Complaints procedure

December 2020

Responsible officer:	Head of Operations (Triathlon Homes) (Responsibility for proposing final draft, implementation and review)
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Review Statement: This procedure will be reviewed at the date mentioned above or following legislative, organisational, or changes to good practice if sooner.

Contents

1. Introduction

1.1 This procedure outlines our approached to managing complaints received from our customers of Triathlon.

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

1.3 This procedure outlines the process for when a Housing Ombudsman Determination has been received and colleagues adhering to the process outlined will ensure consistency, compliance with the Housing Ombudsman requirements and best practice.

1.4 This procedure must be read and implemented in conjunction with the Complaints Policy.

2. Scope

2.1 This procedure applies to a customer of Triathlon but does not apply to members of the public with whom we do not have or intend to have a contractual relationship.

2.2 This Complaints procedure & Housing Ombudsman Determinations process is only applicable to Triathlon customers.

2.3 Complaints will be accepted from third parties, such as relatives or advocates but will require authorisation from the complainant, unless they are an appointed legal representative.

2.4 We will not accept complaints that relate to events more than 6 months ago or those that have already been through the complaint process, unless there are exceptional circumstances.

2.5 We will proactively use learning from complaints to continually improve our services.

2.6 This is a mandatory procedure for all staff, whether they are directly or indirectly involved in the Housing Ombudsman Determination process at any level within the Group. All staff must ensure they are aware of the policy and the importance of complying with this procedure.

3. Roles and Responsibilities

Roles	Responsibilities
Customer Operations Director	Overall responsibility for the implementation of the Complaints Policy and reporting to Senior Managers and Board.
Customer Relations Improvement Manager	Overall responsibility for the development, review and implementation and compliance of the policy

	and associated procedures, ensuring they are up-to-date, monitoring, and staff awareness and training. The Key point of contact for the Housing Ombudsman service.
Customer Relations Advisors	Co-ordinate and manage the complaints process. Supports the Customer Relations Improvement Manager in responding to Ombudsman Contacts and associated activities including processing of Determinations
Customer Service Team	To manage and co-ordinate resolution of Service Dissatisfactions
Area Service Managers	To manage, assist in and resolve any Service Dissatisfactions. To assist the Customer Relations Team in resolving complaints. To undertake and respond to Compensation Reviews. To make recommendations for service improvements. To monitor complaint activity within their business area.
Contract Managers	To manage, assist in and resolve any Service Dissatisfactions. To assist the Customer Relations Team in resolving complaints. To investigate and respond to Compensation Reviews. To make recommendations for service improvements. To monitor complaint activity within their business area.
Heads Of	To manage, assist in and resolve any Service Dissatisfactions. To investigate and respond to Compensation Reviews.

	To conduct Senior Manager Reviews. To participate in Complaint Review Panels. To make recommendations for service improvements. To monitor complaint activity within their business areas. Working with Service Improvement Team to build and deliver action plans from the learning from complaints
Home Services Managers	To manage, assist in and resolve any Service Dissatisfactions. To assist the Customer Relations Team in resolving complaints and make recommendations for service improvements.
Property Services & Estate Teams	To manage, assist in and resolve any Service Dissatisfactions. To assist the Customer Relations Team in resolving complaints and make recommendations for service improvements.
All Staff	Support resolution of complaints, giving the priority needed to ensure that timelines described in this document are met. Support the embedding of service improvements that stem from learning from complaints as required.
All Directors	Ensure all staff are trained in complaint resolution. Monitor complaint resolution in own area. Ensure that learning from complaints raised within their area is addressed. Working with Service Improvement Team to build and deliver action plans from the learning from complaints
Service Improvement Team	To support the business in using the learning from complaints to develop action plans for service improvements.

4. Procedure steps:

Service Dissatisfactions at a glance:

Initial contact	• Customer raises a complaint & agrees it can be logged as a Service Dissatisfaction
Record	• Staff member (case handler) logs the service dissatisfaction in Customer Dynamics (CD) or informs the Service Centre (if no access to CD)
Appoint	• The relevant business team investigates & responds to the case handler
Respond	• The case handler provides the response to the customer & closes on CD

For further information please see the individual steps below.

4.1 **Initial contact from the customer**

- Customer contacts us to make a complaint. This could be in person, over the telephone, by email, by letter, via social media or via our website, and can be accepted by any staff member.

- The staff member (case handler) dealing with the contact from the customer must take details of the complaint being made and consider if it should be logged as a formal or informal complaint.

- The options must be explained to the customer and the case handler must obtain their agreement on how they wish their complaint to be dealt with as an informal complaint (as a Service Dissatisfaction) or as a formal complaint (at stage one).

4.2 **Logging a Service Dissatisfaction (Informal complaint)**

- If the customer is happy for their complaint to be logged as a Service Dissatisfaction the case handler must log the details on Customer Dynamics, recording as much information as possible, including the details of why they are unhappy, what outcome they are expecting and their preferred method of communication. **Please note:** If you do not have access to Customer Dynamics please forward the details to the Service Centre.

- The case handler must inform the customer that their Service Dissatisfaction will be raised with the relevant investigating team to investigate and that we will aim to be in contact again within 5 working days.

