

# Complaints & Compliments Policy Statement

## 1.0 Purpose

We realise that things can sometimes go wrong and people may not be happy with the service they have received. At Impact we are committed to providing excellent service to all our customers. We value diversity and do everything we can to make our services available to as many people as possible. So we can improve and get things right, we welcome complaints and compliments from our customers.

Complaints and compliments are valuable as they:

- give customers the opportunity to provide feedback on services
- give us the opportunity to put things right where mistakes have been made and reward and repeat exceptional performance
- allow us to improve our services and make sure mistakes are not repeated
- enable us to tailor services to customer needs

## 2.0 Impact Housing's commitment

Complaints can be made:

- in person at any Impact Hub, or to any of our employees
  - by telephone
  - by e-mail
  - via Impact's web site
  - by letter
  - by someone acting on behalf of a customer
  - with the assistance of other organisations including:
    - Citizens Advice
    - Service user groups such as tenants associations
    - Voluntary and charitable organisations
- With the use of facilities and information provided for people including:  
disabled people anyone with reading difficulties people whose first language is not English

## 3.0 Coronavirus

Please note that we will record any expressions of dissatisfaction arising from any reduction in Impact's advertised service levels and timescales that have occurred as a result of the Coronavirus outbreak, however, we will not record these as formal complaints and will use the customer insight to make changes to the interim service arrangements.

This interim change to the Complaints Policy has been made to ensure we comply with Government guidelines on social distancing and focus resources on the provision of priority/emergency services.

## 4.0 Linked Documents

1. Process flowchart
2. Guidance

**Name: Anne Rogers**

**Date Reviewed:**

**October 2019**

**Job Title: Head of Customer Experience**

**Next Review Due:**

**October 2022**

## 1. Process for Complaints and Compliments at Impact

### 1.0 Introduction

Impact has developed its Complaints & Compliments Policy based on guidance released by the Housing Ombudsman.

This policy sets out a framework for both customers and staff to ensure that Impact provides effective and fair management of its complaints processes and procedures.

This policy guidance should be followed by all relevant employees.

### 2.0 Overview of process

A complaint is an expression of dissatisfaction, where someone is unhappy about the service, actions or lack of action by Impact Housing Association or a person or body acting on its behalf.

The policy **covers** complaints relating to the following:

- ✓ we have failed to provide a service
- ✓ the standards of the service were not acceptable
- ✓ we provided the service in an unfair or discriminatory manner.

The policy **does not** cover complaints:

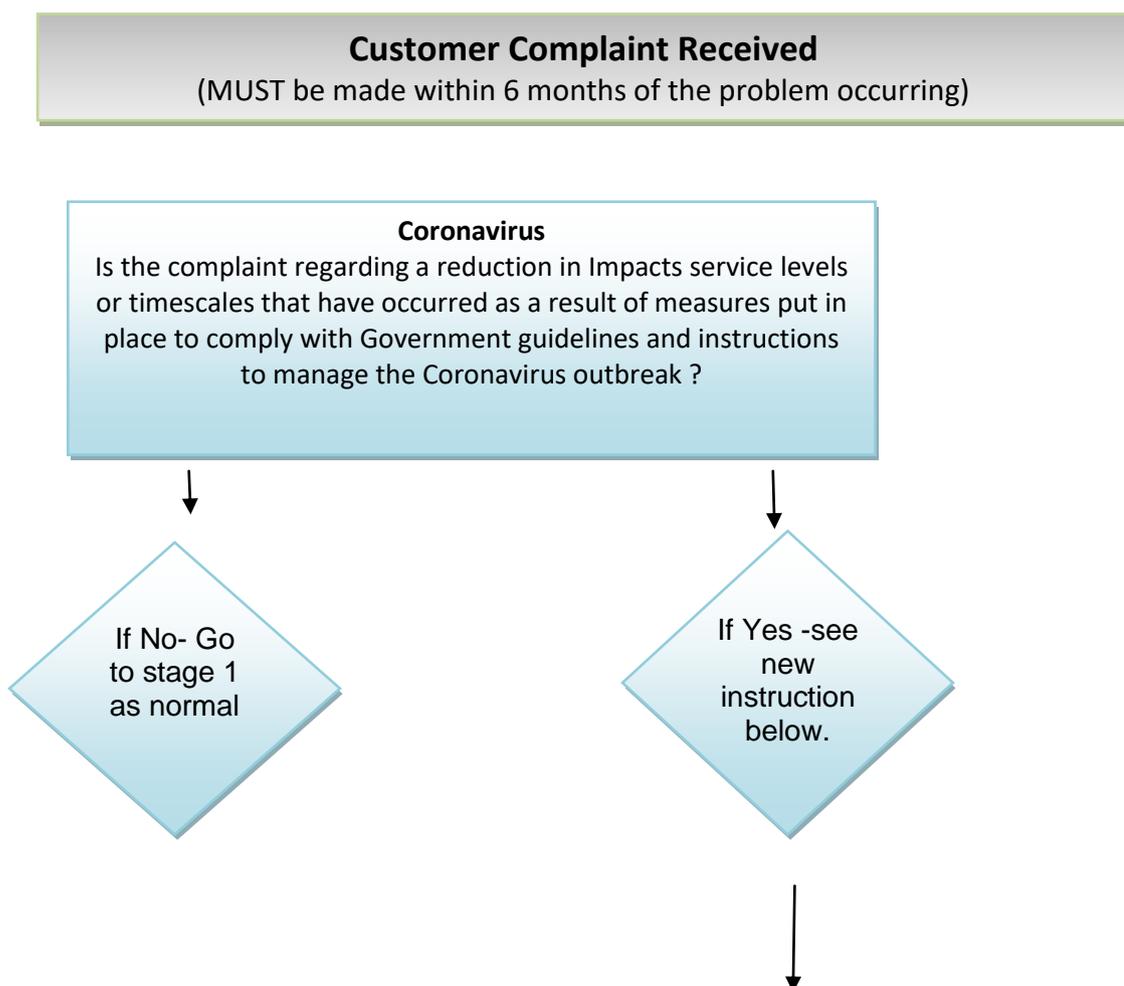
- ✗ in areas where other statutory procedures, rights of appeal or legal remedies already exist
- ✗ from Councillors unless they are acting on behalf of a member of the public or outside organisation
- ✗ about employment matters from members of staff
- ✗ about Board members - complaints of this nature will be dealt with by the relevant code of conduct and governance procedures of Impact Housing
- ✗ about financial impropriety – these will be referred to the Finance Director or the Managing Director as appropriate
- ✗ that refer to matters over six months old unless the complainant has good reasons why they didn't come forward sooner
- ✗ about other tenants - these will be addressed using Impact's Anti-Social Behaviour procedures

- \* In some cases, Impact may need to amend policies or procedures as a result of a complaint, and customers will be advised if this is the case. [See below for temporary amendment to the policy following the outbreak of Coronavirus.](#)

