Compliments and Complaints Policy

Board/EG Approval: September 2025 Responsible Board: Ocean Housing Group

Ltd

Next Review: August 2026 Responsible Executive Director of

Executive: Housing and

Communities

1.0 Policy Statement

1.1 At Ocean Housing, we believe that every piece of feedback whether a compliment, comment, or complaint is a valuable opportunity to learn, grow, and improve the services we provide. We are committed to treating all customers with fairness and respect, and to using their voices to shape a better experience for everyone.

1.2 Our key aims are to:

- Encourage open and honest feedback to help us continually improve our services.
- Promote transparency and accessibility across all areas of the organisation.
- Empower our staff to view feedback positively and respond constructively.
- Resolve complaints swiftly and fairly, ideally at the first point of contact.
- **Share learning from complaints** across departments to drive service improvements.
- Manage unreasonable or persistent complaints effectively and appropriately.

2.0 Customer Feedback

- 2.1 We value customer feedback as a vital measure of our performance and a key driver of service improvement. Our approach to collecting, recording, and reporting feedback has been developed in partnership with our tenants and residents, and aligns with the Housing Ombudsman Complaint Code 2025.
- 2.2 We are committed to creating a culture where customers feel confident and safe to share their experiences positive or negative without fear of repercussion. This commitment is reflected in our Service Standards, which outline how we apply, monitor, and report on our performance.
- 2.3 Customer feedback informs all areas of our service delivery. To strengthen this, we will supplement the feedback gathered through this policy with broader tenant engagement activities. This ensures that all residents and stakeholders are encouraged and empowered to share their views and help shape the services we provide.

3.0 Compliments, Comments, and Suggestions

3.1 We welcome and encourage compliments from customers who are particularly satisfied with the service they've received especially when a team member has gone above and beyond. Recognising excellent service not only boosts morale but also helps us understand what works well. All compliments and suggestions for improvement are recorded and used to inform future service enhancements.



3.2 When a compliment is received, it is shared with the relevant staff member (where known) and their Head of Service. Exceptional service may also be recognised through nominations for our annual Ocean GEM (Going the Extra Mile) awards. Compliments contribute to our overall customer satisfaction monitoring and are reported quarterly to both the Together With Ocean (TWO) tenant group and the Ocean Housing Board.

4.0 Complaints

4.1 Customers who can register a formal complaint

- 4.2 Ocean's customers are defined as:
 - tenants
 - leaseholders
 - shared owners and ReSI shared owners
 - freeholders who pay a service charge
 - housing applicants

4.3 Other Individuals and Organisations

- 4.4 While this policy is primarily intended for customers of Ocean Housing, we recognise that other individuals or organisations may also wish to raise concerns. In such cases, these matters will be referred to our Customer Experience Team, who will assign an appropriate staff member to respond.
- 4.5 These issues will be handled as general correspondence, rather than formal complaints under this policy, and will be addressed in line with the response times outlined in our Customer Care Policy.

4.6 Advocates

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.

4.7 Reasonable Adjustments

Reasonable adjustments will be considered where a customer has difficulty in making a complaint. Further details can be found in our Reasonable Adjustments Policy.

4.8 How to make a complaint

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4.9 We aim to make it as easy as possible for customers to raise a complaint in the way that suits

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them best. Complaints can be submitted:

- In person
- In writing
- By telephone
- Through our website
- By email
- Via our social media channels
- Through Live Chat
- Using the Ocean smartphone app

Where appropriate, we will also include information on how to make a complaint in our customer satisfaction surveys, to ensure all customers are aware of the options available to them.

4.10 Definition of a complaint

4.11 The Housing Ombudsman defines a complaint as:

"an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the organisation, its own staff, or those acting on its behalf, affecting an individual resident or group of residents."

4.12 We acknowledge that the word "complaint" does not have to be used for us to identify and register it as such. We will not stop our efforts to address a service request if a complaint is made.

4.13 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 with respect by a member of staff

4.14 This Policy does not cover:

- 4.15a first request for a service
 - any action or inaction required by law
 - any suggestion that a failure in service has resulted in a personal injury or liability claim
 - the action of an individual or organisation over which we have no control
 - initial investigation of reported cases of anti-social behaviour (ASB), harassment and domestic abuse (dealt with under separate policies and procedures, see our ASB

Policy for details), however, handling of the cases can be the subject of a formal complaint

- 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, with the exception of disrepair claims brought under the Homes (Fitness for Habitation) Act 2018
- issues which occurred over 12 months ago and gave rise to a complaint
- matters which have previously been considered under the complaints policy
- 4.16 Complaints which involve any of the above will not be progressed under this policy and the customer will be advised of the reason why. Details of how to contact the Housing Ombudsman for information and advice in these circumstances will be provided.

4.17 Service Requests

4.18 Service requests are requests made by residents requiring action from Ocean to put something right, such as a missed appointment. Where these are issues that can be easily resolved, they will be passed to a manager to review within 48 hours. This is outside of our complaints process.