- The Service Dissatisfaction Customer Dynamics case must be referred by phone or email to the relevant investigating team to investigate and request an immediate response. **Please note:** Calling the relevant investigating team may ensure a quicker response and is therefore the preferred contact method.

- The relevant team must investigate the Service Dissatisfaction and provide a response immediately to the case handler, in as short a time as possible, which should be less than 5 working days.

Please note: The response from the team should include: identification of service failures and reason for this and what remedies/ actions will be taken to recover the issue. If the action required will not be completed before the response is to be provided to the customer, then the case handler must be provided with the details of what will be done and by when so that this can be provided to the customer.

4.1.1 Response received

- Once a response has been provided by the relevant team, the case hander must contact the customer through their preferred method of communication with the outcome of the investigation.

- If responding by phone it should be established during that call if the customer is happy with the resolution or not. If responding in writing, then we must provide details of how they can escalate if they are unhappy with the outcome.

- If the response was provided to the customer over the phone, once you have got agreement from them that they are happy, and the matter has been resolved you must update the case notes in Customer Dynamics and closed.

- If you have provided the response through written communication, then the correspondence should be attached the case and then closed on Customer Dynamics.

- If compensation has been offered and accepted by the customer, the case handler must arrange payment.

4.2.1 **Customer unhappy with the resolution**

- If the customer is unhappy with the resolution the case handler must refer the case to the Customer Relations Team to be logged as a formal complaint.

- The case handler must inform the customer that we are referring their case to the Customer Relations Team to be logged as a formal complaint and they will be contacted by a member of the team within 3 working days.

- Continue to section 4.3.

4.2.2 **No response received**

The case handler should set their own reminders or a task in Customer Dynamics as a reminder to chase the investigating team.

- If no response or a lack of information is received from the relevant investigating team by day 5 (working days) the case handler must chase the investigating team for their response or the missing detail, asking for an immediate response or the request will be escalated to their line manager. If possible call the relevant investigating team for a response.

- The relevant investigating team must provide a response immediately.
- If still no response or a lack of information by day 6 (working days) the case handler will escalate to the Line Manager within the business area that the response is required from.
- The case handler should contact the customer to advise of the delay in response, through their preferred method of communication.
- If at this point the customer requests for the matter is logged as a formal complaint due to the lack of response, then this must be adhered to. Please continue to section 4.2.5.
- If the matter remains as a Service Dissatisfaction, after 10 working days if there is still no response from the investigating team the case handler must contact the customer to ensure they are happy for this matter to remain as a Service Dissatisfaction.
- If the customer is happy to continue with the Service Dissatisfaction process, please continue to section 4.2.4.
- If the customer requests that the matter is logged as a formal complaint due to the lack of response, then this must be adhered to. Please continue to section 4.2.5.

4.2.3 **Continue with Service Dissatisfaction**

- If the customer is happy for it to continue to be dealt with as a Service Dissatisfaction advise the customer that you will be in contact again as soon as possible.
- Chase the relevant team for a response, this should be done by asking for an immediate response or you will escalate to the Head Of or equivalent manager.
- If still no response or a lack of information by day 12 the issue should be escalated to a Director advising that the Service Dissatisfaction will be passed to the Customer Relations Team to be logged as a formal complaint. Please continue to section 4.2.
- If a response is provided by the relevant team, please revert to section 4.2.1.

4.2.4 **Requests to escalate to a formal complaint**

- If the customer advises that they are unhappy & wish for the matter to be raised as a formal complaint or there is no response by day 13 we must raise the issue as a formal complaint.
- We must inform the customer that we will log their Service Dissatisfaction as a formal complaint, as requested or discussed and advise them that the Customer Relations Team will be in contact within 3 working days.

4.3 **Logging a formal complaint**

- If the customer would like their concern to be logged as a formal complaint, log as a stage 1 complaint on Customer Dynamics, recording as much information as possible, including the details of why they are complaining, the outcome they are expecting and preferred method of communication.

Once we have all the details send the Customer Dynamics case to the Customer Relations Team. **Please note:** The case should be created in Customer Dynamics first, although if it is an urgent letter or email this can be forwarded to the Customer Relations Team via CustomerRelations.Team@shgroup.org.uk without a case being raised in Customer Dynamics.

