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Compliments and Complaints Policy





Policy Outline

Handling Customer Compliments and Complaints

OVERALL PURPOSE

This document sets out the West North West Homes Leeds policy with regard to Complaints and Compliments. Our commitments are outlined in the Policy Statement found in Section 1 of this document.

INTRODUCTION

West North West Homes Leeds is committed to providing excellent services that match the expectations of our customers and that meet our agreed service standards. The company welcomes feedback from customers and will treat all complaints and compliments seriously. We will acknowledge and investigate all complaints quickly and respond promptly. We will treat all complaints as learning opportunities and apply improvements to our services based on the analysis of the complaints we receive. We will engage with customers and involve them fully in the complaint handling process, especially through the West North West Homes Leeds Complaints Review Panel.

PERFORMANCE MEASURES

We will monitor the implementation and delivery of services through this Policy through:

- We will acknowledge complaints made to us within 1 working day
Target: 98%
- We will deal comprehensively with Stage 1 and Stage 2 complaints within 10 working days of receiving them
Target: 90%
- We will deal comprehensively with Stage 3 complaints within 20 working days of receiving them
Target: 90%
- We will reduce the number of stage 1 complaints received in 2010/11 to 800 from the 941 received in 2009/10
- We will improve customer satisfaction with the way complaints are handled.
Target: 80%

Customer Service Policy

1. Statement of Intent

Policy Statement

West North West Homes Leeds is dedicated to achieving it's vision of Putting the Customer First and is committed to delivering services that match the Company's agreed service standards and that meet customers needs and expectations first time, every time.

West North West Homes Leeds welcomes customer feedback, compliments and complaints and will treat all such contacts as important learning opportunities.

West North West Homes Leeds will

- Publicise our compliments and complaints policy and make it easy for customers to register compliments and complaints with us
- Record all compliments and complaints made and acknowledge all complaints in writing
- Make every effort to speak to the customer in person to make sure the nature of the issue is fully understood. We will at all times respect the customer and treat all customers fairly and equitably, taking into account the needs of our diverse and vulnerable customers
- Investigate all complaints fully and reply to customers in writing with a detailed response that deals with each of the issues raised
- Where the Company is at fault, West North West Homes Leeds will accept responsibility and apologise for the mistake. It will agree the action that needs to be taken to rectify the matter with the customer and ensure this is delivered to the agreed timescale
- West North West Homes Leeds will involve customers in the development and deployment of our complaints policy and in the working of our complaints process, including engaging with customers through Sounding Boards and through customer representatives on the Complaints Review Panel
- We will analyse complaints, compliments and feedback to identify underlying issues and trends and use this information to improve services
- Publish our performance in handling complaints against our targets widely
- Publish the number of compliments received from customers

2.0 Outline of Service

2.1 Process Introduction and Scope

This document defines the process to be used by West North West Homes Leeds people and partners to receive, record, manage and respond to complaints and compliments made to the organisation.

It applies to everyone and is a mandatory procedure.

2.2 Definitions

- 2.2.1 A complaint is an expression of dissatisfaction by a customer, however made, about the standard of service, action or lack of action by West North West Homes Leeds or our partners working on our behalf. A request for service is not a complaint. As an example, a customer who complains that a neighbour's garden is untidy is requesting a service and this should not be recorded as a complaint. A customer who complains that they reported an untidy garden and nothing has been done about it is a legitimate complaint and should be recorded as such.
- 2.2.2 A complaint directed to the Chair or Chief Executive of the Company, or a complaint originating from an M.P, elected member or person of similar standing, will be recorded and dealt with to the process and targeted timescales defined by this procedure.
- 2.2.3 A compliment is an expression of satisfaction with aspects of service provided by West North West Homes Leeds or our partners made by a customer. A compliment represents a valuable learning opportunity. Compliments will be recorded and analysed to identify best practice opportunities and compliment statistics will be published.
- 2.2.4 A complaint is a valuable indicator of the performance of the services provided by West North West Homes Leeds and as such should be welcomed. A complaint represents a learning opportunity to put something right both for individuals and the service as a whole.
- 2.2.5 A complaint can be made in a variety of forms but must be treated in a consistent manner using this process regardless of how it is made. Complaints can be made in person, by phone, in writing, verbally, by letter, by fax, by email, on a complaint or feedback form or by any other means.

2.3 Background and Linkages

This process reflects feedback received from customers, mystery shopping outcomes and the results of the Inspection of 2010. It is based on best practice from across the sector and includes recommendations made in preparation for inspection by the organisation's critical friend. The timescales and targets included are challenging and reflect the heightened expectations of excellence of both customers and inspectors.

