

Procedure

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Contents

1. INTRODUCTION	3
2. WHO CAN MAKE A COMPLAINT?	ERROR! BOOKMARK NOT DEFINED.
3. RECEIPT OF A COMPLAINT	ERROR! BOOKMARK NOT DEFINED.
4. WHAT IS A COMPLAINT?	4
5. WHAT IS A SERVICE REQUEST?	5
6. STAGE 1 COMPLAINT	6
7. STAGE 2 COMPLAINT	8
8. RECORD KEEPING	9
9. UNACCEPTABLE BEHAVIOUR	10
10. PUTTING THINGS RIGHT	10
11. COMPLAINTS TO THE HOUSING OMBUDSMAN SERVICE (HOS)	11
12. SCRUTINY AND OVERSIGHT	13
13. CONTINUOUS LEARNING AND IMPROVEMENT	14

1. Introduction

This procedure should be read in conjunction with our TalkToUs policy.

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.'

This procedure aims to ensure that complaints are dealt with promptly, consistently, and fairly, in line our TalkToUs policy, the Housing Ombudsman's Complaint Handling Code and their dispute resolution principles.

2. Who can make a complaint?

- Tenants (a person who is or who was in a landlord / tenant relationship with us at the time the problem occurred).
- Leaseholder.
- Property Pool Plus applicants.
- Customers with a licence to occupy.
- Customers who have a service agreement with us.
- Third Party representatives (MP and Councillor).

We may accept complaints from individuals who do not fall into the above categories. However, if they remain dissatisfied with the outcome of their complaint, they will be advised to seek independent advice as their complaints fall outside of the remit of the Housing Ombudsman Service Scheme.

We will accept complaints made by groups, third parties or as a result of a petition, where we have consent of the customer/s in line with data protection legislation.

Where a petition or group complaint is received, we will ask for a nominated representative with whom we can consult.

3. Receipt of a complaint

Complaints can be reported to us in the following ways:

- [MyHaltonHome customer portal \(customers only\)](#)

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- <https://halton.powerappsportals.com/RaiseComplaint/> (non customers)
 - Customer Service Team 0303-333-0101.
 - With the reception team at Waterfront Point, Warrington Road, Widnes, WA8 0TD.
 - In person with any Halton Housing employee.

We offer the facility for photos and documents to be provided by the complainant as part of the complaint being made.

When customers are surveyed and / or provide feedback indicating they are dissatisfied, this will not be defined as a complaint, however the customer will be advised on how to make a complaint should they wish to do so.

Customers who are subject to restrictions under our [Unacceptable Behaviour Policy](#), will be advised on how they can raise service issues or complaints with us. Please refer to the [Unacceptable Behaviour Policy](#) for more information.

Anonymous complaints will be passed to the relevant area of the business for their information and any action they deem appropriate. Outcome of any complaint will not be given.

Customer information and complaints will be handled in line with data protection legislation. Details of our Privacy Statement can be found on our [website](#).

In line with the Equality Act 2010, we will make reasonable adjustments, wherever possible to do so and keep a record of these. Further details can be found in our Equality, Diversity and Inclusion Policy and our Additional Support and Reasonable Adjustment Policy.

4. What is a complaint?

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.*

Exclusions

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 unacceptable (an unacceptable complaint is one that is pursued without merit, persistently or deliberately to cause annoyance or frustration). Guidance on this can be found in our [Unacceptable Behaviour Policy](#))
- Complaints of nuisance or antisocial behaviour (ASB), are dealt with by our [ABS and Hate Crime Policy](#). However, we will consider complaints about how nuisance or ASB reports were managed.
- Compensation claims for damage to individual property or personal injury, as these will be dealt with directly or through our insurers. Guidance on this can be found in our [Discretionary Compensation Policy](#)
- Complaints about the conduct of employees will be investigated internally with HR and in line with data protection legislation, the outcome must remain confidential and will not be disclosed to the customer.

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.

Any customers whose behaviour is considered unacceptable as per our [Unacceptable Behaviour Policy](#) may be excluded or have conditions placed on the complaint being pursued through the complaints process.

5. What is a service request?

We recognise the difference between a service request and a complaint.

A service request is: *'a request from a customer requiring action to be taken to provide a service or fix a problem. Service requests are not complaints, but will be recorded, monitored and reviewed regularly.'*

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.

