



EDEN HOUSING ASSOCIATION LIMITED

Compliments, Complaints and Feedback Policy

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This policy applies to Eden Housing Association and all its wholly owned subsidiaries

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1. Policy Statement

Providing excellent customer service is one of our main objectives. We aim to put the needs and aspirations of our customers at the heart of everything we do.

The Association views Compliments, Complaints and Feedback handling as a key element of its Customer Strategy and a means of monitoring, maintaining and improving the level and quality of service provided. In addition, we will use the feedback received to drive and deliver the improvements our customers want.

The Regulator of Social Housing's Consumer Standard "Tenant Involvement and Empowerment" clearly states, "*a registered provider shall have an approach to complaints that is clear, simple and ensures that complaints are resolved promptly, politely and fairly*". The main aim of this policy and associated procedure is to set out Eden Housing Association's (EHA) approach to resolving Compliments, Complaints, and Feedback, clearly demonstrating how we will meet this requirement.

2. References

Internal

Customer Strategy (STRAT 07)
Data Protection Policy (CORP 13)
Compliments, Complaints and Feedback Procedure
Feedback Manager User Guide
Feedback Manager Tutorial Video
Unacceptable Actions Policy
Financial Redress and Compensation – currently being reviewed/developed

External

Gov.UK Regulatory Standards – Consumer Standard
Housing Ombudsman Service
General Data Protection Regulation
Data Protection Act 2018
Housing Quality Network Complaints Tool Kit
Ministry of Housing Communities and Local Government - A New Deal for Social Housing

3. Policy Content

EHA sets out to provide a high quality of service and satisfaction to all of our customers however, we recognise that occasionally things do go wrong.

This policy provides a means by which customers can inform us when they are either satisfied or dissatisfied with the service they have received. We will always encourage our staff to think creatively and use common sense when dealing with all complaints and feedback. In addition, we welcome praise when our staff do things well or go the extra mile.

4. Our Aim

- To deliver a seamless, high quality customer experience which is tailored to the

individual's requirements

- To be fair, transparent and consistent in the way we manage Compliments, Complaints and Feedback
- To recognise teams/individuals and the services provided which have exceeded the expectations of our customers
- To ensure that all Compliments, Complaints and Feedback are assigned to the relevant member of staff
- To learn from Complaints/Feedback and commit to making appropriate changes to prevent a recurrence
- To put things right as quickly as possible
- To ensure that we keep the customer informed of progress whilst we are dealing with the Complaint/Feedback
- To inform our customers when they have influenced changes to policy, improvements to services and publish our findings.

5. Compliments, Complaints and Feedback

When dealing with Compliments, Complaints and Feedback we will always:

- **Show respect** – treating everyone with fairness and dignity, in addition all information shared with us will be dealt with in a confidential manner by an appropriate member of staff
- **Be open positive and flexible** - towards feedback and new ideas. We will encourage innovations and creativity that will improve outcomes for our customers.
- **Work in partnership** – develop open communications and equal relationships with our customers, staff and partners, valuing their contributions at all times enabling us to work together to resolve issues effectively and efficiently
- **Deliver** – we will do what we say we are going to and be held accountable for all of our actions

6. Who can make a Compliment, Complaint or provide Feedback?

Anyone receiving or requesting a service from EHA can make a Compliment, Complaint or provide Feedback for example

- EHA Tenants and Leaseholders
- Residents (owner occupiers and private tenants)

In addition we will accept Compliments, Complaints and Feedback from family members, local councilors or any other advocate acting in the best interests of our customer (providing they are authorised to do so).

7. How can a customer make a Compliment, Complaint or provide Feedback?

In order to encourage feedback from our customers we recognise that we must not put barriers in their way. Customers are able to make Compliments, Complaints and provide Feedback in a number of ways

- Telephone
- Letter

- E-mail
- Website
- Social Media
- Online self-service portal
- In person

If the customer requires assistance to use our service, we will do everything we reasonably can to assist by:

- Providing advice and assistance about the process
- Providing information in other formats such as large print, braille and other languages
- Providing an interpreter
- Providing a same sex interview.

