

Complaints & Customer Feedback Policy

NEI-POL-01-04

March 2024

Summary

This policy is designed to make it easy for customers to make a complaint, provide feedback or compliment us. It outlines Plus Dane's approach to complaint handling to ensure we provide a fair and equitable service.

Purpose:

The main purpose of the policy is to be compliant with the Housing Ombudsman Service Complaint Handling Code.

Audience:

There are three main audience groups:

- Colleagues
- Customers
- Third parties that provide feedback/make complaint on behalf of a customer

DOCUMENT CONTROL			
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2 NEI-POL-01-02	OCT 20	Kate Jungnitz, Director of Customer Service	Review following implementation of the HOS Complaint Handling Code
3 NEI-POL-01-03	OCT 23	Danielle Sharp, Director of Communications & External Affairs	Review following consultations with Leadership Team & Customer Assurance Panel
	NOV 23	Board	Approval of the policy
4 NEI-POL-01-04	MAR 24	Danielle Sharp, Director of Communications & External Affairs	Review following the new HOS Complaints Handling Code
		EMT	Approval of the reviewed policy
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14.11.23 - Leadership team

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6. DISTRIBUTION

Name / Department	Title

7. ASSOCIATED DOCUMENTS

Ref: -

Title: -
HOS process
Compensation Framework

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1. Policy Statement

Plus Dane strives to deliver excellent services that represent value for money and reflect the changing needs of our diverse customers. We appreciate that sometimes we get it wrong and this policy outlines how we will put it right in these instances.

We want our complaints process to support us to rebuild trust with our customers where it has been lost and to learn the lessons so that the same issues do not reoccur.

Complaints are welcomed from customers, residents, representatives of customers or anyone else that is impacted by Plus Dane and the services we provide. Complaints by a third party working on behalf of Plus Dane will also be managed under this policy.

This policy is compliant with the Housing Ombudsman Service Complaint Handling Code and with the Regulator for the new Transparency, Influence and Accountability Standard and the Equality Act 2010.

2. Policy Aims

Through this policy, Plus Dane will:

- Encourage and make it easy for customers to make a complaint, provide constructive feedback or compliment us.
- Make sure our approach to complaints provides appropriate re-course where we have gotten things wrong using a transparent two stage process.
- Where possible, resolve complaints quickly, at the first point of contact if this is possible and the customer's preference.
- Treat all customers fairly.
- Learn from customer feedback and make adjustments to improve our services.

When handling complaints, we will operate within the appropriate laws, regulatory standards and our policy framework at all times. Policies are available on our website and upon request for those customers that are unable to access the website.

Customers may be required to report some matters directly to the police or social services in line with local safeguarding guidance.

3. Links to Corporate Plan:

The Customer Complaints & Feedback Policy directly supports the delivery of two corporate objectives:

- Customer experience – customer feedback and complaints provide an excellent learning opportunity for the organisation and an opportunity to make changes to how we do things when it doesn't go right.
- Colleague experience – customer feedback and complaints support colleagues to learn and grow and achieve job satisfaction from making

improvements that can support us to deliver a better customer experience.

4. Complaints definition

Plus Dane has adopted the Housing Ombudsman Service definition of a complaint:

A complaint is an expression of dissatisfaction, however made, about the standard of service, actions or lack of action, by us, our colleagues, or those acting on our behalf, affecting an individual resident or group of residents.

Even if the word complaint is not used, if appropriate, we may treat it as such.

5. Service requests

A service request is a request from a customer that requires action to put it right. We will always seek an opportunity to put a service request right and will not log it as a complaint unless we fail to do this, and the customer raises dissatisfaction with our response.

6. Anonymous Complaints

We will review any anonymous complaints received to understand whether lessons can be learnt from the feedback however, we will not enact our complaints policy in these cases as the ability to investigate thoroughly is impeded.

7. Exclusions from the policy

There may be occasions where complaints are not accepted and handled in line with this policy including:

- When it is an initial request for a service and there has been no service failure.
- Where the same issue has already exhausted Plus Dane's Complaints Policy.
- The issue that has resulted in the complaint is over twelve months old.
- New reports of Anti-Social Behaviour (ASB) which will be managed through the ASB Policy.
- Legal cases and insurance claims.
- Rent & service charge enquiries will be dealt with through the Service Charge Policy unless it is thought, or there is evidence to suggest we have acted outside of that policy.
- When the complaint is about a service not provided by or on behalf of Plus Dane.
- Employment complaints

If the complaint relates to an allocation decision, it may fall within the local authority remit to review. We will advise the customer at the time of the enquiry the most appropriate course of action to support them to achieve their desired outcome in the most efficient way. Where we are unable to deal with a complaint through this policy, we will inform the customer and be clear about the reasons why.

