

## Complaints, Compliments and Suggestions Policy

Responsible Officer	Executive Director Customer Services
This policy is applicable to	All Directorates/companies
Approved by	KMT
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Date of next review	March 2024
Implementation date	April 2021
Key related documents (policy, procedure, customer literature)	Complaint, Compliments and Suggestions Procedure Customer complaint brochure Compensation and Goodwill Payments Policy Unacceptable Customer Behaviour Policy Verification Procedure Data Protection Policy
Sources of best practice or guidance used in developing this policy	See references section

Version control			
Version number (1)	2	Author of Policy	Ashley Wallace
Equality Impact Analysis (2)	Initial/Full	Equality Analysis Date	
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Document change history		
Version	Date	Changed sections
2	25/02/2021	Amended copy in policy statement
2	25/02/2021	Additional reference documents listed under 'Key Related Documents'
2	25/02/2021	Amended 'Consultation' table
2	25/02/2021	Amended copy in 'Key Performance Measures'
2	25/02/2021	Added definition of a complaint to 'Definitions' section
2	25/02/2021	Added lines to 'Performance Measures' section
2	25/02/2021	Copy amended in section 2.0 'Objectives'
2	25/02/2021	Copy amended in section 6.0 'What is excluded'
2	25/02/2021	Copy amended in section 3.0 'How do customers make a complaint'
2	25/02/2021	Copy amended in section 5.0 'Complaints we will investigate'
2	25/02/2021	Copy amended, clauses added and removed in section 7.0 'What happens when a customer makes a complaint'

2	25/02/2021	Copy amended, clauses added and removed in section 8.0 'Complaint stages 1 & 2'
2	25/02/2021	Copy amended in section 9.0 'Complaint Decision'
2	25/02/2021	Copy amended in section 10.0 'General Rules'
2	25/02/2021	Copy amended in section 11.0 'Timescales for raising and escalating complaints'
2	25/02/2021	Copy amended in section 12.0 'Compliments'
2	25/02/2021	Copy amended in section 13.0 'Suggestions'
2	25/02/2021	Copy amended in section 14.0 'Monitoring and Review'
2	25/02/2021	Copy amended in section 15.0 'Equality and Diversity'
2	25/02/2021	Copy amended in section 16.0 'Data Protection'
2	25/02/2021	Additions made to list in section 17.0 'References'

<b>Consultation</b>	
Consultation Group (if applicable)	Date of Consultation (if applicable)
Staff	2016, 2017, 2019/20 and 2021
Union(s)	NA
Customers	2016, 2017, 2019/20 and 2021
Human Resources / Organisation Development	2021 (Di Keller)
Health and Safety Working Group	NA
Other stakeholder (please state)	2021: Data Protection Team (Jill Johnson), Assistant Director of Customer Services and Operations (Wendy Graham), York Housing Colleagues (via Rachael Simmons), Strategy & Insight Team (Milo Barnett), Governance Team (Karen Sinden)

## Policy statement

At Karbon Homes, we recognise all forms of customer feedback as valuable pieces of insight that support us to understand how we're performing – where we're doing well and where there is opportunity for improvement.

One of our key strategic aims is to deliver an excellent customer service - however we know that sometimes things can go wrong and that it might occasionally be necessary to raise a complaint with us.

The purpose of this policy is to provide a framework for dealing with complaints, compliments and suggestions.

It is supported by a procedure document for colleagues; and a brochure document for customers, which both aim to simply explain how to use this core Karbon service.

## Risk policy is designed to control

10 Regulatory and Legislative Environment

## Key performance measures

- A quarterly report on complaints, compliments and suggestions is shared with Karbon's Group Performance Committee, Executive Team, Karbon Management Team (KMT) and our Involved Residents Group
- Weekly operational reporting on complaints, compliments and suggestions is cascaded to our management teams via the leadership team in our Customer Services Directorate
- Within our organisational KPIs, the number of complaints upheld by the Housing Ombudsman Service is reported on and scrutinised by our KMT and LMT each month
- Complaints, compliments and suggestions are viewable by service area by the relevant leadership team
- Our Customer Experience Team ensure that insight on complaints, compliments and suggestion trend and analysis is shared with service area teams through our network of quarterly Customer Experience Action Meetings (CEAMs)
- Our Customer Experience Team retain an overview of the following complaint measures:
  - Number of complaints recorded, including stage and category
  - Number of complaints open, particularly any over timescales
  - Complaint outcome decision (upheld/not upheld)
  - Category of complaint (e.g., Repairs and Maintenance/Tenancy Management)
  - Details of any lessons that have been learned
  - The amount of any compensation offered