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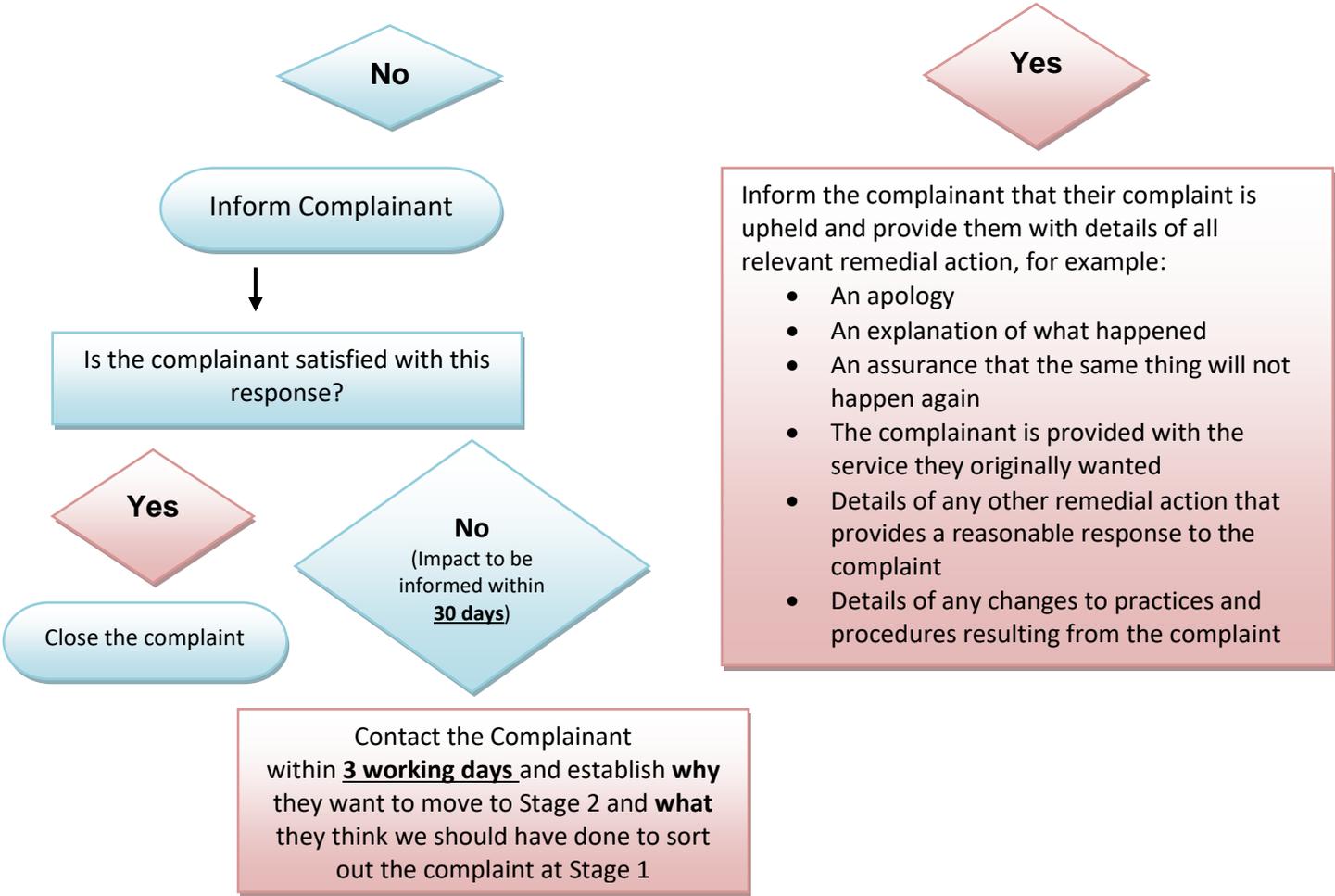
### 3.0 Flow chart of the process

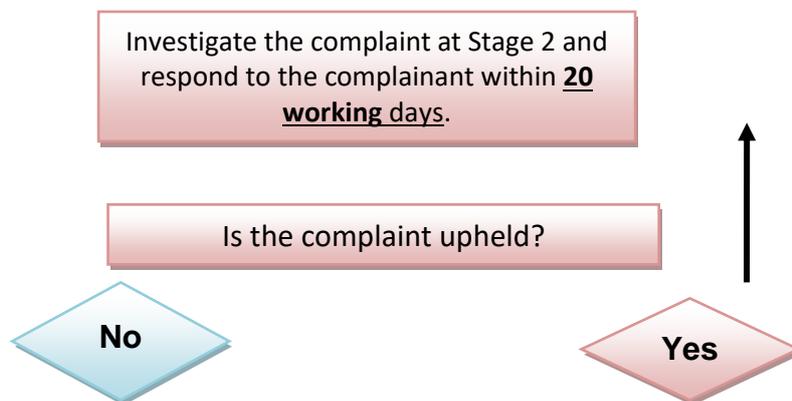


- Apologise to the customer for any dissatisfaction they are experiencing, but state that we are not able to accept a complaint for any reduction in service levels or timescales as a result of the Coronavirus outbreak.
- Be clear that the reduction in service is a consequence of measures implemented to ensure that Impact complies with Government guidelines and instructions and the need to ensure that we prioritise both customer and staff safety during this difficult period.
- Apologise for any inconvenience and assure the customer that we will record any incidents of dissatisfaction and endeavour to rectify the issue.
- Log the feedback on the Covid 19 tab on the complaints spreadsheet [T:\Complaints & Compliments](#)

**STAGE 1**  
Impact will look into and try to resolve the problem within **5 working days**

- After investigation, has Impact:
- FAILED TO PROVIDE A SERVICE?
  - PROVIDED A STANDARD OF SERVICE THAT IS NOT ACCEPTABLE?
  - PROVIDED A SERVICE IN AN UNFAIR OR DISCRIMINATORY MANNER?





