

## Complaints, Compliments and Comments Policy

Policy Category	Corporate
Policy Reference Number	HG_GRP_CORP_184
Version Number	5.2
Date Effective From	14/10/24
Applicable to	Colleagues, Board/Committee Members, Involved Customers, Volunteers and others directly involved in delivering Home Group's business activities
Policy Owner	Executive Director or Repairs and Maintenance
Policy Author	Policy Business Partner
Approved by	Executive team February 2020 Policy Owner March 2022
Equality Assessment	EA Complaints
Date of last review	9/4/24
Next review of policy due	31/3/25
Distribution	Internal: All Home Group colleagues, volunteers and agency workers. Communicated via Home World Intranet  External: Summary on Home Group website. Full policy available on request to Home Group policy team
Key search terms	Complaint; Complainant; Compliment; Comment; Compensation; Ombudsman; Dissatisfaction; Unacceptable behaviour
<ul style="list-style-type: none"> <li>• For the full version history of this policy, click <a href="#">HERE (see back page)</a></li> <li>• Please avoid referring to printed versions of this policy or saving it on shared/ individual drives. All policies and supporting resources can be found under 'Policy and Procedures' on the intranet. Printed and saved versions may quickly go out of date- contact <a href="mailto:policy@homegroup.org.uk">policy@homegroup.org.uk</a> for support and advice</li> </ul>	

## 1.0 Complaints, Compliments and Comments policy statement

Home Group aims to deliver the best services possible to customers and stakeholders, and positively encourages feedback in the form of complaints, compliments or comments. This information is extremely valuable as it can tell us how well we are doing and how we can improve our services.

We want to make it as simple and straightforward as possible for customers and stakeholders to provide positive and negative feedback to us. When we receive feedback we ensure we deal with matters which are raised both promptly, politely and in the right way.

Our goal is to provide excellent services and we hope that customers will rarely have grounds to complain. However, when things do go wrong we treat complaints seriously and make every effort to work with our customers and stakeholders to understand their issues and resolve complaints to their satisfaction.

We recognise the importance of involving customers in reviewing and scrutinising complaints and have a variety of mechanisms in place to do this.

This policy also sets out our approach to discretionary compensation. Maintaining good relations with our customers is important and there may be occasions where it is appropriate for us to make good will gestures.

## 2.0 Policy scope

This policy reflects best practice and our 'Building homes, independence and aspirations' Strategy. We recognise the needs of a diverse population and act within the scope of our Equality Diversity and Inclusion Policy and the Equality Act 2010.

This policy also helps us deliver key elements of our customer promise which are:

- To provide a safe place to live;
- To deliver a reliable repairs service;
- To care about you;
- To help our communities to grow;
- To tell you where your money goes;
- To work together with customers and partners

This policy conforms to the principles set out by the appropriate Ombudsman Services mentioned below. It complies with Government prescribed standards, legislative and regulatory requirements at the time of publishing, including but not limited to:

- Regulator of Social Housing
- Housing Ombudsman Service
- Local Government Ombudsman Service
- Consumer Protection Act
- Localism Act 2011
- Health and Social Care Act 2008 (Regulated Activities) Regulations 2014
- Equality Act 2010
- Scottish Social Housing Charter
- Scottish Public Services Ombudsman (SPSO) model complaints handling process

We expect all colleagues, board/committee members, involved customers, volunteers and others directly involved in delivering Home Group's business activities to adhere to the principles set out in this policy. It should be used with the supporting documents and procedures which support the policy standards.

Our approach to related issues such as whistleblowing, anti-fraud and bribery, tackling anti-social behaviour, harassment and safeguarding are explained in our other policies and associated resources. Matters that meet our definition of a complaint (as set out in section 4 of this policy) will be dealt with under this policy and associated procedures, even where another process is being followed. For example, a complaint about Home Group's failure to deal effectively with a report of Anti-social behaviour, should be dealt with under the provisions of this policy, as well as the original report being simultaneously dealt with under Home Group's Tackling Anti-social Behaviour policy and procedures.

