



<b>Policy title:</b>	Customer Feedback Policy		
<b>Scope:</b>	Group-wide		
<b>Policy owner &amp; job title:</b>	Head of Customer Services		
<b>Approver:</b>	Executive Director of Customer Experience		
<b>Date:</b>	1 January 2023	<b>Review Due Date:</b>	1 January 2025

**Notes:**

*The word “customer” relates to persons who are Aspire Housing tenants, leaseholders, commercial leaseholders and shared owners.*

**POLICY SUMMARY**

We are committed to delivering customer service excellence to all customers. We believe in offering customers a way to easily pass on compliments, feedback, or complaints for a service we have provided in order to drive service improvements.

Our commitment is to deal with comments and concerns in a fair and consistent way, maintaining openness and transparency.

**Associated Policies & Procedures:** Equality and Diversity Policy, Individual Rights Procedure, Subject Access Request (SAR) Procedure, Data Breach Procedure, Damp & Mould Policy (new), Understanding your role in effective complaints handling, and Homeworks compliments and complaints process.

**1. POLICY STATEMENT**

We value customer feedback as a way of involving customers in shaping and improving services and making sure that customers are at the heart of everything we do.

**Our Aims**

- To provide a simple and accessible process. We will make it easy for customers to give feedback.

- Deal with all customer feedback in strictest confidence
- Respond to the needs of our customers
- Accurately record and analyse all feedback
- Deal with all feedback promptly and courteously
- Investigate and respond with our findings
- Keep customers informed
- Make sure our colleagues are adequately trained to handle complaints where this is necessary as part of their role
- Use plain language
- Be open and transparent
- Identify opportunities for improvements and learn from mistakes

Aspire Housing will comply with the Housing Ombudsman’s Complaint Handling Code and will complete an annual self-assessment against their standards which will be published online.

## 2. COMPLIMENTS, COMMENTS AND SUGGESTIONS

A compliment is a polite expression of praise, admiration or gratitude about a service, contractor or one of our colleagues. It’s great when customers let us know what we are doing well, as we can learn and share good practice across our teams.

A comment or suggestion is a remark expressing an opinion, reaction, or an idea, for consideration. We value customer feedback and have a strong commitment to involving our customers in shaping our services and improving neighbourhoods.

## 3. COMPLAINTS

A complaint is defined as *“an expression of dissatisfaction, however made, about the standard of service, actions or lack of actions by us, or our contractors affecting an individual customer or a group of customers”*.

A summary guide to the Aspire Housing complaints procedure is published on the Aspire Housing website on our ‘Frequently Asked Questions’ (FAQs) pages.

### 3.1 Making a complaint

We want to make it easy for customers to give us feedback, so we will accept feedback through all our communication channels and will be logged by our Customer Excellence Team.

We will always accommodate a customer’s needs to make a complaint, making any necessary adjustments and taking complaints from advocates as set out in section 3.3.

Complaints that are taken over the phone by the Customer Excellence Team will be acknowledged and logged immediately. For those that are received through other contact methods they will be acknowledged and logged at stage one within 5 days of receipt.

Correspondence received from MPs or councillors will be reviewed to understand whether there has been a service failure or not. Where there has been a service failure then this will be logged as a complaint and will be responded to through the formal process, with the ability to escalate when required. Otherwise, it will be recorded as an enquiry and will be responded to outside of the complaint process.

Where a complaint is received through a number of routes, for example, by the customer and a councillor or MP, then these will be logged separately for reporting purposes, one formal response will be drafted, and a copy sent to all parties.

### **3.2 Complaint Handling**

We know that sometimes things can go wrong and customers may want to make a complaint. We are committed to resolving issues as quickly as possible and use complaints as an opportunity to improve our services to customers.

