

Customer Feedback Policy & Procedure

1.	Policy Objective
1.1	We want to provide the best possible service to our customers and this Policy sets out how we deal with and value the feedback our customers give us.
1.2	We value all feedback about our services, whether a compliment, a complaint or just an observation. We record all feedback and use it to continually improve our services.
1.3	There will be times when things don't go as well as we, or our customers, would like and when that happens we need to know about it so we can take steps to resolve the problem quickly and restore the customer's confidence whilst learning from what went wrong. If you feel we've done something well, we'd also like to hear about it so we can pass it back to the staff concerned and build on that good practice further.
1.4	We will take personal responsibility for complaints at the time they're first reported and work with customers to put things right quickly and fairly.
1.5	The Housing Ombudsman can provide free, independent and impartial assistance throughout the life of a complaint and all WCH customers have a right to access the Housing Ombudsman Service.
2.	Legislative or Regulatory Requirement
2.1	The RSH Tenant Involvement and Empowerment Standard requires that we <i>"have an approach to complaints that is clear, simple and accessible that ensures that complaints are resolved promptly, politely and fairly"</i> .
2.2	This Policy accords with guidance from the Housing Ombudsman's <i>"Principles of Good Complaint Handling"</i> and <i>"Complaint Handling Code"</i> , the Financial Ombudsman Service's complaints handling requirements, the 2010 Equality Act and the Localism Act 2011 (as amended).
3.	Scope and Definitions
3.1	This Policy covers our tenants, residents and anyone else receiving a service from Watford Community Housing. We welcome and listen to all feedback about our services whether given by our customers or other parties / individuals.
3.2	The Housing Ombudsman has no authority over complaints brought by individuals other than a landlord's tenant's or leaseholder's. Where we receive a complaint (as defined at section 4) from someone other than a tenant or leaseholder, we therefore

<p>3.2.1</p> <p>3.3</p> <p>3.4</p> <p>3.5</p>	<p>have discretion as to whether or not to deal with it as such under this Policy. We will consider this at Stage 1 of the Procedure (see section 5.1 below) based on the subject-matter and the issue's relevance to us and inform the complainant accordingly</p> <p>Nb. where we accept a complaint brought by a person who's not our customer we will inform them that we're doing so on a purely discretionary basis and in accordance with the spirit of this Policy. We will also inform them that we reserve the right to truncate or adapt the Procedure we subsequently follow (see section 6 below) accordingly.</p> <p>If you feel unable to report a problem yourself, you can do so through a recognised third party such as an advocate, councillor or Member of Parliament. In that case, we'd need to ask for the customer's written permission to discuss the situation with the third party.</p> <p>We're not able to deal, under this Complaints procedure, with issues already being dealt with by a solicitor or legal advisor; these would be classed as a legal dispute and as such are approached separately.</p> <p>We have a separate Customer Compensation Policy, which sets out the circumstances where tenants are entitled to financial compensation for a failure by us to deliver a chargeable service or where a tenant suffers damage/loss due to our actions/inactions. This does not extend to damage/loss which would fall under a home contents insurance policy or matters beyond our control.</p>												
<p>4. Reporting Feedback</p>													
<p>4.1</p> <p>4.1.1</p>	<p>All feedback we receive is valuable – it can help shape our services and the future direction of the organisation positively.</p> <p>Customers can give us feedback in a number of ways:</p> <table border="1" data-bbox="331 1272 1426 1816"> <tr> <td data-bbox="331 1272 600 1339">In person:</td> <td data-bbox="600 1272 1426 1339">To any member of our staff</td> </tr> <tr> <td data-bbox="331 1339 600 1406">Digital Service:</td> <td data-bbox="600 1339 1426 1406">Register at www.myaccount.wcht.org.uk/WCH/www/login</td> </tr> <tr> <td data-bbox="331 1406 600 1473">By telephone:</td> <td data-bbox="600 1406 1426 1473">0800 218 2247 / 01923 209000</td> </tr> <tr> <td data-bbox="331 1473 600 1541">Online:</td> <td data-bbox="600 1473 1426 1541">www.wcht.org.uk/feedback</td> </tr> <tr> <td data-bbox="331 1541 600 1608">By email:</td> <td data-bbox="600 1541 1426 1608">feedback@wcht.org.uk</td> </tr> <tr> <td data-bbox="331 1608 600 1816">In writing to:</td> <td data-bbox="600 1608 1426 1816">Gateway House 59 Clarendon Road Watford Hertfordshire WD17 1LA</td> </tr> </table>	In person:	To any member of our staff	Digital Service:	Register at www.myaccount.wcht.org.uk/WCH/www/login	By telephone:	0800 218 2247 / 01923 209000	Online:	www.wcht.org.uk/feedback	By email:	feedback@wcht.org.uk	In writing to:	Gateway House 59 Clarendon Road Watford Hertfordshire WD17 1LA
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<p>4.2</p>	<p>We encourage customers making a complaint to outline what they feel would be a satisfactory resolution to the problem at the outset, so that everyone's clear about expectations.</p>												