## Definitions

A 'compliment' is an expression of satisfaction with a service that we, or anyone acting on our behalf have provided. This could be satisfaction with an individual member of staff, a team or a particular service area.

A suggestion is an innovative idea shared with Karbon to change the way we deliver our services for the benefit of the wider audience, such as a change in policy or process.

In line with the Housing Ombudsman Complaint Handling Code, Karbon's definition of a complaint is:

"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".

## Abbreviations

Not applicable.

## **1.0 Purpose of policy**

1.1 The purpose of this policy is to provide a framework for dealing with complaints, compliments and suggestions.

## **2.0 Objectives**

2.1 Karbon's approach to complaints, compliments and suggestions:

- Promotes consistency and fairness in complaint case handling
- Is non-discriminatory
- Is easily accessible and well publicised
- Is simple to understand and use
- Allows speedy handling, with established timescales for responses and ensures customers are informed of progress
- Ensures a full and thorough investigation
- Respects customers' desire for confidentiality
- Provides an effective response and appropriate redress
- Provides information to Team Leaders, Managers and Directors so that services can be continuously improved
- Follows the Housing Ombudsman's Complaint Handling Code
- Meets regulatory requirements
- Delivers a better service to customers by monitoring and measuring complaints, compliments and suggestions and taking action to listen and learn

## **3.0 Policy detail**

### **3.1 HOW DO CUSTOMERS MAKE A COMPLAINT?**

3.2 We regard complaints as a positive source of feedback. Complaints are learning opportunities that enable us to be more responsive to the people we serve. Complaints can be made in the following ways:

- By telephone to our Customer Relations Team on 0808 164 0111 between the hours of 8am and 6pm, Monday to Friday
- By email to our Customer Relations Team at: [info@karbonhomes.co.uk](mailto:info@karbonhomes.co.uk)
- In writing to our Head Office address: Number Five, Gosforth Park Avenue, Gosforth Business Park, Newcastle upon Tyne, NE12 8EG
- Face to face with any member of staff, including contractors working on Karbon's behalf
- Via our website: [www.karbonhomes.co.uk](http://www.karbonhomes.co.uk)
- Via Karbon's social media pages, using Twitter Direct Message and Facebook Messenger
- Via a Councillor or MP or other relevant third party (e.g., Housing Ombudsman or consumer rights organisation)

3.3 We accept complaints from a customer's authorised contact.

- 3.4 We will accept anonymous complaints, even though it can be difficult to conduct a full investigation without knowing the identity of a complainant. This must be explained to the complainant, and they should be asked how they want to be advised of the outcome of an investigation.
- 3.5 We will support the principle of customers seeking assistance and support from third party consumer rights organisations such as the Citizens Advice Bureau in pursuing their complaint.
- 3.6 Karbon's Unacceptable Customer Behaviour Policy clearly sets out our approach to managing the relatively few customers whose actions or behaviour are considered unacceptable.
- 3.7 Customers should endeavour to be as concise as possible if submitting a written complaint. This will enable a more swift and efficient response to any concerns.
- 3.8 Information on our approach to Complaints, Compliments and Suggestions can also be found within our starter packs for new tenancies and on our website at <https://www.karbonhomes.co.uk/about-us/open-and-transparent/complaints>

#### **4.0 WHO CAN COMPLAIN?**

- 4.1 Anyone affected by a service we provide.

#### **5.0 COMPLAINTS WE WILL INVESTIGATE**

- 5.1 In line with Housing Ombudsman guidance to the housing sector, Karbon recognise complaints to 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.”