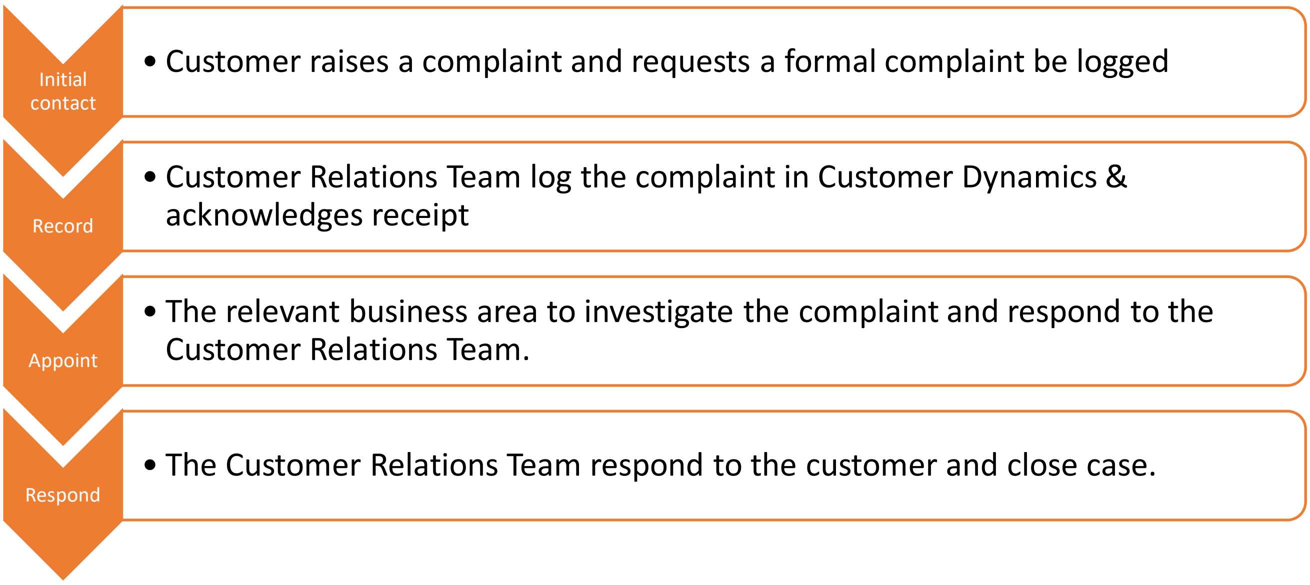
If the matter was previously a Service Dissatisfaction, then please ensure you link the SD to the new complaint so that the CRT team can see what actions have been taken so far.

- We must inform the customer that we are referring the complaint to our Customer Relations team who will be in contact within 3 working days.

4.4 Stage 1 Complaints

The Customer Relations Team receive direct complaints and escalated Service Dissatisfactions.

Stage 1 Complaints at a glance:



For further information please see the individual steps below.

4.4.1 Logging stage 1 complaints

- All Customer Relation Team members attend a daily meeting to review and allocate new complaints.
- The Customer Relations Advisor must read the complaint details and decide if more than one issue is being raised, if this is the case, the complaint should be logged as more than one complaint.
- Upon identification of the issues being raised the Customer Relations Advisor must log the complaint(s) on Customer Dynamics as a Stage 1 Complaint *(unless this has already been done by another member of staff).*
- If further clarity is required on the complaint details the Customer Relations Advisor must contact the customer by phone if possible to discuss the complaint further. This call would serve as the acknowledgement call.

- Following the call and clarification of details, the Customer Relations Advisor must add any additional information to the Stage 1 Complaint case.

- On the day of receipt of the complaint, the Customer Relations Advisor must send the complaint by email to the relevant team/business area *(refer to the Complaint responders list for relevant team members to contact if unsure)* for investigation. The email will advise the deadline for response within the subject line and the introduction must include the following information:
    - Customer name and address
    - Brief description of the complaint
    - The outcome expected from the customer
    - An explanation as to what is expected from the investigator, i.e. completion of the proforma within the email
    - Attach any documents, photos and notes relevant to the complaint

- In addition to the above the Customer Relations Advisor must either copy & paste the Proforma template into the body of the email or attach to the email, asking the investigator to provide the following information unless stated not required: *(Please see the Proforma guidance)*
    - Advising the reasons for the service failure
    - Chronological order of events
    - What they understand the current situation to be
    - All actions taken / to be taken to remedy the matter with timescales
    - Free text box for any additional relevant information felt necessary to the case

- If it is felt by the Customer Relations Advisor that a quick phone call to the relevant team could resolve the matter immediately, this should be considered, ensuring that all relevant information is obtained and record the details within the case.

- If a call with the investigating team has taken place, once the call is complete the Customer Relations Advisor must request an immediate follow up email from the investigator confirming the discussion and agreed actions.

- Within 3 working days of receiving the complaint the Customer Relations Advisor must either have called to acknowledge the complaint, emailed or sent the ‘Stage 1 Acknowledgement letter’, which must include a summary of the complaint details, the customers expected outcome and that we aim to provide a response within 10 working days.

- The relevant team must complete their investigations and provide a response to the Customer Relations Team with an action plan where appropriate within 3 working days. If there is going to be a delay in responding please refer to section 4.4.4.

4.4.2 **Response received**

- Upon receipt of the response from the relevant investigating team the Customer Relations Advisor must provide a written response to the customer within the required 10 working days deadline, in writing (either by letter or email) using the stage one response template.

- If there are actions to be completed to fully resolve the complaint, please refer to section 4.4.3.

- The Customer Relations Advisor should close the case on Customer Dynamics.

4.4.3 **Monitoring action plans**

- It is the responsibility of the relevant investigating team to monitor the actions and ensure completed.
- Once all actions have been completed the relevant investigating team must inform the Customer Relations Advisor, so they can update the complaint case records in Customer Dynamics.
- If the Customer Relations Advisor observes that the action plan has not been delivered to time, or if further issues have arisen in the delivery of the action plan, the Customer Relations Advisor will contact the customer to provide further feedback and to review any compensation due. **Please note:** The Customer Relations Advisor will monitor the action plan where appropriate through calendar invites to the relevant investigating team as reminders.

