



Halton
Housing

Policy

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Talk To Us Policy

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1.0 Introduction

We are committed to continually improving the services we provide to customers. We therefore welcome any views or feedback on service delivery, whether good or bad.

Enquiries, compliments, and complaints are a valuable source of feedback, which helps us to improve and provide better services. The process of registering an enquiry, compliment or complaint is collectively referred to as ‘Talk to Us.’

2.0 Policy Statement

We have developed this Talk to Us Policy, which is designed to be accessible, fair to customers and easy to understand.

In implementing the Policy, we will have due regard to any relevant regulatory standards, as well as our own policies on Diversity and Customer Care.

3.0 Definition of a complaint

- 3.1 A complaint is: ‘an expression of dissatisfaction, about the standard of service, actions, or lack of action by Halton Housing, our colleagues, or those acting on our behalf.
- 3.2 A complaint that is submitted via a third party or representative will still be handled in line with this policy.
- 3.3 Except for MP’s and elected members of the Council (due to the legal position on their advocacy role¹); anybody complaining on behalf of a customer will be asked to provide us with a signed declaration from the customer providing permission for them to act on the customers behalf. An example of a third-party declaration form is given here [3rd Party Declaration Form](#)
- 3.4 MP’s and Councillors may make enquiries on behalf of their constituents / residents To comply with GDPR provisions and guidance, we will only disclose/provide access to the part of the customer’s personal information that is required to enable them to fulfil their duties in this role without the need of the customer’s express written consent.

¹ By virtue of the *Data Protection (Processing of Sensitive Personal Data) (Elected Representatives) Order 2002 SI 2002/2905*

4.0 Service Requests

- 4.0 A service request is where a customer may be unhappy with a situation and is requesting us to act, for example they are experiencing noise nuisance from a neighbour. Or something that they are reporting to us for the first time e.g. a repair that needs to be carried out.
- 4.1 Service requests are recorded in our Customer Relationship Management system, reviewed, and managed through to completion.
- 4.2 A complaint may be raised if the customer is dissatisfied with the response to their service request or the level of service they have received.

5.0 Exclusions

- 5.1 We will accept a complaint unless there is a valid reason not to do, we may not accept a complaint when:
- The issue is more than 12 months old, or the customer has been aware of it for more than 12 months and has not contacted us, the customer will be informed in writing that the issue(s) raised cannot be dealt with due to the passage of time.
 - It relates to a first-time request for a service.
 - The complaint or formal enquiry relates to any active legal proceedings.
 - The complaint has already been considered under a previous complaint and the issues are the same.
 - The complaint is considered to be unreasonable (An unreasonable complaint is one that is pursued without merit, persistently or deliberately to cause annoyance or frustration, guidelines on this can be found in our unreasonable behaviour policy)
- 5.2 If we decide not to accept a complaint, we will write to customers with a detailed explanation as to the reasons why and explain the customer's option to contact the Housing Ombudsman.
- 5.3 Any customers whose behaviour is considered unreasonable as per our unreasonable behaviour policy may be excluded or have conditions placed on the complaint being pursued through the complaints process.

6.0 Accessibility and awareness

- 6.1 We are committed to making sure that our complaints process is accessible to all customers as a result, we will make reasonable adjustments to our process for customers where appropriate. This policy does not seek to explain how we will approach every situation, it is intended as a general statement of our approach.
- 6.2 There is no prescribed list of reasonable adjustments that we can offer, the adjustment will depend on the individual's needs. We will discuss the requirements with the customer and look to reach agreement on what may be reasonable in the circumstances. We will not make assumptions about whether a person requires any reasonable adjustments or about what those adjustments should be.

Some examples of the adjustments that we can make include are:

- Provision of information in appropriate alternative formats (e.g., large print, Braille)
 - Provision of language interpreter including British Sign Language
 - Extension of time limits (where it is lawful to do so)
 - Use of email or telephone in preference to hard copy letters
 - Communication through a representative or intermediary
 - Rest or comfort breaks in meetings.
- 6.3 Customers can access the Housing Ombudsman Service at any stage of their complaints process for impartial advice and support.

Housing Ombudsman Service PO Box 1484, Unit D, Preston, PR2 0ET.
Telephone: 0300 111 3000. Email: info@housing-ombudsman.org.uk
Website: www.housing-ombudsman.org.uk

7.0 Complaint handling personnel

- 7.1 We have a dedicated team of Customer Resolutions Officers to ensure that complaints are acknowledged and responded to appropriately and in a timely manner. The Customer Resolutions officers will also liaise with the Housing Ombudsman to support with any active investigations.
- 7.2 We also have colleagues across the organisation that are trained to handling complaints effectively, in line with our policy.

Complaint handlers will:

- act sensitively and fairly.
- be trained to handle complaints effectively.
- collaborate with colleagues across the organisation to seek quick resolution.
- have the authority and autonomy to act to resolve disputes quickly and fairly.

