

# CUSTOMER FEEDBACK POLICY

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Lead officer:	Chris Czyzyk

## 1 INTRODUCTION

- 1.1 The Policy provides a means through which customer can provide feedback and hold Stockport Homes to account for the services it provides.

## 2 STRATEGIC LINKS

- 2.1 The Policy reflects the Social Housing White Paper proposals, the Housing Ombudsman Scheme and Complaint Handling Code. This means that Stockport Homes will always make a reasonable and proportionate effort to resolve a complaint and learn from the outcome of complaints.
- 2.2 The 'Regulatory Framework for Social Housing in England' sets out that Registered Providers<sup>1</sup> shall 'have an approach to complaints that is clear, simple and accessible that ensures that complaints are resolved promptly, politely and fairly'. The Policy has been designed to deliver the requirements of the Framework.
- 2.3 The Policy meets the obligations of the Hackitt Review, which prescribes an approach for residents to raise complaints about fire or structural high-rise safety issues. Any such complaints will be directed to the Building Safety manager, with escalation to the Building Safety Regulator where requested.
- 2.4 The Policy provides a route for Home Improvement Agency<sup>2</sup> complaints to be raised. The Home Improvement Agency (HIA) delivers certain aspects of Stockport Council's private sector housing grants scheme, including disabled facilities grants. When making a complaint, grant applicants will be made aware of their right to use the Council's complaints procedure rather than the Stockport Homes complaint process. If a grant applicant chooses to use Stockport Homes' complaints process, Stockport Council will be consulted before any scheme delivery complaints progress to the appeal stage, and as part of the normal Stockport Homes complaints process the Council will be consulted on the appeal decision. A similar approach will be applied to other local authority commissioned works.
- 2.5 The Policy operates alongside the Unacceptable Behaviour Policy, which is designed to protect members of staff that are subject to abusive behaviour, unreasonable demands, and unreasonable persistence. These behaviours can sometimes arise during the investigation of complaints.
- 2.6 The Policy operates alongside the Disciplinary Policy, Procedure and Guidance, which deals with the conduct of staff employed by Stockport Homes.
- 2.7 The Policy operates alongside the Compensation Policy, which sets out where compensation gestures may be awarded.

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<sup>1</sup> Stockport Homes is a Registered Provider for the properties it owns. The social housing stock managed by Stockport Homes on behalf of Stockport Council is also covered by the framework.

<sup>2</sup> <https://www.stockporthomes.org/staying-put-scheme/>

- 2.8 The Policy supports the Stockport Homes Group aim to 'be accountable to customers'.
- 2.9 The Customer Feedback Policy and information about the Housing Ombudsman and Complaint Handling Code is published on the SHG website, which includes accessibility tools. This information is available in a physical format upon request.

### 3 POLICY STATEMENT

- 3.1 In accordance with the Housing Ombudsman Scheme's Complaint Handling Code, complaints are defined as:

*'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.'*

- 3.2 Stockport Homes welcomes customer feedback from all sources, including but not limited to:

- Email
- Online via the Stockport Homes website
- Letter
- Telephone
- In-person
- Web-chat
- Social Media

In accordance with the Equality Act 2010 Stockport Homes will adapt normal processes to meet individual needs in accessing the Customer Feedback process. Reasonable adjustments will be made, which may include, but are not limited to:

- Adhering to a customer's preferred communication method and frequency.
- Providing written communications in a format which is accessible to the customer, such as large print, on coloured paper, or in braille.
- Use of interpreting services where language may be a barrier.
- Taking a flexible approach to location of meetings where these are required to ensure accessibility.
- Allowing the customer to have a representative deal with the complaint on their behalf and to be represented or accompanied to any meeting with SHG.