There may also be circumstances where we need to handle complaints differently if complainants are 'unreasonable'. In these situations we follow the 'Managing unacceptable behaviour' supporting document.

Statutory compensation in relation to Right to Repair, Home Loss and Disturbance Payments, Right to Compensation for home improvements and delays to Right to Buy sales is outlined in our Statutory Compensation compliance note.

### 3.0 Standards

#### **Standard 1: Taking a positive approach**

We welcome the opinions of our customers and actively encourage and support customers and other stakeholders to give feedback on the services we provide whether negative or positive. Where possible we deal with complaints at the first point of contact. We take a positive attitude and acknowledge all complaints, compliments and comments within the timescales set out in our procedures. We promote equality and diversity and treat customers and stakeholders with respect and professionalism at all times.

#### **Standard 2: Communication and Customer Involvement**

We are open and transparent and provide a range of options for customers and stakeholders to give us feedback. This includes face to face contact, via telephone, email or through the website. Issues raised through social media will be followed up and further details collected. We make every effort to communicate in ways our customers and stakeholders prefer. We take account of protected characteristics when communicating and where appropriate we make reasonable adjustments.

When investigating a complaint we will give customers a named contact who is responsible for keeping them informed of progress, any problems encountered in completing investigations and will write to them on the resolution of that individual complaint.

We will organise regular workshops for involved customers to scrutinise complaints to ensure compliance with procedures and to provide recommendations for improvement.

**Standard 3: Confidentiality**

We handle information in line with our Information Security Policy, Information Governance Policy, associated resources and Data Protection legislation. Customer information is shared with third parties only where this is required for the investigation or resolution of the complaint.

We ensure that our treatment of customers will not change because they have complained.

**Standard 4: Timely and effective complaint handling**

We systematically record and thoroughly and impartially investigate all complaints. We take complaints seriously and try to establish what has happened and what the customer would like to see happen in order to reach a satisfactory resolution. We respond fairly, politely, in a timely manner and in accordance with legislation, regulation and appropriate Ombudsman Services. Timescales for responding to complaints within scope of the Housing Ombudsman service and the Scottish Public Services Ombudsman are set out in the appendices of this policy (appendix 1 and 2 respectively).

Where we are not able to find a resolution to a complaint we inform customers how they can escalate their complaint to the next stage in line with our complaints handling procedures.

Where we decline to escalate a complaint we will write to the customer explaining our reasons for this as well as the customer's right to approach the relevant Ombudsman or other external body if they remain dissatisfied.

**Standard 5: Learning from Complaints, Compliments and Comments**

We maintain records of all complaints and compliments we receive. We actively seek customer feedback and use this information to learn, celebrate, measure, monitor and benchmark performance to identify trends and re-occurring issues. We use this knowledge to improve our policies, procedures and quality of our services.

We regularly report on our performance to customers and other stakeholders.

**Standard 6: Signposting complaints to external bodies**

We support the right of customers to complain to external bodies after exhausting our complaints handling process, if they remain dissatisfied. We signpost customers to external agencies or groups so they are fully informed and supported with their options.

**Standard 7: Discretionary Compensation**

There may be occasions where it is fitting for us to make a good will gesture or to award compensation. Discretionary compensation payments by Home Group are not automatic, even when it is clear mistakes have been made. Offers of compensation are approved in line with our guidance. Compensation is used to offset against any rent, service charges or other housing related debt owed to us except in exceptional circumstances. Customers are able to escalate their complaint to the appropriate external body, where they are

dissatisfied, after exhausting our complaints handling process, even if they have accepted a compensation payment.

Where a contractor fails on its duty and agrees that compensation is due, it is the responsibility of the contractor to agree an appropriate level of compensation with the customer. We will support the customer and liaise with the contractor to arrange this.