8. Definitions

The definitions detailed below will ensure that the policy and associated procedures are implemented consistently across the organisation

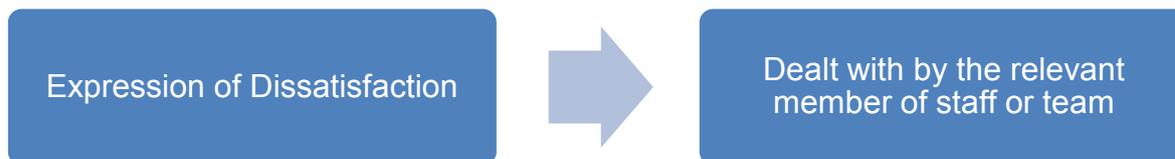
- **Service Request** – a request for service, such as a repair or the logging of an ASB incident, which has not previously been brought to our attention
- **Compliment** - an expression of gratitude or praise for a member of staff or service area
- **Comment** – an area of strength or weakness, which can be used to continuously improve our services
- **Expression of Dissatisfaction (EOD)** – these will generally arise when the initial request for service has not been dealt with appropriately
- **Formal Complaint** – is dissatisfaction with the actions, decisions or failure of our services after we have had the opportunity to put things right. The Formal Complaints process involves three stages.

EOD and Formal Complaints could relate to one or more of the following areas (this list is not exhaustive)

- Failure to provide a service
- Failure to provide a service to a standard that could reasonably be expected
- Failure to follow EHA policy or procedure
- Unhelpful attitude of a member of staff and/or contractors
- Failure to provide information or the right information in a timely manner
- We gave poor or unsuitable advice
- We failed to respond to enquiries
- We missed agreed appointments
- Delay or neglect to administrative or other processes
- Failure to consider all relevant information before reaching a decision
- Failure to fulfil any contractual decisions
- Any examples of malice, bias, inequity or discrimination

9. Expressions of Dissatisfaction (EOD) and Formal Complaints

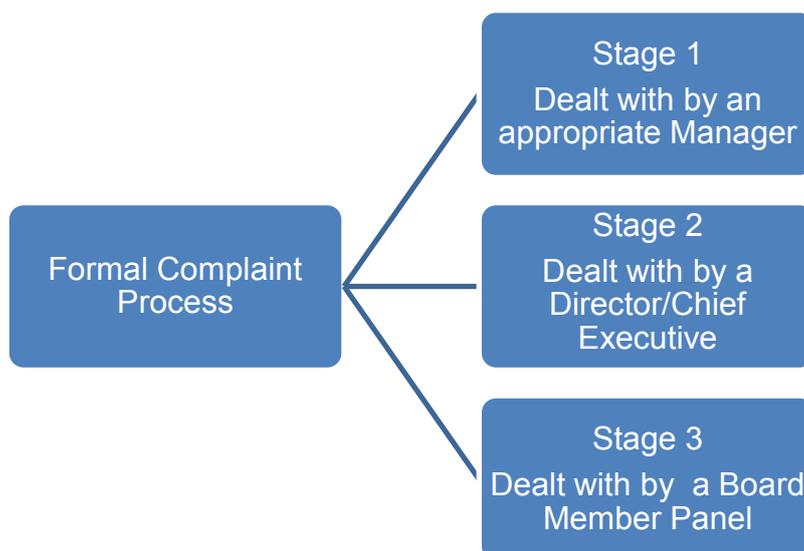
EOD - will generally arise when the initial request for service has not been dealt with appropriately or to the customer's satisfaction.



We aim to deal with an EOD within 5 working days (in exceptional circumstances, the timescale may need to be extended). Responses to EOD can be via phone, email, verbally or in writing dependant on the requirements of the customer.

We will endeavour to resolve an EOD swiftly and to the satisfaction of the customer however, if they are unhappy with our response, they may request that the EOD is escalated to a formal complaint.

Formal Complaints - a Formal Complaint is generally dissatisfaction with the actions, decisions or failure of our services after we have had the opportunity to put things right. The Formal Complaints process generally involves three stages however, where circumstances make this impractical, a two-stage process may be adopted.



We will allow for financial recompense to customers, within defined corporate guidelines where service failure has occurred these will be considered on a case-by-case basis. (**Appendix 2** details the timescales for dealing with each stage of the Formal Complaints process).

10. When dealing with EOD and Formal Complaints, we will:

- Recognise the importance of re-building trust with the complainant and maintaining good communications
- Ensure that internal/and or independent support or advocacy is available for customers who need it
- Ensure that all communications either verbal or written are customer friendly
- When responding to formal complaints we will provide a written acknowledgment which will include

- the complaint reference number
 - name of the investigating officer
 - timescale for the response (as detailed in **Appendix 2**)
- When responding to formal complaints we will ensure that they are comprehensive and include
 - an apology or an expression of regret
 - summary of the complaint findings of the investigator
 - any actions EHA proposes to take to resolve the complaint
 - details of how the complainant can escalate the complaint if not satisfied

If the given timescales cannot be adhered to, we will inform the complainant and advise when they can expect a response and why there has been a delay.

