



## **POLICY DOCUMENT**

**Group Member:** Progress Housing Group

**Service Area:** Housing Operations – Continuous Improvement

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## 1. Introduction

- 1.1 Progress Housing Group (the Group) aims to provide customers/residents with the best possible service at all times and actively encourages feedback to identify any areas of improvement
- 1.2 The Group will ensure that we deal with all feedback consistently across the Group and in a way that reflects our Equality, Diversity and Inclusion Policy and Strategy. An effective complaints service allows the Group to rectify any service failures through lessons learnt. We will use feedback for transparent accountability and continuous improvement of service delivery and policy development.
- 1.3 We recognise that occasionally the level of service provided may result in inconvenience or loss to our customers/residents. This Policy defines where the Group will make an apology and consider making a discretionary payment of compensation (i.e. without accepting any liability for any loss) as a goodwill gesture.
- 1.4 Any payment made is not a substitute for statutory compensation and any situation where the Group has a statutory duty will be dealt with specifically under other policies.
- 1.5 This Policy has been created in line with the Housing Ombudsman's Complaint Handling Code. You can access the code at: <https://www.housing-ombudsman.org.uk/>

## 2. Scope of the Policy

- 2.1 This Policy applies to all Group customers/residents, including:
  - People living in our properties
  - People receiving a service from us such as Progress Lifeline and Progress Futures
  - Leaseholders and Commercial tenants
  - Advocates (authorised to act on behalf of a tenant or Group of tenants)
  - Private residents neighbouring our properties
  - Applicants for our properties or a service provided by the Group
  - Key Unlocking Futures Limited customers
- 2.2 This Policy does not apply to:
  - Concert Living customers/residents

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### **Not accepted under Stage One or Stage Two of this policy**

- 2.3 The following matters will not follow this Policy:
- 2.3.1 Matters for which the Group has a more specific policy in place, including complaints regarding anti-social behaviour or neighbour nuisance
  - 2.3.2 When a customer makes contact to inform us that something requires our attention, this is a request for service and is not (automatically) a complaint. However, it may progress to a complaint if we discover that the problem had arisen due to inaction or poor service on our part.
  - 2.3.3 Appeals concerning an unsuccessful housing application under the Choice Based Lettings schemes of which we are a partner member. The partnership policy will apply should an applicant challenge the Choice Based Lettings review/appeal decision.
  - 2.3.4 If the complaint relates to any formal legal proceedings that have commenced against the Group or issued by the Group – this is defined as details of the claim, such as the Claim Form and Particulars of Claim, having been filed at court. However, should a complaint include any matters that will not be addressed as part of the legal proceedings, a course of action will be agreed upon between the Legal Director, the Customer Feedback Co-ordinator and any other relevant colleagues as to the approach to take and communicated to the customer.
  - 2.3.5 Parties whose services are not commissioned or endorsed by the Group
  - 2.3.6 Historical matters that occurred over six months before the customer raised the complaint/dissatisfaction to the Group for the first time or when a request to progress a complaint to Stage 2 has not been made within six months of a Stage One response having been provided.
  - 2.3.7 Matters that have already been considered under this Policy and that have completed our complaints and redress process.
- 2.4 If we decide not to accept a complaint or progress a complaint to Stage Two of our process, a detailed explanation will be provided to the customer setting out the reasons why the matter is not suitable for our complaints process and include their right to take that decision to the Ombudsman.