This process is designed to align to the Leeds City Council Compliments and Complaints Procedures but is aimed at meeting the specific needs of West North West Homes Leeds and its customers. The process will link to Siebel as the reporting and monitoring process owned by Leeds City Council and used by WNWHL people and partners.

2.4 Process Outline

2.4.1 Process stages

The complaints process comprises of 4 stages.

Stage 1 is a first line complaint which every effort should be made to deal with immediately and at the first point of contact. If something can be put right straight away, it should be done so by the officer or manager responsible for the provision of the service. The action should be agreed with the customer and confirmed in writing. The response should be copied to the complaints team who will update the system. The case should then be closed at this stage. Responses to more complex cases will be co-ordinated by the Complaints team.

Target: 10 days from the complaint being first received by WNWHL

Stage 2 defines those complaints which have been unable to be dealt with to the satisfaction of the customer at Stage 1 and have been escalated to a higher level for investigation and action. Customers should provide notice of their wish to escalate to stage 2 of the process within 3 months of receipt of the stage 1 response letter. Vulnerable customers, including those where support is provided by the WNWHL Tenancy Support Team and other care or support workers, are excluded from this restriction. These cases should be investigated with a fresh set of eyes by an appropriate member of the West North West Homes Leeds Management Team. Every effort should be made to visit the customer during the investigation and the customer should always be offered the choice of a meeting, to be arranged at their convenience. Actions should be agreed with the customer and confirmed in writing and copied to the complaints team, who will update the system.

Target: 10 days from the customer contacting WNWHL to say they are not prepared to accept the resolution reached at Stage 1.

Stage 3 defines those cases where the customer remains dissatisfied with the outcome of the complaint once it has passed through stages 1 and 2 of the process. Customers should provide notice of their wish to escalate to stage 3 of the process within 3 months of receipt of the stage 2 response letter. Vulnerable customers, including those where support is provided by the WNWHL Tenancy Support Team and other care or support workers, are excluded from this restriction. Stage 3 allows for an independent review of the complaint to be made by people unconnected to the organisation or the department responsible for the delivery of the service. Stage 3 reviews will be undertaken by a panel of tenants appointed by the WNWHL Complaints Review Panel. Appropriate terms of reference have been devised for the panel and guidance on decision making powers and financial levels of authority and training will be provided.

Target: 20 days from the customer contacting WNWHL to say they are not prepared to accept the resolution reached at Stage 2.

Complaints which have not been dealt with to the satisfaction of the customer by Stages 1, 2 and 3 of the process can be referred by the customer to the Local Government Ombudsman. Ombudsman cases will normally be investigated by a member of the Senior Management Team and responded to by the Chief Executive.

Target: 20 days from the Ombudsman or Council contacting WNWHL.

2.4.2 Receipt of Complaints

However received, complaints should be recorded on the system immediately and an acknowledgement letter sent to the customer. This will normally be completed by the Complaints Team and must happen within 1 working day of the complaint being received. The process and target applies and recording must begin immediately the complaint is received by WNWHL or its partners.

If the matter can be resolved straight away, it should be and the action agreed with the customer should be included in the first letter. If the matter can't be resolved immediately, the acknowledgement letter will detail who will be dealing with the complaint and when the customer should expect the matter to be completed by.

If the complaint is outside of the remit of the service or department receiving the complaint, if the problem is of a particularly complex nature or if more than one service or department is involved, then the complaint will be referred to the WNWHL complaints team who will be responsible for allocating responsibility and co-ordinating the response.

It is the responsibility of the person receiving the complaint to either record it directly onto the system or pass it immediately to the Complaints Team to do so. If the complaint is entirely within the remit of the service or department receiving the complaint, an appropriate person should be appointed to investigate the matter, liaise with the customer, take appropriate action, confirm that action in writing to the customer and confirm the action to the Complaints Team.

Divisions or service areas will appoint a complaints champion who will be responsible for the smooth running of the complaints process within their service area. The service area complaint champion may play the role of identifying who will be responsible for owning complaints or allocating complaints to specific individuals.

2.4.3 Dealing with Complaints.

Complaints should be dealt with immediately they are received. The person appointed to investigate a complaint must deal comprehensively with the complaint within 10 working days of it being first received by the company or its partners.

Whilst every complaint will be different, the primary focus of the investigation should be to determine whether the WNWHL standard of service appropriate to the matter has been met. If the service standard has not been met, then the complaint should be upheld and appropriate action taken to correct the matter.

