



CUSTOMER FEEDBACK POLICY

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1. Introduction and Aims of Policy

- 1.1 Rochdale Boroughwide Housing (RBH) aims to conduct its business in a manner which is open, transparent and accountable. The aims and objectives of this policy reflect some of the key mutual membership values adopted by our Representative Body:
- **'Responsibility'** – We will take responsibility for our actions. When something has gone wrong we will investigate what has happened, explain to the customer why it has happened and what we intend to do in order to rectify the matter and offer an apology. In appropriate circumstances we will also offer a goodwill gesture to recompense the customer for any hardship suffered;
 - **'Openness & Honesty'** – We will carry out any actions that have been agreed in order to rectify the complaint, be honest about why something has gone wrong, not seeking to justify our actions inappropriately and share information about what we have learned from complaints;
 - **'Caring'** – We will listen and respond to the needs of our customers, at all times trying to understand complaints from their perspective rather than an organisational one;
 - **'Equity'** – We will carry on our business in a way that is fair and unbiased, ensuring that a complaint from a customer does not prejudice their right to the receipt of a good service from us during the period of the complaint and in the future;
- 1.2 We are committed to delivering a series of Offer Document Promises made to tenants as part of the transfer process whilst continuing to build stronger communities and delivering excellent services at all times.
- 1.3 Of course we recognise that occasionally things can go wrong, we fail to live up to our customers expectations or our own service standards and that on such occasions we have responsibility to put things right.
- 1.4 We also appreciate the value of recognising instances where we have delivered a service of a particular type or in a specific area that is innovative, exceeds customer expectations and represents good practice. On these occasions we will aim to celebrate this and use it as a 'learning experience' within the organisation to improve similar services across the whole of the borough.
- 1.5 How we manage positive and negative comments from our customers forms a key part of our overall approach to reviewing performance, improving service delivery and achieving high levels of customer satisfaction in all that we do. As such we

encourage, welcome and value complaints, comments and compliments as an important form of customer feedback.

- 1.6 This policy and its accompanying procedure aims to ensure that there is a clear, accessible, effective, confidential, and responsive system in place for managing and monitoring customer feedback about the services we provide, enabling us to act on them in a way that is quick, fair, consistent and in a manner appropriate to both customers and RBH in its capacity as landlord.

2. Policy Objectives

- 2.1 The aims of this policy set out the context within which we will deal with complaints, comments and compliments on a day to day basis and form a framework for how the complaints procedure will operate. The aims are supplemented by the following specific objectives that we wish to achieve from the implementation of these new policies and procedures. We will:

- encourage customers to let us know when they are satisfied or dissatisfied with the service they have received from us providing clear information to customers about how they can make a complaint, comment or compliment and ensuring a range of access methods are available including by telephone, e-mail, letter, in person or on-line through our website;
- where a mistake has been made, always offer an apology, taking appropriate action to put things right, taking preventative action to ensure that similar problems do not re-occur and where appropriate recompensing the customer for any inconvenience caused;
- where we consider the complaint is unfounded, fully explain why we have reached that decision;
- offer all necessary support to customers who need help in making their complaint, comment or compliment and accept feedback from anyone they choose to represent them, for example, an advocate, family member, friend, Citizens Advice Bureau or 'Designated Person' (Member of Parliament, Local Ward Councillor or member of a Designated Tenants Panel);
- treat all customer feedback with respect, investigating in a way that reassures them we are taking their feedback seriously, considering individual circumstances and taking account of what outcome the customer would wish to see as a result of their feedback;
- empower all our employees to take responsibility for dealing with feedback at the first point of contact, responding to customers in a positive manner and seeking to resolve the customers issue locally without recourse to the formal complaints process;