This concludes the 2 Stages of Impact’s Complaints Procedure, however the complainant may wish to take their complaint to a **DESIGNATED PERSON** (an MP, Local Councillor or Tenant Panel) who can:

- Work with both sides to find a solution.
- Say if they think that the solution that what was offered was reasonable.
- Refer the complaint to the Housing Ombudsman Service if they are not able to offer a solution or uphold the solution that was offered.

**Tenant Complaint Panel**

Impact’s Tenants’ Complaints Panel is a recognised, trained volunteer group of tenants supported by Impact but are independent of them.

If a complainant requests that a complaint is referred to a panel we will:

- Contact them within 3 days to establish the reason for the request.
- Aim to contact them within 20 working days to inform them of the outcome and any recommendations.

If tenants do not refer their complaint to a Designated Person, they must wait for 8 weeks after their Stage 2 response and then refer their complaint to the Housing Ombudsman in writing

#### 4.0 Detailed process

A complaint is an expression of dissatisfaction, where someone is unhappy about the service, actions or lack of action by Impact Housing Association or a person or body acting on its behalf.

The policy **covers** complaints relating to the following:

- ✓ we have failed to provide a service
- ✓ the standards of the service were not acceptable
- ✓ we provided the service in an unfair or discriminatory manner.

## 5.0 MANAGEMENT OF THE PROCESS

We will:

- have nominated officers to oversee the handling of complaints
- make sure that key employees are properly trained in complaint handling
- record complaints properly
- review complaints, causes and changes to service provision arising from them
- identify trends in respect of complaints and review services accordingly

Customers need to inform Impact of their complaint within **six months** of the problem occurring.

Impacts Complaints Process has **two stages**.

A complaint can be resolved at any time during the two stages.

### STAGE ONE

We will try to resolve the problem within **5 working days** of the customer getting in touch.

This will include a relevant member of staff:

- contacting the complainant by telephone to introduce themselves and confirm the complaint has been received
- getting more details about the complaint
- establishing what the complainant would like to happen
- trying to resolve the problem and agree with the complainant what will happen next

If the complaint is too complicated to solve at Stage One, or if a course of action cannot be agreed, the complaint will go to Stage two.

Once a complaint has been closed at Stage One, a complainant has 30 days to come back to us and say that they are not happy about what we have done.

If 30 days have passed, the complaint will be treated as a new complaint

### STAGE TWO

If a complaint is not resolved at Stage One, the complainant can ask to move it to Stage Two.

The complainant needs to inform us why they want to move to Stage Two and what they think we should have done to sort out their complaint at Stage One.

We will contact the complainant within 3 working days of them telling us to move their complaint to Stage Two.

The complaint will then be investigated.

We aim to contact the complainant within 20 working days to let them know what we have found out and what we will do to resolve their complaint.

This concludes Impact's Complaints Procedure.

## **DESIGNATED PERSON**

If a complaint is not resolved by Impact at Stage Two, complainants can take their complaint to a Designated Person.

This can be an MP, a local councillor or Impact's recognised Tenant Complaint Panel.

If the complainant chooses to have their complaint considered by the Tenant Complaint Panel the complainant should state why they want to take their complaints to the panel and what they think we should have done to sort out their complaint at Stage Two.

We will contact the complainant within 3 working days of them telling us to move their complaint to a Tenant Complaint Panel.

The Panel investigation will then take place.

We aim to contact the complainant within 20 working days of receiving the request to hold a panel to let them know the outcome of the panel and any recommendations made.

Designated Persons, including the Tenant Panel can:

- Work with both Impact and the complainant to find a solution
- Say if the solution Impact offered was reasonable
- Refer the complaint to the Housing Ombudsman Service if they are not able to offer a solution or uphold Impact's solution

However it should be noted that:

- Designated Persons, including the Tenant Panel have no direct impact on or legal authority over Impact's Complaints Procedure.
- The Housing Ombudsman Service is NOT a regulator and cannot define the expected role or processes for Designated Persons. Nor does the Ombudsman have any jurisdiction over Designated Persons.