The appointed person should fully investigate the circumstances and background to each complaint and make every effort to address the issue openly and honestly. Wherever possible, this should include meeting with the customer to discuss the issue. Investigations should focus on the root cause of the problem and not just the single occurrence. Where an issue identifies a systemic failure improvement action should be initiated to make sure the problem does not recur.

The investigating officer should own the complaint on behalf of the customer and take responsibility for resolving the complaint and responding back to the customer.

The principals of confidentiality should be maintained at all times and details of customer contact should not be discussed outside the necessary investigation of the

case. Customers should be kept informed of progress and regular contact should be maintained.

In the response to the customer the complainant must be informed of their right to take the complaint further if they remain dissatisfied with the response at stage 1, stage 2 or stage 3 and should be provided with the name of the nominated person they should contact if they wish to take the matter further.

Once a complaint has been closed to the satisfaction of the customer the owning officer must take appropriate action to close the case and inform the Complaints Team who will arrange to input the details onto the system.

2.4.4 Handling Compliments

Compliments are a useful barometer of customer satisfaction with service and represent a valuable learning opportunity. Compliments received should be copied to the Complaints Team who will record them onto the system, provide initial analysis to identify best practice opportunities and include compliment statistics on published reports.

Compliments should also be analysed by operational service areas and discussed at team meetings to identify best practice opportunities and ensure good practice is applied consistently across the business. Consideration should also be given to recognising individuals complimented by customers, through the application of the WNWHL Reward and Recognition policy.

2.4.5 Monitoring Progress

The WNWHL complaints team will be responsible for maintaining the complaints monitoring and recording system and the overall complaints filing system. They will ensure that each complaint received is input onto the system, either directly or by others at the first point of contact, maintaining control as appropriate. They will be responsible for compiling and reporting statistics for both WNWHL and other parties. The complaints team will also measure customer satisfaction with the complaints process, use the findings to improve the process and publish the results.

The complaints team will provide monthly reports on the number and status of complaints in hand. These reports will be circulated to the Business Improvement Manager, the Senior Management Team, allocated managers responsible for dealing with complaints, Divisional Champions, the WNWHL Complaints Review Panel and the Board of Directors.

Complaints will be monitored by WNWHL's equality monitoring standard and analysis of the results will be provided in the monthly statistical reports.

The number and type of requests for use of the translation and interpretations service when handling complaints will also be monitored and analysed.

2.4.6 Responsibilities

First Points of Contact – Depending on access rights, either to lodge the complaint onto the system and acknowledge the complaint to the customer or to pass the complaint to the Complaints Team to do so. Allocation of the complaint to an owning officer, or referral to the complaints team when beyond their remit.

Complaints Team – Providing a knowledge base and centre of excellence on managing customer complaints, proactively advising WNWHL people and partners on best practice. Logging complaints onto the system. Providing letter templates for each stage of the complaints process, making sure they are available to all and are used. Allocation of complaints to investigating officers and monitoring of the system to ensure resolution targets are met and the complaints procedures are complied with. Proactively checking the quality of responses to customers and ensuring the replies are easy to understand and address the issues raised by the customers. Monitoring that promises made to customers when complaints are resolved are kept. Updating the system once complaints have been dealt with. Producing monthly reports and statistics. Organising and managing the work of the Complaints Review Panel. Promoting and publicising the complaints process and encouraging customers to feedback comments and complaints. Measuring customer satisfaction with the complaints process.

Owning officer - Investigating the complaint, discussing the problem with the customer which should include a meeting with the customer wherever possible, identifying root causes, resolution and response to the customer

Complaints Departmental Champions – Owning the deployment of the complaints process within their service area, ensuring compliance to procedures and the achievement of targets. Proactively ensuring complaints are regularly discussed at team meetings and that root causes and trend analysis is completed and learning applied to improve services and their delivery. Attendance at WNWHL Complaints Review Panel meetings.

Complaints Review Panel – The Complaints Review Panel is composed of Tenants, Officers and representatives of the main Partners and Contractors involved in delivering services. It's purpose is to oversee the performance of the complaints process and review progress against targets; to ensure root cause analysis is applied and that appropriate corrective action is taken when complaints are investigated; to identify trends and ensure action is taken to proactively improve processes and service delivery; to appoint Tenants to act as a panel to review complaints that have reached Stage 3 of the process.

Process Ownership, Review and Development – Business Improvement Manager

2.4.7 Unreasonable or Persistent Complainants' and unreasonable complainant behaviour

In most cases customers make complaints in good faith and dealing with a complaint follows a straightforward process. Raising legitimate queries or criticisms of the complaints procedures should not lead to a complainant being defined as acting unreasonably. Also, the fact that a customer is unhappy with the outcome of a complaint and seeks to challenge should not result in he or she being labelled unreasonable.