We will also provide the details of the Housing Ombudsman Service if they wish to seek advice from the Service or challenge the decision. The Housing Ombudsman Service, if it deems appropriate, can instruct us to take on the complaint. We will comply with any Housing Ombudsman instruction to accept a complaint.

8. How to make a complaint and give feedback

We are committed to making it as easy as possible for customers to raise a complaint and share feedback. There are multiple for customers to contact us:

- during office or home visits
- through our website <https://www.plusdane.co.uk/complaints/>
- by email complaints@plusdane.co.uk
- by calling 0800 169 2988
- through our Customer Portal
<https://customer.plusdane.co.uk/account/login>
- through a Plus Dane colleague
- via social media, for example Facebook or Twitter
- in writing to our registered Head Office
- by completing the form on the back of our complaint leaflet which is available on our website

Plus Dane will offer support to customers to make a complaint under this policy where they have difficulty using any of the channels above.

Any dissatisfaction reported directly to the Chief Executive or Board members either in person, via email or social media will be referred to our Customer Relations Team to be dealt with through this policy.

9. Stages in our Complaints process

Plus Dane has a two-stage approach to resolving complaints. We have a dedicated Customer Relations Team, trained to provide objective oversight of any issues raised by customers.

The outcome of all complaints will be discussed with the customer and confirmed in writing and will outline the detail of the investigation, findings, what we believe to be the root cause of the issue and what we will do to put it right. We will also outline the lessons we have learnt to prevent the same issue happening again. Standard letter templates will be used for complaint acknowledgments and responses to ensure that key information is provided to customers about the process itself.

10. Early resolution

Wherever it is the customer's preference, we will always aim to resolve the customer's issue at the first point of contact, while being clear that the customer can opt to progress the issue to a complaint if they are dissatisfied.

11. Stage 1

We will log and acknowledge a complaint within five working days of receipt. The complaint will be investigated by a member of our Customer Relations Team (investigator) in order to carry out an objective review of the issue, establish the root cause and provide a resolution. If it becomes apparent that there is any conflict in relation to the investigator and the complaint or the person making the complaint, the complaint will be reallocated.

The investigator will:

- Contact the customer, introduce themselves and outline the complaints process.
- Set out our understanding of the complaint so the customer can confirm this aligns with the complaint they wish to make.
- Send a formal acknowledgement to provide customers with a further opportunity to confirm that the reason for the complaint is correct. The acknowledgement will include investigating officer details as well as timescales within which the customer should expect a response. Establish more information to inform the investigation through interrogating our systems, reviewing relevant reports, listening to call recordings, speaking with relevant colleagues or involved third parties and arranging inspections if necessary.
- Consider the legal obligations of both Plus Dane and the customer.
- Consider the policy within which the service has been delivered.
- Agree communication updates throughout the investigation.
- Develop a written response outlining the investigation and outcome, including all aspects of the complaint.

We will issue our decision in writing within 10 working days from acknowledging a complaint, clearly setting out our understanding of the complaint, what our investigation has included and any learnings that have been identified. We will always try to discuss the outcome with the customer before we issue the formal written response.

In exceptional circumstances, where we may not be able to meet the 10-day response time, we will provide an explanation and a date by which the stage one response should be received. This will not exceed a further 10 days without good reason. If an extension beyond 20 working days is required to enable us to respond to the complaint fully, this will be approved by the Customer Relations and Service Improvement Manager and agreed by both parties.

The potential outcomes of a complaint are that it can be upheld, partially upheld or not upheld and any outcome will be explained based on the available evidence. A complaint will be considered as resolved once the outcome of the complaint has been shared with the customer. If we uphold any aspect of a complaint, we will identify how we intend to put it right and provide clear timescales of when further actions, such as

additional repairs, will be completed. We will also explain how we will seek to prevent it happening again and detail any appropriate payments being offered.

If the complaint is not resolved satisfactorily the customer may request for their complaint to progress to stage 2. How to do this will be clearly outlined in the stage 1 written response, which will also include the contact details of the Housing Ombudsman Service.

12. Stage 2

If a customer remains dissatisfied after the stage 1 response, they can ask to escalate the complaint to stage 2 of the process. The Customer Relations Team will acknowledge the complaint at stage 2 within five working days of receipt, outlining the stage 2 process and assign it to a senior manager (Head of Service or above).

We will not unreasonably refuse to escalate a complaint. Reasons for declining to escalate a complaint are the same as the reasons for not accepting a complaint set out in Section 4, 'Exclusions from Policy.'