- where appropriate, initiate further discussions with customers via our designated 'Feedback Co-ordinator' with a view to resolving issues that should normally be dealt with without recourse to the formal complaints process;
- formally acknowledge all feedback within two working days from its receipt, provide a full response within ten working days or where this is not possible keep the customer informed of progress in relation to the handling of their complaint. Where feedback is given verbally we will ensure that our response is suitably documented. We will continue to monitor our performance in relation to timescales but will also introduce new measures to assess how well we responded to customers feedback and to measure satisfaction with the final outcome;
- ensure that comprehensive details of all feedback are recorded in an appropriate manner, including any corrective and preventative action taken in order to rectify complaints. Feedback will be used either to identify where the service has failed or to identify where we have done something particularly well. This will enable us to analyse trends in service delivery, learning from both positive and negative feedback and bringing about continuous improvement;
- make performance information gathered from feedback available to customers;
- raise employee awareness of the importance of good complaints management and monitoring including the need to respond in a proper and appropriate manner. This will be done through the induction programme and targeted internal and external training;
- take all reasonable steps to ensure that all customers, employees, members and volunteers are both aware of, and have access to, this policy;

3. Scope of the Policy

- 3.1 This policy is relevant to any person who either receives a direct service from, or is affected by a decision or action taken by RBH or one of its subsidiary organisations .
- 3.2 The policy applies to all RBH employees (both permanent and temporary), and volunteers who deliver services to RBH tenants and leaseholders.
- 3.3 The policy also applies to contractors who are procured to deliver services on behalf of RBH or consultants who are engaged to review and influence RBH services.
- 3.4 RBH will, therefore, follow procedures that aim to ensure that all employees, volunteers, contractors and consultants are fully aware of, and abide by their responsibilities under this policy.

4. The Complaints, Comments and Compliments Process

Resolving Service Issues Promptly

- 4.1 Many day to day complaints (e.g. a missed repair appointment) should be capable of being resolved without recourse to the formal complaints procedure and RBH actively encourages all employees to take responsibility for resolving service issues at the first point of contact with the customer. Whilst these issues are still expressions of dissatisfaction they do not tend to be complex issues that need to go through the formal complaint stages. These are acknowledged and passed to the appropriate team to deal with. However, RBH recognises their value as an important element of service feedback and are now seeking to develop a new process for recording feedback from a wide range of sources in order to help develop and improve services further.
- 4.2 If you are dissatisfied with any service provided by RBH and would like the issue to be resolved informally as described above you may contact the Customer Feedback Co-ordinator. Tel: 0800 027 7769 or email: RBH General Enquiries RBH@rbh.org.uk. This will mean that your issue is directed to the appropriate team for prompt resolution.

Formal Complaint - Stage 1

- 4.3 This formal stage of the process will be appropriate where the informal stage (above) has failed to resolve the matter to the customers satisfaction or where the customer has indicated that they wish to proceed straight to this stage.
- 4.4 All complaints will be dealt with in confidence, fairly and as quickly as possible, respecting a customers rights under the Data Protection Act 1998.
- 4.5 RBH will promptly acknowledge the customers complaint or comment, giving them a reference number and informing them of the name of the investigating officer who will deal with their complaint or comment;
- 4.6 The investigator will contact the customer as part of their investigations and, where necessary, to seek further clarification on any issues raised by the customer;
- 4.7 The investigator will aim to complete the investigation and send the customer a written response within 10 working days. If more time is needed the investigator will contact the customer, explain why there is a delay and inform them of when a response can be expected;

Formal Complaint - Stage 2

- 4.8 If a customer is unhappy with the response received from the investigator they may appeal (within 28 days of receiving their response) explaining the reason(s) why they are dissatisfied.
- 4.9 At this stage the customer will be given the choice of whether to appeal and ask that the complaint be looked into again by either an independent Director, (that is someone who does not manage the service which the customer complained about) or an independent appeals panel (that is a panel comprising of tenant and employee members specifically set up for the purposes of hearing complaints appeals).
- 4.10 The appeal will be acknowledged, investigated and responded to within the same timescales as the customers original complaint;

Follow up to Complaints

- 4.11 Within 28 days of RBH responding to a customer they will be sent a questionnaire asking for their feedback on the way the complaint has been handled (the process) and satisfaction with the outcome.
- 4.12 RBH will publish anonymised information to tenants in newsletters and on our website showing how we have performed in relation to the processing of complaints, the types of complaints that we have received and how we have used the feedback to improve our services.

Use of Advocates

- 4.13 If you wish to make a complaint and need assistance with this RBH welcomes the use of Councillors, MP's or other advocates to act on your behalf. If you wish to use a Councillor, MP or advocate RBH would ask that you give them written authorisation to act on your behalf. In responding to your complaint we will send a response to you and a copy to your advocate so that they are aware of our response and can discuss it with you.

