

Policy title:	Customer Feedback Policy		
Scope:	Group-wide		
Policy owner & job title:	Paul Malkin, Head of Customer Services		
Approver:	Andrei Szatkowski, Executive Director of Customer Experience		
Date:	1 October 2020	Review Due Date:	1 October 2022

Notes:

- Aspire Housing** *The word “customer” relates to persons who are Aspire Housing tenants, leaseholders, commercial leaseholders and shared owners.*
- Achieve Training** *The word “customer” relates to learners, students, apprentices, or customers.*
- Realise** *Customers are varied and the policy aim, and principles below will be followed for all Realise volunteers, partners and beneficiaries, with reference to the Fundraising Regulations if applicable.*

POLICY SUMMARY

Across **we are aspire** we are committed to delivering customer service excellence to all our Aspire Housing, Achieve Training and Realise charity customers . We believe in offering customers a way to easily pass on compliments, feedback or complaints for a service we have provided in order to drive service improvements.

Our commitment is to deal with comments and concerns in a fair and consistent way, maintaining openness and transparency.

Associated Policies & Procedures: Equality and Diversity Policy, Individual Rights Procedure, Subject Access Request (SAR) Procedure, Data Breach Procedure, Aspire Housing Complaints Resolution Manual.

1. POLICY STATEMENT

We value customer feedback (including complaints) as a way of involving customers in shaping services and improving neighbourhoods and making sure that customers are at the heart of everything we do.

Our Aims

- To provide a simple and accessible process. We will make it easy for customers to give feedback.
- Deal with all customer feedback in strictest confidence
- Respond to the needs of our customers
- Accurately record and analyse all feedback
- Deal with all feedback promptly and courteously
- Investigate and respond with our findings
- Keep customers informed
- Make sure our colleagues are adequately trained to handle complaints where this is necessary as part of their role
- Use plain language
- Be open and transparent
- Identify opportunities for improvements and learn from mistakes

Aspire Housing will comply with the Housing Ombudsman's Complaint Handling Code and will complete an annual self-assessment against their standards which will be published online.

2. COMPLIMENTS, COMMENTS AND SUGGESTIONS

A compliment is a polite expression of praise, admiration or gratitude about a service, contractor or one of our colleagues. It's great when customers let us know what we're doing well, as we can learn and share good practice across our group.

A comment or suggestion is a remark expressing an opinion, reaction or an idea, for consideration. We value customer feedback and have a strong commitment to involving our customers in shaping our services and improving neighbourhoods.

3. COMPLAINTS

A complaint is defined as *"an expression of dissatisfaction, however made, about the standard of service, actions or lack of actions by us, or our contractors affecting an individual customer or a group of customers"*.

A summary guide to the Aspire Housing complaints procedure is published on the Aspire Housing website on our 'Frequently Asked Questions' (FAQs) pages.

3.1 Making a complaint

We want to make it easy for customers to give us feedback, so we will accept feedback through all of our communication channels:

- Via the online form on the 'Contact us' page on our website
- Live chat
- Email
- Social media (to maintain your privacy we will ask for details to be sent in private messages)
- Telephone
- In writing
- In person, whether this be at one of our venues, in your community or in your home

We will always accommodate a customer's needs to make a complaint, making any necessary adjustments and taking complaints from advocates as set out in section 3.3.

3.2 Complaint Handling

We know that sometimes things can go wrong and customers may want to make a complaint. We are committed to resolving issues as quickly as possible and use complaints as an opportunity to improve our services to customers.

