



## **CUSTOMER COMPLAINTS & FEEDBACK POLICY**

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<b>Title</b>	CUSTOMER COMPLAINTS & FEEDBACK POLICY	
<b>Lead Officer/Author</b>	Claire Tough	
<b>Position</b>	Director of Communities and Customer Service	
<b>Department/Section</b>	<b>Communities &amp; Customer Service</b>	
<b>Contact details</b>	Email Claire.tough@homesinsomerset.org Contact Number 01278 435400	
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▪ Version	V3	Annual Policy Review
▪ People Forum	NR	
▪ H&S Forum	NR	
▪ Customer Engagement	15 Jul 2025	<ul style="list-style-type: none"> <li>• The policy is very easy to understand (no big words or acronyms)</li> <li>• Coloured headings enable customers to find a specific paragraph easily and makes the document look friendlier.</li> <li>• Confirmation that the document is available in another language if requested</li> </ul>
▪ STAC	24 Jul 2025	<ul style="list-style-type: none"> <li>• Very concise &amp; easy to understand</li> <li>• Include Board Member Responsible for Complaints in monitoring schedule (suggest 3 monthly reviews)</li> <li>• Suggest use supporter (rather than advocate) to ensure understanding</li> <li>• Discussion re rewording customer v tenant (agreed to defer to wider consultation)</li> </ul>
▪ Leadership Team	NR	
▪ Senior Leadership Team	16 Jul 2025	<ul style="list-style-type: none"> <li>• Include reference to publishing lessons learned and customer feedback more widely including website, social media and newsletters</li> <li>• Include the standard Equality Statement for all customer policies</li> </ul>
▪ Executive Team	15 Jul 2025	<ul style="list-style-type: none"> <li>• Clarity of Stage 2 process</li> <li>• Enhanced reporting in all areas of complaint handling</li> <li>• Policy Review date brought forward</li> </ul>
▪ Board	29 Jul 2025	

▪ Approved Version Issued	03 Mar 2022 26 Mar 2024	Version 1 Version 2
▪ Tier Definition <b>T1</b> - Strategic/ Regulatory Risk <b>T2</b> - Significant Operational Risk <b>T3</b> – Minor Operational Risk	T1	Regulatory Requirement under Consumer Standards
▪ Target Review	Jul 2026	Amended from July 26 for in-year review and sign-off

## Homes in Somerset – Customer Complaints and Feedback Policy

### 1. Introduction

- 1.1. The purpose of this policy is to ensure customers and partners have a clear, simple and accessible process to express dissatisfaction with our service delivery or to provide feedback so we can enable a Customers First and continuous improvement approach. Our aim is that the process will provide a timely response to customers to their feedback.

### 2. Responsibilities (who is accountable for adherence to this policy)

- 2.1 To ensure accountability and adherence, the following roles have direct responsibility for compliance with this policy.

Responsible Persons are:

#### **Customer Focus Manager**

- i. Operational Lead for Complaints: Oversees the logging, monitoring, and coordination of all initial and formal complaints.
- ii. Stage 2 Escalation: Manages the escalation process for formal complaints, including determining who will review the case (options cover a panel, executive, or self).
- iii. Performance Monitoring: Collates complaint data monthly, shares anonymised case studies with senior management and the Board, and ensures lessons learned are disseminated across the organisation.
- iv. Compliance and Reporting: Ensures compliance with the Housing Ombudsman Complaint Handling Code, including the production of the annual Complaints Performance and Service Improvement report.
- v. Customer Support: Provides appropriate support to complainants, including reasonable adjustments and signposting to advocacy services.
- vi. Colleague Engagement: Ensures all colleagues are aware of the content of the policy and are supported in its delivery.

#### **Director of Communities & Customer Service**

- i. Strategic Oversight: Provides leadership and strategic direction for the complaints and feedback process.
- ii. Escalation Point: Acts as a point of contact for complaints involving the Customer Focus Manager for complex issues requiring senior oversight.
- iii. Governance and Assurance: Ensures that the policy is reviewed annually and that updates are presented to the Board for approval.

- iv. Regulatory Alignment: Ensures the policy aligns with statutory requirements and best practice, including the Regulator of Social Housing (RSH's) Consumer Standards and the Housing Ombudsman Service (HOS) Complaint Handling Code.