8.0 Complaint handling principles

- 8.1 We will provide the customer with clear and easy to understand information at the outset, explaining our complaints process, our understanding of the complaint and the resolution sought.
- 8.2 We will try to resolve complaints as quickly as possible; we will gather all the necessary information to fully consider the issues raised, consider a suitable outcome would resolve the matter for the customer and whether there are any urgent actions required.
- 8.3 Customers may opt to have a representative deal with the complaint on their behalf and may be represented or accompanied at any meeting with us where this is reasonable.
- 8.4 We conduct each complaint investigation in an impartial manner. The complaint handler will:
- Listen and take time to understand the complaint and the issues raised.
 - Act independently and with an open mind.
 - Deal with any actual or perceived conflict of interest.
 - Consider all issues, information, and evidence carefully.
 - Keep the complaint confidential as far as possible, with information only disclosed if necessary to thoroughly investigate the matter.
- 8.5 Where a key issue of a complaint relates to legal obligations, we will clearly explain this and provide copies of any relevant policies or documents or legislation that may help customers to understand our decisions.
- 8.6 We will keep customers regularly updated about the progress of their complaint. We will adhere to any reasonable agreements with customers in terms of frequency and method of communication.
- 8.7 The customer, and if applicable any colleague who is the subject of the complaint, will be given a fair chance to set out their position and comment on any findings before a final decision is made.

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- 8.8 A full record of the complaint will be kept in our Customer Relationship Management system. This will include details of the complaint, date received, correspondence with the customer, correspondence with other parties, any reports or surveys prepared, the complaint investigation and any outcomes at each stage.
 - 8.9 Our unreasonable behaviour policy sets out how we will manage behaviour from customers and/or their representatives that we consider unreasonable when pursuing a complaint.
 - 8.10 Any restrictions placed on a customer's contact due to unacceptable behaviour will be appropriate to their needs and demonstrate regard for the provisions of the Equality Act 2010.

9.0 Complaints stage one

- 9.1 When a formal complaint is made, it is acknowledged and logged at stage one of the complaints procedure within five days of receipt. We will clearly set our understanding of the complaint and the resolution the customer is seeking. We will seek further clarity or information from the customer where needed.

The Complaint Handler will contact the customer within three working days of the complaint being acknowledged to discuss their complaint and ensure we have fully understood the issues raised.

- 9.2 We will respond to a complaint within ten working days of it being logged. On occasion we may require more time to fully investigate the complaint, if this is the case we will contact the customer, explain why the extension is needed and, agree reasonable intervals at which we will keep them informed of the status of the complaint and advise them of their right to contact the Housing Ombudsman. Any extension should not exceed a further ten days without good reason.
- 9.3 Where the problem is a recurring issue, we will consider any older reports as part of the background to the complaint if this helps to resolve the issue for the customer.
- 9.4 When the complaint investigation is complete, we will send a response to the customer addressing all points raised, providing obvious reasons for any decisions, outlining any actions taken or required and referencing any relevant policy, law, and good practice where appropriate.

Actions required will be tracked and actioned with regular updates provided to the customer.

- 9.5 Where customers raise additional issues during the investigation, these will be incorporated into the stage one response if they are relevant, and the stage one response has not been issued. Where the stage one response has been issued, or it would unreasonably delay the response, the new issues raised may be logged as a new complaint.
- 9.6 We will confirm the following in writing to the customer at the completion of stage one.
- The complaint stage.
 - The decision on the complaint
 - The reasons for any decisions made.
 - The details of any remedy offered to put things right.
 - Details of any outstanding actions
 - Details of how to escalate the matter to stage two if the resident is not satisfied with the answer.

10.0 Complaints stage two

- 10.1 If all or part of the complaint is not resolved to the customer's satisfaction at stage one, customers can progress to stage two of our complaints process unless an exclusion applies.
- 10.2 Customers wishing to progress to stage two of the formal complaint's procedure must make a request within twenty working days of receiving the stage one decision letter.
- 10.3 If we decline to escalate a complaint, we will clearly communicate in writing our reasons for this as well as the customer's right to approach the Ombudsman about our decision.

We may not escalate a complaint if:

- The stage two complaint is outside of the 20-day time period outlined in the stage one response.
 - The complaint relates to any active legal proceedings.
- 10.4 When we receive a request to progress to stage two, we will set out our understanding of issues outstanding and the outcomes the customer is seeking. If we are unsure about any aspect of the complaint, we will ask the customer for

further information to ensure all elements of the complaint are agreed by both parties.

- 10.5 We will only escalate a complaint to stage two once it has completed stage one and at the request of the customer.
- 10.6 The person considering the complaint at stage two, will not be the same person that considered the complaint at stage one.
- 10.7 The Complaint handler will contact the customer within 5 days of the complaint being escalated, to ensure a clear understanding of the issues and the resolution sought.
- 10.8 We will respond to the stage two complaint within twenty working days of the complaint being escalated. On occasion we may need an extension to this timeframe to fully investigate the complaint, if this is the case, we will provide a clear explanation and timeframes for the extension as well as their right to contact the Housing Ombudsman. This will not exceed a further 20 days without good reason.

