- listening to ensure we understand the complaint
- attempting to resolve issues quickly
- keeping our customers informed, including what will happen next
- managing customer expectations
- taking ownership of issues raised
- saying 'sorry' if we got things wrong
- investigating complaints fully
- doing all we can to put things right within reasonable timescales
- following our policy and procedures
- fully and accurately recording details, actions and investigations at all stages
- learning from complaints to improve our service and prevent complaints

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<sup>1</sup> Unacceptable behaviour includes but is not limited to harassment, threats, violence, malicious communications, unreasonable persistence which disproportionately affects resources. If restricting on this basis we will be proportionate and have regard for the provisions of the Equality Act 2010.

<sup>2</sup> See Appendix A for more information about reasonable adjustments.

- providing training and guidance to our staff.

We will publish this policy on our website and in a customer leaflet, we will also publicise information about complaints in our customer newsletter.

## **OUR COMPLAINTS PROCEDURE**

We have a two-stage procedure, which is co-ordinated by our complaints team, which is made up of managers in our housing management and property services teams.

At the earliest stage a member of the complaints team will consider the complexity of the complaint and will offer an early apology, explanation or resolution where possible. Some complex complaints may need a longer and more in depth investigation and we will communicate that to customers.

We will consider if the resident is vulnerable or at risk and follow other relevant policies and procedures to ensure risks are mitigated.

When logging complaints we will set out our understanding of the complaint and the outcome the customer is seeking, we will seek clarity from the resident if we are unclear.

When acknowledging complaints we will be clear with customers which aspects of the complaint we are, and are not, responsible for and clarify any areas where this is not clear.

At each stage of the complaints process, complaint handlers will:

- deal with complaints on their merits, act independently, and have an open mind;
- give the resident a fair chance to set out their position;
- take measures to address any actual or perceived conflict of interest; and
- consider all relevant information and evidence carefully.

If we are not able to resolve a customer's complaint within the timeframes set out for each stage, we will:

- explain the reasons why;
- provide revised timescales;
- keep the customer informed of progress; and
- provide them with details for the Housing Ombudsman

Any extension will be no more than 10 working days if at stage one or 20 working days if at stage 2. It will not be without good reason, and the reason(s) will be clearly explained to the customer.

A complaint response will 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.

### Stage One – Complaint

If an initial attempt to resolve the issue is unsuccessful, a formal complaint will be recorded and we will:

- log and acknowledge the complaint within 5 working days of it being received;
- tell the customers who will be dealing with their complaint and how to contact them;

- aim to resolve the complaint within 10 working days from the date of acknowledgement; and
- provide the customer with a written response to their complaint which confirms the complaint stage, definition, decision, reason for decision, any remedy being offered, any outstanding actions and how to escalate to stage two if they are not satisfied with the response.

Complaints at this stage will usually be dealt with by a senior member of staff, such as a senior officer or manager.

Where a complaint is made by a third party on behalf of a customer, the third party will receive an acknowledgment and a copy of the response will be sent to the customer.

### Stage Two – Review

A customer can request a review or an escalation of their complaint once stage one has been completed.. We will:

- acknowledge the complaint has progressed to this stage within 5 working days of the escalation request being received;
- tell customers who will be dealing with their complaint and how to contact them;
- aim to resolve the complaint within 20 working days from the date of acknowledgement;
- allow customers to comment on any adverse findings before a final decision is made; and
- provide the customer with a written response to their complaint which confirms the complaint stage, definition, decision, reason for decision, any remedy being offered, any outstanding actions and how to escalate to the Housing Ombudsman if they are not satisfied with the response.

Complaints at this stage will usually be dealt with by a member of our Executive Team, that person will have had no involvement in stage one of the complaints process so that the review can be independent. We may involve Board Members as part of the review and customers can ask for our Resident Engagement Panel to be involved.

If complaints are not resolved at the review stage customers can refer their complaint directly to the Housing Ombudsman Service. The Housing Ombudsman Service contact details can be found at [www.housing-ombudsman.org.uk](http://www.housing-ombudsman.org.uk). Customers can engage with the Housing Ombudsman at any stage of the complaints process for advice or information.

## **RESOLVING COMPLAINTS**

Where something has gone wrong we will acknowledge this and set out the actions we have already taken, or intend 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<sup>3</sup>;
- Changing policies, procedures or practices.

Any remedy offered will reflect the impact on the customer as a result of any fault identified. The remedy offer will clearly set out what will happen and by when, in agreement with the customer where appropriate. Any remedy proposed will be followed through to completion.

When attempting to resolve complaints we will take into account the personal circumstances of the customer and will make reasonable adjustments where needed. Appendix A sets out what we mean by reasonable adjustments. Reasonable adjustments can be relevant to the customer accessing the complaints service but also in finding a resolution.

Mediation can often support two parties in finding a resolution, this is something that we will consider and use as part of our complaints process where it is felt appropriate.

## **MONITORING & LEARNING**

We will promote complaints and all feedback to our staff and customers as an opportunity to reflect, learn and improve.

Our Chief Executive is our board member responsible for complaints (MRC). They will ensure the Board regularly receives information on complaints that provide insight to our complaint handling performance. This will include:

- The number of complaints received
- The type of complaints received
- The timescales for resolving complaints
- Outcomes of complaints
- Customer satisfaction with how complaints are resolved
- Issues and trends with complaint handling
- Updates on Housing Ombudsman investigations and findings
- Annual complaints performance and service improvement report

This information and any trends and learning from complaints will also be reported to the Resident Engagement Panel on a regular basis. It will also be shared more widely with residents via our resident newsletter and annual report to residents.

Training on this policy will be provided to existing staff and new staff when they join. Training will be on-going through regular discussion with staff about complaints received and learning from them.

Successful complaint handling and positive feedback from residents will also be shared so that we can praise and motivate staff and demonstrate the standards we expect for our customers.

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<sup>3</sup> Where we have failed in providing a service, our aim in resolving the situation will be to restore a customer to the position they would have been in had we delivered the service. There could be many solutions to putting a situation right but in some instances financial compensation might be the only appropriate route. Our approach to compensation can be found in our Compensation Policy.

## **Appendix A - Reasonable Adjustments for Complaints Handling**

We want to ensure that our complaints procedure is inclusive and does not discriminate or disadvantage any customers because of their protected characteristics. The protected characteristics are; age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, sexual orientation.

The aim is to minimise barriers to customers in accessing and engaging fully with the complaints process. It is also to ensure that when considering the complaint, communicating with the customer and formulating our findings and resolutions that we make reasonable adjustments appropriate to a customer's protected characteristics.

The Equality Act 2010 does not define what is 'reasonable', but we consider the most following to be relevant:

- how effective the adjustment(s) could be in preventing or reducing disadvantage
- the practicality of making the adjustment
- the availability of resources including external support and finances
- any disruption to services that making the adjustment might cause.

Here are a few examples of reasonable adjustments we would make:

- making it clear in customer promotion of this policy that information can be provided in alternative formats
- allowing more time than would usually be allowed for customers to provide any information needed to resolve their complaint and/or respond to enquiries and other queries.
- providing specialist support where required, such as a sign language interpreter.

**Appendix B – Service request or complaint – flow charts**