Some enquiries or complaints will be related to Data Protection and, if so, will be dealt with through one of the following;

- Subject Access Request (SAR) Procedure
- Individual Rights Procedure, covering other data subject rights under The GDPR
- Data Breach Procedure

The following principles apply to make sure we treat all complaints seriously and deal with them in an appropriate way:

- The complaint process will be led by the Customer Relations Manager.
- Each service area will have a designated complaints handler, that will be trained to deal with complaints effectively and who has the authority and autonomy to act to resolve issues quickly.
- Complaints will be looked at sensitively and fairly from the customer's point of view.
- The person making a complaint will be advised who is dealing with their complaint.
- Complaints will be dealt with promptly and in strictest confidence, only disclosing information, if necessary, to properly investigate the matter.
- Customers will be kept updated on the progress of their complaint.
- We will provide a clear explanation of the outcome of our investigation including the reasons for the decision, an apology where appropriate, and what action we will take.

- A complaints panel with senior representatives from each of the customer facing teams will regularly review complaints and feedback and will ensure findings are used to help us identify areas for improvement in our services.

Where we undertake a contract on behalf of another organisation, we will adhere to their complaints policy unless this is not specified as part of the contract. If we are not responsible for dealing with an issue raised through feedback, we will aim to identify who is and refer the matter to the relevant person or organisation.

Any complaints that are received by a member of The Board or The Executive management team, including through social media, will be dealt with using this complaints handling process and will be responded to by the person who has been allocated the complaint to investigate.

Complaints will not be considered for:

- Issues which are raised more than six months after the relevant events (unless it is an on-going issue we are aware of).
- Cases where a final decision has already been made and no further appeal is possible.
- Cases where legal proceedings have started, with the Claim Form and Particulars of Claim been filed at court, and not concluded. (Where a customer has a live complaint which is followed by a disrepair claim, resolution will continue to be sought through the complaint process alongside legal advice).
- Service requests, including those that have already been reported to the Customer Excellence Team and are currently in the process of being resolved.
- Anti-Social Behaviour reports which are investigated by the Aspire Housing Locality Team and reported separately.

If we decide not to accept a complaint, a detailed explanation will be provided to the customer setting out the reasons why the matter is not suitable for the complaints process and the right to take that decision to the Ombudsman. If the Ombudsman does not agree that the exclusion has been fairly applied, they may instruct us to take on the complaint.

### **3.3 Advocacy & Support**

An advocate (also sometimes known as a designated person) is someone who has been asked by the person making the complaint to act on their behalf. This could include an MP, Councillor, a family member, friend, or another customer but not a legal representative.

We will accept complaints from advocates where authorisation has been given by the customer for us to discuss the matter with them on their behalf.

Our colleagues can also support customers to complain if there is no conflict of interest with their own role.

Correspondence received from MPs or Councillors will be logged as either complaints or enquiries, depending on whether there has been a service failure or a request for information or an update (see 3.1). Those that are logged as complaints will be dealt with using the three-stage process outlined in section 3.4.

### **3.4 Complaint Stages**

Formal complaints are investigated and responded to by our internal two-stage process. If the issue cannot be resolved internally by us, customers have the option of a third stage by referring their case to the Housing Ombudsman.

#### **Stage 1: Complaint** - *internal investigation usually by a Team or Service Manager*

We will aim to resolve reported issues as soon as possible. When an immediate solution can be found, for example, the issue can be resolved to the satisfaction of the customer within two working days and they agree that they do not require a formal letter response, then this can be closed as a 'quick fix'. The complaint will still be logged and the details of the resolution recorded, however there is no need to provide a formal written response.

When an immediate resolution is not possible because further investigation is required, or the person making the complaint is not satisfied with the initial response provided, it will be dealt with within ten working days, in line with the Housing Ombudsman Code.

If a resolution within 10 days is not possible, we will agree a response date with the person making the complaint, this should not exceed a further 10 days. If an extension beyond 20 working days is required to respond to the complaint fully, this should be agreed with the person making the complaint. If an agreement cannot be reached then the Housing Ombudsman's contact details should be shared for the complainant to receive their support.

Cases will remain open until all the issues raised have been responded to. Where a complaint covers more than one service area the complaint handler will engage with the relevant colleagues to respond to each part. As soon as a resolution has been agreed with the customer and confirmed in writing (as required) the case can be closed. Agreed actions do not need to be completed before a case can be closed, however they must be monitored to ensure they are delivered as promised, keeping the customer updated.