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### 3. Responsibility

- 3.1 It is the responsibility of the Group's Executive Board to approve this Policy.
- 3.2 It is the responsibility of the Head of Housing Support Services to review and implement the Policy. The Policy is monitored through regular board reporting and business intelligence reporting.
- 3.3 Service Directors and our Senior Leadership Team are responsible for promoting the value of feedback and considering recognition incentives.
- 3.4 It is the responsibility of our Heads of Service/Directors to investigate and respond to Stage Two complaints as Senior Managers, ensuring that their review of the case is independent and thorough. The Heads of Service are responsible for monitoring their department's performance as a key performance indicator for the Group and promoting the importance of feedback.
- 3.5 Case Managers (generally the Manager of the relevant department, but responsibility can be delegated where agreed in advance by the Customer Feedback Co-ordinator) are responsible for ensuring that the Policy is followed and are accountable for Stage One complaints.
- 3.6 With support from the Customer Feedback Team, the Customer Feedback Co-ordinator is responsible for coordinating the feedback process. The team will ensure that all written guidance is kept up to date, provide advice and training to Case Managers and report upon performance. Lessons learned from complaints will be communicated to the Group (and customers/residents where appropriate) and all opportunities for continuous improvement our services identified.
- 3.7 The Progress Connect Team is responsible for logging new feedback and resolving any complaints at the first point of contact where possible. The team is responsible for ensuring that they log all communication accurately and follow this Policy, taking responsibility for updating any guidance, scripting and work instructions as needed.
- 3.8 All colleagues of Progress Housing Group are responsible for following this Policy and aiming to resolve issues for customers/residents before they become a complaint.

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## 4. Policy

### 4.1 Aims & Objectives

- 4.1.1 The Group will offer a range of ways for our customers/residents to provide feedback to us. We will set out clear service standards for responding to complaints and provide guidance on any next steps of what to do should they remain dissatisfied
- 4.1.2 We will ensure that the complaints process is clear, simple and accessible and we investigate and respond to complaints promptly and in line with our Complaints, Feedback and Redress Procedure.
- 4.1.3 We will take a transparent and accountable approach to receive feedback and consider using customer insight to improve our services.
- 4.1.4 We will update our customers/residents on our performance via newsletters, website, and customer scrutiny meetings highlighting how we use our feedback to improve our services. We will also include this in our Tenants Annual Report.

### 4.2 Definitions of Feedback

- 4.2.1 **Complaint (expression of dissatisfaction, as defined in the Housing Ombudsman's Complaint Handling Code):** 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. The word complaint does not have to be used for it to be treated as such. A complaint that is submitted via a third party or representative must still be handled in line with the landlord's complaints policy.
- 4.2.2 **Resolved at point of contact expression of dissatisfaction (early resolution):** When there has been an expression of dissatisfaction received and action can be agreed with the person raising the dissatisfaction immediately and to their satisfaction, without progressing through the complaints process.
- 4.2.3 **Compliment (positive feedback):** An expression of satisfaction with the standard of service received from the Group, one of our employees or contractors.

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4.2.4 **Anonymous feedback:** Feedback provided to us where the identity of the person is not disclosed. The person's anonymity does not prevent us from recording the feedback provided or carrying out any investigations that may be required.

4.2.5 **Comments:** This is where a customer provides general comments or suggestions about the service we provide. When comments are not an expression of dissatisfaction or a compliment, but there may be learning to take from it, we will record these on our systems and the relevant departments will be made aware.

### 4.3 Expressions of Dissatisfaction (EOD)

4.3.1 EODs can be provided to the Group verbally, in writing, by email, by telephone, via webchat, via our website or via social media. All EODs will be recorded and managed following the Complaints, Feedback and Redress Procedure.

4.3.2 Residents have the opportunity to have a representative deal with their complaint on their behalf, and to be represented or accompanied at any meeting with the landlord where this is reasonable.

4.3.3 Should a group of customers/residents wish to raise the same complaint through a petition or group communication, one member of the customer group should be selected as the designated lead contact. It will then be the responsibility of the lead contact to provide the other members of the Group with any updates or responses the Group provides.

4.3.4 The Group's EOD process will involve two stages.

4.3.5 Should a dissatisfaction be raised with us, we will aim to resolve the matter in the initial contact where possible. We will confirm with the customer that the matter has been resolved to their satisfaction and record this feedback as EODs, resolved at the point of contact.

4.3.6 Customers/residents can seek early resolution, advice and support from the Housing Ombudsman Service at any time to help resolve an issue or complaint with their landlord. They can also formally refer an unresolved complaint to the Housing Ombudsman that has already been through the Group's process.

4.3.7 Any complaints received via social media will follow our Complaints, Feedback and Redress procedure. There may be

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instances where confirmed identification is sought before an EOD can be recorded.