Options for Complainants Following Informal and Formal RBH Process

- 4.14 The decision of the Independent Director or Appeals Panel will be deemed to be final and if the tenant, leaseholder or housing applicant still feels that their complaint has not been resolved to their satisfaction after it has been through stage 1 and stage 2 of RBH's formal process they can refer their complaint to a designated person of their choice.

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- 4.15 A 'Designated Person' is:
- A Member of Parliament;
 - A local ward Councillor
 - A Designated Tenants Panel recognised by RBH for the purposes of resolving complaints at a local level and/or referring them on to the Housing Ombudsman.
- 4.16 A customer may ask a designated person to either help them try and resolve their complaint locally through further discussions with RBH, **or** to refer their complaint directly to the Housing Ombudsman.
- 4.17 The customer must authorise their chosen designated person to act on their behalf and agree to disclose all relevant details pertinent to their complaint to them.
- 4.18 A Designated Person has the right to refuse to refer a complaint to the Housing Ombudsman if they so wish but must inform the complainant of this in writing.
- 4.19 Alternatively customers who choose or prefer not to approach a designated person about their complaint can wait 8 weeks from the date of the decision of the stage 2 appeal and approach the Ombudsman directly with their complaint.
- 4.20 RBH is a member of the Independent Housing Ombudsman scheme and will co-operate fully with the Ombudsman making available all records and information relating to the complaint and abiding by the Ombudsmans final determination.

The Housing Ombudsman Service

- 4.21 The Housing Ombudsman service is a body set up by the Government to provide a free and independent way of dealing with complaints against housing organisations. Generally they will not consider a complaint referred to them either via a designated person or directly unless it has first been through all the stages of this formal complaints process.
- 4.22 Further information on the Housing Ombudsman can be found by visiting their website at: www.ihos.org.uk

4.23 Contact details for the Housing Ombudsman are as follows:

Housing Ombudsman Service
81 Aldwych
London
WC2B 4HN
Tel: 020 7421 3800
Lo-Call: 0845 7125 973
Minicom: 020 7404 7092
Fax: 020 7831 1942
Email: info@housing-ombudsman.org.uk

5. Definitions

Resolving Service Issues Promptly

- 5.1 This is where you are dissatisfied with a service but wish us to resolve it promptly through the appropriate team and without the need to make it a formal complaint.

Formal Complaint

- 5.2 We define a complaint where it has been processed through the formal complaints process as: 'any dissatisfaction expressed by a customer after either having received a service from us or following an action taken by us which has affected them, or any dissatisfaction expressed by a customer about a lack of action or standard of service provided by us or any person or organisation acting on our behalf'.
- 5.3 Specifically this may be where:
- You are unhappy with what we do or the way we do it;
 - You consider we have not done something that we should have, or have taken too long;
 - You feel that we have not complied with our published policy and wish to challenge its suitability;
 - You have been told that you cannot use one of our services;
 - Your needs are not being met due to the lack of a particular service;
 - You are not happy with the quality of the service you have received from us;
 - You are unhappy with the attitude, behaviour or way you have been treated by one of our employees or contractors.

Compliment

- 5.4 We define a compliment as: ‘an expression of satisfaction received from a customer for a job well done’ **or**;
- 5.5 ‘recognition from a customer that a particular process has worked well and has exceeded their expectations’

Comment

- 5.6 We define a comment as when a customer wishes to make an observation about a service they have received. For example they may be generally satisfied with the way we have provided it but may have a suggestion for how it could be improved further for the future benefit of other customers receiving the service. Comments are acknowledged but there is generally no action required to be taken on them. However, RBH recognises their value as another important element of service feedback.