4.3	Customers have the choice to leave feedback anonymously. We will still log and investigate feedback without contact details, however we will not be able to respond or provide any update if this is the case.
4.4	We categorise customer feedback in three ways – as either general feedback (where the customer wishes to pass back comments or make us aware of an issue but not necessarily investigate or resolve it on their behalf) or as a complaint or as a compliment.
4.5	<p>Compliments</p> <p>4.5.1 <i>Definition of a compliment:</i></p> <p>A positive comment or observation about our service, activities, processes or a member of staff. Compliments are valuable pieces of feedback for us - we record and report on them in the same way as we do complaints. In our current Business Plan, we have set an ambitious target to increase the number of compliments so they equal complaints under a commitment to drive improvements across all areas of our activity.</p> <p>4.5.3 We feed individual compliments back to the staff member concerned (as well as their manager) and try to build on this good practice further across the organisation.</p>
4.6	<p>Complaints</p> <p>4.6.1 <i>Definition of a complaint:</i></p> <p>We apply the Housing Ombudsman’s description of a complaint 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.”. Here the issue may be that we have fallen below our core Service Standards.</p> <p>4.6.2 Examples of a complaint could be:</p> <ul style="list-style-type: none"> • A failure to provide a service in accordance with our policies or Service Standards. • Unacceptable quality of work or service. • Delays in responding to an enquiry, in providing a service or completing work. • A failure to provide information or providing the wrong information. • Unacceptable behaviour or attitude of a staff member or contractor. • A complaint about unfairness e.g. of a policy or procedure. <p>4.6.3 What is <u>not</u> a complaint?</p> <ul style="list-style-type: none"> • Dissatisfaction with levels of rent or service charges – if you’re unhappy about these please discuss this with our Customer Services team. • A first request for a service (e.g. a repair) or general follow-up enquiries about the status of that request. • An explanation of a policy, practice or decision. • A report (itself) of anti-social behaviour about a neighbour (we have a separate Anti-Social Behaviour Policy & Procedure to deal with this) although

