

Customer Feedback Policy

November 2020

Lead officer	Hina Patel
Author	Hina Patel
Version number	1.0 final
Date agreed	November 2020
Agreed by	Executive Leadership Team
Review date	November 2023
Diversity compliant	TBC
Equality Impact Assessment required	
Data Protection compliant	Yes
Health and Safety compliant	Yes

Contents

		Page
1.	What this policy is about and why we need it	1
2.	Who does this policy apply to	1
3.	Our policy is...	1
4.	How we will monitor this policy	12
5.	Procedures and other documents that link to this policy	12
6.	Links to other policies, legislation and regulations	12
7.	When this policy will be reviewed	12

1. What this policy is about and why we need it.

- 1.1 At Acis we value all customer feedback, listening to customers is integral to our principles. This policy outlines our approach to dealing with complaints, compliments and comments/suggestions; including councillor and MP enquiries. We need this policy to ensure we are all handling customer complaints in accordance with the Housing Ombudsman's Complaint Handling Code, and to our agreed Acis standards and to support us to create a positive culture of valuing and using feedback.

2. Who does this policy apply to?

- 2.1 This policy refers to all our customers including:
- Tenants
 - Shared Owners
 - Leaseholders
 - Acis HomePlus customers
 - Riverside Training learners
 - Anyone who uses or is affected by services provided by us
 - Advocates or representatives can make complaints on behalf of our customers providing we have written consent.
- 2.2 Queries from MPs or councillors are treated as 'MP and Councillor enquiries.'
- 2.3 This policy does not apply to individuals or companies where we have a commercial relationship.

3. Our policy

- 3.1 We are interested in all customer feedback including comments / suggestions which can be extremely valuable in improving our service. We welcome compliments as we also want to know when we are doing well. We value all feedback and when customers complain our policy is to:

- Listen
- Investigate
- Put things right where we need to
- Learn

When customers complain, we aim to reach a resolution as quickly as we are able focusing on solutions that are in line with our stated service / policy, meet the needs of our customer(s) and are cost-effective. We want to resolve complaints at the first point of contact whenever possible.

3.2 What is a complaint?

We define a complaint in line with the Housing Ombudsman's Complaint Handling Code as

'an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the organisation, its own staff, or those acting on its behalf, affecting an individual resident or group of residents.'

Whilst we recognise that our definition is very 'housing' orientated as required by the Housing Ombudsman, we follow these principles for all our customers and learners.

Complaints could be a consequence of:

- Failure to provide stated service
- Delays to service
- Failure to follow our own policy or procedure
- Failure to communicate in timely way
- Inappropriate behaviour
- Objection against an Acis policy position

We do not consider the following as a complaint:

- A request for service
- Reports of anti-social behaviour
- Issues over six months old that have not been previously raised unless there are exceptional circumstances
- Where legal proceedings have commenced
- Issues that are not Acis responsibility
- Issues that have already been through the Acis complaints process
- Matters that should be referred to insurers

If we decide not to accept a complaint, a detailed explanation will be provided, setting out the reasons why the matter is not suitable for the complaints process.

This does not include appeals against Acis decisions where there are formalised procedures in place.

3.3 *What is a compliment?*

An expression of satisfaction about the service, our actions or employees affecting our customer(s)

3.4 *What is a comment?*

This is when we have been given feedback on how we could do things differently or better. We include suggestions in this category.

3.5 *How we handle complaints*

We do recognise that it is not always possible to resolve complaints quickly and therefore we operate a number of stages within our process. This means customers can ask for a review of the findings of the initial complaint.

3.6 *How to make a complaint?*

We want to make it as easy as possible for customers to make a complaint and guidance is available on our website. Complaints can be made verbally or in writing. If a complaint is made verbally, Acis employees will record these on the customer's behalf.

Whether verbally or in writing, when a customer makes a complaint, it is important that we understand what the issue is and what they want us to do to put it right.

Where a complaint or a petition has been received from a group of customers, the employee to whom we have assigned the investigation will arrange a meeting with one or two of the group members who will be asked to act as contact persons for reporting back to the wider group.

If petitions are received, they will be treated in the same way as a group complaint.

3.7 Service Issues

In line with our aim to resolve complaints as quickly as possible, some feedback is dealt with as a 'service issue.' Services issues are concerns raised by a customer that can be dealt with immediately or very quickly. Examples of service issues are when we have failed to attend a repair appointment and our resolution would be to book another appointment or where we have not contacted a customer within an agreed timescale; the solution in this case would be to arrange for our Acis employee to get in touch with the customer.

