

CUSTOMER FEEDBACK: COMPLIMENTS, COMMENTS AND COMPLAINTS

Board/EG Approval: September 2017
Next Review: September 2019

Responsible Board: Ocean Housing Group Ltd
Responsible Executive: Managing Director of Ocean Housing Ltd

1.0 POLICY STATEMENT

1.1 Ocean Housing Group is committed to learning from all customer feedback. We welcome compliments, comments and complaints and see them as an opportunity to improve the quality of our services.

The main aims of this policy are to:

- encourage customer feedback and learn from it to improve services to our customers
- promote and support the organisation as open and accessible
- empower staff to view customer feedback in a positive way and act accordingly
- ensure a successful resolution of complaints, quickly and fairly, and at the first point of contact wherever possible
- ensure the learning is extracted from complaints and where necessary shared across all departments
- enable us to deal effectively with unreasonably persistent complainants

2.0 CUSTOMER FEEDBACK

2.1 We have developed a coordinated approach to customer feedback through our Service Standards which outline our service commitments and provide details of the ways in which we will monitor and report our performance against them. Customer feedback is a key indicator of our performance and is used across all of the Standards. We will use customer surveys, tenant-led inspections, focus groups, estate walkabouts and wider tenant involvement activities to ensure that all our residents and stakeholders are encouraged to provide us with feedback about our services.

3.0 COMPLAINTS

3.1 This policy considers complaints received from Ocean's customers: tenants' leaseholders' shared-owners and housing applicants. Other individuals or organisations who wish to express dissatisfaction at Ocean should be referred to our customer service team who will identify an appropriate member of staff to deal with their issue and it will be addressed outside of this Policy.

3.2 MPs and Councilors can make a complaint on behalf of a customer. Other advocates acting on behalf of a customer can do so subject to the completion of a signed advocacy form as evidence of a complainant's authorisation or, if it is not possible for the complainant to authorise an advocate in this way, we will request other evidence that the advocacy is legitimate.

3.3 For the purpose of this policy complaints relate specifically to instances where:

- we have failed to provide a service that we should have
- the quality of the service we have provided has been poor
- customers have waited longer than published timescales or than they think is reasonable for us to do something
- customers have not been treated fairly or courteously by a member of staff

It does not cover:

- any action or inaction required by law
- the action of an individual or organization over which we have no control
- anti-social behaviour, harassment and domestic abuse (dealt with under separate policies and procedures)
- contractual disputes
- decisions taken to conform to Ocean's agreed policies such as rent increases
- something which is or could be dealt with by the court or a tribunal, or which is, or should be, being dealt with by Ocean's insurers

- 3.4 We aim to resolve all complaints at the first point of contact to minimise inconvenience for our customers. However, this is not always possible and to ensure fairness and transparency we follow a three stage complaints process which is detailed at Annex 1: The Complaints Procedure. At each stage of the procedure the complainant will receive a written response to their complaint. The response will give a decision (whether the complaint is upheld, partially upheld or not upheld), the reason for that decision and explain who the complainant should contact if they wish to move to the next stage of the complaints process.
- 3.5 The final stage of the procedure provides for the complaint to be considered by the Group Chief Executive.
- 3.6 Customers complaining to Ocean can expect us to:
- treat them politely and respectfully
 - deal with their complaint as quickly and effectively as possible in line with the timescales detailed within the complaints procedure
 - appoint a case manager who will deal with their complaint and be their point of contact during the process. This should be the manager about whose service the complaint is mainly about but who has not been previously involved in the specific issues detailed within the complaint – they will lead on all aspects of the complaint
 - take their complaint seriously, look at all the points raised and provide an appropriate response
 - deal with all complaints fairly and consistently and with due regard to confidentiality
 - undertake a full and impartial review
 - apologise when things have gone wrong
 - keep them informed of progress using their preferred method of communication
 - use their feedback to improve the way we provide services
- 3.7 If a customer remains unsatisfied with our response to their complaint at the end of our complaints process the Localism Act 2011 provides that tenants can ask for their complaint to be considered by a 'designated person'.
- 3.8 A designated person can be a Tenant Panel, an MP or a local councillor. Ocean's Tenants and Residents Panel and Scrutiny Panel have established a sub-group to consider complaints: the Designated Person Panel.
- 3.9 A designated person can help to resolve a complaint in one of two ways; they can try to resolve the complaint themselves or they can refer the complaint straight to the Housing Ombudsman. If they refuse to do either the customer can contact the Ombudsman directly.
- 3.10 The designated person can try to put things right in whichever way they think may work best. If the problem is still not resolved following the intervention of a designated person they or the customer can refer the complaint to the Housing Ombudsman.
- 3.11 Complaints to the Ombudsman do not have to be referred by a designated person, but if they are not there must be at least 8 weeks from the end of our internal complaints process before the Ombudsman can consider the case.