The customer does not have to use the word compliant for it to be treated as one. Stockport Homes will accept a complaint which is submitted via a third party or a representative including Elected Members, subject to confirmation of permission to act in this capacity. In instances where some fault has been found the complaint response will set out the actions that will be taken to address the issue. Where customer's sought outcomes are unreasonable or unrealistic or where there is no evident failure on the part of Stockport Homes, this will be set out to the customer through the formal complaints process.

- 3.3 Stockport Homes operate a centralised Customer Feedback team who are responsible for recording and monitoring all complaints and ensuring these are handled in accordance with the Complaint Handling Code, including where these are being handled by a third-party. Customers can raise concerns directly with the Customer Feedback team, and complaints are also accepted through all other service areas who will pass the details of this to the Customer Feedback team, without need for the customer to contact the Customer Feedback team directly for this to be recorded.
- 3.4 Stockport Homes recognise the difference between a formal complaint and a service request. A Service Request is a request from a customer requiring action, for instance following a missed appointment where this can be resolved in the moment by way of making a new appointment. Where this approach is agreed with the customer, the contact will be recorded as a Service Request but will not enter the formal complaints process. The customer retains the option to progress their concerns as a formal complaint irrespective of this being handled as a Service Request. Handling of the Service Request will remain ongoing if the customer seeks to progress as a complaint. Stockport Homes operates a two-stage complaint investigation process that consists of a 'Stage One' investigation and a 'Stage Two' investigation. It will make every effort to resolve complaints in a timely way, including without the issue entering the two-stage process if an issue is likely to be resolved quickly and easily, and where this approach is agreed with the complainant. Where issues are being dealt with outside of the two-stage process, a resolution will be agreed within five working days of the issue being raised or otherwise an offer will be made for the issue to be handled through the two-stage process, with this being formally recorded and acknowledged no more than five working days from the issue having first been raised.
- 3.5 SHG will always consider the circumstances of each complaint. However, there are instances where complaints will not be accepted for investigation. These are where the issues:
- are being addressed via another more appropriate route, for instance decisions around homelessness or Allocations assessments being challenged via the Allocations Review process.
  - have not been raised within 12 months of the matter arising or the customer becoming aware of them, except those concerning health and safety.
  - have already received a response through the complaints process.
  - are being pursued in an unreasonable manner, such as being accompanied by unacceptable behaviour.
  - concern matters that do not cause significant adverse impact to the complainant, or
  - are subject to legal processes. This is defined as details of the claim, such as the Claim Form and Particulars of claim, have been filed at court.
- 3.6 Reports of anti-social behaviour will be handled in accordance with the Anti-Social

Behaviour Policy. Where there is concern about the handling of an existing anti-social behaviour case or a case closed within the last six months, this will be handled through the Customer Feedback process.

- 3.7 When a complaint is accepted at any stage of the formal complaints process, it will be acknowledged by the Customer Feedback Team within five working days of having been received. The acknowledgement will be clear on which aspects of the complaint Stockport Homes are, and are not, responsible for and clarify any areas where this is not clear. Complaints will not be refused escalation through all stages of the formal complaint process unless excluded for reasons set out in paragraph 3.5. Where this is the case, the reason will be clearly set out to the complainant and signposting will be provided in relation to the customer's right to take this decision to the relevant Ombudsman.
- 3.8 A full record of the complaint will be recorded, including the outcomes at each stage. This will include the original complaint and the date received, all correspondence with the resident, correspondence with other parties, and any relevant supporting documentation such as reports or surveys.
- 3.9 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 complainant 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.
- At both Stage 1 and Stage 2 of the complaints process, complainants will receive a written formal response which includes:
    - the complaint stage;
    - the complaint definition;
    - the decision on the complaint;
    - the reasons for any decisions made;
    - the details of any remedy offered to put things right;
    - details of any outstanding actions; and
    - details of how to escalate the matter to Stage 2 (if responding at Stage 1) or to the Ombudsman if the individual remains dissatisfied.

