

Compliments, Comments and Complaints Policy

1. Purpose

1.1 Complaint Principles

1.2 Everyone at Clanmil is responsible for delivering great service. When something goes wrong, the way we respond reflects our values. When this happens we gather and track information through the complaints process. In this regard:

- We welcome complaints and see them as an opportunity for improvement
- We will seek clarity about what will resolve a complaint and seek to do just that
- We will actively listen and discuss complaints with our tenants, avoiding standard letters
- We will ensure our colleagues are empowered and confident to try to resolve complaints at first point of contact

1.3 We are committed to delivering efficient and effective services that meet the needs and aspirations of our customers. We recognise that on occasions things may go wrong and customers receive a service that is not satisfactory. Satisfaction is a key measurement of service quality and we all take it seriously. This policy sets out our approach and takes account of the current regulatory requirements set out by the Department for Communities (DfC) in the Housing Association Guide (Tenancy Management). Statistical data in respect of complaints is also included in The DfC Regulatory Standards Annual Return.

2. Compliments

2.1 The majority of this document refers to how we deal with complaints, however, there are many times where we receive compliments from our customers to let us know about great customer service they have received from our staff. Where this is the case we will share these compliments with staff across the organisation and include them in our regular reporting. We will also seek to highlight areas of good practice from our compliments that can help improve services or response across the association.

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3. Policy Aims

3.1 The main aims of the policy are to ensure:-

- All complaints are dealt with promptly and consistently and wherever possible resolved to complainant’s satisfaction
- It is as easy as possible to make a complaint
- Complainants are treated fairly and with respect
- All issues raised in complaints are addressed and those raising them kept informed of progress and the outcome
- Lessons are learnt from feedback and any improvements made as a result of those lessons are communicated to staff and customers

4. Roles and Responsibilities

Group Director of Corporate Services – designated as the senior member of SMT with responsibility for Complaints

Business Assurance Manager – responsible for the oversight and management of the complaints handling process

Business Assurance Officer/Corporate Services Assistant – responsible for the day-to-day administration of the complaints handling process (AQAO will provide continuity of cover where necessary during staff absences)

All Staff – responsible for dealing with complaints handling in line with the Group’s Complaint Policy (BA PO1) and Complaints Procedure (BA001)

5. Definition of a Complaint

5.1 A complaint is an expression of dissatisfaction, regarding the standard and/or quality of service, action or lack of action by Clanmil or staff, which has impacted a customer or a group of customers.

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6. Who can make a Complaint?

6.1 We normally receive complaints from:

- Tenants or advocates of Clanmil Housing (e.g. friends or family acting on their behalf with permission)
- Applicants for housing
- Non-Clanmil Housing tenants or members of the public who receive a service from us, or are affected by a service delivered by us
- Elected representatives e.g. MPs, MLAs and Councillors.

6.2 Where a complaint has been made by a third party, on behalf of a customer, Clanmil reserves the right to seek confirmation that the third party has obtained appropriate consent to make the complaint on their behalf.

7. Examples of Complaints

7.1 A complaint is a formal expression of dissatisfaction with issues such as:-

- dissatisfaction with standards or quality of services
- delays in responding to enquiries or not acting on a request for a service
- poor staff attitude or performance (i.e. not calling back or responding to enquiries)
- failure to follow our agreed policies/procedures/legislation or contractual obligations without reason; and
- unfair treatment on the grounds of equality.

7.2 This policy does not cover:

- A neighbour complaint or a report of anti-social behaviour or harassment, all of which are covered by separate policies
- A routine service request, such as reporting a responsive repair for the first time or an enquiry, perhaps about a rent account
- Adult and child safeguarding issues, both of which are covered by separate Child and Adult Safeguarding Policies. All concerns will be referred to the Safeguarding Team in the first instance

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- Complaints regarding issues that are currently subject to legal proceedings against Clanmil (this does not preclude customers from making a complaint prior to legal action)
- Claims for compensation - these are dealt with by a separate policy
- A matter which occurred longer than six months ago (unless there are exceptional circumstances).

7.3 Anonymous Complaints. Anonymous complaints received will be referred to a manager of the service department to which the complaint relates , who will review the complaint and decide if the matter needs to be investigated further. Full consideration of the reasons for not proceeding to investigate will be documented and reported to the Group Director of Corporate Services.