## **IMPACT TENANT COMPLAINTS PANEL**

The Impact Tenant Complaints Panel is our recognised panel.

It is a group of tenants who are supported by Impact but are independent of us.

Panel members are volunteers who have had training in resolving complaints.

Complainants who wish the Complaints Panel to consider their complaint can contact them:

- by emailing: [TenantComplaintPanel@impacthousing.org.uk](mailto:TenantComplaintPanel@impacthousing.org.uk)
- by phoning 03448736290

If a complainant does not wish to refer their complaint to a Designated Person, they should be informed that they can wait eight weeks after receiving their final response from Impact and then can refer their complaint directly to the Housing Ombudsman Service. The law says that they should do this in writing.

## THE HOUSING OMBUDSMAN SERVICE

This is an independent service set up by the Government to investigate complaints about housing associations.

The service can be contacted at:

- Housing Ombudsman Service, Exchange Tower, Harbour Exchange Square, London, E14 9GE
- Telephone : 0300 111 3000 Lines are open Monday to Friday from 9:15 to 17:15 (except public holidays)
- Fax : 020 7831 1942
- Email : [info@housing-ombudsman.org.uk](mailto:info@housing-ombudsman.org.uk)
- For further information go to: [www.housing-ombudsman.org.uk](http://www.housing-ombudsman.org.uk)

Impact will fully co-operate with the Ombudsman's investigation and consider any remedies proposed. The Ombudsman will decide whether or not we have acted unfairly or if a complainant has suffered an injustice as a result of maladministration.

**Note however** that some complaints are always out of the Housing Ombudsman's jurisdiction. For example **the Ombudsman cannot consider complaints where the complainant does not have a landlord/tenant relationship**, for example, Impact Furniture Services, the Oval Centre, and complainants who are not tenants of Impact.

The Housing Ombudsman Service's position is that **early and local resolution** is the best possible outcome to a complaint. They will encourage positive relationships between landlords such as Impact and its tenants and the designated persons to achieve this. They will also provide information and advice to support designated persons to improve the methods and approaches they may use to resolve a dispute. The Ombudsman's office **will not** comment on a Designated Person decision, they will however feed-back on referrals from designated persons to complaints handling at all levels.

When the Housing Ombudsman receives a complaint, they **will always ask if it has been referred to a Designated Person**, and if not, they will want to clarify the reasons for this. They will either then refer the matter to a Designated Person or if it is **more than 8 weeks** from the end of Impact's complaints process and the tenants is clear they DO NOT WANT to make use of a Designated Person at a local level, the Ombudsman will consider the case.

## THE FINANCIAL OMBUDSMAN

We take care to provide the highest standards of financial related service to our customers. We will investigate complaints in line with our procedure and report back to the complainant with our findings.

If they are unhappy with the outcome of their complaint, where financial related service has been provided they can normally take the complaint to the Financial Ombudsman Service:

- The Financial Ombudsman Service, Exchange Tower  
London, E14 9SR.
- Call 0800 023 4 567 Monday to Friday – 8am to 8pm, Saturday – 9am to 1pm. Calls to this number are normally free for people ringing from a "fixed line" phone – but charges may apply if you call from a mobile phone.
- Call 0300 123 9 123. Calls to this number are charged at the same rate as 01 or 02 numbers on mobile phone tariffs.
- email: [complaint.info@financial-ombudsman.org.uk](mailto:complaint.info@financial-ombudsman.org.uk)
- For further information go to: [www.financial-ombudsman.org.uk/consumer/complaints.htm](http://www.financial-ombudsman.org.uk/consumer/complaints.htm)

## PERSISTENT AND UNREASONABLE COMPLAINANTS

Where a complainant persists in pursuing a complaint, which has no reasonable basis, or where Impact has already taken reasonable action in response to the complaint, we will exercise discretion as to when a matter will be regarded as closed and will not be reinvestigated.

The “**Unreasonable, Unacceptable & Persistent Customer Actions and Behaviour**” policy sets out Impact's approach to the very few complainants whose actions or behaviour we consider unreasonable and unacceptable. This document is available on Sharepoint and on Impact's Website.