4.4.4 **Delayed response**

- If the team investigating the complaint is unable to respond to the Customer Relations Team within the requested 3 working days, they must inform the Customer Relations Advisor immediately, explaining why they are unable to meet the deadline and provide a date when they will provide a response by.
- The Customer Relations Advisor must make a note on the case advising of the delay in responding and the new deadline set by the responder.
- If the delay takes us over the required 10 working day deadline, which should only be in exceptional cases, the Customer Relations Advisor must send the 'Stage One Extension Letter' to the customer to advise of the delay, the reasons behind the delay and the new response deadline date, which cannot exceed a further 10 working days.
- The relevant investigating team must complete their investigations and provide the delayed response to the Customer Relations Team with an action plan where appropriate within the deadline set.
- Upon receipt of the response from the relevant team the Customer Relations Advisor must provide a written response to the customer within the agreed deadline.
- If there are actions to be completed to fully resolve the complaint, please refer to section 4.4.3.
- The Customer Relations Advisor should close the case on Customer Dynamics.

4.4.5 **No response received**

- If after 3 working days the Customer Relations Advisor does not receive any response or notification of a delay in response from the team investigating the complaint or they have not provided all of the information, they must escalate to the teams' line manager requesting an immediate response.
- The Line Manager must investigate with their team as to why they have not provided a response to the Customer Relations Team and request an immediate response be provided. Refer to section 4.4.2 when a response is provided.
- If after 6 working days from when the complaint was sent to the investigating team the Customer Relations Advisor does not receive a response from the team or their Line Manager, they must escalate to the Teams Senior Manager requesting an immediate response.

- The Senior Manager must investigate with their team as to why they have not provided a response to the Customer Relations Team and request an immediate response be provided. Refer to section 4.4.2 when a response is provided

- If after 8 working days from when the complaint was sent to the investigating team the Customer Relations Advisor does not receive a response from the team, Line Manager or Senior Manager, the Customer Relations Advisor must write to the customer. This letter will provide an apology for the delay in responding, explain why we cannot meet the original 10 working deadline and advise of the new response deadline, which must not exceed a further 10 working days. Refer to section 4.4.2 when the response is provided

- If we go over the initial 10 working days deadline the Customer Relations Advisor must inform the Senior Manager / Service Area Director.

- The Service Area Director must investigate with their team as to why they have not provided a response to the Customer Relations Team and request an immediate response be provided. Refer to section 4.4.2 when a response is provided.

4.5 **Stage 2 Complaint**

If a customer is unhappy with the outcome of their stage 1 complaint, they can contact us to discuss their concerns, why they are unhappy and the outcome they expected. This is an opportunity for us to explore to see if there is anything further we can do to resolve the matter, or they can request that their complaint be escalated to stage 2. This could consist of one of the following:

- Compensation Review
- Senior Manager Review

Please refer to the Policy to establish which of the escalation options is relevant and you should then explain to the customer what Stage 2 options is available to them.

Stage 2 at a glance

Triage
- Customer Relations Team discuss with the customer their request for their complaint to be escalated to stage 2 and agree which option to proceed with

Record
- Customer Relations Team record request & acknowledge
- If a stage 2 Complaints Panel has been requested it must be passed to the Customer Relations Manager

Appoint
- The relevant business area investigates and provides a solution
- For Complaint Panels a Complaint Panel Review meeting is held

Respond
- The Customer Relations Team provide a response to the customer and close the case

For further information please see the individual steps below.

4.6 Compensation Review

A Compensation Review will be carried out if a customer is unhappy with our offer of compensation. This can include if the customer is unhappy that an offer wasn't made along with the amount of an offer.

4.6.1 Logging a Compensation Review

- The Customer Relations Advisor will inform the customer that their complaint will be escalated to a Stage 2 Compensation Review as they are unhappy with our Compensation offer/lack of offer.

- The Customer Relations Advisor must establish the following with the customer: *(Dependant on how the customer contacts us, the above should be either completed during the initial call received, via email or calling the customer to clarify details.)*
    - Why they are unhappy with the offer awarded (if applicable)
    - What compensation they are seeking
    - Further information that supports their request.
    - Preferred method of communication including a phone number so the Compensation Reviewer can call them to discuss the case.

- Once the Customer Relations Advisor has gathered the above information they must log the request on Customer Dynamics as a Compensation Review.

4.6.2 Appoint Head of Operations

- On the day of receipt of the request, the Customer Relations Advisor must then notify the Head of Operations that a Compensation Review is required and provide details within an email of the case details including:
    - Customer name, address and contact details
    - Complaint background
    - Copy of previous response
    - Information from the customer explaining why unhappy with the previous offer, what outcome they are seeking, and any additional information provided by the customer.

4.6.3 Acknowledging a Compensation Review

- Upon receiving the Compensation Review request the Customer Relations Advisor must either have called to acknowledge the escalation, send an email or the 'Compensation Review Acknowledgement letter', which must summarise the Compensation Review details, the customers expected outcome and that we aim to provide a response within 10 working days.

4.6.4 Review Compensation case

- The Head of Operations or a nominated manager must review the Compensation Review case details and refer to the Group's compensation policy and framework/guidance.

