

Compliments and Complaints Policy

Board/EG Approval: May 2024

Responsible Board: Ocean Housing Group Ltd

Next Review: May 2025

Responsible Executive: Managing Director of Ocean Housing Ltd

1.0 Policy Statement

1.1 Ocean Housing 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 and ensure that we are treating our customers with dignity and respect at all times.

1.2 The main aims are to:

- encourage customer feedback and learn from it to improve services to our customers
- promote and support the organisation to be 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 our approach to recording and reporting customer feedback in conjunction with our tenants and residents and in accordance with the Housing Ombudsman Complaint Code 2024. We want customers to feel comfortable in raising complaints with us without the fear of repercussion. We set out this approach in our Service Standards, which provide details of the ways in which we will apply, monitor and report our performance against them.

2.2 Customer feedback is a key indicator of our performance and is used across all of the Standards. We will support the feedback we receive through the implementation of this policy with customer surveys, 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 Compliments, Comments, and Suggestions

3.1 Compliments are usually received when a customer is very satisfied with the service they have received or when they feel that a member of staff has gone the extra mile in providing that service. All customers are encouraged to tell us when they feel that they have received outstanding service, or when they have suggestions for how a service can be improved. This information will be recorded so that it can be used to improve our services in the future.

3.2 Feedback is shared with the individual staff member where known, and the heads of service concerned. Nominations may also be made for the annual Ocean GEM (Going the Extra Mile) awards, which recognises outstanding customer service. Compliments will be taken into account as part of our customer satisfaction monitoring and shared quarterly with our Together With Ocean (TWO) tenant group and the Ocean Housing Board.

4.0 Complaints

4.1 Customers who can register a formal complaint

Ocean's customers are defined as:

- tenants
- leaseholders
- shared owners and ReSI shared owners
- freeholders who pay a service charge
- Ocean Extra customers
- housing applicants

4.2 Other Individuals and Organisations

Any other individuals or organisations who wish to express dissatisfaction will be referred to our customer experience team who will identify an appropriate member of staff to deal with their issue and it will be addressed outside of this Policy, as correspondence, with a response provided in accordance with the timeframes set out in our Customer Care Policy.

4.3 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.

4.4 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.

4.5 How to make a complaint

4.5.1 Ocean will accept complaints in person, in writing, by telephone, through our website, by email, using our social media channels, through Live Chat or using the Ocean smartphone app. We will also make available, where possible, details of how to complain, in appropriate satisfaction surveys.

4.6 Definition of a complaint

4.6.1 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.”

4.6.2 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.

4.7 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

4.8 This Policy does not cover:

- 4.8.1
- a 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

4.8.2 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.

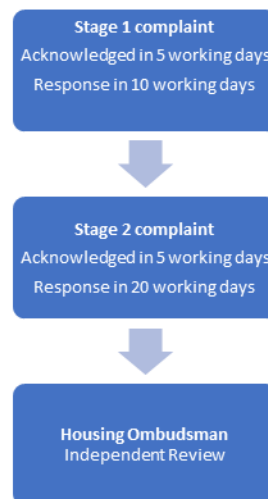
4.9 Service Requests

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.

4.10 How we deal with Complaints

Where a complaint is raised following an expression of dissatisfaction, even where the request is ongoing, we follow a two-stage complaints process as detailed below. The complaint will be considered by a different member of staff at each stage to ensure an objective review. An independent review of the complaint can be conducted by the Housing Ombudsman if a customer remains dissatisfied once our internal complaints process has been completed.

4.11 The Complaints Process



4.12 Stage 1 – Registering and reviewing a complaint

4.12.1 If a customer is dissatisfied with the standard of service, action or lack of actions by us or our contractors and raises this with us and asks us to register a formal complaint, we will do so at Stage 1 in our internal complaint process. We will ensure a complaint can be remedied at any stage of our complaints process without the need for escalation.