4.19 How we deal with Complaints

4.20 When a customer expresses dissatisfaction—even if the original issue is still being resolved—we will treat it as a formal complaint and follow our two-stage complaints process, outlined below.

To ensure fairness and objectivity, each stage of the process will be handled by a different member of staff. If the customer remains dissatisfied after both stages have been completed, they have the right to request an independent review by the Housing Ombudsman.

4.21 The Complaints Process





4.22 Stage 1 – Registering and reviewing a complaint

- 4.23 If a customer is unhappy with our service or that of our contractors and requests a formal complaint, we will log it at Stage 1 of our process. We aim to resolve issues at any stage without needing escalation.
- 4.24 We will acknowledge all complaints whether in person, by phone, or in writing within 5 working days of receipt. Our response will include a clear summary of the issues raised and the outcomes the customer is seeking, known as the "complaint definition."
- 4.25 At Stage 1, a case manager will be assigned to the complaint. They will take responsibility for ensuring all issues are addressed, with input from other teams as needed.
- 4.26 If a customer raises additional issues during the investigation, and they are related to the original complaint, they will be included in the Stage 1 response provided it hasn't already been issued.
 If the Stage 1 response has been sent, or the new issues are unrelated or would cause unreasonable delay, they will be logged as a new complaint. We will always be clear about which issues we are and are not responsible for.
- 4.27 Once the investigation is complete, we will provide a full written response within 10 working days.
 - If more time is needed due to the complexity of the complaint, we will inform the customer of the revised timescale. Any extension will be limited to a maximum of 10 additional working days, unless there is a valid reason, which will be clearly explained to the customer.
- 4.28 The full Stage 1 response will inform the customer that, if they remain dissatisfied, they may escalate the complaint to Stage 2 of our internal process.
- 4.29 If the complaint is not escalated beyond Stage 1, a satisfaction survey will be sent via SMS or email at least 10 working days after the complaint is closed. Feedback is anonymous and used solely to improve our complaints handling process.

4.30 Stage 2 - Reviewing the complaint

- 4.31 If a customer is not satisfied with the Stage 1 outcome, they may request a review within 10 working days of the response. Upon receipt, we will acknowledge and register the complaint as Stage 2 within 5 working days, including a summary of the issues and desired outcomes known as the "complaint definition." We will also clarify which issues we can and cannot address. If a complaint cannot be escalated, we will explain why.
- 4.32 The complaint will be investigated by the Managing Director or a senior staff member they nominate. A full written response will be provided within 20 working days. If more time is needed due to complexity, we will inform the customer and explain the reason. Any extension will not exceed 20 additional working days without good cause.

4.33 The final response will advise the customer of their right to refer the matter to the Housing Ombudsman if they remain dissatisfied.

4.34 Housing Ombudsman's role

4.35 A customer may contact the Housing Ombudsman at any time for advice and guidance. However, once our internal complaints process is complete, if a customer remains dissatisfied, they should contact the Housing Ombudsman for an independent review.

The contact details for the Housing Ombudsman are as follows:

Housing Ombudsman Service PO Box 1484 Unit D Preston PR2 0ET

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

Email: info@housing-ombudsman.org.uk

5.0 How we will handle your complaint

- 5.1 Customers complaining to Ocean can expect us to:
 - 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

5.2 What we will assess

- 5.3 Each complaint is assessed individually to ensure a fair and thorough response. We will consider:
 - What the complaint is about
 - What evidence is needed to fully understand the issues
 - Any risks the complaint raises
 - Relevant vulnerabilities of the customer
 - What outcome the customer is seeking, and whether it is reasonable
 - Any urgent actions required
- When determining an appropriate remedy, we consider:
 - How long the issue has been ongoing
 - How often the issue has occurred
 - The severity of any service failure or omission
 - The number of failures identified
 - The cumulative impact on the customer
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The customer's individual circumstances or vulnerabilities

5.5 Complaint determinations and actions

- 5.6 Our response will clearly state whether the complaint is:
 - Upheld Ocean is fully responsible for the issues raised
 - Partially upheld Ocean is responsible for some, but not all, of the issues
 - Not upheld Ocean is not responsible or accountable for the issues raised

5.7 What action we will take

- We aim to resolve complaints in a way that reflects the impact of any service failure. Remedies may include:
 - Acknowledging where things went wrong
 - Providing explanations or assistance
 - Offering a sincere apology
 - Taking corrective action
 - Reconsidering or changing a decision
 - Amending records
 - Offering a financial remedy
 - Changing policies, procedures, or practices
 - Providing feedback to staff
 - Where immediate action is required, we may take steps before issuing the formal complaint response.

5.9 Document retention

5.10 Ocean will keep copies of complaints and complaint correspondence in accordance with the timescales set in our data retention policy.

6.0 Compensation

- 6.1 Compensation will be considered on a case-by-case basis, depending on the nature and impact of the complaint. There are four main types of compensation:
 - Mandatory payments such as statutory home loss payments
 - Quantifiable loss payments where actual financial loss can be demonstrated
 - **Discretionary payments** for time, trouble, distress, or inconvenience
 - Personal injury payments for incidents such as slips, trips, or falls
- Further information on the different types of compensation and process each will follow is contained in our Compensation Policy.