## 4 COMPLAINT STAGES

- 4.1 'Stage One': This stage of the process encourages investigating officers to resolve complaints through engagement with customers. It allows up to ten working days to respond, with an additional ten working days available in exceptional circumstances and when agreed with the complainant. A formal written response is provided which sets out how the complaint was investigated, any failure identified, the outcome of the complaint, any remedies being made and how the complaint can be pursued further including details of the Housing Ombudsman where the complaint is within their jurisdiction. The complainant should make any request for their complaint to proceed to Stage Two of the Customer Feedback within 20 working days of the Stage 1 response being provided. Where there are reasonable mitigating circumstances which mean the complainant has not been able to pursue their request for escalation in this time, such as due to medical

issues, a flexible approach will be taken by the Customer Feedback team in accepting the request. Where a decision is made to refuse an escalation request then it must be set out in line with the exclusions in paragraph 3.5 and an explanation will be provided to the resident. The communication will make clear that the stage one response was its final response to the complaint, and it will provide details of the Housing Ombudsman.

- 4.2 'Stage Two': This involves a complaint being reviewed by a more senior officer, usually a Head of Service. This will not be the same person that considered the complaint at Stage One. Stage Two allows up to 20 working days to respond, with an additional 20 working days available in exceptional circumstances and when agreed with the complainant. A final, formal written response will be provided as part of the Stage Two complaint investigation which sets out the outcome of the complaint following review, any remedies being made and how the complaint can be pursued further including details of the relevant Ombudsman. Stage Two complaint investigators are encouraged to take a flexible approach to their review, ensuring complainants have had sufficient opportunity to set out their concerns at this stage.
- 4.3 In the rare instances that complaints cannot be responded to within the timescales set out above, SHG will agree with the complainant suitable intervals for being updated about the complaint.

## **5 REMEDIES TO COMPLAINTS**

- 5.1 In some instances, complaint investigations will determine that remedial actions are required as part of the complaint outcome. Where something has gone wrong Stockport Homes will acknowledge this and set out the actions that have already been taken or will be undertaken 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.

In many cases remedies will involve an apology and delivery of service, for instance the undertaking of a repair. Sometimes there may be a need to acknowledge quantifiable loss incurred by a complainant or a need to compensate for time and trouble or inconvenience and distress owing to Stockport Homes' failure, in addition to any statutory payments. In all cases, the complaint response will set out what remedies are being provided and reasonable expected timescales for these remedies to be provided or delivered as agreed with the complainant. Where financial compensation is being awarded, this will be made in accordance with the Compensation Policy which sets out in what circumstances compensation will be made and the level of award which should be offered.

## **6 LEARNING FROM COMPLAINTS**

- 6.1 Stockport Homes will try to identify learning from every complaint that it deals with. On a regular basis Stockport Homes will publish the learning that is has implemented from complaints to demonstrate to customers that it is improving services that it provides to customers.

## **7 EQUALITY IMPACT ASSESSMENT**

- 7.1 This policy is designed to be flexible and encourage feedback from customers. It does not limit the ways in which complaints can be raised, instead it creates an open approach to complaints handling. The policy encourages the use of advocates or representatives where customers need support in raising or pursuing the complaint. It provides ways in which customers can be supported to raise their complaint, such as via trained customer advisors providing guidance to complainants at Stage Two.
- 7.2 The approach encourages early resolution, and the Stage Two stage contains options to tailor the approach to the needs of customers.

## **8 OWNERSHIP, MONITORING AND REVIEW**

- 8.1 The Policy has been approved by the Board. It is owned at a strategic level by the Head of Customer and on an operational level by the Customer Experience Manager. It will be reviewed on a three-yearly cycle, or earlier if required.
- 8.2 The Policy is monitored through the Customer Feedback Report. The report is presented to the Executive Leadership Team, and the Customer Focus Committee of the Stockport Homes Board, on a quarterly basis. Each of these reports are used to identify learning and carry out trend analysis.