- Once reviewed and understood the Head of Operations or nominated manager must make a call to the customer to discuss the case and a resolution. *(Be sure not to promise anything that we cannot deliver, taking into consideration relevant policies and if necessary speaking to the relevant team to discuss service level agreements and possible resolutions)*

4.6.5 **Responding to a Compensation review**

- Within 8 working days the Head of Operations must provide the Customer Relations Advisor with their response, including details of their discussions with the customer, the resolution and the reasons behind their decision, and details of any compensation offers.

- Upon receipt of the response from the Head of Operations the Customer Relations Advisor must provide a written response to the resident / customer within the required 10 working days deadline. This should be done in writing either by email or letter using the 'compensation review outcome letter.

- If there are actions to be completed to fully resolve the complaint, please refer to section 4.4.3.

- If a new compensation offer has been agreed the Customer Relations Advisor must arrange the payment.

- The Customer Relations Advisor should update the case and close on Customer Dynamics.

4.6.6 **Delayed response**

- If the Head of Operations carrying out the Compensation Review is unable to respond to the Customer Relations Team within the requested timeframe, they must inform the Customer Relations Advisor immediately, explaining why they are unable to meet the deadline and provide a date when they will provide a response by. This date cannot exceed a further 10 working days.

- The Customer Relations Advisor must make a note on the case advising of the delay in responding and the new deadline set by the responder.

- If the delay takes us over the required 10 working day deadline the Customer Relations Advisor must send the 'Stage 2 Extension' letter to the customer to advise of the delay, the reasons behind the delay and the new response deadline date.

- The Head of Operations must complete their investigations and provide the delayed response to the Customer Relations Team with details of an additional compensation payments to be made within the deadline set.

- Upon receipt of the response from the Head of Operations the Customer Relations Advisor must provide a written response to the resident / customer within the agreed deadline.

- If there is compensation to be paid the Customer Relations Advisor will arrange this payment.

- The Customer Relations Advisor should close the case on Customer Dynamics.

4.7 **Senior Manager Review**

A Senior Manager Review can be offered to the customer so long as the dissatisfaction is not solely related to compensation.

4.7.1 **Logging a Senior Manager review**

- Once the customer has confirmed they would like their complaint to be escalated to a Stage 2, if not already provided the Customer Relations Advisor must obtain from the customer the following:

(*Dependant on how the customer contacts us, the above should be either completed during the initial call received, via email or calling the customer following receipt of a request.)*

- Why they are unhappy with the outcome of the stage 1 complaint
- The outcome they are seeking
- Further information that supports their request
- Confirm if they would like a call from the Senior Manager as part of the review to discuss their case
- A contact number and best time to call *(this is dependent on if the customer wants a call)*

- The Customer Relations Team case handler must then log the case as a Stage 2 Senior Manager Review on Customer Dynamics.

4.7.2 Appoint a Senior Manager

- The Customer Relations Advisor should discuss with the Customer Relations Improvement Manager which Senior Manager should be contacted to undertake the review. The Customer Relations Advisor will then notify the relevant person that a review has been requested seeking their involvement, advise will book a call with the customer if requested in their diary, checking on dates to avoid, and confirm will provide complaint details within 6 working days.

- If the customer requested a call with the Senior Manager, the Customer Relations Advisor must consult the Senior Managers diary and book a call in with the customer, sending a calendar invite with the customers contact details. The call must be booked for no later than 10 – 15 working days' time from receipt of request.

- When looking to book a call with the Senior Manager and the customer, the Customer Relations Advisor should consider if a property visit is more appropriate. If it is felt a visit might be more appropriate a discussion should be held with the Senior Manager and send a calendar invite with the customers details.

4.7.3 Acknowledging a Senior Manager Review

- Upon receiving the request for a Senior Manager Review the Customer Relations Advisor must either have called to acknowledge the escalation, send an email or the 'Senior Manager Review Acknowledgement letter'. This will provide a summary of the complaint details, the customers expected outcome, confirm the date and time of the call with the Senior Manager and that we aim to provide a response within 20 working days.

4.7.4 Senior Manager Review report

Within 6 working days of receiving the request for a Senior Manager Review the Customer Relations Advisor must email the full report to the Senior Manager for review. This is to allow the manager time to review the case ahead of any scheduled call with the customer.

- The Customer Relations Advisor must complete the 'Senior Manager Review' report which contains the following information:
  - Date of call with customer
  - Complaint reference
  - Customer name
  - Customer address
  - Region

  - Case Handler
  - Background
  - Summary of complaint and key actions taken to resolve at stage 1
  - Areas of continuing dissatisfaction
  - Outcome being sought
  - Current situation
  - Consideration by the Senior Manager
  - Documents attached
- In addition to the Report, the Customer Relations Advisor must provide additional information, including but not exclusive to:
  - Complaint file from Customer Dynamics
  - Copies of any responses to / from the customer not included in the file
  - Repair chronology from orchard/dynamics/ASB case files? Download of contact from dynamics (where relevant)
  - Copies / Location of other relevant documentation
  - Relevant policies and procedures

4.7.5 Review Senior Manager case

- Upon receipt of the Senior Manager Review report, the Senior Manager must review all the details provided, seek to obtain any additional information that they require to fully consider the complaint.

- The Senior Manager must call or visit the customer as per the calendar invite from the Customer Relations Advisor, discuss the case with the customer and advise of their resolution. Please refer to section 4.7.7.