The senior manager will:

- Contact the customer to introduce themselves and discuss next steps within 5 days.
- Understand the reason for the escalation and what additional information the customer would like to be considered.
- Agree communication updates throughout the process.
- Develop a written response outlining the investigation and outcome.

We will issue our response within 20 days of the escalated complaint being acknowledged clearly setting out our understanding of the complaint, what our investigation has identified and what our learning is.

In exceptional circumstances, we may not be able to meet the 20-day response time. In these instances, we will provide an explanation for the delay and a date by which the stage two response should be received. This will not exceed a further 20 working days without good reason. How to escalate a complaint to the Housing Ombudsman Service will be clearly outlined in the stage 2 written response for those customers that remain dissatisfied.

13. Closing complaints

We will only close a complaint on our system when all agreed actions have been completed. It is the responsibility of the Customer Relations Team to monitor the completion of actions and to formally close each complaint. We will conduct a post complaint survey as part of our commitment to learning from customer's experience.

14. The Housing Ombudsman Service

Customers can contact the Housing Ombudsman Service at any point throughout our complaints process for advice and support.

If customers remain dissatisfied after exhausting Plus Dane's complaints process, they can contact the Housing Ombudsman Service to review the complaint and our response.

Plus Dane's website and Unity magazine publish information about our Complaints Policy and the Housing Ombudsman Service.

15. Complaints escalated to the Housing Ombudsman Service

When a complaint is escalated to the Housing Ombudsman Service it may:

- Work with both us and the customer to resolve the dispute under its early resolution procedure. For example, it can use its experience of resolving complaints to make suggestions if it believes there is a way to resolve the complaint.
- Carry out an investigation. It will only do this for those complaints where it decides an investigation is proportionate to the circumstances and evidence, for example complex complaints involving many issues.
- Refer the case to a different organisation if it's an issue it cannot make a decision about because it is not within its jurisdiction.

Plus Dane will cooperate with the Ombudsman Service request for evidence and provide this within the timeframe set by the Ombudsman Service. Plus Dane communicates with the Ombudsman via its landlord portal which provides a summary of all complaints the Service is supporting Plus Dane customers with.

If a response cannot be provided within this timeframe, we will provide the Ombudsman Service with an explanation for the delay. If the explanation is reasonable, the Ombudsman Service will agree a revised date.

Failure to provide evidence to the Ombudsman Service in a timely manner may result in the Ombudsman issuing a complaint handling failure order.

16. Discretionary payments / compensation

When we get things wrong, we will apologise and consider an appropriate remedy. This is important in helping us to rebuild the trust we may have lost. Remedies can come in different ways but will be agreed with customers before a response letter is sent. Examples of remedies include:

- Taking action if there has been a delay in delivering a service.
- Reconsidering or changing a decision.
- Amending a record.
- Providing a financial remedy / compensation.
- Changing policies, procedures or practices.

Any remedy offered will reflect the extent of any service failures and the level of detriment caused to the customer as a result.

Compensation may be offered where there has been financial loss. Customers are responsible for loss or damage to items in their home and should have appropriate contents insurance to cover this. In instances where compensation is deemed an

appropriate remedy, we will consider the age and condition of any items that need replacing and may request appropriate evidence such as receipts and proof of purchase.

There are some occasions where compensation will not be issued. For example, loss of wages, annual leave, etc – This is often requested where repair appointments have been cancelled or rescheduled. The tenancy agreement and or lease agreement requires customers to give access for repairs to be carried out as needed. We reserve the right to pay compensation in recognition of the inconvenience caused, for example where repairs appointments are repeatedly missed, or the repair issue has not been resolved after multiple visits.

Compensation will be assessed by:

- The severity of the situation and the individual impact on a customer which may include disability or other personal circumstances.
- Length of time involved.
- Any other relevant factors.
- Statutory payments due.

The amount of compensation we decide upon does not reflect a definitive loss, as we are not able to quantify this, but it is a recognition of the overall distress and inconvenience caused by the particular circumstances of the complaint. Where there is evidence of financial loss, we will issue this directly to the customer. We reserve the right to offset any additional payment against monies owed by the customer to Plus Dane Housing.

17. Councillor and MP enquiries

Correspondence received from local councillors and Members of Parliament (MP) will be acknowledged and responded to within 10 working days of receipt. If we are unable to meet this timescale for any reason, we will contact the Cllr / MP and outline the reason for the delay and when they can expect a response.

If we consider the problem to be a complaint, the issue will be logged and responded to under our complaint procedure and the Cllr / MP will be informed.

18. Surveys and other feedback approaches

Plus Dane may upon reviewing feedback from surveys or other feedback approaches, contact a customer to investigate and aim to rectify any issues at first point, however if deemed appropriate a complaint may be logged on their behalf.