- 5.2 The following list is a (non-exhaustive) guide to the range of complaints we will consider:

- Failure to provide a service or to achieve the required standards/quality
- Employee's attitudes and their actions or lack of actions relating to a service
- Dissatisfaction with the manner in which our standards and procedures have been adhered to
- Dissatisfaction with our policies
- Alleged discrimination

#### **6.0 WHAT IS EXCLUDED BY THIS POLICY?**

- 6.1 The following are excluded from Karbon's complaints procedure:

- A first-time request for a service

- A request for information or an explanation
- A matter being dealt with through legal action or an insurance claim, or is currently subject to legal action, an insurance claim or a claim for damages
- Dissatisfaction with a decision where a complainant has not used the relevant review procedure e.g., if a customer is not happy with a rent increase/decrease letter an alternative appeals procedure exists
- Complaints about services provided by individuals/companies not within our control e.g., Utility Companies, Local Authorities etc
- Expressions of dissatisfaction about our decision to take legal action or the outcome of legal action
- Complaints about Karbon's money advice service - customers who wish to complain about our money advice service must follow the separate guidance in appendix 1

## **7.0 WHAT HAPPENS WHEN A CUSTOMER MAKES A COMPLAINT?**

- 7.1 Often a customer's concerns can be resolved informally and quickly at first point of contact and do not need to go through our formal 2 stage complaint process. Should a customer wish for their concerns to be recorded as a complaint, then Karbon colleagues should willingly do so using the guidance above in section six which outlines issues that Karbon will investigate and those excluded from our policy.
- 7.2 If a customer wishes for their concern to be recorded as a complaint, then a first attempt to resolve matters is known as a 'stage 0' complaint. Karbon colleagues should always try and help a customer correct any issues they have at first point of contact – the emphasis is on resolving problems and putting things right with the minimum of delay. For example, many concerns can often be easily corrected with an apology, adequate explanation of the service failure or steps taken to resolve it – e.g., our Customer Relations Team may apologise and offer to make a new appointment for a repair following a failed appointment.
- 7.3 Stage 0 complaints are issues that can usually be resolved informally and they signify the entry point to our complaints service. They are expressions of dissatisfaction that can be handled at first point of contact, therefore they should be managed and responded to ideally within the same day, but at least within five working days of the issue being raised with Karbon.
- 7.4 A central record of all complaints will be held on our ICT system. All complaints are logged on the day they are received (or the nearest working day).
- 7.5 Given the informal nature of stage 0 complaints, concerns handled at this stage in our service will not receive formal written communication to acknowledge their concern.
- 7.6 It is possible that customers may disagree with our explanation or suggestion of actions to put things right. After recording the complaint in our ICT system and discussing the issue with a Karbon colleague, if an acceptable resolution cannot be agreed upon then customers have the option to escalate their complaint to our formal complaint handling stages (1 & 2). Customers can request for their complaint to be escalated to stage 1 of our process during the same stage 0 conversation they are

having about their concerns; or by any of the other contact methods listed in section 3.

7.7 If the customer requests contact only in writing then the guidance in section 8 should always be followed.

## 8.0 COMPLAINTS STAGES 1 AND 2

8.1 Following the escalation of a complaint to stage 1, an acknowledgment is issued in writing within 1 working day by the person hearing the complaint. A copy of our Karbon Homes Complaints leaflet should be included in the acknowledgement so that our customer knows how the process works, what to expect and how to seek support from the Housing Ombudsman service.

8.2 We will comply with the following standards:

- **Stage one** - Following a review of the complaint, a full written response will be issued to the complainant by a Team Leader, Manager or Head of Service within a maximum of 5 working days (unless there are mitigating reasons to extend this period). The colleague managing the complaint investigation at stage 1 will offer to telephone the complainant to assist in investigating their concerns before sending a written complaint outcome response.
- **Stage two** – If the complainant is unsatisfied with the response provided by our Team Leader, Manager or Head of Service at stage one, they may request that their complaint is escalated once more to stage two of our process. At stage two, the relevant Head of Service, Assistant Director, Director or Executive Director will issue a written response within a maximum of 5 working days (unless there are mitigating reasons to extend this period).