However, in a minority of cases people pursue their complaints in a way that can either impede the investigation of their complaint or can have significant resource issues. In some instances, the persistent or repetitive raising of an issue after all reasonable efforts have been made to resolve the matter can be disruptive and

have a disproportionate impact on the ability of the company to handle all complaints.

2.4.7.1 Definition of unreasonable or unreasonably persistent complainants

Unreasonable or unreasonably persistent complainants are those complainants who, because of the frequency or nature of their contacts with WNWHL, hinder WNWHL's consideration of their or other people's complaints.

Whilst unreasonable or unreasonably persistent complainants may have justified complaints or grievances, the manner in which they pursue them is often inappropriate. This includes complaints which after investigation are found to have no substance or cases which have been dealt with appropriately and a determination made. Contacts often place very heavy demands on staff time and the manner they are pursued by the complainant may be very emotionally charged and distressing for all involved.

This might also include behaviours that are, or become on escalation, unacceptable. Examples include offensive, abusive or threatening behaviour and separate WNWHL policies to protect staff from harassment or harm apply in these cases.

Unreasonable behaviour might include one or two isolated incidents, or unreasonably persistent behaviour which often is an accumulation of incidents or behaviour over a longer period. Examples that might lead a complaint being considered to be unreasonable might include:

- Making unnecessarily excessive demands on the time and resources of staff, for example excessive telephoning or sending emails to one or more staff members, writing lengthy and complex letters every few days and expecting immediate responses
- Submitting repeat complaints after the complaints process has been completed, essentially about the same issue.
- Refusing to accept the decision once a complaint has fully progressed through all stages of the complaints process and repeatedly arguing the point and complaining about the decision.
- Refusing to specify the grounds of a complaint, despite offers of assistance from staff
- Making groundless complaints about staff dealing with the complaint and insisting they be replaced
- Refusing to co-operate with the complaints investigation process whilst still wishing to pursue the complaint
- Refusing to accept that issues are not within the remit of the complaints process
- Insisting complaints are dealt with in ways which are inappropriate or incompatible with the complaints process or best practice
- Changing the basis of the complaint as the investigation proceeds or denying statements made at an earlier stage.
- Introducing trivial or irrelevant new information to be taken into account, or raising large numbers of detailed but unimportant questions and insisting they are all fully answered.
- Recording meetings and conversations without the prior knowledge and consent of other persons involved.
- Adopting a scattergun approach and pursuing complaints at the same time with numerous people or agencies, for instance Members of Parliament, Councillors, Police, Solicitors or the Ombudsman
- A combination of all or some of the behaviours listed above

2.4.7.2 Application of unreasonable or unreasonably persistent complainants

A decision to apply the unreasonable behaviour policy to a customer will normally be referred by staff to the Business Improvement Manager. This should be triggered by a review of the behaviours of the customer, examples of which are listed above, and would include a list of actions that would be enacted. The referral should include a clear specification of:

1. Why it is proposed the policy should be enacted
2. What restrictions on contact should be applied and for how long
3. In what circumstances restrictions may be lifted
4. Writing to the customer to inform them of the restrictions and allowing them a right of appeal
5. Advice to staff of the restrictions on contact
6. A clear timescale for review of the decision, which should normally be no longer than 3 months after restrictions are applied.

Before applying restrictions on contact, the Business Improvement Manager should fully investigate the circumstances and history of the complainant and assure that the complaint has been investigated properly, that any decision reached is the right one, that communications with the customer has been adequate and that the complainant is not now providing significant new information that might affect the original decision on the complaint.

Due consideration should be given to the specific circumstances of each customer. This will include working with our Tenancy Support Team and other agencies to take into account the needs of vulnerable or at risk customers and that restricting contact does not constitute a discriminatory act.

2.4.7.3 Options for action

The precise application of restrictions to customers will vary and be determined by nature of each case. Restrictions should be proportionate to the nature and frequency of the complainants contact with WNWHL.

The following represents a 'menu' of potential options which might be chosen and applied, if warranted.

- Placing time limits on telephone calls and personal contacts
- Restricting the number of telephone calls that will be taken (e.g. 1 call on a specified morning or afternoon, once a week).
- Limiting the customer to one medium of contact (e.g. phone call, email or letter) or requiring the customer to communicate only with one named member of staff
- Requiring personal contacts to take place in the presence of a witness
- Refusing to register and process further complaints about the same matter
- Where a decision on a complaint has been made, providing the customer with only acknowledgement of further contacts and stating that future correspondence will be read and put on file but not responded to.