- 4.12.2 We will acknowledge the complaint either in person, on the telephone or in writing. All complaints will be acknowledged within 5 working days of being received by us and include our understanding of the issues which require to be addressed and the outcomes they are seeking, this is referred to as the “complaint definition”.
- 4.12.3 At Stage 1, the complaint will be assigned to a case manager who will take responsibility for ensuring that all of the issues raised are responded to. This may require input from colleagues in other teams.
- 4.12.4 The case manager will then be able to fully investigate the issues raised.
- 4.12.5 Where customer’s raise additional complaints during the investigation, these must be incorporated into the stage 1 response if they are related, and the stage 1 response has not been issued. Where the stage 1 response has been issued, the new issues are unrelated to the issues already being investigated or it would unreasonably delay the response, the new issues will be logged as a new complaint. We will be clear about what issues we are and are not responsible for.
- 4.12.6 Once the investigation is complete, we will provide a full written response within 10 working days. Occasionally this may not be possible, we will decide whether an extension to this timescale is needed when considering the complexity of the complaint and then inform the customer of the expected timescale for response. Any extension will be no more than 10 working days without good reason, and the reason(s) will be clearly explained to the customer.
- 4.12.7 The full complaint response will advise the customer that if they are still not satisfied, they have the option to escalate their complaint to the second stage of our internal complaint process within 10 working days.
- 4.12.8 If the complaint is not escalated beyond stage 1 of our internal process, a satisfaction survey will be sent via SMS text or email to the complainant to provide feedback on the process at least 10 working days after the complaint is closed. This feedback will remain anonymous and be used only to help improve our complaint handling process.

4.13 Stage 2 - Reviewing the complaint

- 4.13.1 If the customer is **not satisfied with the outcome of their complaint at Stage 1** and wishes for the matter to be reviewed, they should let us know at the latest within 10 working days of the date of our response. On receipt, we will acknowledge the complaint and **register as a Stage 2 complaint within 5 working days** of being received by us and include our understanding of the issues which require to be addressed and the outcomes they are seeking, this is referred to as the “complaint definition”. We will be clear about what issues we are and are not responsible for. If we are not able to escalate a complaint, we will clearly set out these reasons why.
- 4.13.2 The Managing Director of Ocean Housing will complete an investigation and review.

- 4.13.3 Once the investigation is complete, the Managing Director or senior member of staff nominated by the Managing Director will complete a **full written response within 20 working days**. Occasionally this may not be possible, we will decide whether an extension to this timescale is needed when considering the complexity of the complaint and then inform the customer of the expected timescale for response. Any extension will be no more than 20 working days without good reason, and the reason(s) will be clearly explained to the customer.
- 4.14.4 The response to the complaint will **advise the customer that if they are still not satisfied, they are able to refer the complaint to the Housing Ombudsman for review**.

4.14 Housing Ombudsman's role

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 152
Liverpool
L33 7WQ

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

5.2.1 We will assess each complaint on an individual basis identifying the following:

- what the complaint is about
- what evidence is needed to fully consider the issues
- what risks the complaint raises
- relevant vulnerabilities
- what outcome would resolve the matter for the tenant or resident and whether the expectation for a desired outcome are unreasonable or unrealistic
- any urgent action that we may need to take

5.3 **Factors which we will consider in formulating a remedy can include, but are not limited to:**

- length of time that a situation has been ongoing
- frequency with which something has occurred
- severity of any service failure or omission
- number of different failures identified
- the cumulative impact on the tenant or resident
- a tenant or resident's particular circumstances or vulnerabilities

5.4 **Complaint determinations and actions**

5.4.1 In our complaint response we will identify in our response that it has been upheld, partially upheld or not upheld as set out below:

- Upheld complaint will be one where we have found that we are wholly responsible for the issues raised
- Partially upheld where we have responsibility for some, but not all of the issues identified
- Not upheld if Ocean is not responsible or is not accountable for the issues identified in the complaint.