7.4 We acknowledge that anonymous complaints can rarely be properly investigated, because of insufficient verifiable information. We do however understand that there may be occasions when people are fearful of giving their name and will do our best to understand the issues in these circumstances.

8. How to make a Complaint

8.1 People can make a complaint in any way – verbal or in writing and by any communication channel. Full details are on our website and via a leaflet held at schemes. Any complaints made by social media, and which meet the definition of a complaint in this policy, will also be referred to the Business Assurance Team to deal with in the same way as other complaints.

9. What Action will be taken by Clanmil on Receipt of a complaint

10. The Process

10.1 We recognise that many concerns can be raised informally and resolved quickly at first point of contact. Clanmil staff team will offer a verbal update on the resolution when any issue is raised with them – this includes concerns raised by tenants at our older people and supported living schemes. However, if the complaint is considered more serious or complex to be dealt with informally, or if it has not been successfully

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resolved informally, the complaint can be reported through the formal complaint process.

- 10.2 All complaints will be acknowledged within 3 days, advising the named contact who will be dealing with the complaint. This person will be able to answer any queries and keep the person making the complaint up to date on progress.

Stage 1 (Front Line Resolution)

Our frontline staff will investigate and try to resolve the complaint and will aim to respond within 10 working days or less. They will speak to the complainant to advise of the outcome of the complaint and will also send a written response summarising what action we have or will be taking.

A response may take longer if the complaint is more complex. If this is the case, we will be in contact with the complainant to advise the reasons for the delay, and when a response is likely.

Stage 2 (Taking it Further)

If the complainant is not satisfied with the resolution of the complaint by our frontline team, a high level review will be carried out by a Director. We will aim to respond to the complaint at this stage within 20 working days.

A response may take longer if the complaint is more complex. If this is the case, we will contact the complainant to advise about the delay, the reason for it and when a response can be expected.

Stage 3 (Independent Review)

If, following the review by a Director, the complainant is still dissatisfied with the complaint outcome, or the way it was handled, the complainant can ask for an independent review. Their complaint will then be considered by an independent review panel. The complainant will be advised as soon as possible of the review date. We will aim for the complaint to be heard and a response forwarded to the complainant from the Chair of the Panel within 20 working days.

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11. Taking it Further

- 11.1 Once the complaint has progressed through to Stage 3, and we have issued a final written response, this is the final stage of our internal process. If a complainant remain dissatisfied, they can take their complaint to the Northern Ireland Public Services Ombudsman at the address below. Complainants must normally make their complaint to the Ombudsman within 6 months of the date of the final response they received at Stage 3 Review.
- 11.2 The Ombudsman will consider if it is appropriate for them to investigate the complaint and will normally expect the full internal process to be exhausted. Contact details the Ombudsman are as follows:-

Northern Ireland Public Services Ombudsman
 Progressive House
 33 – 37 Wellington Place
 Belfast
 BT1 6HN

Tel: 028 9023 3821 nipso@nipso.org.uk
<https://nipso.org.uk/nipso/>

12. Housing with Care

- 12.1 All complaints that originate at any of our Housing with Care Homes will be managed in the first instance by the relevant Home Manager. All complaints will also be reviewed by the Supported Living Manager and reported for monitoring to the Business Assurance Team. Specific guidance on the action to be taken by staff on the receipt of complaints is included in procedures to be followed by each of the Homes (HWC045). Complaints about the nature of care can be made directly at any time via the Formal Complaints Policy to head office.

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- 12.2 Where any complaint has been made to a Clanmil Home, the Regulation and Improvement Authority (RQIA) will, as part of their inspection process, review complaints to assess the effectiveness of our complaints processes to see if there are any wider issues for the purposes of raising standards.