The decision of the Board Member Panel at Stage 3 is the end of the Eden Housing Association complaints process. A letter confirming the decision of the panel will include details on how the complainant can take their complaint forward should they decide that they are dissatisfied with the process Eden Housing Association has followed.

Referring to a Designated Person

If the customer has been unable to resolve their complaint through our complaints procedure, they can appoint a designated person who can also help find a solution. The designated person can be an MP, a local councillor or a Tenant Panel. Their role is to help resolve disputes between tenants and their landlords, alternatively the Designated Person can also refer the complaint directly to the Housing Ombudsman for investigation, (the law states that when a designated person refers to the Ombudsman it must be in writing).

Referring the complaint to the Housing Ombudsman

If the complainant decides not to contact a designated person, they can refer directly to the Housing Ombudsman eight weeks after we have provided our final response to the complaint. The Housing Ombudsman will deal with each complaint to find the best outcome for the complainant's individual circumstances. More information can be obtained from www.housing-ombudsman.org.uk if required

11. Customer Responsibilities

We believe that our customers have the right to be heard, understood and respected, in addition our staff have the same rights.

We recognise that when things go wrong our customers may be unhappy and show signs of stress and frustration when making a complaint. However, our customers have a responsibility not to engage in:

- Aggressive or abusive behaviour – for example verbal abuse and threats
- Making unreasonable demands – for example continual phone calls, letters,

emails or visits to our offices repeatedly changing the content of a complaint or raising unrelated issues. We consider these demands as unacceptable and unreasonable if they start to substantially impact on our work, such as taking up an excessive amount of staff time to the disadvantage of other customers

- Making malicious complaints – for example making malicious comments or complaints, which are without foundation.
- Unreasonable Persistence – for example persisting in pursuing a matter when they have already exhausted other statutory routes of appeal, making complaints in order to make life difficult for EHA rather than to genuinely resolve a problem

12. Staff Responsibility

The Director of Operations retains the overall responsibility for this policy however all managers are responsible for the implementation ensuring that associated monitoring, staff awareness, training, policy development and communication to customers is undertaken.

13. Equality Impact Assessment (EIA)

Eden Housing Association is committed to ensuring that no person or group of persons will be treated less favorably than another person or group and will carry out its duty with positive regard to the following core strands of equality;

- Age
- Disability
- Gender
- Race
- Transgender
- Sexual Orientation
- Religion and or Belief
- Civil Partnership and Marriage
- Pregnancy and Maternity

A copy of the Equality Impact Assessment can be found in **Appendix 1**

14. Monitoring and Review

This policy will be reviewed every 3 years, or in line with change in regulation and/or legislation. Monitoring results will be used by the Association to inform future policy review in this area. All reviews will consider whether:

- the current Policy adheres to legislative and regulatory requirements and reflects current good practice;
- the aims and objectives of the Policy are being met;
- the current Policy outcomes meet the needs and aspirations of our customer base;
- service users are aware of and understand the Policy and believe it to be consistent and fair;
- the service offers value for money.

Our policy and procedures aim to promote a positive approach from all employees and members of the Association. Regular training and updates will be provided to further enhance that approach.

Performance monitoring will be undertaken in the following areas to assess the impact of:

- The number of Compliments, Comments, EOD and Complaints recorded
- The number of EOD and Formal Complaints where timescale has been extended
- The number of Stage 3 Formal Complaints referred to the Designated Person or Housing Ombudsman
- The number of service improvements implemented as a result of Complaints, Compliments and EOD recorded.

Overall monitoring and review of the Policy will be undertaken in consultation with:

- Service Users
- Staff
- Board Members

Question	Response
1. Name of the policy/practice/activity being assessed	Compliments, Complaints and Feedback Policy
2. Summary of aims and objectives of the policy/practice/activity	The policy and associated procedure sets out how EHA will deal with Compliments Complaints and Feedback and use the information collected as a means of maintaining and improving the level of quality and service we provide to our customers.
3. What involvement, consultation, engagement has taken place for the policy/practice/activity (e.g relevant groups/stakeholders)	<p>The policy and associated procedure has been written following consultation with:</p> <ul style="list-style-type: none"> • Housing Quality Network Complaints Toolkit • Housing Ombudsman Service • Gov.UK Consumer Standard • Ministry of Homes Communities and Local Govt (A new deal for Social Hsg) • Residents Focus Group • Input from current service user • EHA Scrutiny Panel Review recommendations • ECHO
4. Who is affected by the policy/practice/activity	The policy and procedure applies to all EHA customers.
5. What are the arrangements for monitoring and reviewing the impact of the policy/practice/activity	All Compliments, Complaints and Feedback are recorded on the Feedback Manager Module of Orchard (which includes appropriate retention timeframes). Cases are reviewed on a weekly basis by managers and included within quarterly KPI's. Policy and associated procedures are reviewed every 3 years, or in line with change in regulation and/or legislation.