5.5 **What action we will take**

5.5.1 Complaints can be resolved in a number of ways – if there are any immediate actions required, we may undertake them before the formal complaint response is issued. We will offer a remedy that reflects the extent of any and all service failures and the level of detriment caused. These may include:

- acknowledging where things have gone wrong
- providing an explanation, assistance or reasons
- apologising
- taking action if there has been a service failure
- reconsidering or changing a decision
- amending a record
- providing a financial remedy
- changing policies, procedures or practices
- giving feedback to staff

5.6 **Document retention**

5.6.1 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. There are four types of compensation payment; mandatory (such as statutory home loss payments), quantifiable loss payments (where people can demonstrate actual loss), discretionary payments (for time and

trouble/distress and inconvenience and Personal Injury (slips, trips and falls).

- 6.2 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 to all our customers. There are however 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 customers complaints. All such cases will be assessed and addressed in accordance with our Reasonable Behaviour policy and may result in a restriction or limit on their contact.

8.0 MP and Councillor Enquiries

- 8.1 Enquiries received from an MP or councillor will be logged and processed under a separate contact protocol and are dealt with outside of the Compliments and Complaints Policy. Such enquiries are escalated to the Group Chief Executive and investigated and responded to within the timescales set out in our Correspondence Monitoring Procedure.

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 Ocean fosters a positive complaint handling culture where 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 is provided to those staff who manage and administer the complaints procedure.

10.0 Learning from complaints

- 10.1 Ocean uses complaint feedback to inform learning and improvements in our policies and procedures, and behaviours. We will look beyond the circumstances of the individual complaint and consider whether service improvements can be made as a result of any learning from the complaint.
- 10.2 We prioritise complaint handling and a culture of learning from complaints. All relevant staff will be suitably trained in the importance of complaint handling. Complaints are seen as a core service and will be resourced to handle complaints effectively.
- 10.3 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.

- 10.4 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.
- 10.5 The Head of Customer Experience completes a review of all complaint responses, complaint performance each quarter, meeting with the Managing Director and senior managers to ensure that complaint performance is consistent, and that all learning from feedback is being applied across the organisation.
- 10.6 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.
- 10.7 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

- 12.1 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. Training will be provided to ensure understanding and compliance.
- 12.2 We will report complaint and feedback performance to Executive Group on a monthly basis and the Ocean Housing Board and Member(s) Responsible for Complaints and Together With Ocean (TWO) our tenants and residents panel, quarterly and publish the report on our website. All information will be presented confidentially and, in a way, so as to ensure that the customer cannot be identified.
- 12.3 The report will include:
- a. updates on the volume, categories and outcomes of complaints, alongside complaint handling performance;
 - b. reviews of issues and trends arising from complaint handling, including repeat complainants;
 - c. updates on the outcomes of the Ombudsman's investigations and progress made in complying with orders related to severe maladministration findings.

- 12.4 On an annual basis complaint volumes and analysis will be reported to the Ocean Housing Board together with assurance and compliance of the Housing Ombudsman Complaint Code
- 12.5 The Head of Customer Experience will ensure that all complaints are monitored and is accountable for complaint handling.

13.0 Equality, Diversity and Inclusion

- 13.1 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.
- 13.2 We will ensure that all our procedure and correspondence with complainants does not contain jargon and is written in plain English. The Head of Customer Experience reviews all complaint responses to ensure that they adhere to this policy.
- 13.3 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.
- 13.4 The Ocean Housing Reasonable Adjustments Policy will be applied, where required, to ensure fair access for all.

14.0 Tenant and Resident Involvement

- 14.1 This policy has been developed with feedback from tenant representatives, in particular the process and timescales.
- 14.2 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
- 14.4 In addition, we will make available for scrutiny the Ombudsman's annual landlord performance report.

15.0 Communication

- 15.1 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.
- 15.2 Publication of the complaints procedure will be available in leaflet form and provided on receipt of all newly registered complaints either electronically or in hard copy.
- 15.3 The policy and process will also be regularly published on our social media channels and in our StreetTalk magazine.