All complaint investigations will involve personal contact with the person making the complaint within 5 days, either by telephone, or a home visit, to understand the reasons for the complaint and what could be done to resolve it.

We will communicate with the customer using the method they have asked us to use (either telephone, email or letter) although our response to the complaint will be made by letter (which may be sent via email if the customer agrees to this).

A written response will be provided to the customer detailing the outcome and explaining how they can appeal against this decision if they are not satisfied.

If the person making the complaint does not respond within 14 days of the written response being sent, we will assume that the outcome is accepted, the complaint will be considered closed, and no further appeal will be possible. If for some reason someone was unable to respond in 14 days due to vulnerabilities or has a valid explanation then we would consider this on an individual basis.

### **Stage 2: Appeal** - *internal investigation usually by Head of Service*

If the person complaining is not satisfied with the response to their complaint, they have the right to appeal within 14 days of the date of the written response. The appeal should include the reasons why the customer is not satisfied with the response and any additional information that may be relevant to their appeal.

The appeal will be considered by an independent person not previously involved in the complaint, usually a Head of Service. The decision of the appeal will be final.

Appeals will usually be responded to within 20 working days in line with the Housing Ombudsman Code. If this is not possible, then we will agree a response date with the person who submitted the appeal, which should not exceed a further 10 days, if longer than this is required then this needs to be in agreement with all parties. If an agreement cannot be reached then the Housing Ombudsman's contact details should be shared for the complainant to receive their support.

A written response will be provided to the customer detailing the outcome of the appeal and explaining their options if they are not satisfied.

### **Stage 3: Housing Ombudsman** - *External investigation\**

If an Aspire Housing customer is not satisfied with the outcome of their appeal, they have the right to progress their complaint to the Housing Ombudsman Service, as soon as our complaints process has ended.

The Housing Ombudsman is an independent service, investigating complaints and making recommendations where it thinks that the landlord may not have acted in a reasonable or fair way.

The Ombudsman may offer their 'early resolution service' to help to resolve the dispute without the need for a formal investigation.

The Housing Ombudsman can be contacted at:

The Housing Ombudsman Service  
PO Box 152  
Liverpool  
L33 7WQ  
Telephone: 0300 111 3000  
Email: [info@housing-ombudsman.co.uk](mailto:info@housing-ombudsman.co.uk)

We will fully cooperate with The Housing Ombudsman in any investigation and will provide all records and information requested. Other than in exceptional circumstances, we will also accept any recommendations made by the Housing Ombudsman and take the appropriate actions suggested by them.

### **3.5 Mediation**

Mediation is a process where a neutral third party may help resolve a situation where there is conflict between different individuals and/or groups.

We may fund mediation if this is thought to be a practicable option for resolving the situation. If this is offered, the customer will still be able to progress and appeal against their complaint response using the standard procedure.

### **3.6 Complaint resolution**

At all stages the aim is to resolve the complaint to the customers satisfaction. Where something has gone wrong, we will acknowledge this, apologise, and set out the actions we have taken, or will take to put it right and when these will happen. These can include:

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

Any financial remedy or compensation must reflect the extent of any service failures or detriment caused to the customer. Where customers can demonstrate a financial loss as a direct result of the service failure then we will consider compensating for all or part of the loss, taking account of the specific circumstances of the case.

Where the financial loss cannot be demonstrated, or where there has been avoidable inconvenience or distress, a financial remedy may be offered in way of apology to resolve the complaint. Where the decision to offer compensation is made the value of the offer will be decided in line with the Housing Ombudsman Service guidelines.

Compensation will not be considered when:

- Legal proceedings are underway or have taken place.
- Where a personal injury claim is being managed, unless with the express consent of our insurers.

All compensation awarded will be recorded. If the customer has debts with us, then compensation may be used to offset these.