Service requests are recorded in our Customer Relationship Management system (CRM), reviewed, and managed through to completion by the relevant responsible team.

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 in line with our TalktoUs Complaint Policy and Procedure.

6. Stage 1 complaint

The Customer Resolutions Team (CRT) will be responsible for the management and monitoring of complaints, in line with the Housing Ombudsman's Complaint Handling Code.

When a complaint is logged in CRM the CRT will call the customer to triage the complaint to see if a quick resolution can be made. If not, the CRT will log and acknowledge a stage 1 complaint and allocate it to an appropriate complaint handler, **within five working days** of receipt.

The stage 1 acknowledgement letter will advise the customer of:

- Complaint reference number
- Complaint received date
- Our understanding of their complaint
- Their expected resolution/outcome of the complaint
- Complaint due date
- Complaint handler and their contact details
- Does the customer have any disabilities or reasonable adjustments we need to be aware of
- How to contact the Housing Ombudsman Service

The complaint handler will contact the customer **within three working days** of receiving the complaint, to introduce themselves and confirm our understanding of the complaint and their expected resolution outcome. They will also gather any other relevant information to assist their investigation.

When a customer requests contact using a specific method of communication, this will be facilitated wherever possible to do so.

Details of all contact (emails, attachments, telephone calls, text messages, WhatsApp messages, voice messages, etc) with the customer and any information provided to or by them, **must be recorded** in CRM on the complaint case.

Complaint handlers 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.

Stage 1 complaints will be responded to within **10 working days** from the complaint being logged. Where a complaint is complex or further information is required, we may extend by up to a further 10 working days (in agreement with customer).

Further extensions will only be made in exceptional circumstances and in agreement with the customer. If the customer is not in agreement, they will be provided with the contact information for the Housing Ombudsman to allow them to challenge the proposed response date.

On completion of the complaint investigation the customer will receive a Stage 1 outcome letter, sent from CRM via email (post will be used if customer has requested this method). The letter will be in clear, plain language detailing.

- The complaint stage.
- The complaint definition.
- The decision on the complaint.
- The reasons for any decision 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 2 of the customer is not happy with the response.

All stage 1 responses will be provided when the answer to the complaint is known, not when any outstanding actions required to address the issue are completed.

Complaint commitments (outstanding actions) will be logged by the complaint handler and/or the CRT in CRM and will be actioned through to completion by a relevant service manager.

At any time of the stage 1 process, we may offer or agree to a request from the customer to refer the matter to mediation.

7. Stage 2 complaint

If all or part of the stage 1 complaint is not resolved to the customers satisfaction, they can escalate their complaint **within 20 working days** from the date of the Stage 1 outcome letter.

Requests to escalate outside of this timescale will only be considered if there are exceptional circumstances for the delay in escalating.

Requests for an escalation to Stage 2 complaint will be emailed from the customer to talktous@haltonhousing.co.uk. The CRT will review the escalation, acknowledge, and log **within five working days** of the request for escalation.

The complaint handler investigating the complaint at stage two, will not be the same complaint handler that investigated the complaint at stage one.

The stage 2 acknowledgement letter will advise the customer of:

- Complaint reference number
- Complaint received date
- Our understanding of their complaint
- Their expected resolution/outcome of the complaint
- Complaint due date
- Complaint handler and their contact details
- Does the customer have any disabilities or reasonable adjustments we need to be aware of
- How to contact the Housing Ombudsman Service

The complaint handler will contact the customer **within five working days** of receiving the escalation complaint, to introduce themselves and confirm our understanding of the complaint and their expected resolution outcome. They will also gather any other relevant information to assist their investigation.

Stage 2 complaints will be responded to **within 20 working days** from the complaint being logged. Where a complaint is complex or further information is required, we may extend by up to a further 20 working days (in agreement with customer).

Further extensions will only be made in exceptional circumstances and in agreement with the customer. If the customer is not in agreement, they will be provided with the contact information for the Housing Ombudsman to allow them to challenge the proposed response date.

On completion of the complaint investigation the customer will receive a Stage 2 outcome letter, sent from CRM via email (post will be used if customer has requested this method). The letter will be in clear, plain language detailing:

- The complaint stage.
- The complaint definition
- 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 to the Housing Ombudsman

The stage 2 outcome letter will be the final response to the customer and will include details of how to escalate the complaint to the Housing Ombudsman if the customer remains unhappy with the decision.