- 4.3.8 All complaints information will be handled sensitively and in accordance with relevant data protection requirements. Where a customer posts a specific complaint publically on one of the Group's official social media pages, we will direct the complainant to an alternative contact method such as live chat or telephone to ensure privacy and confidentiality.

If a customer posts personal or sensitive details on a public post, for example, an address, contact number, or names another individual, this will be removed to protect the individual's privacy and confidentiality. Any information the customer provides through social media will only be used for the purpose it was provided for. More details about this can be found in our Social Media Policy and our published community rules.

### **Stage One**

- 4.3.9 We will record and acknowledge receipt of a complaint within 5 working days and aim to respond in writing to the customer within 10 working days from acknowledgement. We will aim to respond as quickly as possible.
- 4.3.10 It may be that some complaints remain open for a longer period while we investigate, however, we will contact the customer within the original 10 working day timescale to agree a new timescale for response. If an agreement cannot be made with the customer, then they will be advised that they have the right to refer to the Housing Ombudsman (template letter provided).
- 4.3.11 We will aim to resolve a complaint to the customer's satisfaction, however, we will advise the customer of the next stage of our complaints process if we cannot do this.

### **Stage Two**

- 4.3.12 Should a customer remain dissatisfied after Stage One has been completed, they can request that their complaint progress to the next stage of the Group's process, a Senior Manager Review (Head of Service or Senior Manager). The Senior Manager carrying out the review will not have had any involvement in the outcome of the Stage One process and will carry out an independent investigation.



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- 4.3.13 A request to progress an EOD to Stage Two must be made within 6 months from the date that the Stage One response was provided/dated.
- 4.3.14 Should the EOD progress to Stage Two, we will acknowledge the case has been escalated to a Senior Manager for review within 5 working days of receipt.
- 4.3.15 We will aim to provide a full written response within 20 working days from the date of acknowledgement. However, there may be instances when investigations take longer than expected and an extension is required. Should this be the case, the customer will be updated on this within the 20 working day timescale and advised of a new date to expect a complete response.

### **Housing Ombudsman**

- 4.3.16 A resident can contact the Housing Ombudsman at any time throughout the Group's complaints process and can refer their complaint to them should they remain dissatisfied once the complaints process has been completed.
- 4.3.17 Should the Group receive any communications from an MP/Councillor or the Housing Ombudsman concerning a current or completed EOD, we will respond to them directly within 10 working days or by the specified timescales given to us by the MP/Councillor or by the Housing Ombudsman, whichever is soonest.
- 4.3.18 The nature of the complaint will determine which Ombudsman the complainant should contact.

The Housing Ombudsman Service is contactable via:

Housing Ombudsman Service  
 PO Box 152  
 Liverpool  
 L33 7WQ  
 Tel: 0300 111 3000 (Monday to Friday 9:15 to 17:00).  
 Email: [info@housing-ombudsman.org.uk](mailto:info@housing-ombudsman.org.uk)  
 Website: [www.housing-ombudsman.org.uk](http://www.housing-ombudsman.org.uk)

The Local Government and Social Care Ombudsman (LGSCO) is contactable via:

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The Local Government and Social Care Ombudsman  
PO Box 4771  
Coventry  
CV4 0EH

Tel: 0300 061 0614

Website: [www.lgo.org.uk](http://www.lgo.org.uk), <http://www.lgo.org.uk/make-a-complaint>

Information on the First Tier Tribunal (Property Chamber) and the contact details for the nearest service can be found at: <https://www.gov.uk/courts-tribunals/first-tier-tribunal-property-chamber>

#### 4.4 Where a complaint is upheld, the Group will:

- 4.4.1 Apologise where appropriate.
- 4.4.2 Take practical action to put things right.
- 4.4.3 Consider compensation/goodwill/reimbursement in some instances. See Appendix 1.
- 4.4.4 Review where we can make service improvements to prevent further complaints of a similar nature.