8.3 To move to stage 2 of the complaints process, complainants must be able to answer the following questions (customers do not have to do this in writing and where necessary we can provide support):

- a. What specific parts of your original complaint have we not investigated?
- b. What part of our response do you disagree with and why?
- c. What would you like the outcome of your complaint to be (what would you like us to do)?

8.4 If a complainant does not objectively answer the above questions, we reserve the right to refuse escalation of the complaint on the basis that we will not know what more to investigate. In such cases we will explain why we will not review the complaint and confirm in writing that the complaint will be closed. In our closing letter, we will offer information about further steps a customer can take if still dissatisfied.

8.5 A final outcome letter sent to the customer at stage 2 signifies the end of our complaints process.

8.6 If complainants believe that their complaint has not been dealt with adequately after exhausting stages zero, one and two of Karbon's complaints process, they are

encouraged to contact a 'designated person' or the Housing Ombudsman Service as noted below.

- 8.7 Customers have the opportunity to seek support a Designated Person at any point in their complaint. This is also explained in our stage 1 and 2 complaint written responses.
- 8.8 A Designated Person can be an MP or a local Councillor. The designated person may help resolve the complaint directly, may refer the complaint to the Ombudsman, or may decline doing either. In the latter case the complainant may approach the Ombudsman for their consideration of the complaint. The complainant may also approach the Ombudsman directly if more than 8 weeks have elapsed since the completion of the internal procedure.

## **9.0 COMPLAINT DECISIONS**

9.1 We categorise final decisions about complaints as one of two outcomes:

### *9.2 Complaint upheld*

This is where we agree that the complaint was justified – for example, if the investigating colleague identifies service failures that led to the complaint.

### *9.3 Complaint not upheld*

This is where we do not agree that the complaint was justified. For example, if the investigating colleague determines that Karbon have acted fairly or within timescales.

## **10.0 GENERAL RULES**

- 10.1 When escalating a complaint, customers may not add in new or additional concerns or allegations to be investigated that are unrelated to the originating complaint. Any new or additional concerns or allegations that are unrelated must be treated as a separate complaint (i.e., given a new reference number and investigated first at stage 0).
- 10.2 If a complaint is not upheld – i.e., deemed not justified – then we reserve the right to refuse escalation to stage 2 of our process. In instances where Karbon have refused to escalate a complaint, this must be explained clearly to our customer in writing.
- 10.3 We understand that some complainants may not be able to articulate their thoughts and feelings in writing. We must always offer customers the opportunity to speak and/or meet with us so they can articulate their dissatisfaction.
- 10.4 If a complaint is particularly complicated or in exceptional circumstances, it may take longer to investigate than the published timescales. We will write to a complainant to tell them this (giving a reason why) and advise them of a new reply date. We must do this before the original reply timescale has elapsed.

- 10.5 Staff members that are the subject of a complaint cannot investigate that specific complaint.
- 10.6 If a customer complains about the way in which a complaint was handled or disagrees with the Complaints Policy (e.g., if the customer feels timescales were not met or feels the incorrect person responded to a complaint), it will not be escalated to the next stage of the complaints process. It will be treated as a separate complaint (i.e., given a new reference number, investigated at stage 0, and will be investigated by a different Karbon colleague).
- 10.7 Although complaints can be received from a range of individuals, only our tenants/leaseholders/service users/their advocates can escalate a complaint to the Housing Ombudsman Service. Leaseholders may refer their complaint to the First Tier Property Tribunal in cases of lease disputes.
- 10.8 Customers who are not Tenants, Service Users or Leaseholders (or advocates acting on their behalf) will have therefore exhausted our complaints process after completing stage 2.
- 10.9 If we have formally dealt with a complaint (at stage 1 / stage 2), we will not deal with repeated submissions of the same complaint (we will inform the customer of this in writing).
- 10.10 A complaint made in the form of a petition on behalf of multiple customers will be treated as one complaint. Communications will be directed to the nominated signatory of the petition.
- 10.11 If a customer complains about several subjects at once (in the same piece of correspondence), the correct Officer to investigate is the Officer whose service area is affected most. Karbon's Customer Feedback Specialist can be consulted to determine which service area would be best placed to manage the complaint, and in cases of severe complexity, whether their direct, centralised management of the complaint would be best for our customer.
- 10.12 If legal advice or insurance advice is needed after receipt of a complaint, the complaints process may be delayed until the advice is received. The complainant must be notified of this in writing.
- 10.13 Priority will be given to resolving substantive live issues ahead of conducting any necessary investigation, without prejudicing consideration of the complaint.
- 10.14 Correspondence from public officials and external stakeholders should be responded to by the relevant Manager or Head of Service for the service area the complaint is in relation to. Usually, public officials will communicate with Karbon via email to raise complaints on behalf of constituents or complaints they themselves would like Karbon to respond to. All public official emails should be shared with our Customer Feedback Specialist who will ensure the relevant service Manager or Head of Service is notified, that the complaint is recorded in our ICT system, that a response is provided and that all other relevant Karbon stakeholders have been informed of the contact.
- 10.15 Public officials and external stakeholders include (this list is not exhaustive):