Please note: The default position is that the call will be done by phone but if a customer requests it, the call could take place as a face to face call, using skype or Microsoft teams.

4.7.6 Senior Manager response

- Upon completion of their investigations the Senior Manager must provide a response for the customer detailing their discussions and agreed outcome. A response must be provided within 20 working days of the request to escalate.

- If the Senior Manager is considering that additional works/actions are required to resolve, then they should discuss this with a relevant person within the business areas that the complaint relates to – especially if there is a financial implication (such as undertaking works).

- Any payment of compensation should be considered having read the Group’s Compensation Policy, framework and guidance.

- Once the response has been written the Senior Manager must send this to the Customer Relations Advisor within the agreed deadline.

- If there are actions to be completed to fully resolve the complaint, please refer to section 4.7.8.

- If compensation has been agreed, the Senior Manager must inform the Customer Relations Advisor requesting for payment to be arranged

- Upon receipt of the response from the Senior Manager, if there is compensation to be paid the Customer Relations Advisor must make arrangements for the payment.

- The Customer Relations Advisor must then top & tail the letter from the Senior Manager and send to the customer, under the Senior Managers name, within the 20 working days deadline, using the Senior Manager Review response letter.
- The Customer Relations Advisor will update Customer Dynamics and close the case.

4.7.7 **Monitoring action plans**

- It is the responsibility of the Senior Manager to monitor the actions and ensure completed.
- Once all actions have been completed the Senior Manager must inform the Customer Relations Advisor, so they can update the complaint case records in Customer Dynamics.
- If the Customer Relations Advisor observes that the action plan has not been delivered to time, or if further issues have arisen in the delivery of the action plan, the Customer Relations Advisor will contact the customer to provide further feedback and to review any compensation due. **Please note:** The Customer Relations Team case handler will monitor the action plan where appropriate through calendar invites to the Senior Manager as reminders.

4.7.8 **Delayed response**

- If for any reason the Senior Manager has concerns that they are not going to be able to meet the deadline, then they should let the Customer Relations Advisor know and the reason for the delay.
- The Customer Relations Advisor will then notify the customer of the delay, using the ‘Stage 2 response extension’ letter. The delay cannot exceed a further 10 working days.
- Upon receipt of the response from the Senior Manager, if there are actions to be completed to fully resolve the complaint, please refer to section 4.7.8.
- If compensation has been offered and agreed, the Senior Manager must inform the Customer Relations Advisor requesting for payment to be arranged.
- Upon receipt of the response from the Senior Manager, if there is compensation to be paid the Customer Relations Advisor must make arrangements for the payment.
- The Customer Relations Advisor will top & tail the letter, using the Senior Manager Review response letter, and send to the customer, under the Senior Managers name, within the agreed deadline.
- The Customer Relations Advisor will update Customer Dynamics and close the case.

4.8 **No further action**

On occasions it may not be appropriate for any of the above options to be considered. For example, if the customer is seeking an outcome that is not within the control or remit of the Group to deliver or the issue itself is contractually or legally complex and would better be considered using another route, such as a First Tier Tribunal.

- If the Customer Relations Advisor believes that the complaint should not be escalated to Stage 2 then they should refer this to the Customer Relations Improvement Manager to review and decide. Depending on the complexity, the CRM may wish to contact the Ombudsman to seek advice before making a decision.

- The decision not to review the complaint at Stage 2 must be communicated to the customer in writing by the Customer Relations Improvement Manager and within this letter they should aim to sign post them to an alternative review option or if there isn't one they should advise them of their right to refer their complaint to the Housing Ombudsman.

- The Customer Relations Improvement Manager must then update the notes on the Customer Dynamics case and close it.

4.8.1 **Escalation agreed**

- If the Customer Relations Improvement Manager considers the case and agrees that it can be escalated to Stage 2 Compensation Review or Stage 2 Senior Manager review, the customer must be informed of this decision.

- Please refer to sections 4.6, 4.7 or 4.8 dependant on the agreed escalation.

4.9 **Housing Ombudsman Enquires**

Contact from the Housing Ombudsman will normally take three forms:

- They are formally investigating a complaint and require the Group to provide them with the information that they need to carry out an investigation. This will normally only happen once a complaint has exhausted the Group's internal process.

- They are unclear if we are dealing with an issue from one of our residents and they ask us to either raise a complaint or escalate the complaint (as required).

- They have investigated a complaint and are writing to inform us of their decision.

4.9.1 **Housing Ombudsman enquiry received**

- When an enquiry is received from the Housing Ombudsman this must be passed to the Customer Relations Team immediately.

- A Customer Relations Advisor will assess the details to determine if the enquiry relates to a new or existing case by checking Customer Dynamics.

4.9.2 **Existing complaint**

- If the check of Customer Dynamics identifies that it is an existing complaint, the Customer Relations Advisor must check the complaints case to determine at what stage the complaint is at.

- If it is a complaint that is currently being investigated at either stage 1 or 2 of our process the Customer Relations Advisor must update the Housing Ombudsman with this information.

- If it is a complaint that has been closed at stage 2 the Customer Relations Advisor must update Customer Dynamics to a Housing Ombudsman case and refer it to the Customer Relations Improvement Manager.