	<p>dissatisfaction with our handling of an ASB case could be considered a complaint.</p> <ul style="list-style-type: none"> • Dissatisfaction with legal or legislative requirements (which we are not responsible for) e.g. local authority nominations processes. • A matter which is already being dealt with under our internal Complaints Procedure (section 5 below) or the External Complaints Procedure (section 6). • Dissatisfaction with something arising more than six months ago – it would be at our discretion whether or not to deal with this under our Complaints Procedure.
5.	Our Complaints Procedure
5.1	The following sets out our two-stage complaint handling procedure.
5.2	Stage 1 Initial Investigation
5.2.1	We aim to resolve most complaints at Stage 1. We will acknowledge the complaint within one working day of its receipt. If we have your email address we will generally do this by email unless you ask us not to.
5.2.2	A Watford Community Housing Team manager will carry out the initial investigations. We would then aim to resolve the complaint the same working day if a quick solution can be found. If not we'd look to resolve the issue within a maximum of ten working days from our initial acknowledgement.
5.2.3	If the problem has been resolved within this timescale we will agree with you that the complaint can be closed but if there are things outstanding e.g. repair work, we will continue to monitor the situation closely to ensure it is completed within a reasonable timescale.
5.3	Stage 2 Appeal
5.3.1	We reserve the right <u>not</u> to accept an Appeal where : - <ul style="list-style-type: none"> • The appeal is not sufficiently detailed or clear. • No new evidence is being submitted beyond that already considered. • We consider that our policies, procedures or regulatory requirements have been followed in full in relation to the matter. • We consider that the complaint is being progressed in order to achieve a higher award of compensation or other benefit. • We consider that the complaint is vexatious or otherwise unreasonable.
5.3.2	You can ask for the issue to go to Appeal if : <ul style="list-style-type: none"> • Our Initial Investigation has been concluded but you're unhappy with the outcome – in this case we would expect an Appeal to be requested within ten working days of the Initial Investigation being concluded. • Our Initial Investigation hasn't been concluded but more than ten working days (or a longer timescale we agreed with you) has passed and you're unhappy with progress.
5.3.3	An Appeal would be carried out by a Watford Community Housing manager at Head of Service or above level (at WCH's discretion) together with a Customer Representative. It should take no more than fifteen working days from receipt of a request for Appeal. If the issue is such that we can't conclude the Appeal within this

<p>5.3.4</p> <p>5.3.5</p> <p>5.3.6</p>	<p>timescale we will apologise, explain why this is the case and confirm a new expected response date.</p> <p>Again, we will generally use email to communicate with you unless you ask us not to. If you're satisfied with the outcome of the Appeal we will agree with you that the case can be closed.</p> <p>We reserve the right <u>not</u> to accept an Appeal where : -</p> <ul style="list-style-type: none"> • The appeal is not sufficiently detailed or clear. • No new evidence is being submitted beyond that already considered. • We consider that our policies, procedures or regulatory requirements have been followed in full in relation to the matter. • We consider that the complaint is being progressed in order to achieve a higher award of compensation or other benefit. • We consider that the complaint is vexatious or otherwise unreasonable. <p>The conclusion of an Appeal represents the exhaustion of our internal complaints handling procedure. Complainants who remain dissatisfied can pursue their complaint externally.</p>
6.	External Complaints Procedure
<p>6.1</p> <p>6.1.1</p> <p>6.1.2</p> <p>6.2</p> <p>6.3</p>	<p><u>Local Independent Review</u></p> <p>Following changes made by the Localism Act, the Housing Ombudsman will no longer consider an unresolved complaint within 8 weeks of conclusion of an organisation's internal complaints procedure.</p> <p>Within this 8 week period, complainants can take their complaint to an independent 'designated person' for review. Their role is to try and obtain resolution locally when an organisation's internal complaints process has been exhausted.</p> <p><u>What is a 'designated person'?</u></p> <ul style="list-style-type: none"> • A Member of Parliament (MP) from any national constituency. • Any local councillor from the customer's home district. • A panel of tenants either of Watford Community Housing or another housing association which is recognised as a complaint-handling body. <p><i>Nb. Tenant panels must have agreed a code of conduct and been recognised by us through being entered into the official 'Housing Ombudsman Register'. MPs and Councillors also act as individuals and are not protected from legal action by their role or elected status.</i></p> <p>We recognise the constructive nature of the designated person's role and contribution and will carefully and seriously consider any outcomes / recommendations they make. They have no formal 'powers and so we are not obliged to implement them.</p>
<p>6.4</p> <p>6.4.1</p>	<p><u>The Housing Ombudsman</u></p> <p>If a resolution hasn't been reached locally, and 8 weeks have passed since the conclusion of our Complaints Procedure, a complainant can take their complaint to the Housing Ombudsman. The Ombudsman will not normally consider a complaint until all stages of our Complaints Procedure have been completed.</p>