4.0 COMPENSATION

4.1 Where a customer has been inconvenienced by a loss of service, late repairs or staff failing to keep appointments they may be entitled to compensation from Ocean. Further details are included within our Compensation Policy.

5.0 UNREASONABLY PERSISTENT COMPLAINANTS

5.1 We are committed to providing a complaints service that is accessible to all our customers. However, there are a small number of complainants who, because of the frequency, nature and/or quality of their contact with us, hinder our consideration of theirs, or other people's complaints. We refer to such complainants as 'unreasonably persistent complainants' and, exceptionally, we will take action to limit their contact with our office.

5.2 The decision to restrict access to our offices will be taken in consultation with senior management, and will normally follow a prior warning, in writing, to the complainant. Any restrictions imposed will be appropriate and proportionate. The options we are most likely to consider are:

- requesting contact in a particular form
- requiring contact to take place with a named officer
- restricting calls to specified days and times
- asking the complainants to enter into an agreement about their future contact with us

5.3 In all cases where we decide to treat someone as an unreasonably persistent complainant, we will write to tell the complainants why we believe their behaviour falls into that category, what action we are taking and the duration of that action. We will also tell them how they can challenge the decision if they disagree with it. If we decide to carry on treating someone as an unreasonable persistent complainant and we are still investigating their complaint six months later, we will carry out a review and decide if restrictions will continue.

5.4 Where a complainant whose case is closed persists in communicating with us about it, we may decide to terminate contact with that complainant about the matter. In such cases, we will read all correspondence from that complainant, but unless there is fresh evidence which affects our decision on the complaint we will simply acknowledge it or place it on file with no acknowledgement.

5.5 New complaints from people who have previously been 'unreasonably persistent complainants' will be treated on their merits.

6.0 TRAINING AND LEARNING

6.1 Our approach to customer feedback and complaints will form a part of the 'new starter' induction programme. Staff are encouraged to view all customer feedback including complaints, as a positive way to learn, improve and provide good customer care. More specific training will be provided to those staff who manage and administer the complaints procedure.

7.0 LINKS TO OTHER POLICIES AND STRATEGIES

- 7.1
- Service Standards
 - Compensation Policy
 - Tenant Involvement Strategy

8.0 RESPONSIBILITIES AND MONITORING

- 8.1 All members of staff have a responsibility to familiarise themselves with this policy, follow it and ensure any member of staff who reports to them does the same.
- 8.2 We will benchmark our complaints service and complete an annual report comparing our performance in dealing with complaints to similar organisations.
- 8.3 The Managing Director of Ocean Housing Ltd will ensure that all complaints are monitored and that this information is reported to the relevant Board on at least an annual basis. The report will highlight any trends, which may suggest the need for improvements in areas of service provision or practices.

9.0 EQUALITY AND DIVERSITY

- 9.1 We will apply our Customer Feedback Policy consistently and fairly, and will not discriminate against anyone regardless of their age, gender, transgender, disability, religion or belief, sexual orientation, race or ethnicity.
- 9.2 We will ensure that all our procedure and correspondence with complainants does not contain jargon and is written in plain English. Each quarter complaints resolved within the period will be reviewed by the Managing Director of Ocean Housing Ltd to ensure that it adheres to this policy. We will consider the communication requirements of all our customers and will make the complaints procedure and other correspondence available in other languages or formats as required.