The customer should be written to and informed of the decision to restrict contact. This should clearly specify why the decision has been made, what it means for his or her future contact with WNWHL, how long the restrictions will last and the customers right of appeal. A copy of this complaints policy should be included with the letter.

Clear records should be kept of any complaint that is made by the customer and excluded from the complaints process because of the application of the unreasonable or persistent complainants' policy.

2.4.7.4 Exceptions

When unreasonable and unreasonably persistent complainants make complaints about new issues, these should be treated on their merits and decisions will be taken on whether the restrictions should be lifted as necessary.

Especial efforts should be made to ensure that the application of the unreasonable behaviour policy takes into account the needs of vulnerable or at risk customers and that restricting contact does not constitute a discriminatory act.

Appeals against the application of restrictions of contact will normally be acted on at a level above that of the officer making the original decision. This would normally mean that appeals will be reviewed by the Head of Service, Business Improvement.

2.4.8 Learning from Complaints

Complaints and comments received from customers represent a valuable learning opportunity. When complaints are investigated it is important that the root cause of the problem be identified and its significance understood. The learning from this must then be applied across the whole service area and the Company.

In the first instance complaints will be analysed by the recording system and any trends or recurring issues will be identified. These trends will be discussed at team meetings and that root cause analysis and learning will be directly applied to improve services and their delivery.

Analysis will also be undertaken by the operational teams and partner organisations to which complaints are addressed. This analysis will include the completion of 'Learning From Complaints' forms which must contain a record of the outcome, a record of the actions taken to resolve the complaint and to ensure it does not recur and a list of the changes adopted as a result.

Analysis will also be applied by the Complaints Review Panel and recommendations for change will be made. General learning will be shared across the Company through team briefs, staff newsletters, the intranet, training, raising awareness at team meetings and by amending procedures and working protocols.

3.0 Specific Needs

3.1 Meeting the needs of all our customers

This policy and process will ensure that all customers who make a complaint against WNWHL will be treated fairly and equitably. When dealing with complaints, officers should always be aware of individual customer needs. Wherever possible, especially in relation to communications needs and arranging visits, we will seek to do the following:

- 3.1 Offering home visits upon request, especially for older, disabled or vulnerable customers

- 3.2 Engaging and working with support or care workers especially when meeting with customers or arranging home visits
- 3.3 Offer translation and interpretation services, including use of a British Sign Language signer where appropriate and the services of a translator for non English speakers.
- 3.4 Offering the option of either a male or female member of staff, where possible, especially relating to home visits or meetings.

4.0 Consultation

Consultation on this review and re-issue of the Complaints and Compliments Policy has taken place with the Access to Service Customer Sounding Board and the Complaints Review Panel. The policy has been amended in light of this consultation and this draft of the policy has been approved and endorsed by each of those bodies

5.0 Monitoring

The WNWHL Customer Relations team will be responsible for monitoring performance against this policy.

Performance will be measured and reported regularly as follows:

- 5.1 Monthly reports to the Senior Management Team at Performance SMT
- 5.2 Monthly reports to the WNWHL Board of Directors
- 5.3 Bi-Monthly reports to the WNWHL Complaints Review Panel
- 5.4 Performance against targets will also be included on monthly Local Performance Frameworks, Performance Summary Reports and Performance Dashboards.

6.0 Review

In preparation for delivering this policy during 2010 West North West homes Leeds has reviewed and taken into account new or emerging government legislation and government and council policies.

As a result, this policy now fully reflects, and is inclusive of the issues arising from those policies and legislation, and considers the impacts arising.

This process will be reviewed for effectiveness annually. The 2010 review followed the following timetable.

- 6.1 Annual Review and first draft completed in June 2010
- 6.2 Annual review was completed jointly with Tenants at the Complaints Review Panel on 7/6/2010 and the Access to Services Customer Sounding Board on 15/6/10

6.3 Reviewed Policy for approval by Services and Investment Sub Committee on 20/7/10

The next review will be completed in May 2011.

7.0 Legislation

7.1 New or emerging legislation and new policy for 2010 include:
• Equality's Bill

Policy timeline

Approved by Service and Investment Committee July 2009

Draft completed – June 2010

Impact Assessed –June 2010

Final version completed –July 2010

Due for approval by Services and Investment Committee – 20 July 2010

Review and consult with customers and stakeholders May – June 2011

Annual Review Date – July 2011