Some enquiries or complaints will be related to Data Protection. These need to be dealt with through one of the following;

- Subject Access Request (SAR) Procedure
- Individual Rights Procedure, covering other data subject rights under The GDPR
- Data Breach Procedure

The following principles apply to make sure we treat all complaints seriously and deal with them in an appropriate way:

- The complaint process will be led by:
 - For Aspire Housing, the Head of Customer Services
 - For Achieve Training, the Quality Manager
 - For Realise Charity, the Charity Manager
- Each service area will have a designated complaints handler, that will be trained to deal with complaints effectively and who has the authority and autonomy to act to resolve issues quickly.
- Complaints will be looked at sensitively and fairly from the customer's point of view.
- The person making a complaint will be advised who is dealing with their complaint.
- Complaints will be dealt with promptly and in strictest confidence, only disclosing information if necessary, to properly investigate the matter.
- Customers will be kept updated on the progress of their complaint.

- We will provide a clear explanation of the outcome of our investigation including the reasons for the decision, an apology where appropriate, and what action we will take.
- A complaints panel (Aspire Housing), the Senior Management Team (Achieve Training and Realise charity) will regularly review complaints and feedback and will ensure findings are used to help us identify areas for improvement in our services.

Where we undertake a contract on behalf of another organisation we will adhere to their complaints policy unless this is not specified as part of the contract. If we are not responsible for dealing with an issue raised through feedback, we will aim to identify who is and refer the matter to the relevant person or organisation.

Complaints will not be considered for:

- Issues which are raised more than six months after the relevant events (unless it is an on-going issue we are aware of).
- Cases where a final decision has already been made and no further appeal is possible.
- Cases where legal action is already being taken.
- Issues that have been reported to the Customer Excellence Team (not as a formal complaint) and are currently in the process of being resolved.
- Anti-Social Behaviour complaints which are investigated by the Aspire Housing and were reported separately.

Any complaints that are received by a member of The Board or The Executive management team, including through social media, will be dealt with using the complaints handling procedure outlined in section 3.2 and will be responded to by the person who has been allocated the complaint to investigate.

3.3 Advocacy & Support

An advocate (also sometimes known as a designated person) is someone who has been asked by the person making the complaint to act on their behalf. This could include an MP, Councillor, a family member, friend or another customer but not a legal representative.

We will accept complaints from advocates where authorisation has been given by the customer for us to discuss the matter with an advocate on their behalf.

Our colleagues can also support customers to complain, as long as there is no conflict of interest with their own role.

Complaints and enquiries received through MPs/Councillors will be dealt with using the three-stage process outlined in section 3.4.

3.4 Complaint Stages

We will aim to resolve reported issues as soon as possible. When an immediate solution can be found, for example, the issue can be resolved within two working days; then it will not be treated as a formal complaint.

Formal complaints are investigated and responded to by our internal two-stage process. If the issue can not be resolved internally by us, Aspire Housing customers have the option of a third stage by referring their case to the Housing Ombudsman. For Achieve Training, if the issue cannot be resolved internally, customers following funded education and training programmes have the option of reporting their concerns to the ESFA (the funding body).

Stage 1: Complaint - *internal investigation usually by a Team or Service Manager (Achieve: internal investigation usually by a Manager, coordinated by the Quality Manager)*

When an immediate resolution is not possible because further investigation is required, or the person making the complaint is not satisfied with the initial response provided, it will be known as a 'formal complaint' and will usually be dealt with within five working days.

If a resolution within 5 days is not possible, we will agree a response date with the person making the complaint. Cases will remain open until all the issues raised have been resolved. Where a complaint covers more than one service area the complaint handler will engage with the relevant colleagues to respond to each part.

All complaint investigations will involve personal contact with the person making the complaint either by telephone, or a home visit, to understand the reasons for the complaint and what could be done to resolve it.

We will communicate with the customer using the method they have asked us to use (either telephone, email or letter) although our response to the complaint will be made by letter (which may be sent via email if the customer agrees to this).

A written response will be provided to the customer detailing the outcome and explaining how they can appeal against this decision if they are not satisfied.

If the person making the complaint does not respond within 14 days of the written response being sent, we will assume that the outcome is accepted, the complaint will be considered closed and no further appeal will be possible.