What is Not a Complaint or Compliment

- 5.7 The following matters are outside the scope of this policy as there are other mechanisms for dealing with them:
- When you are making the first request for a service from us (for example the first time you report a repair). This will normally be channelled through our Contact Centre (Telephone 0800 0277769 or 01706 274100) at the website; www.rbh.org.uk or via a Customer Information Point at St Alban’s House Drake Street, Rochdale, <http://www.rbh.org.uk/>
 - When you are requesting information or clarification about our services policies or procedures (as above);
 - If you have a problem with your neighbour or another resident living in your neighbourhood. These should be dealt with under the anti-social behaviour policy and procedure;
 - If you are raising an issue where there is a right of appeal (e.g. against a decision about your application for housing) or where there is a legal solution (e.g. a claim for damages that should be handled as a public liability insurance claim);
 - Where you have a complaint about decisions or services taken or provided by other organisations, over which RBH has no control;
 - Complaints about a particular policy or process which has been followed correctly but which the customer feels has disadvantaged them in some way, e.g. rent arrears or service charge collection;

- Complaints relating to the actions or conduct of RBH Board members and tenant members of the Representative Body. These will be dealt with in accordance with the codes of conduct that apply to each body.

6. What you can expect when you make a Complaint or Comment

6.1 If we make a mistake that results in a complaint or comment we will endeavour to try and put things right and will always ask the customer what they want to happen as a result of their complaint or comment. Some practical measures may include:

- Offering an apology to the customer;
- Feeding back to customers the outcomes from our investigations, providing the customer with a full explanation of what went wrong and what action we intend to take in order to resolve the matter;
- Agreeing to provide a service that we initially refused to provide or making appropriate changes to a service in order to redress the issue complained about;
- Reviewing and amending the information provided in our service literature (e.g. service standards);
- Reviewing the policy or procedure that led to the initial complaint or comment;
- Arranging supplementary training and guidance for employees responsible for delivering the service;
- Offering the customer a small customer care payment as a gesture of goodwill. In cases where the customer has suffered genuine financial loss, for example damage to their possessions or loss of earnings whilst waiting for an appointment then the payment will reflect this providing that the customer can provide reasonable proof of the loss. RBH will also reserve the right to offset such payment against any rent arrears or other debt.
- Offering to refer the matter for mediation by a Designated Tenants Panel. This is a panel made up of tenants for the purposes of discussing and working with the complainant and a representative of the service being complained about in order to broker a resolution that is mutually acceptable to both parties. RBH are currently in the process of establishing such a panel.

7. Dealing with abusive, persistent or vexatious complaints and complainants.

7.1 RBH are committed to dealing with complaints and comments in an impartial and reasonable manner and making a complaint will not affect a customer's rights to fair treatment and a good service from us.

We realise that the circumstances that have caused the customer to complain may be distressing and cause them to act out of character and we expect our employees and contractors to treat customers with respect at all times.

7.2 However, on occasions, where a customer's behaviour is considered to be unreasonable and unacceptable, adversely affecting our ability to continue delivering services to other customers, we will reserve the right to restrict or change the way in which the customer makes contact with us.

7.3 We will not accept:

- Aggressive or abusive behaviour towards our employees or contractors including threats, physical violence, personal verbal abuse, harassment and derogatory remarks;
- Unreasonable demands which impact on our employees' time and ability to carry out their duties, for example continually making calls, changing the content of their original complaint or insisting on dealing with a particular employee;
- Unreasonable persistence in refusing to accept an explanation or decision and continuing to pursue their complaint without providing any new information that may have a significant impact.

8. Imposing Restrictions

8.1 We will ensure that the complaint is being, or has been, investigated properly according to the RBH Complaints, Comments and Compliments Policy.

8.2 If RBH considers that the behavior continues to be unreasonable, persistent or vexatious in nature the Service Manager will contact the complainant either by telephone, in writing or by e-mail to explain why this behaviour is causing concern, and ask them to change this behaviour.

8.3 If the disruptive behaviour continues, the Service Manager will issue a reminder letter to the complainant advising them that the way in which they will be allowed to contact us in the future will be restricted.

8.4 Any restriction that is imposed on the complainant's contact with us will be appropriate and proportionate and the complainant will be advised of the period of time the restriction will be in place for.

8.5 Restrictions will be tailored to deal with the individual circumstances of the complainant and may include:

- Banning the complainant from making contact by telephone except through a third party e.g. solicitor, councillor or friend acting on their behalf.
- Banning the complainant from sending e-mails to individual and/or RBH employees and insisting they only correspond by letter or designated mailbox.