4.9.3 **No complaint logged**

- If the check of Customer Dynamics identifies that we do not have a complaint, the Customer Relations Advisor must contact the customer to discuss the complaint details and decide if a complaint needs to be logged.

- If it is agreed with the customer that a formal complaint needs to be logged the Customer Relations Advisor must log the complaint, please refer to section 4.3.

- If it is agreed with the customer that it could be dealt with as a Service Dissatisfaction the Customer Relations Advisor must log as a Service Dissatisfaction, please refer to section 4.2.

- The Customer Relations Advisor must inform the Housing Ombudsman via letter or email of the action taken.

4.9.4 Housing Ombudsman Determinations

At a glance

Triage
- Case is received by Customer Relations Manager for review and to decide if it should be appealed

Appeal
- Customer Relations Manager confirms appeal (or not) to relevant stakeholders
- Appeal is lodged, where appropriate, to Housing Ombudsman Service

Orders
- Case is assigned to relevant service owner with action to be complete and due date

Recommendation
- Case is assigned to relevant service owner for further consideration

For further information please see the individual steps below.

4.9.5 Triage

- If the received Housing Ombudsman Service Determination doesn't identify a service failure, Recommendation or Order no action from the business is required. The Customer Relations Improvement Manager will update the Housing Ombudsman Service Determinations log and circulate Chief Executive, Executive Director Customer Services and any other relevant member of the Executive Management Team (EMT). The Customer Relations Improvement Manager will also copy in the relevant Director or Head of Service. The Determination should then be added to the complaint case and the case should be closed on Customer Dynamics.

- Once a new Housing Ombudsman Service Determination is received the Customer Relations Improvement Manager will triage the details of the case to decide if it should be appealed.

- This triage will look at the Order(s) presented by the Housing Ombudsman Service and the details of the complaint case to identify if there are any discrepancies between the information. It will also review the course of action presented to agree they are achievable within the timeframe given.

- The Customer Relations Improvement Manager will complete the triage process to meet the date specified within the Determination by which any appeal must be raised with the Housing Ombudsman Service.

4.9.6 **Appeal**

- Following the triage of the Determination the Customer Relations Improvement Manager will speak to the relevant colleagues in the business area to agree that an appeal is appropriate. confirm their approach to appeal (or not) to the relevant stakeholders. This will normally include the Director or Head of Service.

- Where an appeal is raised the Customer Relations Improvement Manager will present new information or discrepancies in the information presented to the Housing Ombudsman Service.

- When an appeal is not raised the Customer Relations Improvement Manager will assign action(s) to pick up the Order(s) from the Housing Ombudsman Service Determination and consider the Recommendations. As part of this allocation of action(s) the Customer Relations Improvement Manager will specify what is required and the due date.

4.9.7 **Orders**

- Following the allocation of action(s), the relevant service owner will create and manage their own action plan to complete the work by the due date given.

- The service owner will oversee completion of the work and be responsible for updating the Housing Ombudsman Service Determination log. Where the due date provided is not achievable the service owner will discuss this with the Customer Relations Improvement Manager.

- Once the work has been completed the service owner will confirm the outcome to the Customer Relations Improvement Manager providing any supplementary information that the Housing Ombudsman Service requested. The Customer Relations Improvement Manager will then provide the information to the Housing Ombudsman Service (and customer as appropriate) and update Customer Dynamics.

4.9.8 **Recommendations**

- Following the allocation of action(s), the relevant service owner will consider the recommendation and action as appropriate.

- The service owner will determine if any action is necessary and, where applicable, a due date. The service owner will oversee all aspects of the completion of the work and alongside any other updates they make to their records or internal libraries, they'll be responsible for updating the HOS Determination Log.

4.9.9 Monitoring & Reporting

The Customer Relations Team will report on Housing Ombudsman Service Determinations using the Housing Ombudsman Service Determination log. This is available and managed on SharePoint. Access will be provided to all appropriate stakeholders who are working on a Housing Ombudsman Service Order(s) or Recommendation(s).

A headline tab will show key business details that will be discussed with the Housing Ombudsman Service every 6 months although individuals will only have to update their specific case.

4.9.10 Updating the system

The Customer Relations Team will ensure that Customer Dynamics is kept up to date and that regular checks are conducted to ensure all the necessary information is on the customer record once a case is completed.

4.10 Petitions

On occasions we will receive a petition and this section covers the approach we will take. A petition is a formal written request which is signed by a group of people appealing to authority in respect of a particular cause. Usually we will receive petitions from a group of residents who are dissatisfied with a particular service. Largely the petition process will follow our complaints and compensation process, with some exceptions.

4.10.1 Receipt of a Petition

- On receipt of a petition (this can be via email or post), the recipient must check the following:
    - The information within the petition is clear and concise and details the issues which gave cause to the creation of the petition.
    - There is a name, address, postcode and signature of every individual supporting the petition.
- The petition must then be uploaded to EDMS under the first name detailed on the petition.
- The person receiving the petition should log the case on Customer Dynamics under the main complainant, detailed on the petition. If the customer is a non-resident, the recipient will need to create a new profile (so long as the petition falls within the remit of our Complaints Policy).
- Open the customer's profile and log a new case under 'Feedback'.
- Each signatory on the petition will need to be added as additional complainants.
- Once logged, categorise and sub-categorise as appropriate.
- The petition should be logged to the relevant business area, (this could be a Home Services Manager, Sheltered Services Manager or Contract Manager amongst others, dependant on the issue being raised) unless it's a petition against a staff member, in those incidences it must be logged to the staff member's line manager.