Stage 2: Appeal - *internal investigation usually by Head of Service (Achieve: usually by Head of Service coordinated by Quality Manager)*

If the person complaining is not satisfied with the response to their complaint, they have the right to appeal within 14 days of the date of the written response. The appeal should include the reasons why the customer is not satisfied with the response and any additional information that may be relevant to their appeal.

The appeal will be considered by an independent person not previously involved in the complaint; usually a Head of Service. The decision of the appeal will be final.

Appeals will usually be responded to within 10 working days. If this is not possible, then we will agree a response date with the person who submitted the appeal.

A written response will be provided to the customer detailing the outcome of the appeal and explaining their options if they are not satisfied.

Stage 3 (Aspire Housing): Housing Ombudsman - External investigation*

If an Aspire Housing customer is not satisfied with the outcome of their appeal, they have the right to progress their complaint to the Housing Ombudsman Service.

The Housing Ombudsman is an independent service, investigating complaints and making recommendations where it thinks that the landlord may not have acted in a reasonable or fair way.

There is an eight-week period after receiving the appeal outcome before a complaint can be referred to the Housing Ombudsman Service (or earlier if referred through a designated person such as an MP or Councillor).

The Ombudsman may offer their 'early resolution service' to help to resolve the dispute without the need for a formal investigation.

The Housing Ombudsman can be contacted at:

The Housing Ombudsman Service
PO Box 152
Liverpool
L33 7WQ
Telephone: 0300 111 3000
Email: info@housing-ombudsman.co.uk

We will fully cooperate with The Housing Ombudsman in any investigation and will provide all records and information requested. Other than in exceptional circumstances, we will also accept any recommendations made by the Housing Ombudsman and take the appropriate actions suggested by them.

**This service does not apply to Achieve Training or Realise customers.*

Stage 3 (Achieve Training): **Education and Skills Funding Agency**

If you are dissatisfied with the processing of, or response received in relation to any complaint, then you have the right to escalate the complaint to the Education and Skills Funding Agency. Email or post your complaint to the ESFA complaints team:

ESFA complaints team

complaints.ESFA@education.gov.uk

Information about the ESFA's complaints process can be found here:

<https://www.gov.uk/government/organisations/education-and-skills-funding-agency/about/complaints-procedure>

Stage 3 (Realise Charity): Financial Ombudsman Service

If you are not happy with the outcome of your appeal to the Realise Charity, you have the right to progress your complaint to the Financial Ombudsman Service. This needs to be done within six months of you receiving the appeal response.

A complaint can be made to the Financial Ombudsman Service by calling 0800 0234567 between 8am and 5pm Monday to Friday or online at <https://www.financial-ombudsman.org.uk/contact-us/complain-online>

3.5 Mediation

Mediation is a process where a neutral third party may help resolve a situation where there is conflict between different individuals and/or groups.

We may fund mediation if this is thought to be a practicable option for resolving the situation. If this is offered, the customer will still be able to progress and appeal against their complaint response using the standard procedure.

3.6 Compensation (Aspire Housing only)

Compensation is not awarded as standard practice. We will only consider compensation when there has been loss or damage and will only be paid in cases where we are at fault.

- There must be evidence to support the compensation claim.
- Requests must be made within 30-days of the initial complaint.
- Awards will only be back dated to the date the service failure was first reported to Aspire and only until the complaint has been resolved to the satisfaction of the person making it.
- Any decision to award compensation must be approved by a Head of Service.

Compensation will not be considered when:

- Legal proceedings are underway or have taken place.
- Where we have not been negligent, or the loss or damage is the result of unforeseen circumstances (such as extreme weather) and the loss is covered by the customer's own contents insurance.
- Where a personal injury claim is being managed, unless with the express consent of our Insurers.

All compensation awarded will be recorded. If the customer has debts with the **we are aspire** group, then compensation may be used to offset these.