RQIA can be contacted at:-

RQIA
9th Floor Riverside Tower
5 Lanyon Place
Belfast
BT1 3BT

Tel: 028 9051 7500 info@rqia.org.uk

13. Financial Ombudsman Service

- 13.1 The Financial Ombudsman Service provides a free, independent service for clients to solve disputes with not for profit debt advice providers.
- 13.2 They will only become involved in a complaint once we have had the opportunity to investigate matters, so complaints should always be raised with us first.
- 13.3 If a complaint is about debt advice and expresses dissatisfaction with the final response a complainant has received from us, or if eight weeks have passed since a complainant first let us know about their concerns, they can ask the Financial Ombudsman to review their complaint. Their contact details are:

Financial Ombudsman Service
South Quay Plaza
183 Marsh Wall
London E14 9SR

0800 0 234 567 – free for people phoning from a ‘fixed’ line (e.g. a landline at home)
0300 123 9 123 – free for mobile phone users who pay a monthly charge for calls to numbers starting 01 and 02

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complaint.info@financial-ombudsman.org.uk

14. Equality Scheme – Section 75 Duties

- 14.1 Clanmil Housing has been designated a public authority and as such has a specific responsibility under Section 75 of the Northern Ireland Act 1998.
- 14.2 If a complainant would like to highlight any of Clanmil policies or procedures which, they feel, breach the nine groups designated under the Section 75 duties, they should contact the association using the normal complaints process,, , in writing, clearly indicating the perceived breach is relating to Section 75.
- 14.3 Full details on the process for complaints under Section 75 are set out in the Clanmil Equality Scheme, which is available on the website.

15. Community Consultation

- 15.1 Clanmil’s complaints policy is for use by customers who are unhappy with the service(s) they have received from us, or who have been affected in a negative way through our activities.
- 15.2 We acknowledge that some people may be dissatisfied with Clanmil’s proposals to provide social housing in areas in which they live. All expressions of dissatisfaction received during periods of community consultation will be handled in accordance with Clanmil’s Community Consultation policy. This policy sets out clearly how the Association will engage with local communities and how we will deal with and respond to any expressions of dissatisfaction which are received during community consultation.

16. Unreasonable and Vexatious Complaints

- 16.1 Clanmil defines complaints as unreasonable if;
 - the complainant has previously made the same complaint that was investigated but not upheld and there is no further information in support of a new complaint;

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- the complaint is considered to be vexatious due to its nature (complainant is seeking to impede Clanmil or cause unnecessary aggravation or annoyance to Clanmil staff rather than to resolve a dispute/grievance between themselves and Clanmil);
- an excessive number of complaints have been submitted by the complainant and not upheld;
- the complainant is aggressive or abusive towards Clanmil staff.

16.2 Clanmil will consider all circumstances surrounding the behaviour outlined above and will fully document any reasons not to proceed to consider a complaint under this policy. This will be signed off by the Director of the relevant Department.

16.3 Where we feel complainants’ actions or their behaviour is unreasonable, staff will follow guidelines provided to them in Complaints Procedure.

17. Learning from Complaints

17.1 Clanmil Housing views complaints as an opportunity for learning.

17.2 Quarterly and annual reporting and trends analysis help the Association identify any recurring issues and consider improvements in our service. If such improvements have been made, we will either notify the complainant concerned of the changes direct, or where relevant, share this information with our customers through Clanmil publications. Any areas for improvement are communicated and actioned by departmental managers.

17.3 Learning outcomes from stage 2 and stage 3 review of complaints are shared within inter-departmental teams and overseen by the Senior Management Team.

18. Satisfaction and Reporting

18.1 We carry out a short satisfaction questionnaire with a sample of complainants who had their complaint formally responded to at stage 1. A member of the Business Assurance team will either call or email the complainant to ask if they were satisfied with the way our staff handled their complaint.

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18.2 If any issues or negative trends are identified or reported during this call, these will be passed to the relevant heads of departments to address.

18.3 We use performance indicators to report to the Board on the complaints process. These are:

- The number of complaints resolved within timescale
- The percentage of complainants satisfied with complaints handling
- The number of complaints escalated to stage 2
- General Customer Satisfaction is also measured annually.

18.4 Targets are reviewed annually and if necessary action plans are drawn to improve performance. Reporting and monitoring is by Senior Management Team and Board.

19. Training

19.1 We will carry out induction and refresher training for all employees to make sure they are aware of our commitment to excellent service delivery and targets. This will include the training to deal with complaints promptly, politely and fairly.

20. Monitoring and review

20.1 This policy will be reviewed within a three-year period.

21. Supporting Procedures

Procedure	Procedure Reference	Location
Complaints Handling	BA001	Sharepoint/T Drive
Complaints Handling	HWC045	Sharepoint/T Drive

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