6.4.2	Any decision then reached will be final and we are obliged to abide by the Ombudsman's outcomes / recommendations.
6.5	<u>Financial Ombudsman Service (FOS)</u>
6.5.1	If you have a complaint about something which falls within the remit of the FOS (e.g. a consumer credit matter) you can refer it to the FOS if 8 weeks or more have passed since we received your complaint and you're unhappy with how we've handled it.
6.5.2	When concluding on this type of complaint under our Complaints Procedure, we will let you know that you can refer the matter to the FOS within six months of the end of our Procedure and give you the FOS's website and contact details as well as a copy of its 'Your Complaint and the Ombudsman' leaflet. We will also tell you whether we're happy for the FOS to look into the matter outside of the six month time limit.
7.	Persistent / Unreasonable Behaviour
7.1	We maintain a Cautionary Use Database to record instances where contact with individual customers has had to be limited or prevented due to persistent or unreasonable behaviour. Notes are also kept on our systems to limit contact where we need to do so, to protect staff from abuse.
7.2	The Housing Ombudsman has its own guidance on what constitutes unacceptable behaviour which we follow and which is reflected in our Persistent & Unreasonable Behaviour Policy at Appendix 1.
8.	Monitoring & Reporting
8.1	We summarise, record, monitor and report quarterly on all feedback we receive to ensure we're meeting our complaint-handling Service Standards and other objectives. The results are published on our website.
8.2	We run weekly reports to monitor feedback, the results of which are presented to the Executive Management Team in a quarterly report highlighting areas of concern and what measures to put in place to improve services, it is then presented to Board and the Gateway Membership Team. This information is also reported on our website feedback page for our customer to view.
9.	Related documents
	<ul style="list-style-type: none"> • Orchard Feedback Module User Guide • Diversity and Inclusion Policy • Service Standards • Customer Service Strategy • Corporate Social Media Policy & Procedure • Tenant Compensation Policy • Use of Cautionary Database – Appendix 2 Data Protection Policy
10.	Appendices
	Appendix 1 : Persistent or Unreasonable Behaviour Policy
11.	Approval
GMT (consultation):	22 January 2020
Executive Management Team:	11 February 2020
Operational implementation date:	1 April 2020
Next Review:	April 2022
Policy 'owner':	Customer Experience Manager

Appendix 1 – Persistent or Unreasonable Behaviour Policy

1. Introduction

This Policy sets out our approach to the few customers whose actions or behaviour we consider unacceptable. We adopt a similar approach to that of the Housing Ombudsman Service, applicable from 1st November 2012.

2. Policy aims

2.1 To make clear to customers in all their dealings with us, what we can and cannot do in relation to their case. In doing so, we aim to be open and avoid raising expectations we can't meet.

2.2 To deal fairly, honestly and consistently with all customers, including those whose actions we consider unacceptable. We believe that everyone who approaches us has the right to be heard, understood and respected. We also consider that our staff have the same rights.

2.3 To provide a service that's accessible to everyone who's entitled to it. We do however reserve the right, where we consider customers' actions to be unacceptable, to restrict or change access to our services.

2.4 To ensure that staff and other customers don't suffer detriment as a result of customers who act in an unacceptable way.

3. Defining unacceptable actions by complainants

3.1 People may act out of character in times of stress and we recognise that there may have been distressing circumstances leading up to a customer interaction. We don't view behaviour as unacceptable just because someone is forceful or determined but where customers behave in an unacceptable way towards our staff, or a way which places unreasonable demands on them, we may deal with it under this Policy. We have grouped this kind of behaviour into three broad categories:

Aggressive or abusive behaviour

a. Violence is not restricted to physical aggression or harm. It includes any behaviour (including language) which makes staff feel afraid, threatened or abused.

b. Examples would include : physical violence, verbal abuse, swearing, derogatory remarks, rudeness inflammatory statements and malicious allegations.

c. We expect our staff to be treated courteously and with respect. Violence or abuse towards staff is unacceptable. We staff understand the difference between anger and aggression. Anger may accompany a complaint but when it escalates into aggression towards our staff it is unacceptable.

Unreasonable demands

a. Customers may make what we consider to be unreasonable demands on us through the amount of information they request or provide, the level of service they expect, or the

number of approaches they make. We consider these demands unreasonable if they start to impact disproportionately on our work or take up an excessive amount of time to the detriment of other customers. What amounts to unreasonable demands will always depend on the individual circumstances of the case.

b. Examples would include : demanding responses within an unreasonable timescale, insisting on seeing or speaking to a particular member of staff, disproportionate phone calls, emails, or letters, repeatedly changing the substance of a complaint or raising unrelated concerns.