## EQUALITY AND DIVERSITY

We value equality and diversity and do everything we can to make our services available to as many people as possible

In relation to complaints, we will ensure that:

- complaints will be dealt with impartially, objectively and professionally
- complaints will be taken seriously
- no one will receive adverse or discriminatory treatment as a result of making a complaint
- customers will be able to easily get to, into and around the building where any tenant panel is to be held

## **COMPLAINTS POLICY INFORMATION TO CUSTOMERS**

We know that people won't use the complaints procedure if they don't know it exists, so we will publicise it widely by:

- producing information which clearly explains how to complain
- providing the information in several languages and in Braille, on tape or CD-Rom and in large print (on request)
- working in partnership with local organisations such as Citizens Advice, charity and voluntary groups
- posting information on Impact's website including an on-line complaints form
- posting information on Social Media

## **COMPLAINTS POLICY INFORMATION TO STAFF**

Staff will be briefed on the Complaints & Compliments Policy in line with this document.

Key staff will receive training on this Policy and the detail of the process.

## **MONITORING AND REPORTING ARRANGEMENTS**

Complaints and compliments are a major source of information about what people think of the service we provide. To make sure the system is working we will:

- Undertake customer surveys of those who have made complaints
- Undertake surveys of users and user groups
- Undertake detailed analysis of the complaints process to highlight problem areas and change things accordingly

We will produce detailed quarterly reports on complaints to our Executive and Senior Management Teams which will include:

- how many and what type of complaints and compliments received
- how many complaints are resolved at each step of the process
- how many complaints are resolved within the target timescale
- changes to service provision arising from complaints and compliments
- trends concerning complaints

The number and type of complaints received will be published annually in Impact's Annual Report to Tenants.

## COMPLIMENTS AND COMMENTS

At Impact we really value positive feedback. It helps us to reward and recognise excellence and is extremely motivating for the individual and teams concerned. If an employee, a team or anyone who deals with customers on Impact's behalf goes 'the extra mile' or impresses a customer, they should be encouraged to tell us who was involved and what happened.

We will make sure that we:

- Pass the compliment to the relevant person and to their Line Manager
- Share the highlighted good practice across Impact
- Incorporate the highlighted good practice into our services wherever possible

### 5.0 Responsibilities chart

Responsibilities	Board /MD	SMG	R.O.'s/ Managers	All Staff	Senior Performance Officer	Customer Service Manager
Overall management and resources	✓	✓				
Policy Champion					✓	
Communicate the Policy					✓	✓
Communicate the Policy to contractors and partners		✓			✓	✓
Monitor and review the Policy					✓	
Compliance with the Policy	✓	✓	✓	✓	✓	✓
Brief staff on the Policy		✓	✓		✓	✓

### 6.0 Links to other policies and regulations

- Compensation Policy
- Data Protection Policy
- Confidentiality Policy
- Unreasonable, Unacceptable & Persistent Customer Actions and Behaviour Policy

**Name:** Anne Rogers  
**Job title:** Head of Customer Experience

**Date reviewed:** October 2019  
**Next review due:** October 2022

## 2. Guidance for Complaints Policy

### 1.0 Impact's Guidance

The Complaints Policy is there to put things right where they have gone wrong, in short to provide a remedy.

The policy **covers** complaints relating to the following:

- ✓ we have failed to provide a service
- ✓ the standards of the service were not acceptable
- ✓ we provided the service in an unfair or discriminatory manner.

When a complaint is made the complainant will be asked what they want in order to resolve the matter. This could involve one or more of the following:

- an apology
- an explanation of what happened
- an assurance that the same thing will not happen again
- the complainant gets the service he/she wants
- details of any other remedial action that provides a reasonable response to the complaint
- details of any changes to practices and procedures resulting from the complaint

### 2.0 Legal Guidance

- Changes to Complaints Management (accessing the Housing Ombudsman and the introduction of Designated Persons) in line with the requirements of **Sections 180-182 of the Localism Act 2011**

### 3.0 Links to other guidance

- Housing Ombudsman Service – Complaints Guidance
- Financial Ombudsman Service – Complaints Guidance

**Name: Anne Rogers**  
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**Date reviewed: October 2019**  
**Next review due: October 2022**