#### 4.5 Where a complaint is not upheld, the Group will:

- 4.5.1 Ensure that the response contains a statement of regret for any inconvenience or distress experienced where appropriate.
- 4.5.2 Be clear in providing reasons why the complaint/dissatisfaction was not upheld.
- 4.5.3 Review EODs that were not upheld and look at what actions can be taken/implemented from a lessons learned point of view.

#### 4.6 Support and mediation

- 4.6.1 It is essential to consider that complainants who are behaving inappropriately or unacceptably may have support needs and we should discuss with them a referral to an appropriate agency
- 4.6.2 Mediation may help deal with complaints and we should consider the possibility of its use when appropriate

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4.6.3 Where appropriate, it is recommended that customers/residents with identified support needs have an Advocate to assist them through the complaints process.

#### 4.7 **MP/Councillor Communication**

4.7.1 Where there is no report of dissatisfaction in MP/Councillor communication, we will record and acknowledge receipt of the enquiry within 5 working days and aim to respond with them directly within 10 working days from acknowledgement. We will aim to provide a response as quickly as possible.

#### 4.8 **Unacceptable Behaviour**

4.8.1 In exceptional cases, we may decide that a person or Group of people makes vexatious or habitual complaints. Colleagues will refer to the Unacceptable Behaviour Procedure for guidance on proceeding with any dissatisfaction that falls under this category. We will consider this procedure as a last resort and after all reasonable measures have been taken to resolve the complaint, considering the customer's circumstances.

#### 4.9 **Reasonable adjustments**

4.9.1 The Group will make reasonable adjustments where required, dependent on the individual needs of the customer. This will be with the customer's agreement and may include, for example:

- Allowing more time than we would usually for someone to provide information that we need.
- Provision of information in appropriate alternative formats (eg large print, Braille, coloured paper etc).
- Use of email or telephone in preference to hard copy letters.
- Communication through a representative or intermediary

#### 4.10 **Compensation, goodwill, and reimbursement payments**

4.10.1 The Group will consider suitable redress under the following circumstances and at our discretion (see Appendix 1 for further guidance):

- Loss of amenity for which the Group is responsible for providing.

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- Where the Group has accepted that the level of service provided has not met required standards.
- The repair or provision of a shared facility between the Group's tenants, leaseholders, or other occupiers/service users.
- Where it has been proven that our colleagues or contractors have caused damage to property/belongings.

#### 4.11 Compliments (positive feedback)

4.11.1 Compliments can be given verbally, in writing, email, telephone, via webchat, social media, or via the website. All compliments will be recorded.

4.11.2 Compliments or positive feedback will be passed on to the relevant employee(s) via their line manager.

If the line manager feels that additional recognition should be provided for the compliment received, they may escalate it to senior leaders to consider appropriate reward and recognition.

## 5. Implementation

### 5.1 Training

5.1.1 All employees will receive training on managing feedback as and when appropriate in addition to general refresher training.

5.1.2 The Group's Customer Feedback Co-ordinator will provide ongoing guidance, support and additional training.

### 5.2 Monitoring and reporting

5.2.1 The Head of Operations (Housing Support Services) will ensure the monitoring and coordination of all complaints and feedback covered in this Policy.

5.2.2 Analysis and reporting will be undertaken each quarter and presented to the relevant board (Executive Board unless reports to other board are requested), including lessons learned.

5.2.3 Our customer groups will review complaints and feedback to help identify any lessons learned or possible service improvements.

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- 5.2.4 Customers/residents will be provided with general information about complaints and lessons learnt via the website, social media, tenant newsletters, and customer forums.
- 5.2.5 The Group will report on wider learning and improvements from complaints to their residents, managers, and employees. Feedback shall be regularly provided to relevant scrutiny panels, committees, and boards and be discussed alongside scrutiny of the Ombudsman's annual landlord performance report, should a report be produced by them.
- 5.2.6 The Group will provide an annual report to our tenants and board on feedback received and the Group's learning from this.
- 5.2.7 The Group will complete and publish a self-assessment against the Ombudsman's Complaint Handling Code annually and following a significant restructure or change in procedures.