Unreasonable persistence

a. We recognise that some customers will not or cannot accept that we are unable to assist them further or provide a level of service other than that provided already. Complainants may persist in disagreeing with an action or decision taken in relation to their case or contact us persistently about the same issue. Again, we consider this persistence unreasonable when it starts to impact disproportionately on our work or take up an excessive amount of time to the detriment of other customers.

b. Examples would include : persistent refusal to accept a decision made in relation to a complaint or an explanation about what we can and can not do and continuing to pursue a complaint without providing any new information.

4. Managing unacceptable behaviour

4.1 There are very few customers whose behaviour, demands or persistence we consider to be unacceptable. How we aim to manage these situations depends on their nature and extent. If they adversely affect our ability to operate and provide a service to others, we may need to restrict a person's contact with us in order to manage the situation appropriately. We'll aim to do this in a way which still allows a case to progress. We may restrict contact in person, by telephone, email, letter or any combination of these. We will always seek to maintain at least one form of contact. In extreme situations, we'll inform the customer in writing that their name is on a 'no personal contact' list. This means that they must restrict contact with us to written communication or communication through a third party.

4.2 The use or threat of physical violence, verbal abuse, or harassment towards our staff is likely to result in the termination of all direct contact with the person on a temporary/permanent basis. Incidents may be reported to the police in appropriate circumstances; they will always be reported where physical violence is used or threatened or discriminatory remarks made.

4.3 We will not accept communication (written or verbal) which is abusive to staff or which contain malicious allegations. In these circumstances we'll tell the person concerned why we're taking this approach and, in the case of unacceptable language, ask them to stop the communication (eg a telephone call) in question. We may require future contact to be through a third party.

4.4 Where someone repeatedly telephones or visits our premises without appointment (including where personal contact has been restricted) or they send irrelevant / duplicative documents or they raise the same issue repeatedly without cause we may decide to:

- restrict contact to telephone calls eg at set times or limit contact to a particular member of staff ;
- restrict contact to pre-arranged appointments or written communication only;
- return irrelevant documents to the sender or, in exceptional cases, advise that documentation will be destroyed;
- restrict issues being raised to those which are clearly relevant;
- take other action that we consider appropriate. We will, however, always say what action we are taking and why.

4.5 Persistent customer requests or demands may be considered unreasonable where all internal review mechanisms have been exhausted (eg our Complaints procedure) and the customer continues to dispute the outcome. We will advise the customer that we are unable to enter into any further communication about the matter. If the customer's requests or demands persist, their communication will be read and filed, but responded to only where it provides new, relevant information about the case. This decision will be made by a Director/Assistant Director.

5. Deciding to restrict customer contact

5.1 Staff who experience aggressive or abusive behaviour from a customer (or another person on their behalf) have authority to deal with that behaviour as it immediately arises in a way they consider appropriate having regard to this Policy.

5.2 Aside from these immediate situations, decisions to restrict contact with us are always taken after careful consideration by a panel of three managers. Wherever possible, we will give the customer an opportunity to modify their behaviour or actions before contact is restricted. Customers will be informed in writing that a decision has been made to restrict their contact and why, the nature of the new contact arrangements and the timescales that will apply. They will also be informed of their right to appeal our decision.

5.3 A customer can appeal against a decision to restrict their contact with us. A manager more senior to the original decision-maker who has not previously been involved in the case will consider the appeal. They will consider the case carefully and, having done so, advise the customer in writing either that the restricted contact arrangements still apply or that a different course of action will be adopted.

5.4 We record all incidents of unacceptable actions or behaviour by customers.

5.5 Full(er) customer contact may be restored if the customer demonstrates acceptable behaviour over a sufficient period of time. Senior management will review the status of all users with restricted contact arrangements annually.

5.6 Staff should refer to our Use of Cautionary Database guidelines for full guidance. See the Data Protection Policy.