7.0 Reasonable Behaviour

- 7.1 We are committed to providing a complaints service that is accessible and fair to all customers. However, in a small number of cases, the frequency, nature, or tone of a customer's contact may hinder our ability to manage their complaint or the complaints of others effectively.
- 7.2 In such cases, we will assess the situation in line with our Reasonable Behaviour Policy. Where necessary, we may apply appropriate restrictions or limits on contact to ensure our service remains effective and respectful for everyone involved.

8.0 MP and Councillor Enquiries

8.1 Enquiries from Members of Parliament (MPs) or local councillors are handled separately from this policy. These are logged and processed under a dedicated contact protocol, outside of the Compliments and Complaints Policy.

9.0 Training

- 9.1 Our approach to customer feedback and complaints is part of the 'new starter' induction programme and is underpinned by our company values and behaviours framework.
- 9.2 At Ocean, we promote a positive approach to complaint handling, where all customer feedback including complaints is seen as an opportunity to learn, improve, and deliver excellent customer care.
- 9.3 Staff are encouraged to view complaints constructively, and those directly involved in managing or administering the complaints process receive specialist training to ensure they handle cases effectively and professionally.

10.0 Learning from complaints

- At Ocean, we use complaint feedback to inform continuous improvement in our services, policies, procedures, and behaviours. We look beyond individual cases to identify opportunities for wider service enhancements.
- We prioritise complaint handling as a core service, ensuring it is properly resourced and supported by a culture of learning. All relevant staff receive training on the importance of effective complaint handling.
- Accountability and transparency are integral to a positive complaint handling culture. We will regularly report back on wider learning and improvements from complaints to stakeholders, such as residents' panels, staff, and the Ocean Housing Board.
- We survey all complainants to understand if they are satisfied with the process and the way the complaint was handled. Feedback from this survey is regularly reviewed and published in our annual review of customer feedback.

- The Head of Standards and Performance completes a review of all complaint responses and regularly meets with the Executive Director of Housing and Communities together with senior managers, to ensure that complaint performance is consistent, and that all learning from feedback is being applied across the organisation.
- Quarterly meetings are held with Ocean Housing Board Member(s) with Responsibility for Complaints to review complaint performance and how learning is being applied across the organisation.
- The Group Chief Executive undertakes a regular review of stage 2 complaints to ensure that we are addressing issues in a timely and appropriate manner.

11.0 Links to other policies and strategies

- Service Standards
- Compensation Policy
- Tenant and Resident Partnership Strategy
- Reasonable Adjustments Policy
- Reasonable Behaviour Policy
- Customer Care Policy
- ASB Policy

12.0 Responsibilities and Monitoring

- All staff are responsible for familiarising themselves with this policy, following its procedures, and ensuring that any team members they manage do the same. Training and guidance will be provided to support understanding and ensure compliance across the organisation.
- We are committed to transparency and continuous improvement through regular monitoring and reporting of complaints and feedback.
 - Monthly: Performance data is reported to the Executive Group.
 - Quarterly: Reports are shared with the Ocean Housing Board, the Board Member(s)
 Responsible for Complaints, and Together With Ocean (TWO), our tenants and
 resident's panel. These reports are also published on our website, ensuring public
 accountability.
- 12.3 All reports are anonymised to protect customer confidentiality.
- 12.4 Quarterly Reports Will Include:

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- Volume, categories, and outcomes of complaints, along with performance against handling targets
- Analysis of trends and recurring issues, including repeat complaints
- Updates on Housing Ombudsman investigations and progress on any findings of severe maladministration



Housing Board, along with assurance of compliance with the Housing Ombudsman Complaint Handling Code.

The Head of Performance and Standards is responsible for overseeing all complaints and ensuring robust monitoring and accountability across the organisation.

13.0 Equality, Diversity and Inclusion

- We will apply our Customer Compliments and Complaints Policy consistently and fairly and will not discriminate against anyone regardless of their age, gender, transgender, disability, religion, belief, sexual orientation, race or ethnicity.
- We will ensure that all our procedure and correspondence with complainants does not contain jargon and is written in plain English.
- 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.
- The Ocean Housing Reasonable Adjustments Policy will be applied, where required, to ensure fair access for all.

14.0 Tenant and Resident Involvement

- This policy has been developed with feedback from tenant representatives, in particular the process and timescales.
- We will provide an overview of complaints received to Together With Ocean (TWO) monthly and report complaint and feedback performance to the group quarterly and publish the report on our website.
- 14.3 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
- In addition, we will make available for scrutiny the Ombudsman's annual landlord performance report.

15.0 Communication

The policy is available on the intranet for employees of Ocean Housing and to all other stakeholders via the Ocean Housing website and Tenants' Handbook.

- Publication of the complaint's procedure will be available in leaflet form and provided on receipt of all newly registered complaints either electronically or in hard copy.
- The policy and process will also be regularly published on our social media channels and in our StreetTalk magazine.