Injury or damage to personal belongings, property or homes are dealt with as insurance claims. We reserve the right to re-direct insurance claims to third parties (contractors) as appropriate.

### Standard 8: Value for money

The more efficiently we resolve complaints and the quicker appropriate responses are given, the better for both Home Group and the customer.

Dealing with complaints effectively and to the customer's satisfaction may have a positive impact on customer retention.

Learning from complaints, compliments and comments not only helps shape and improve our working practices, it helps us get it right first time, contributing to value for money.

## 4.0 Key definitions

Word / phrase	Definition
Complaint	We use the definition of a complaint adopted by the relevant ombudsman in Scotland and England. <b>In Scotland</b> , a complaint is defined as ' <i>an expression of dissatisfaction by one or more members of the public about Home Group's action or lack of action, or about the standard of service provided by or on behalf of Home Group.</i> ' <b>In England</b> , a complaint is defined as ' <i>an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by Home Group, its own staff, or those acting on its behalf, affecting an individual resident or group of residents.</i> ' Home Group colleagues can find further information and examples of what would / would not be considered a complaint in line with relevant Ombudsman code of practice on the policy pages of Home World <a href="#">here</a>
Compliment	A compliment is a freely given expression of satisfaction. This could be satisfaction with an individual, team or a particular service.
Comment	A comment is an idea, suggestion or opinion on how we can improve our services.
Complainant	A complainant is the person making the complaint.
Discretionary Compensation	Discretionary compensation is something we choose to grant rather than because of any obligation to do so. Discretionary compensation is in the form of a monetary award.
Ombudsman	An 'Ombudsman' is an impartial and independent organisation that can look at complaints after exhausting Home Group's complaints handling process, if complainants remain unhappy with the outcome of their complaint.
Property	'Property' outlined in policy standard 7 means goods or possessions.

Protected Characteristics	The Characteristics of people as defined in the Equality Act – these are age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion and belief, gender and sexual orientation.
Good will gestures	Good will gestures are used to maintain good relations with customers. They are not monetary awards.
Unreasonable complainant	An <i>unreasonable complainant</i> can be characterised by: <ul style="list-style-type: none"> <li>• Actions which are harassing, prolific, repetitive or obsessive, and/or</li> <li>• An insistence upon pursuing unmeritorious complaints, and/or</li> <li>• An insistence on pursuing a complaint in an unreasonable manner</li> </ul> Other words used to describe this type of behaviour are <i>vexatious</i> and <i>unacceptable</i> .

## 5.0 Supporting documents

In order to comply with Home Group's approach to **complaints, compliments & comments**, and achieve the standards set out above, the relevant processes and policy compliance notes must be followed in line with stated roles and responsibilities. Colleagues should refer to our internal index for the full list of supporting documents.

## 6.0 Version history

Version Number	Effective Date	Amendment made by (name & job title)	Version approved by (name & job title)	Description of Changes
1.0	April 2013	Customer Services Change Management Team	Director of Customers Service Centre	Original approved version
2.0	June 2016	Policy business partner	Director of Customer Experience	Policy reviewed to incorporate compliments and comments as well as complaints. New discretionary compensation policy standard added. First and final response added and value for money standard included.
2.1	August 2017	Policy business partner)	Director of Service Delivery	August 2017 <ul style="list-style-type: none"> <li>• Amended Policy Owner</li> <li>• Removed reference to the 'association of retirement housing managers code of practice' due to membership changes</li> <li>• Removed reference to document P184e which has been merged with P184f</li> <li>• Removed reference to 'client'</li> </ul>
2.2	February 2018	Compliance business partner	N/A	Re-branded