### 5.3 Policy and procedure references

- Complaints, Feedback & Redress Procedure
- ASB Policy/Procedure
- Allocations Policy
- Group Equality, Diversity, and Inclusion Policy
- Group Code of Conduct
- Housing Ombudsman Complaints Handling Code
- Group Unacceptable Behaviour Procedure
- Group GDPR Data Protection Policy
- Insight Strategy

## 6. Consultation

- 6.1 Consultation for this Policy has been taken with involved customers, internal colleagues, the Senior Leadership Team, and The Housing Ombudsman.

## 7. Review

- 7.1 We will review this Policy at least every three years or when there is a change to legislation or the relevant regulatory requirements. It

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will also be reviewed where there is a significant change to how we manage our feedback process.

## 8. Equality impact assessment

8.1 An Equality Impact Assessment was carried out in December 2020 and is found to have a neutral impact on the 9 protected characteristics. The Group does not believe that this policy has an adverse impact on any protected characteristic, however we welcome feedback on the procedures and the way it operates. We are interested to know any possible or actual adverse impact that this policy may have on groups in response of gender, marital status, race, disability, sexual orientation, religion or believer, age or any other characteristic.

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## Appendix 1 Redress Guidance

Where customers/residents wish to claim compensation or reimbursement, they should do so within 28 days of the incident(s). In some extenuating circumstances, we may consider redress outside of this timescale. However, we will not normally consider a compensation claim made after six months of the incident(s).

Should the offer be accepted, the customer must confirm their acceptance within 28 days from the date of the offer. Any acceptance made after this time will be paid at the discretion of the Manager.

Our Group policy for compensation will not include service failures which are:

1. Relating to insurance claims such as personal injury/illness.
2. Relating to the right to repair
3. Subject to a tribunal or legal proceedings (including disrepair cases) or orders made by the Housing Ombudsman service or courts.
4. Relating to the right to reimbursement for improvements made to properties.
5. Relating to issues already compensated through Match Funding payments.
6. Relating to issues already compensated through home loss/disturbance, i.e., decant payments.
7. Any loss or damage as a result of the actions of a customer, including:
  - Failure to report repairs promptly and/or failure to allow access to undertake works/inspections or keep appointments.
  - The loss or damage arises from an alteration or repair which the customer has arranged or carried out themselves.
8. Loss or damage due to the result of acts of negligence by a third party, including the loss or damage is due to acts of negligence by a third party, for example, a visitor or contractor who is not acting on behalf (or instruction) of Progress Housing Group.
9. The loss or damage results from the routine failure of a building's component, fixture, or fittings where Progress Housing Group has not been negligent.
10. Service failure results from extreme or unforeseen conditions (such as weather conditions or a pandemic) where Progress Housing Group has taken all reasonable steps to restore services or facilities under the prevailing conditions.

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### Types of payment offers

**Compensation** – When there has been service failure, and the customer is offered payment, for example, loss of facilities or inconvenience. If a customer has arrears on their rent/service charge account, the amount offered will be credited to their account to help clear any arrears. Should the amount cover more than the arrears, we will pay the customer the surplus amount by either cheque or BACS payment upon receipt of the completed acceptance form.

**Re-imbusement** – When there has been a failure in service and the Group has offered to make payment for costs that the customer has incurred. Receipts or evidence will be requested, along with the completed acceptance form, before we pay reimbursement by cheque or BACS payment.

Level of Impact	Inconvenience Caused	Amount Payable	Authorisation Level
<b>Low</b>	Service user is caused mild inconvenience as a direct result of the Group actions or failure to act	Up to £100 by cheque; BACS; flowers; or services to the equivalent e.g. rent-free accommodation to express our regret/apology.	Service Manager
<b>Medium</b>	Service failure on more than one occasion in succession and/or failure to remedy the problem within a reasonable timescale. Can include situations where Supported Living Schemes decide against a project but the potential customer has incurred costs.	£101 - £500	Head of Department
<b>High</b>	Serious or prolonged poor service or situation where the actions of the Group cause severe stress, disruption, inconvenience, loss of income or incur costs to the customer.	Above £500	Relevant Director; Director Legal Services; or Chief Executive.