MPs (or their representatives), Councillors, civil servants, partnering contractors and agencies, funders, community organisations and voluntary groups and partnerships, the police, NHS, charities.

- 10.16 During the course of a request for assistance an MP / Councillor should have received consent for them to make enquiries on their constituent's behalf. Karbon do not need to have a copy of this consent however if it is offered then colleagues should accept a copy and record it in our contact management system.
- 10.17 A complaint submitted via a public official or external stakeholder will be investigated as a new complaint unless a complaint for the same issue is already under investigation. If an ongoing complaint case already exists, the additional contact will be included in the ongoing complaint as further information, with a status update provided to the public official or external stakeholder.
- 10.18 Letters addressed to Board Members or members of the Executive Team should be handed to our Customer Feedback Specialist, who will notify the relevant executive team member and ensure the complaint is correctly logged within our ICT system.
- 10.19 Customers seeking compensation or financial redress do not need to make a formal complaint to have their request considered. Requests for and offers of compensation within a complaint will be considered in accordance with Karbon's Compensation and Goodwill Payments Policy.
- 10.20 We require any contractor that provides services on our behalf to comply with this policy by:
- ✓ Recording and responding to customer feedback when required.
  - ✓ Providing us with any information relating to a complaint when requested.
  - ✓ Assisting us with complaints investigations as appropriate.
- 10.21 We reserve the right to deal with a complaint differently (outside this policy) if circumstances require this. In such a rare case, we record why we have dealt with the complaint differently and inform the complainant accordingly in writing. For example, a customer's personal circumstances may change during the handling of the complaint and we may be asked to pause our handling indefinitely. Karbon reserve the right to manage complaints on a case-by-case basis based on individual merit, but would only seek to work outside of policy to act in our customer's best interests when there are extenuating circumstances.

## **11.0 TIMESCALES FOR RAISING AND ESCALATING COMPLAINTS**

- 11.1 Complaints must be raised within 2 months or as close as possible to the point at which the issue first arose.
- 11.2 If the complainant wishes to proceed to the next stage, they must ask to do this within 10 working days of receiving the stage 0 or 1 decision.
- 11.3 In cases where a complainant can demonstrate a good reason for delaying the decision to escalate a complaint then the matter may still be considered.

## **12.0 COMPLIMENTS**

- 12.1 A 'compliment' is an expression of satisfaction with a service that we, or anyone acting on our behalf have provided. This could be satisfaction with an individual member of staff, a team or a particular service area.
- 12.2 Compliments can be made by contacting us via any of the methods outlined in section 3.1.
- 12.3 A central record of all officially reported compliments will be held on our ICT system. All compliments are logged on the day they are received (or the nearest working day) and shared with the relevant Manager to cascade to their team.
- 12.4 Where customers have provided a compliment in writing, Karbon will reply in writing to acknowledge it's receipt.
- 12.5 Compliments will be included in regular reporting to Karbon's senior leadership teams; and in quarterly reports to our board.
- 12.6 Compliments will also be regularly reviewed at service team level during Karbon's CEAMs (Customer Experience Action Meetings) to highlight best practice.