All our people are encouraged to respond to reported service issues; and to ensure that they are logged on our systems, so we can audit, manage and learn from any feedback.

3.8 Acknowledging a complaint

Recognising that some complaints cannot be dealt with immediately as they require investigation, once a complaint has been logged, we will contact the customer within two working days of receipt. Telephone contact is preferable but is dependent on the customer's preference.

As well as seeking any further details of the complaint and the resolution being sought, we will confirm who is handling the complaint and any other ongoing communication arrangements.

If any health and safety issues are identified from a verbal or written complaint or during this initial contact the appropriate action will be taken. This may include actions such as escalation, reporting to a third party, inspection or remedial works.

3.9 Stage 1 complaint

Following the initial contact with the customer, we will investigate the issue raised. This may involve a desk top review, a visit or inspection of the property if applicable, commissioning a survey or speaking to other colleagues / stakeholders. The investigation should enable us to provide a response to the customer within ten working days. We aim to contact all customers by telephone to advise them of our findings prior to subsequently providing written confirmation. Our correspondence usually includes:

- Summary of the complaint
- Our investigation findings and the reason(s) why the complaint is upheld or not including the conclusion of the investigation
- Apology if we got something wrong
- Next steps if needed (and associated timescales)
- Any compensation offered and how the sum has been derived in accordance with our policy

- Any longer-term actions we might take to help prevent a similar kind of complaint from occurring again. Examples of actions might include remedial action, policy review, training
- What to do if the customer believes the matter is not closed

On occasion, it may not be possible to respond to a complaint in ten working days therefore we will contact the customer to agree a new timescale for response.

We expect to deal with most formal complaints at stage 1.

3.10 Stage 2 complaint

On occasion a customer may feel that the stage 1 investigation and response has not closed the matter. In these cases, customers can request that their complaint is escalated to stage 2, the final stage. We will consider any escalation request that is made within 10 working days of the complaint response at stage 1. If a customer wishes to escalate their complaint to stage 2, one of the following criteria needs to be met and details provided:

- The earlier investigation and associated response were factually inaccurate (details of these inaccuracies are needed)
- The response did not address the complaint
- Important relevant information was not considered at stage 1
- Acis does not complete the actions agreed at stage 1 (the timescale for these actions may go beyond the complaint closure date)

We also require details of what the customer would like us to do to close the matter. These details can be provided either in writing or verbally (where we would record them). If the escalation is not accepted, contact will be made with the customer to advise them of this and the reasons for this decision.

The stage 2 complaint will then be assigned to a senior employee, usually a member of the Senior Management Team or the Executive Leadership Team who has not previously been involved with the complaint. We will contact the customer within two working days of receipt of the complaint ideally by telephone in order to confirm our understanding of the issues raised and the outcome being sought by the customer. During this contact, the customer will be advised that their complaint will be reviewed within the next five working days.

The member of the Senior Management Team or Executive Leadership Team will then review the process and the investigation carried out at stage 1. They will consider if the earlier actions were taken in accordance with our values / principles, policies & procedures and were reasonable and proportionate. They may ask a subject matter expert who has not previously been involved in the complaint to support them in this review.

The stage 2 manager will then send a written response outlining the result of their review to the customer. This should be within 20 days of the request to escalate the complaint at stage 2. If this is not possible; a date should be given as to when this can be expected. This should not exceed a further 10 days without good reason.

After exhausting Acis' complaint process, resident complainants can also approach the Housing Ombudsman to support them to either work with Acis to resolve the complaint or carry out an investigation into our handling and response to the complaint.

We will provide details of the Housing Ombudsman Service as part of our response at Stage 2.

3.13 Communication with complainants

We aim to communicate with complainants promptly recognising that timeliness is an important part of effective complaints handling and matters to our customers. All communication, details of the complaints investigation and any findings or evidence will be recorded and managed in our CRM system.

The preferred method of initial contact when Acis has received a complaint is by telephone (or to arrange an in person meeting) as this method supports gaining details of the complaint and what action the customer is seeking to resolve the issue. The customer can also confirm at this point if they have a preferred method of contact.

As above, we will consider escalations to the next stage of the complaint process if these are made within 10 working days of the written response. Escalations outside this timeframe will only be considered in exceptional circumstances such as family bereavement or illness.