4.10.2 Management of a Petition

- Within 3 working days of receiving the petition, the case handler should seek to identify the lead petition to correspond with and call if necessary to confirm receipt, obtain any additional information required and clarify any details as necessary.
- Within 3 working day of receiving the petition, the case handler must then call one or more of the petitioners (depending on the size of the petition) to confirm receipt, obtain any additional information required and clarify any details as necessary.
- Within 3 working days the case handler must send an acknowledgement letter to all signatories and this should include details of when they can expect a full response to the petition.
- Depending on the nature of the petition it may be useful for the case handler to arrange a meeting with all the petitioners involved. This enables an open discussion and communicate the same message to all involved.
- During investigations the case handler must ensure that the petitioners are updated on the progress of the petition and that any outcome is recorded on Customer Dynamics and communicated to all parties involved.
- The case handler must provide a written response to the petitioners and save within the case in Customer Dynamics.
- Once a response has been sent the case can be closed.

4.10.3 **Escalation of a Petition**

- There may be instances where all or some of the petitioners are not happy with the initial response to their petition. In these circumstances the case handler should seek advice from their Areas Manager / business area Heads of.
- If an escalation is raised the Area Manager / Head of must review the case and can either provide further advice / alternative solutions, or advice to proceed to a stage 2 complaint.
- If the petitioner is unhappy on a personal level this should be responded addressing any personal concerns on a one to one basis, either by the case handler or their Area Manager / Head of.
- If an Area Manager / Head of makes the decision to escalate the petition to a stage 2 complaint, they must nominate one of the petitioners that was unhappy with the original outcome of the petition to represent the rest of the petitioners.
- The Area Manager / Head of must contact that nominated petitioner and confirm they are happy to be the representative.
- Once the representative has been agreed the Area Manager / Head of must communicate this information to all petitioners who were dissatisfied with the original outcome of the petition in writing (email / letter).
- Then the Area Manager / Head of must update the case on Customer Dynamics to a Stage 2 Complaint, amend the case handler and upload any details / documentation, recent communications and updates concerning the petition.

- Please refer to section 4.5.

4.11 Learning from complaints

We believe it's important to not only respond to customer complaints effectively but to also learn from them so that we can reduce the instances of this happening again in the future whilst demonstrating to our customers that we learn from things when they go wrong. The Housing Ombudsman stipulates that we must learn from complaints but our commitment to do doing so goes beyond this requirement; we simply think it's the right thing to do.

4.11.1 How we learn from complaints

- **Insight into Action**

Each year, we will carry out a deep dive across multiple service areas to better understand customer satisfaction and how we can improve our services. We use multiple sources of data to carry out this review, including complaints and survey data. On completion of this review, we work closely with the service owner to build and deliver an improvement action plan.

Each of the following services will be reviewed annually:

- Repairs and Maintenance
- Gas Servicing
- ASB
- Customer Services
- Customer Accounts
- Empty Homes and Lettings
- Community Investment and Care
- Landlord Services and Neighbourhoods

- **Complaints Reporting and Management Information**

It is important for service owners to be able to access complaints data so that they can work collaboratively with the Customer Relations Improvement Manager to identify trends, root causes and opportunities for improvement, in real time. Reports are supplied to the relevant service owners on a weekly and monthly basis which allows them to review the data and implement improvements to services and ways of working, as needed.

- **Case by Case Learning**

The Customer Relations Team work closely with customers to investigate their concerns and identify a resolution to their complaint. In doing so, the Customer Relations Advisors undertake a review of upheld complaints to identify lessons learnt and how we can address both the individual and systemic issues that caused the complaint. The Customer Relations Improvement Manager will take timely action and notify service owners and managers of any people issues as they arise. Issues relating to policy and process will be shared with the Customer Service Policy Lead and Customer Service Improvement Manager.

On a quarterly basis, the Customer Relations Improvement Manager will meet with the Customer Service Improvement Manager to review all lessons learnt and work with the wider business to build improvement action plans as needed. We will document the lessons learnt and how we've addressed this, as well as share this with residents through our annual statement and through the scrutiny panel.

5. General Data Protection Regulation

5.1 All processing activities covered by this procedure should follow the Groups published GDPR Compliance Standards. Please consult the GDPR Policies and Procedures or contact the Data Protection Team if you have any questions, data.protection@shgroup.org.uk.

6. Related Documents

- Complaints policy
- Compensation Policy
- Reasonable Adjustments Policy
- Unacceptable Behaviour Policy
- HR policies (if related to staff complaints)
- Social Media Policy

Procedure Controls sheet		
Author	**Date**	**Main changes and why (i.e. change in legislation, change in internal processes)**
Customer Services Policy Manager	13 December 2021	Changes to acknowledgement timescales and job titles.
Customer Relations Manager	31 December 2020	Revised procedure to take into account changes required to comply with the Housing Ombudsman Complaint Handling Code.