- Banning the complainant from using any RBH service and customer access points such as St Albans House, Kirkholt Drop in Centre, and including any Community Facilities.
- Requiring contact to take place with one named RBH employee.
- Restricting telephone calls to specified days, times and duration.
- Requiring any personal contact to take place in the presence of an appropriate witness.
- Advising the complainant that we will not reply to or acknowledge any further contact from them on the specific topic of that complaint (in this case, a designated RBH employee should be identified to read all future correspondence)

8.6 When the decision has been taken to apply a restriction to a complainant, the Service Manager will inform the complainant in writing (and/or as appropriate) to explain:

- Why we have taken the decision
- What action we are taking
- The duration of that action
- The right of the complainant to contact the Housing Ombudsman about the fact that they have been treated as a vexatious/persistent complainant

8.7 The Service Manager will enclose a copy of the policy in the letter to the complainant.

8.8. Where a complainant continues to behave in a way which is unacceptable, RBH may decide to refuse all contact with the complainant and stop any investigation into his or her complaint.

8.9 Where the behaviour is so extreme or it threatens the immediate safety and welfare of RBH employees and its customers, we will consider other options, for example reporting the matter to the police or taking legal action. In these cases, we may not give the complainant prior warning of such action.

9. New Complaints from complainants who are treated as abusive, vexatious or persistent.

9.1 New complaints from customers who have previously been dealt as a vexatious complainant will be treated on their merits. We do not support a “blanket policy” of ignoring service requests or complaints where they are founded.

9.2 The fact that a complainant is judged to be unreasonably persistent or vexatious and any restrictions imposed on our contact with him or her, will be recorded and notified to those who need to know within the Society, CRM System(Customer Relationship Management) and IBS.

10. Learning From Complaints, Comments and Compliments

10.1 RBH will seek to learn from all types of feedback through the following mechanisms:

- Monitoring and reporting on complaints completed within target timescale, the average number of days taken to process complaints, the number of service follow up's for repairs going over estimated completion date, number of complaints dealt with informally and number of Councillors and MP's enquiries dealt with. As RBH seeks to make the complaints policy more customer focused we will look to develop additional performance indicators to gain qualitative feedback on the customer experience ;
- Analysing and assessing feedback by performance, nature and service area;
- Undertaking periodic telephone surveys via the Contact Centre using a random sample of customers who have made complaints or comments in a six month period;
- Regular review of the cost and quality of the complaints, comments and compliments feedback process.

11. Conflicts of Interest

11.1 During all stages of both the informal and formal complaints, comments and compliments process RBH will take all reasonable steps to ensure that employees investigating, considering or taking a decision in relation to a complaint or comment do not include any person previously concerned with the complaint or comment or who has a personal or otherwise significant interest in the outcome.

12. Equality and Diversity

12.1 We will ensure that this policy is applied fairly and consistently to all of our customers and in accordance with our membership values set out in our Corporate Strategy and Equality and Diversity policy.

This means that no person or group of persons will be treated less favourably than another person or group of persons on account of their age, religion and beliefs, disability, gender, race, sexual orientation, transgender status, marriage and civil partnership, pregnancy and maternity or any other issue that may cause potential discrimination in service delivery.

12.2 This policy has been subjected to an equality & diversity relevance test to determine whether a full equality impact assessment is required and it has been shown that a full assessment is required. The outcome of the assessment is that this policy has a medium impact on our customers.

13. Links to Other RBH Policies and Procedures

- Data Protection and Information Security Policy
- Records Management Policy
- Confidentiality Policy
- Code of Conduct for Employees
- Code of Conduct for Board Members
- Code of Conduct for the Representative Body
- Openness and Public Disclosure Policy
- Employee Grievance and Disciplinary Policy and procedures
- Anti Fraud Policy
- Equality and Diversity Policy
- Formal Complaints, Comments and Compliments procedure
- Anti-Social Behaviour Policy and procedure

14. Monitoring and Review

14.1 All RBH policies and procedures are reviewed on a regular basis in order to ensure that they are 'fit for purpose' and comply with all relevant legislation and statutory regulations.

14.2 This policy, including any other related policies and procedures will be reviewed annually in order to ensure its continued appropriateness and formally reviewed and submitted to the appropriate 'approving body' at least once every three years.