10.0 RESIDENT INVOLVEMENT

- 10.1 Annually we will publish, for all our customers and wider stakeholders, information about:
- the number of complaints received
 - the nature of the complaints
 - the business area the complaint relates to
 - the outcome of the complaints
 - how we have changed the way we do things to improve services as a result of feedback

11.0 COMMUNICATION

- 11.1 A copy of this policy will be given to every board member; Tenants and Residents Panel members, is available on the intranet for employees of Ocean Housing Group and, is available to all other stakeholders via the Ocean Housing Group website and the Tenants Handbook.

ANNEX 1: THE COMPLAINTS PROCEDURE

At Ocean we aim to provide the best possible service for all our customers but we recognise that we will not always get things right first time. If this happens we will always try and resolve problems informally at the first point of contact. However, there may be occasions when a customer wants to take the matter further, specifically, instances where:

- we have failed to provide a service that we should have
- the quality of the service we have provided has been poor
- you have waited longer than published timescales or than you think is reasonable for us to do something
- you have not been treated fairly or courteously by a member of staff

There are certain things that you may not be happy about that we would not normally regard as a complaint:

- The law – we may be prevented from doing something or may have to do something because we are required by law
- The action of someone or another organisation over which we have no control
- Ocean Housing has separate policies and procedures for dealing with Anti-Social Behaviour problems with neighbour, harassment and domestic abuse. This policy does not cover contractual disputes.
- Decisions taken to conform to Ocean's agreed policies such as a rent increase
- Something which is or could be dealt with by the court or a tribunal, or which is being dealt with by Ocean's insurer

This complaints procedure is for Ocean Housing Group customers: tenants, leaseholders, shared-owners and housing applicants. Other individuals or organizations who wish to express dissatisfaction at Ocean should be referred to our customer service team who will identify an appropriate member of staff to deal with this issue.

MPs and Councillors can make a complaint on behalf of a customer. Other advocates acting on behalf of a customer can do so subject to the completion of a signed advocacy form as evidence of a complainant's authorization or, if it is not possible for the complainant to authorise an advocate in this way, we will request other evidence that the advocate is legitimate.

Our complaints process has 3 stages:

Stage 1: Management response

All complaints will be dealt with in the same way regardless of whether it is made verbally via a third party such as a local councilor, Member of Parliament, by email, letter or in person. It will be acknowledged within 2 working days and allocated a reference number

A manager, from the section of Ocean which the complaint is about, who has not been previously involved in the specific issue detailed within the complaint, will investigate the complaint. We will aim to make a decision within 10 working days but if it proves to be more complicated we will keep the complainant informed on progress.

Stage 2: Senior Management Response

If the complainant is not happy with our response to the stage 1 complaint or if the problem which the complaint related to persists, the complainant can ask for the complaint to be considered at stage 2 of the complaints process, within 21 days of the first decision being made. The appeal should be addressed to the Managing Director of Ocean Housing quoting the complaint reference number and should clearly state the outstanding issues including the remedy being sought. It will be acknowledged and looked at again and a reply will be sent within 14 working days. Again, should the matter be more difficult to resolve we will keep the complainant advised of progress.

Stage 3: Group Chief Executive

If we have still not been able to resolve the problem to the complainant's satisfaction they can ask for it to be examined by the Ocean Group Chief Executive. The complainant must make this request, quoting their reference number, within 14 working days of receiving their stage 2 reply.

An investigation by the Group Chief Executive will be completed with 14 working days of the request being received.

Referral to a designated person

If a complaint is not resolved following Stage 3 of our complaints process a complainant can:

- Refer the matter to a designated person OR
- Wait 8 weeks and refer the matter directly to the Ombudsman

A designated person can be a Tenant Panel, an MP or a local councillor. The contact details for the Housing Ombudsman Service are as follows:

Housing Ombudsman Service
Exchange Tower
Harbour Exchange Square
London, E14 9GE

Telephone: 0300 111 3000 (lines are open Monday to Friday 9.15am to 5.15pm)
Fax: 020 7831 1942

Email: info@housing-ombudsman.org.uk