Protected Group	Is there a potential for a positive or negative impact	Explain and provide evidence/data used	Action to address the negative impact
Disability	No	The policy /procedure ensures that EHA will not treat an individual less favorably if they possess a protected characteristic	

Gender reassignment	No	The policy /procedure ensures that EHA will not treat an individual less favorably if they possess a protected characteristic.	
Marriage or civil partnership	No	The policy /procedure ensures that EHA will not treat an individual less favorably if they possess a protected characteristic.	
Pregnancy or maternity	No	The policy /procedure ensures that EHA will not treat an individual less favorably if they possess a protected characteristic.	
Race	No	The policy /procedure ensures that EHA will not treat an individual less favorably if they possess a protected characteristic.	
Religion or belief	No	The policy /procedure ensures that EHA will not treat an individual less favorably if they possess a protected characteristic.	
Sexual orientation	No	The policy /procedure ensures that EHA will not treat an individual less favorably if they possess a protected characteristic.	
Sex (gender)	No	The policy /procedure ensures that EHA will not treat an individual less favorably if they possess a protected characteristic.	
Age	No	The policy /procedure ensures that EHA will not treat an individual less favorably if they possess a protected characteristic.	

Evaluation

Question	Explanation
Is it possible the proposed policy/practice/activity could	No – it is our overall aim to ensure that no

discriminate or unfairly disadvantage people	customer is discriminated against, or receives less favorable treatment because of a protected characteristic. In all “appropriate” circumstances, EHA will comply with a duty to provide a reasonable adjustment.	
Decision	Tick the relevant box	Include any justification required
1. No barriers identified – proceed		
2. Barriers identified towards one (or more) protected groups – stop		
3. Barriers identified towards one (or more) protected groups – adapt or change the policy/practice/activity		
4. Barriers identified towards one (or more) protected groups – no proportionate way to amend the policy/practice/activity so proceed with caution		

Completed by – and date	Heidi Ware – Oct 2019		
Reviewed by – and date	Executive Team – Oct 2019		
Review Date (if applicable)			
Will this EIA be published	Completed EIAs are appended to the policy. Any public-facing policy will be uploaded to the EHA website		

Action (To be completed as required)

If the Evaluation has resulted in Decision 4, complete a risk assessment and record on Operational Risk Register	Date Completed:
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Change Log

Name	Date	Version	Change
	When published		

Feedback Method	Responsible for registering on Feedback Manager	Officer Assigned to for investigation and closure	Appendix 2 Timescale for completion
Compliment	Any member of EHA staff	Manager of individual/service area	No completion timescale set. Compliment is assigned to the relevant manager as soon as it has been logged. Manager then responsible to raise with individual or team. Good practice to do this within 14 working days.
Comment	Any member of EHA staff	Relevant member of staff/manager	No completion timescale set. Comment is assigned to the relevant member of staff/manager as soon as it has been logged. Good practice to investigate within 14 working days and update the customer/Feedback Manager.
Expression of Dissatisfaction	Any member of EHA staff	Relevant member of staff/team	Completion timescale set at 5 working days. Officers will receive a daily reminder/alert if EOD is not closed within 5 working days.
Stage 1 Formal Complaint	Any member of EHA staff	Relevant Manager	Completion timescale set at 15 working days. Manager will receive a daily reminder that the timescale is near from day 10.
Stage 2 Formal Complaint	Any member of EHA staff	Relevant Director or Chief Executive	Completion timescale set at 10 working days.
Stage 3 Formal Complaint	Any member of EHA staff	Complaint Panel Hearing comprising of three Board Members	Board Member Panel will aim to meet within 28 days after the date of the Stage 3 Acknowledgement letter. The panel will make its decision at the end of the hearing and inform the

			complainant of their decision within 2 working days.
Contract Disputes	Any member of EHA staff	Relevant member of Management or Executive Team	Dependant on details within the individual Contract or Service Level Agreement

10. Formal Complaints Flow Chart

Not all Formal Complaints are escalated from an EOD.