In circumstances where we cannot contact the customer after the initial complaint is made to either acknowledge the complaint, source further information or update on the progress of a complaint; we will still complete the investigation with the information we have available. If there is no further successful contact within 10 days of receipt of the complaint or the timeframe agreed with the customer, a written response will be sent with the investigation findings closing the complaint.

We will not consider complaints that are made six months after the initial incident or event.

3.14 Compensation and goodwill gestures

Sometimes compensation payments or goodwill gestures may be made as part of the resolution to a service issue or complaint. All our employees have the discretion to offer a £10 voucher to apologise for any mistakes such as failing to attend an appointment. There are occasions when we fail to provide the level of service expected, customers experience severe inconvenience or financial loss. When this happens, compensation may be considered and offered to resolve the complaint. We will consider each case for compensation on its own merits and in line with the guidance provided below. We will also comply with any statutory obligation for compensation.

It should be noted that it is a customer responsibility to insure their own contents and any compensation is not an alternative to lack of contents insurance.

The employee assigned the complaint can offer compensation to a customer in line with the framework within this policy. Prior to authorising any payment, the customer must have accepted the compensation offer and returned the form to us confirming the payment as full and final settlement of the complaint. Compensation offered cannot exceed the authorisation amounts as outlined in our financial regulations.

For any customer who is in rent arrears or owes any other debt to Acis such as costs for rechargeable repairs or court costs, the compensation will be applied to their account rather than paid to the customer. Where we are responsible for damaging customer fixtures and fittings, we may replace the item rather than offer compensation.

The following table provides guidance on our compensation payments offered:

Missed appointment	Where we do not attend a pre-booked appointment or cancel with less than 24 hours notice. If works are sub-contracted by Acis, payment to be made by the contractor	£10 voucher
Right to Repair	For a prescribed list of small urgent repairs (costing less than £250) which are likely to jeopardise the health and safety of the resident(s). To qualify, if we fail to complete the repair in our usual timescales we will then provide a further date by which we will complete the repair. If we do not carry out the repair by the second date, compensation is payable.	£10 plus £2 per day for every day the repair remains outstanding up to a maximum of £50 for each individual repair.
Loss of rooms / facilities	Subject to exceptional circumstances and assessment of any unreasonable loss of the usage of part(s) of their home as a direct result of the actions or inactions of Acis or any of its contractors, compensation may be payable.	Amount payable based on a % of weekly net rent for the period the room(s) are unusable. For example if two rooms from a six-room property are unusable for two days: $2/6 \times 100 = 33\%$ unusable Weekly rent x no of weeks rent charged in year / 365 days = daily rent Daily rent x 33% = amount payable per day for loss of two rooms Compensation is not payable for works carried out under a planned maintenance programme or renewals carried out as a repair
Extra fuel costs	For the extra fuel costs of temporary heaters where we do not repair or replace heating within our prescribed policy timescales or if use of a dehumidifier is required	£2.50 per day for each day over our agreed timescales for repairing or replacing central heating which is only payable from 1 st October to 31 st March or for the use of a dehumidifier

General service delivery failure	Where a customer has suffered distress, inconvenience, a delay to service due to our failure to deliver services to our policy timescales	<ul style="list-style-type: none"> • Impact low - £20 for minimal impact on customer, compensation paid as acknowledgement that service has fallen short • Medium impact - £40 for when a customer has suffered a level of inconvenience and/or distress as a result of service failure that exceeds what a reasonably tolerant person could be expected to accept. • High impact - £100 for when a customer has suffered inconvenience and/or distress as a result of a serious or repeat service failure. Can be increased upto a maximum of £150 based on duration of issue and seriousness of impact
Damage to personal possessions	Where customer possessions are damaged, the cost of repair or replacement should be met by the resident's insurance. Where damage is made worse due to delays in Acis carrying out repairs or Acis error, customers are expected to provide evidence of purchase.	Amount is determined on a case by case basis. If reimbursement agreed, amount is based on value of goods at the time of their loss or damage rather than replacement value We will usually look to replace items rather than pay a monetary amount

Any other statutory obligation for compensation such as home loss payments or right to payments for improvements are managed outside of this policy.

Goodwill payments or gestures may made if appropriate.