3.7 Unreasonable Behaviour

Our aim is to deal with complaints in an open, fair and impartial way. If because of their actions and behaviour, or nature and frequency of their contacts with us, a customer hinders theirs, or other people's interactions with us, or delays our ability to investigate the complaint, we will consider such behaviour to be unreasonable.

Unreasonable behaviour which can be habitual and/or vexatious includes;

- Refusing to cooperate with us during the investigation.
- Repeatedly contacting several members of staff about the same complaint and making unnecessary demands on staff time.
- Submitting repeat complaints, relating to the same events.
- Continually raising new issues during the complaint investigation which should have been included in the original complaint.
- Any form of abuse towards a member of staff or third party

For the purpose of this policy, abuse, aggression or violence is defined as 'an incident in which employees feel they have been verbally abused, threatened or attacked in circumstances relating to their duties either in or out of work', including, but not limited to:

- Abusive or threatening behaviour towards one of our colleagues (including contractors) or property.
- Physical attack - whether visible injury occurs or not.
- Animal attack - when an animal is used as a threat.
- Verbal abuse - when an employee feels threatened or intimidated and the abuse is personally directed. This also includes cyber-aggression through texts, email messages or social networking sites
- Any derogatory comments or behaviour in relation to age, disability, gender, gender identity, marriage or civil partnership, pregnancy or maternity, religion and belief, race, sexual orientation – in some cases this can constitute a hate crime
- Attack or damage to property or belongings of our colleagues or our group.

- Any work-related incident involving a colleague, or their family, which happens away from the workplace.

If it is felt that during the management of the complaints process the relationship between the customer and our colleague has broken down to such an extent it is felt beyond repair (for example due to unreasonable behaviour), then Aspire reserve the right to cease communication with the customer and refer them to an advocate/designated person to act on their behalf as per section 3.3.

EQUALITY IMPACT ASSESSMENT

All customers, colleagues and others are treated with fairness and respect. We value diversity and will work to prevent and tackle unlawful discrimination.

Customers and others will be supported to provide feedback in a method that is suitable for them and reasonable adjustments will be made to ensure compliance with the Equality Act 2010. Further details can be found in our Equality and Diversity policy which is available on request.

4. RESPONSIBILITIES OF EMPLOYEE

All employees of Aspire have a responsibility to take customer feedback seriously, to record and resolve issues appropriately and in line with this Customer Feedback Policy, related procedures and internal training.

5. RESPONSIBILITY OF ASPIRE

Our group, Aspire Housing, Achieve Training and Realise charity, has the responsibility to record feedback from customers, in particular complaints, responding to them in a timely and fair manner as laid out in this policy.

The group also has a responsibility to analyse feedback, provide reports and take appropriate action, learning from mistakes and improving service delivery.

5.1 Learning from complaints & reporting

Aspire Housing:

Aspire Housing will complete an annual self-assessment against the Housing Ombudsman's Complaint Handling Code and make this available to customers online.

The Housing Ombudsman publish an annual landlord report, detailing cases and outcomes which is available on their website: housing-ombudsman.org.uk

The Board will receive quarterly updates on common themes, resolution times and actions taken, plus an annual review.

Managers receive weekly reports on complaints received and resolution times in order that issues can be identified quickly and resolution times are managed. A monthly report identifies themes, actions already taken and recommendations.

An internal complaints panel will also regularly review complaints and feedback and will ensure findings are used to help us identify areas for improvement in our services.

Complaint data will be regularly shared with the “Observing Aspire Services & Improving Standards” customer group for review, who will have a range of mechanisms available to them to address areas of poor performance or concerns.

Performance data regarding feedback and complaints, alongside service changes that have been made as a result will be included in the Annual Report, which is available to customers online.

To help us to improve our complaint handling performance, we will regularly contact a selection of customers that have made a complaint to understand satisfaction with our process and outcomes.

Achieve Training:

Achieve Training will incorporate customer feedback and areas for improvement into the annual self-assessment reporting process.

The Quality Manager will periodically provide an update on customer feedback to the Senior Management Team at team meetings