If an extension beyond twenty working days is required to enable us to respond to the complaint fully, both parties will agree this.

If for any reason, we respond outside of the agreed timescales without agreement from the customer, this will be acknowledged in our response to the customer and considered in our resolution.

- 10.9 We will confirm the following in writing to the customer at the completion of stage two.
- The complaint stage.
 - The details of the complaint
 - The decision on the complaint
 - A clear explanation of how that decision has been reached.
 - The details of any remedy offered to put things right.
 - Details of any outstanding actions

At any time, we may offer or agree to a request from the customer to refer the matter to mediation.

11.0 Putting things right

- 11.1 Where something has gone wrong, we will acknowledge this and set out the actions we have already taken, or intend to take, to put things right.

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- 11.2 When offering a resolution, we will consider the extent of any service failures and any impact to the customer as a result.

Factors we may consider when determining a resolution can include, but are not limited to, the:

- Length of time that a situation has been ongoing.
 - Frequency with which something has occurred.
 - Severity of any service failure or omission
 - Number of different failures
 - Impact on the resident
 - Resident's individual circumstances or vulnerabilities
- 11.3 Any resolution will clearly set out what will happen and by when, in agreement with the customer where appropriate. Any resolution proposed will be followed through to completion.
- 11.4 If awarding compensation, we will consider whether any statutory payments are due, if any quantifiable losses have been incurred and any time, trouble, distress or inconvenience the customer may have experienced.
- 11.5 In some cases, a customer may have a legal entitlement to redress. We will still offer a resolution where possible, obtaining legal advice where appropriate.

12.0 Continuous learning and improvement

- 12.1 We are committed learning from complaints, identifying key trends and themes of dissatisfaction and using this to improve our services.
- 12.2 Senior management meet regularly to review learnings from complaints and identify improvement opportunities. Learning from complaints will be published on our website along with any action that we are taking to drive service improvement.

13.0 Self-assessment and compliance

- 13.1 We will conduct an annual self-assessment against the Housing Ombudsman Code to ensure our complaint handling remains in line with its requirements.
- 13.2 We will also conduct a self-assessment following a significant restructure and/or change in procedures.

Following each self-assessment, we will:

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- Report the outcome of our self-assessment to our governing body along with our annual complaint performance and service improvement report.
 - Publish the self-assessment and annual performance and service improvement report on the complaints section of our website, alongside our Governing body's response to the report.

13.3 We will publish our complaints policy on our website and regularly promote our complaints process in customer communications. We will promote the role of the Housing Ombudsman and customers rights to contact the Housing Ombudsman for impartial support and advice at any stage of their complaint process.

14.0 Responsibility

14.1 The Governing Body is responsible for the effective implementation of this policy. A member of our Governing body will have lead responsibility for complaints. This person will be known as the 'Member Responsible for Complaints'

14.2 Senior Management will be responsible for ensuring that all employees within their teams are aware of and are appropriately trained in our Policy and Procedures for dealing with enquiries and complaints.

14.3 The Customer Services Manager is responsible for ensuring any requests for training on the complaint's procedure are actioned and delivered as required.

14.4 The day-to-day administration of issues raised under this policy will be conducted by the Customer Resolutions Officer and the Complaint Handler.

15.0 Compliments

Wherever appropriate, we will ensure that any positive feedback on an individual's or team's performance is relayed to both the customer and relevant employees.

Compliments regarding employees will be forwarded to their line manager within ten working days of receipt.

16.0 Performance Measures / Monitoring

Complaints are measured and reported on monthly to the senior leadership team and Quarterly to the Governing Body

17.0 Consultation Arrangements

The Customer Forum has reviewed the Talk to Us Policy. The Customer Forum will also approve the annual complaint performance and service improvement report and receive regulator complaint performance information.

18.0 Regulatory and/or Legal Compliance

This Complaints Policy ensures compliance with The Housing Ombudsman's Complaint Handling Code 1st April 2024. This policy complies with the Regulator of Social Housing's 'Transparency, Influence & Accountability standard' which states:

"Registered providers must ensure complaints are addressed fairly, effectively, and promptly."

19.0 Diversity Considerations

An Equality Impact Assessment has been conducted on the Talk to Us Policy, it concluded that:

The Policy is not directly or indirectly discriminatory.

20.0 Link to Policy

The following documents are linked to this Policy.

- Customer Experience Strategy
- Compensation Policy
- Unreasonable Behaviour Policy
- Customer Code of Conduct
- Employee Code of Conduct
- Equality & Diversity in Employment Policy
- Anti-Social Behaviour & Hate Crime Policy
- Customer Engagement Policy
- Data Protection Policy
- Diversity Policy
- Housing Ombudsman Complaint Handling Code & self-assessment form



Translations available on request by phoning 0303 333 0101 or
via email at info@haltonhousing.org

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