We will not pay compensation when:

- Any loss or damage cannot be evidenced as being the fault of Acis

- Any loss or damage is the fault of the customer including a delay in reporting the issue or allowing access
- Where we or our employees/contractors cannot gain access despite reasonable efforts
- Where the service or facility is unavailable due to circumstances outside our control or unforeseeable events such as vandalism or severe weather conditions and we have acted reasonably to promptly make safe and/or repair after the initial report
- Where evidence of damage to goods/items is not available
- Where we have acted reasonably and complied with our legal and regulatory duties
- Where the incident should be claimed on the customer's insurance
- Any financial loss cannot be adequately evidenced

For any compensation award that is outside the guidance provided, authorisation must be sought from the Customer Experience Manager or the Head of Customer Operations (who holds the compensation budget) prior to any offer.

3.15 *Unreasonable behaviour*

We recognise that customers may be in distress or stressed when making a complaint. Sometimes customers who are angry, demanding or persistent may demonstrate unreasonable behaviour to our employees.

We expect our employees to be treated courteously and with respect. Violence, aggressive behaviour, swearing and derogatory remarks are unacceptable.

Sometimes customers may make what we consider to be unreasonable demands for service such as the volume of information or contact requested, the nature and scale of contact. Examples include:

- Demanding responses within unreasonable timescales
- Insisting on speaking to certain employees
- Continual inbound contact in person, by phone, email or social media
- Repeatedly changing the substance / scope of the complaint. In these circumstances we will be clear as to what we will investigate and respond to

Any incidents of this nature will be logged on our CRM system.

If we experience examples of the behaviour outlined above, we may take one of the following options:

- Only accept contact on certain days of the week and / or arrange for one employee to deal with all contact
- Require the customer to make an appointment to see a named employee before visiting
- Ask that all contact is in writing
- Refuse to accept complaints that have already been investigated
- Any other action that we consider proportionate.

We will always explain what action is being taken, why and when we will review this.

3.16 Compliments

Acis welcomes compliments and these are important to help share our positive practice and when we have gone 'above and beyond.' Compliments are recorded on the Acis CRM system and shared with an individual's or team's line manager.

3.17 Comments and suggestions

Acis always wants to hear any customer or stakeholder comments or suggestions. These are logged on the Acis CRM system and a response will be provided by the area for whom the comment or suggestion was made.

3.18 Expressions of Dissatisfaction

When a customer wants to let their feelings be known about poor service but they do not want a complaint raised or require any individual feedback, we categorise this as an 'expression of dissatisfaction.' These are logged to ensure that we are aware of the issues that are causing frustration with our services to put things right if there is a need. Any feedback of this nature from our customer surveys are also handled as expressions of dissatisfaction.

3.19 MP and Councillor enquiries

Sometimes Acis receives MP or local councillor enquiries. These will be logged by our Legal and Governance team on the Acis CRM system and assigned to the relevant team member to send a written response within 10 working days of receiving the query.

3.20 Complaints made directly to the Executive Leadership Team

Any complaints made directly to the Executive Leadership Team will be acknowledged by the recipient and referred to the Customer Contact Centre who will log the complaint on the CRM system, and assign to the team responsible for the issue as outlined by the Executive team.

3.21 Learning

We are committed to learning from feedback to help ensure that any mistakes we make are not repeated. We will regularly review learning outcomes and any identified trends, so that we can improve the service we offer. In some cases, a commitment to change such as reviewing a policy, a procedure or providing training will form part of the resolution of a complaint, so it is vitally important that learning actions are both identified and actioned.

This policy makes a commitment to follow up and assess if learning has resulted in actions which have addressed the cause of complaint to prevent a reoccurrence. We will also publicise actions resulting from complaints.

4. How we will monitor this policy

4.1 Complaints handling performance and compliments received are regularly monitored. Weekly 'snapshot' reports are sent to all operational managers and on a monthly basis, complaints handling measures are reported to our Senior Management Team and to our Executive Leadership Team. A quarterly report on customer feedback and learning is also reviewed by the Operations Committee. Regular updates are also provided on the Acis website as well as contained within the Acis annual report to customers.

5. Procedures and other documents that link into this policy

5.1 There is an associated complaint handling procedure and guide to this policy. Customer feedback processes are also in place.

6. Links to other policies, legislation and/or regulations

6.1 Policies, legislation and/or regulation that links to this Policy are listed below:

- Reasonable Adjustments Policy
- Housing Act 1996
- Tenant involvement and empowerment consumer standard

7. When this policy will be reviewed

7.1 This policy will be reviewed in three years or earlier if legislative or regulatory changes require addition or amendment.