2.3	April 2019	Policy business partner	Director of Service Delivery (north)	Amended review date and reason for extension. Amended policy owner, aligned to primary activity ownership model
3.0	May 2020	Policy business partner	Director of Service Delivery (north)	Revisions to language and re naming of policy principles completed Reference to customer promise added. Included a commitment to providing a named contact to deal with complaints Added reference to complaints via social media. Added definition of first and final response
3.1	March 2021	Policy Manager	Director of Housing and Support	Updated dates of last / next review following desk top review and risk assessment
3.2	April 2021	Policy Manager	Director of Housing and Support	Removed definition of a complaint and added links to relevant guidance for Scotland / England
3.3	March 2022	Policy Manager	Director of Housing and Support	Updated dates of last / next review following desk top review and risk assessment
3.4	March 2023	Policy Manager	Director of Housing and Support	Updated dates of last / next review following desk top review and risk assessment Updated hyperlinks
4.0	May 2023	Policy Business Partner	Director of Housing and Support	Amended wording in Standard 7: Discretionary Compensation to reflect the customers right to escalate further even if compensation has been accepted, as instructed by the Housing Ombudsman.
4.1	June 2023	Policy Business Partner	Director of Housing and Support	Removed references to 'designated persons' in standard 6 and in definitions table, in line with changes in the Ombudsman Complaint Handling Code.
5.0	July 2023	Policy Business Partner	Board	Added wording in Section 2 – Policy Scope, to confirm complaints meeting our criteria will be addressed under this policy, alongside any other ongoing processes, such as ASB. All references to first and final response removed. Appendices section – new Appendices 1 and 2 added to show timescales for complaints in England and Scotland respectively.
5.1	April 2024	Policy Business Partner	Executive director of repairs and maintenance	Updated dates of last / next review following desk top review and risk assessment
5.2	October 2024	Policy Manager	n/a	Minor amendment to clarify timescales in appendix 1 in line with housing ombudsman complaint handling code

				Changed review date to 31/3/25
--	--	--	--	--------------------------------



## 7.0 Appendices

### Appendix 1: Timescales for responses to complaints in England:



The timescales below are specifically relevant to complaints within England. They have been established and outlined by the Housing Ombudsman Service (HOS).



These timescales apply to complaints within the scope of the Housing Ombudsman service. Different timescales might apply for complaints that are out of the scope. For more information, please see the HOS complaint handling code [here](#).

Stage	Maximum timescale
Stage one - Logging and acknowledgement of complaint	5 working days from receipt of complaint
Stage one response	10 working days from the complaint being acknowledged
Acknowledgement of escalation to stage two	5 working days from request to escalate the complaint
Stage two response	20 working days from the complaint being acknowledged at stage 2

In exceptional cases, timescales for response at stage one and / or stage two might be extended by a further 10 working days to enable us to fully investigate and respond to the complaint. In such cases we will provide a written explanation to the complainant containing a clear timescale for when they can expect to receive a response. If an extension beyond an additional 10 working days is required to enable us to respond to the complaint fully, this should be agreed with the complainant.

**Appendix 2: Timescale for responses to complaints in Scotland:**

The timescales below are specifically relevant to complaints within Scotland. They have been established and outlined by the Scottish Public Services Ombudsman.



These timescales apply to complaints within the scope of the Scottish Public Services Ombudsman. Different timescales might apply for complaints that are out of the scope. For more information, please see the SPSO model complaints handling procedures [here](#).

Stage	Maximum timescale
Stage one – Frontline response if possible	5 working days from receipt of complaint
Acknowledgement of escalation to stage two  (Customer or representative should request this within 6 months from learning of the problem or within 2 months of receiving stage 1 response (whichever is latest))	3 working days from receipt of complaint
Stage two response	20 working days from request to escalate

In exceptional cases, timescales for response at stage one and / or stage two might be extended to enable us to fully investigate and respond to the complaint. Stage one complaints may be extended a further 5 working days but will be automatically escalated to stage two if not closed within 10 days total. If Stage two complaints need be extended, we will update the complainant and any staff involved at least once every 20 days. In such cases we will provide a written explanation to the complainant containing a clear timescale for when they can expect to receive a response.