### **3.7 Unreasonable Behaviour**

Our aim is to deal with complaints in an open, fair and impartial way. If because of their actions and behaviour, or nature and frequency of their contacts with us, a customer hinders theirs, or other people's interactions with us, or delays our ability to investigate the complaint, we will consider such behaviour to be unreasonable.

Unreasonable behaviour which can be habitual and/or vexatious includes:

- Refusing to cooperate with us during the investigation.
- Repeatedly contacting several members of staff about the same complaint and making unnecessary demands on staff time.
- Submitting repeat complaints, relating to the same events.
- Continually raising new issues during the complaint investigation which should have been included in the original complaint.
- Any form of abuse towards a member of staff or third party.

For this policy, abuse, aggression or violence is defined as 'an incident in which employees feel they have been verbally abused, threatened or attacked in circumstances relating to their duties either in or out of work', including, but not limited to:

- Abusive or threatening behaviour towards one of our colleagues (including contractors) or property.
- Physical attack - whether visible injury occurs or not.
- Animal attack - when an animal is used as a threat.
- Verbal abuse - when an employee feels threatened or intimidated and the abuse is personally directed. This also includes cyber-aggression through texts, email messages or social networking sites.
- Any derogatory comments or behaviour in relation to age, disability, gender, gender identity, marriage or civil partnership, pregnancy or maternity, religion



and belief, race, sexual orientation – in some cases this can constitute a hate crime.

- Attack or damage to property or belongings of our colleagues or our group.
- Any work-related incident involving a colleague, or their family, which happens away from the workplace.

If it is felt that during the management of the complaints process the relationship between the customer and our colleague has broken down to such an extent it is felt beyond repair (for example due to unreasonable behaviour), then Aspire reserve the right to cease communication with the customer and refer them to an advocate/designated person to act on their behalf as per section 3.3.

### **EQUALITY IMPACT ASSESSMENT**

We are committed to equal opportunities and our aim is to make providing us with feedback easy and accessible to all our customers. We will treat everyone fairly and help those who need it and make arrangements so that everyone has an equal chance to tell us what they think in a way that is easy for them.

We will respect and cater for differences in age, gender, sexual orientation, gender reassignment, race, religion and belief, disability, marriage or civil partnership and pregnancy and maternity to ensure compliance with the Equality Act 2010.

#### **4. RESPONSIBILITIES OF EMPLOYEE**

All employees of Aspire have a responsibility to take customer feedback seriously, to record and resolve issues appropriately and in line with this Customer Feedback Policy, related procedures and internal training.

#### **5. RESPONSIBILITY OF ASPIRE**

Aspire Housing has the responsibility to record feedback from customers, in particular complaints, responding to them in a timely and fair manner as laid out in this policy.

We also have a responsibility to analyse feedback, provide reports and take appropriate action, learning from mistakes and improving service delivery.

##### **5.1 Positive Feedback**

We will actively record positive feedback and when compliments are received this will be forwarded to the service manager, who will then pass this on to any colleagues involved.

## **5.2 Learning from complaints & reporting**

Aspire Housing will complete an annual self-assessment against the Housing Ombudsman's Complaint Handling Code, which will be signed off by both a customer group and Board and will be made available to customers online.

The Housing Ombudsman publish an annual landlord report, detailing cases and outcomes which is available on their website: [housing-ombudsman.org.uk](http://housing-ombudsman.org.uk)

The Board will receive quarterly updates on common themes, resolution times and actions taken, plus an annual review.

Managers receive weekly reports on complaints received and resolution times in order that issues can be identified quickly, and resolution times are managed. A monthly report identifies themes, actions already taken and recommendations.

An internal complaints panel will also regularly review complaints and feedback and will ensure findings are used to help us identify areas for improvement in our services.

Complaint data will be regularly shared with the "Observing Aspire Services & Improving Standards" customer group for review, who will have a range of mechanisms available to them to address areas of poor performance or concerns.

Performance data regarding feedback and complaints, alongside service changes that have been made as a result will be included in the Annual Report, which is available to customers online.

To help us to improve our complaint handling performance, we will regularly contact a selection of customers that have made a complaint to understand satisfaction with our process and outcomes.