19. Unreasonable behaviour

We will always take account of the customer's experience when dealing with complaints and try to understand the frustrations that can arise from service failures. On occasion there may be times when a customer's behaviour or frequency of contact prevent us from responding effectively to a situation. In these cases, we will refer to our Unreasonable, or Persistent Complainants Framework to decide on the most appropriate course of action moving forward.

20. Petitions

A petition will be considered when ten or more people jointly complain about the same issue or concern. They will be logged and dealt with in accordance with the complaint procedure.

We will ask the group to nominate a spokesperson or key point of contact and all subsequent contact and correspondence will be managed via the nominated spokesperson.

21. Compliments

We are always happy to hear from customers when we get things right so customers can also use the same channels to pay us a compliment.

We try to pass feedback onto the relevant colleagues so we may on occasion ask for more detail to enable us to do this.

22. Confidentiality

All complaints received will be dealt with confidentially and in accordance with the requirements of the General Data Protection Regulations.

If a complaint is about an individual colleague, group of colleagues or a partner contractor, we will not reveal the customers identity, if they don't want us to. However, the nature of the complaint may make the customer identifiable.

23. Use of discretion

On occasion, we may exercise some discretion in applying this policy based on individual circumstances and the requirement to comply with legislation. Any discretion will be applied fairly and appropriately and in the best interests of resolving the complaint for the customer. We will clearly explain our decision and provide the customer with the contact details for the Housing Ombudsman so that they can seek further advice and support if they remain dissatisfied.

24. Equality, Diversity and Inclusion

We will comply with the Equality Act 2010 and the need to make reasonable adjustments dependent on individual circumstances. This means that we may sometimes adapt our normal policies and procedures in order to support customers more appropriately. Customers will be encouraged to share any reasonable adjustments they require to support them through the complaints process. This could include requests such as support from a third party or providing different communication methods to aid understanding. If we are unable to provide the requested adjustment, we will share our decision with the customer and seek alternative ways of meeting their needs throughout the complaint process.

25. Consumer Standards

This policy is compliant with the following Consumer Standards:
Transparency, Influence and Accountability Standard

- Ensuring our approach to complaints is simple and accessible.
- We will publicise our complaints process.

- We will publicise on our website an annual report on complaints including themes of complaints and lessons learnt.
- Treating customers with fairness and respect.
- Taking account of diverse needs and making reasonable adjustments.
- Making sure complaint communications are accessible, clear, timely and appropriate.

26. Roles & Responsibilities

Under this policy, the teams / colleagues detailed below have the following responsibilities:

Board	Final approval of policy
Director of Customer Experience	Ensure implementation of the policy through effective control environment
Customer Relations & Service Improvement Manager	Managing the processes detailed within the policy
Senior Complaint Resolution Officer	Co-ordinating team performance to meet timescale and quality expectations set out within the policy
Complaint Resolution Officers	Undertake all actions involved in coordinating and responding to complaints and compliments including undertaking Stage 1 complaint investigations
Heads of Service, Directors, Executive Directors	Review complaints at Stage 2
Service area managers	Implement lessons learnt

27. Assurance

Complaints performance and the monitoring of this policy is the responsibility of the following colleagues:

- Director of Customer Experience
- Head of Customer Experience
- Customer Relations and Service Improvement Manager

Quarterly reporting of complaints performance will be presented to our Purpose Committee.

Every year, in line with regulatory requirements, we will produce an annual complaints report outlining:

- The number, nature and outcome of complaints.

- Theme and trend analysis to identify and address systemic issues to mitigate risk and reputation.
- Complaint handling performance against service standards
- How we have improved services as a result of learning from complaints.
- Satisfaction with complaint handling.
- Compliance with the Housing Ombudsman 'Complaint Handling Code Self-Assessment'.

Links to other policies/documents:

- Compensation framework.
- Unreasonable behaviour framework.
- Data protection.

28. Equality Impact Assessment

An EIA was carried out as part of the policy development process and learnings have been built into the policy & procedures.

29. Modern Slavery & Human Trafficking

Plus Dane has a modern slavery & human trafficking statement and a number of policies that enable it to identify and deal with modern slavery or human trafficking.

- Safeguarding Policy
- Whistleblowing Policy
- Code of Conduct
- Anti-Fraud Policy
- Anti-Bribery Policy
- Anti-Money Laundering Policy
- Conflict of Interest Policy
- Procurement Policy
- Code of Conduct

Any complaints made that could potentially expose instances of modern slavery or human trafficking will be dealt with in line with Plus Dane's statement and the relevant policy.