## **13.0 SUGGESTIONS**

- 13.1 A 'suggestion' is an innovative idea shared with Karbon to change the way we deliver our services for the benefit of the wider audience, such as a change in policy or process.
- 13.2 Suggestions can be made by contacting us via any of the methods outlined in section 3.1.
- 13.3 A central record of all officially reported suggestions will be held on our ICT system. All suggestions are logged on the day they are received (or the nearest working day) and shared with the relevant Manager to cascade to their team.
- 13.4 Where customers have provided a suggestion in writing, Karbon will reply in writing to acknowledge it's receipt.
- 13.5 Suggestions will be included in regular reporting to Karbon's senior leadership teams; and in quarterly reports to our board.
- 13.6 Suggestions will also be regularly reviewed at service team level during Karbon's CEAMs (Customer Experience Action Meetings) to highlight best practice.

## **14.0 Monitoring and Review**

- 14.1 This policy will be reviewed every 3 years. The review will be brought forward if there are significant changes to good practice, regulatory or legislative requirements.

- 14.2 On at least a quarterly basis information will be reported to the Group Performance Committee, KMT, and Karbon's Involved Resident Group. The report must include all complaints, compliments and suggestion statistics, plus details of any 'lessons learned' and recommendations for service improvements.
- 14.3 Each year we will publish information about the number, nature and outcome of complaints (as required as part of the Regulator's Tenant Involvement and Empowerment Standard).
- 14.4 The Executive Director for Customer Services is responsible for delegating the monitoring, review and implementation of this policy.

## **15.0 Equality and Diversity**

- 15.1 This policy is implemented in line with the Karbon Homes Equality and Diversity Policy and associated legislation including the Public Sector Equality Duty and Equality Act 2010 where we aim to eliminate discrimination, advance equality of opportunity and foster good relations and define the nine protected characteristics as their age, disability, gender reassignment, marriage or civil partnership, pregnancy or maternity, race, religion or belief, sex, or sexual orientation.

However, our approach to equality and diversity goes beyond these protected characteristics and we take into consideration additional factors such as socio-economic status and language barriers which may also impact individuals. Our vision is one where everyone within Karbon Homes is treated fairly, have equality of opportunities, freedom, respect and access to our services.

- 15.2 All of our customer policies and key information are made available on the Karbon Homes website which has an easy-to-use assistive tool that supports accessibility to our information. This includes translation, audio, changes to the size of text, ruler and screen mask. Other reasonable adjustments that can help to make our information and services more accessible are sign language and language interpreters.
- 15.3 We will work to improve accessibility for everybody that we deal with offering reasonable adjustments, adaptations and discussing ways that we can work to remove barriers that customers may experience. A reasonable adjustment involves making a change to the way that we usually do things. We work together to look at options and agree what would be reasonable in your circumstances an example of this may be:

- Allowing more time at each stage of the complaints process for you to respond
- Providing our replies in a different format such as audio.

If you would like to find out more please contact us.

## **16.0 Data Protection and Privacy**

- 16.1 We have a clear policy on data protection and sharing data with other partners/outside agencies under the requirements of the Data Protection Act 1998.

This is clearly set out in our Data Management Policy which, along with the supporting Data Management Guidelines, which must be followed throughout the operation of this policy.

- 16.2 Complainants have a right to ask for personal information associated with their complaint. To do this they must make a Subject Access Request in writing either to by letter or by email, as detailed in section 3.1 in accordance with our Data Protection Policy.

## **17.0 References**

- Localism Act 2011
- Regulatory Framework
- Tenancy Agreement
- Tenants Handbook
- Leaseholders Handbook
- Tenant Involvement and Empowerment Standard
- Unacceptable Customer Behaviour Policy
- Social Housing White Paper 2020
- Housing Ombudsman Complaint Handling Code 2020
- Housing Act 1996
- Equality Act 2010
- Regulator of Social Housing Consumer Standards
- Data Protection Act 2018