All stage 2 responses will be provided when the answer to the complaint is known, not when any outstanding actions required to address the issue are completed.

Complaint commitments (outstanding actions) will be logged by the complaint handler and/or the CRT in CRM and will be actioned through to completion by a relevant service manager.

At any time of the stage 2 process, we may offer or agree to a request from the customer to refer the matter to mediation.

8. Record keeping

Accurate and timely record keeping is essential for complaint management. All complaint handlers are required to keep accurate and timely records of their contact and communications with customers within the CRM complaint case.

The CRM complaint case records should be clear, concise and factual and details should be recorded of:

- All communication with customer regarding their complaint
- Any visits, inspections and meetings held with customer and/or others
- All emails to be sent via CRM complaint case and not Outlook.

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- Any text messages and/or WhatsApp messages
 - Transcripts of any voice messages left by customer
 - Any evidence gathered as part of a complaint investigation to be added to the CRM Documents section within the complaint case

Failure to keep accurate and timely records in CRM may result in evidence not being available to support decision-making, and this could result in a finding of service failure or maladministration by the HOS for inadequate record keeping.

9. Unacceptable Behaviour

We may choose to deal with complaints differently or restrict access to the Complaints Procedure where a customer is pursuing a complaint in an unacceptable manner or if their behaviour is unacceptable or their complaint(s) are unreasonable in nature. Further information is available in our [Unacceptable Behaviour Policy](#).

Where we choose to restrict access or deal with a complaint differently due to a customer's unacceptable behaviour, we will write to them and advise them of our decision, our reasons for this and any restrictions that we impose. The customer may be assigned a single point of contact (SPOC). All correspondence with Halton Housing would have to be made via the SPOC who will remain in regular contact with the customer at agreed intervals.

We treat all customers with courtesy and respect and expect the same in return. While we appreciate customers may be upset by an issue, we will not tolerate abuse, threats or aggressive behaviour towards our employees. Customers behaving in this manner during the complaint investigation process will receive a warning to allow them an opportunity to modify their behaviour. If they fail to do so, we reserve the right to close their complaint and / or place restrictions on their communications with us. Further information is available in our [Customer Code of Conduct](#) and our [Unacceptable Behaviour Policy](#).

Any decision to give a warning or deal with a complaint differently, must be discussed with the Customer Service Manager and/ or Head of Customer Support Services, who will provide advice and support to the complaint handler.

Any restrictions put in place will be kept under regular review by the Unacceptable Behaviour Panel which meet monthly.

10. Putting things right

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.

When offering a remedy, we will consider the extent of any service failures and any impact to the customer as a result. We will offer an appropriate remedy, this could be:

- An apology.
- Acknowledging where things have gone wrong.
- Act if there has been a delay or failure.
- Reconsider or change a decision.
- Amend a record or add a correction or addendum.
- Provide a financial remedy.
- A change to our policies, procedures or working practices.

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, vulnerabilities or any reasonable adjustments.

Claims for compensation must follow our [Discretionary Compensation Policy](#) and will be in line with the Housing Ombudsman Service guidance on remedies, dispute resolution principles, and housing sector best practice.

11. Complaints to the Housing Ombudsman Service (HOS)

We will respond to requests for information and evidence from the HOS in line with data protection and the timescales set by their Complaint Handling Code. If we are unable to meet the timescale, we will contact the Housing Ombudsman and explain why and request an extension.

When we receive a **Jurisdiction information (Information request)** email we will follow the below process:

- Customer Services Manager and/or Customer Resolution Officer will complete by the response date on the request.

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- Customer Services Manager and/or Customer Resolution Officer will request an extension to the response date should that date not be achievable.
 - Customer Services Manager and/or Customer Resolution Officer will co-ordinate the gathering of all information requested on the information request template. **All staff are responsible for providing the information requested and must prioritise this to the response date deadline.**
 - Customer Services Manager will arrange a meeting with appropriate staff prior to response date to ensure all information requested is accurate, current and correct.
 - Customer Services Manager will submit the Jurisdiction information (Information request) on or before the response date.
 - Customer Services Manager and/or Customer Resolution Officer will update the complaint case in CRM pending a determination outcome. **This could take 12 months from the response date. We may be asked to provide more information or confirm information already provided after the response date.**

When we receive a **Determination** email and investigation report we will follow the below process:

- Head of Customer Support Services will forward the determination email (letter and investigation report) to Director of Customer Experience, Customer Services Manager and the relevant Head and Director of the complaint area **within 24 working hours of receipt.**
- Director of Customer Experience will share the determination email with the Executive Team and update the Member Responsible for Complaints (MRC) **within 48 working hours of receipt.**
- Head of Customer Support Services will set up an initial review meeting with Director Customer Experience, Customer Services Manager and the relevant Head and Director of the complaint area **within 5 working days of receipt.** This is to review the determination investigation report in detail and agree any actions using the case review template.
- Head of Customer Support Service will set up a further review meeting **within 10 working days of receipt** with Director Customer Experience, Customer Services Manager and the relevant Head and Director of the complaint area. This further review meeting is to follow up any actions and ensure orders are going to be met within the deadline set by HOS. The case

review template will be updated with any actions, lessons learnt, any service improvements and recommendations.

- Customer Services Manager will update the complaint case in CRM and SharePoint with the determination outcome and attach any supporting review template documentation and then close the complaint case.
- Head of Customer Support Service will ensure that cases will be fully reviewed with the Director Customer Experience & MRC to ensure all actions and outcomes are reviewed, alongside lessons learnt and any service improvements and recommendations.
- Customer Forum will be kept informed and updated on any determinations and advised about lessons learnt and service improvements and recommendations.
- Board will be kept informed and updated of any determinations and advised about lessons learnt, service improvements and recommendations.

12. Scrutiny and oversight

The Member Responsible for Complaints (MRC) is responsible for ensuring the governing body receives regular information on complaints that provides insight on the landlord's complaint handling performance. The MRC will have access to suitable information and employees to perform the role and report on the findings. The MRC will receive.

- Regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance.
- Regular reviews of issues and trends arising from complaint handling.
- Regular updates on the outcomes of the Ombudsman's investigations and progress made in complying with new orders related to severe maladministration findings
- The annual complaints performance and service improvement report.

More information on the MRC can be found on the Housing Ombudsman website [Member Responsible for Complaints \(MRC\) | Housing Ombudsman](#)

The annual complaints performance and service improvement report will be published on the complaints section of the Halton Housing website. The report will contain all elements of specified by the HOS.

13. Continuous learning and improvement

We value complaints as they offer us an opportunity to learn and improve. To enable us to do this, all complaints must be logged using CRM.

It is the responsibility of employees and managers to ensure actions taken on complaints are recorded, correspondence is filed appropriately, and response timescales are met.

Managers are responsible for the quality assurance of complaints within their respective service areas. They will also be responsible for any follow up action and arrangement of any redress offered, including the payment of compensation.

Any learning outcomes, actions for improvement or changes to our policies, procedures or services will be recorded on the Listen, Learn, Act tracker and will be discussed monthly with relevant Heads of Service.

Complaints performance will be reported:

- **Weekly** - operational report detailing the number of Stage 1 and Stage 2 complaints received, completed, and closed at the triage stage. This report reflects the previous week's performance and includes the total number of open complaints carried forward into the new week.
- **Monthly** - Customer Experience report is shared with Heads and Directors of Service.
- **Quarterly** - Board and MRC receive Customer Report and MRC report
- **Annually** - Customer Complaints Performance and Service Improvement



Translations are available on request, by calling 0303 333 0101.

اگر به این سند به زبان خود نیاز دارید، لطفاً با شماره 0303 333 0101 با ما تماس بگیرید.

إذا كنت بحاجة إلى هذه الوثيقة بلغتك، يرجى الاتصال بنا على 0303 333 0101

যদি আপনি এই তথ্য অন্য ভাষায় পেতে চান, তাহলে দয়া করে 0303 333 0101 নম্বরে ফোন করুন।

यदि आपको इस दस्तावेज़ की अपनी भाषा में आवश्यकता है, तो कृपया हमसे 0303 333 0101 पर संपर्क करें।

اگر آپ کو اپنی زبان میں اس دستاویز کی ضرورت ہے، تو براہ کرم ہم سے 0303 333 0101 پر رابطہ کریں

如果您需要您自己語言的本文件，請致電 0303 333 0101 與我們聯繫

Jeśli potrzebujesz tego dokumentu w swoim języku, skontaktuj się z nami pod numerem 0303 333 0101