### **Board Member Responsible for Complaints**

- i. Governance Role: Has lead responsibility for complaints to support a positive complaint handling culture. Provides independent oversight and assurance that the complaints process is fair, transparent, and effective.
- ii. Accountability: Ensures that the organisation is held accountable for how complaints are handled, and that learning is embedded into service delivery.
- iii. Board Liaison: Works with the Board to ensure that complaints performance and learning are regularly reviewed and acted upon.

## **3. Statement of Intent (what are the policy objectives and outcomes?)**

### **3.1 Principles**

We want to ensure that our Customer Complaints and Feedback Policy and process is:

- Clear and easy to use for anyone wishing to make a complaint or provide feedback on our services
- Accessible and available to all and that customers and partners are aware of our policy and procedure
- Consistent in approach for all HiS colleagues
- Based upon resolution at first point of contact
- HiS welcomes third party representation to support customers throughout the complaints process and are committed to ensuring support is available to customers who need our help with sourcing the help of an external supporter (advocate).

## **4. Relevant Legislation or Regulation**

### **4.1. Equality and Diversity**

Under the Equality Act 2010, HiS are considered as providing a public function and must have due regard to the need to:

- Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited under the Act
- Advance equality of opportunity between persons who share relevant protected characteristics and persons who do not share it

We may adapt our approach or provision to ensure that services are accessible to people with a protected characteristic (as defined by the Act) as well as everybody else. This will be in accordance with our Vulnerable Persons and Reasonable Adjustments Policy.

HiS will be consistent in our approach to complaints and treat all customers who access the complaints process in a fair and transparent manner allowing for reasonable adjustments as necessary.

HiS will offer appropriate support to all complainants and consider any sensitive or diverse needs.

Consideration will be given to sign-posting customers to suitable agencies for additional support and guidance throughout the complaints process.

Where necessary, additional support will be provided, such as translation of documents or the use of language line for example

#### **4.2 Regulator of Social Housing Consumer Standards**

This policy aligns with the Regulator of Social Housing's (RSH) Consumer Standards, specifically the Transparency, Influence and Accountability (TI&A) Standard. Under the TI&A Standard (effective April 2024), we ensure all customers can access information, influence decisions, and hold us to account. This includes transparent reporting on complaints and opportunities for customer scrutiny.

#### **4.3. The Housing Ombudsman Complaint Handling Code (2024)**

The Code sets statutory expectations for fair, timely, and accessible complaint resolution. We conduct annual self-assessments against the Code and use complaints to drive service improvement.

### **5. Policy Details**

#### **5.1 This policy will be applied to any expression of dissatisfaction or complaint about a service provided by HiS, our colleagues or partner contractor.**

This policy will not apply for informal day to day matters that can be resolved or for reporting of such matters as anti-social behaviour, fly-tipping or general neighbour disputes.

The Housing Ombudsman recognises that for matters such as safeguarding or health and safety concerns, other policies and processes may be more appropriate to use.

HiS also welcomes and encourages positive feedback and compliments can be submitted about a colleague, a team, or the organisation and its partners.

Compliments are logged and passed onto colleagues so we can identify areas of good practice.

## 5.2 **What is a complaint?**

The Housing Ombudsman Complaint Handling Code, defines a complaint as “any expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the landlord, its own staff, or those acting on its behalf, affecting an individual resident or group of residents.”

The customer does not always have to use the word “complaint” for it to be treated as such, but we do distinguish between a service request, survey feedback and a formal complaint. Whenever a customer expresses dissatisfaction, then HiS will offer them the choice to log their dissatisfaction as a complaint.

A service request and a complaint differ in intent and tone:

- A service request is a formal ask for something to be provided or fixed—like reporting a broken streetlight or requesting a new bin. It’s typically routine and non-contentious.
- A complaint expresses dissatisfaction—such as poor service, delays, or unresolved issues. It often implies that expectations haven’t been met and may require investigation or escalation.

This distinction is important to ensure appropriate complaint handling and resolution.

## 5.3 **What will be considered a complaint?**

Any contact that expresses dissatisfaction with our services will be logged as a complaint. This will include dissatisfaction with the standard of service received from HiS or a member of a HiS colleague or our contractors.

Examples of first-time contacts that will be treated as a complaint if requested by a customer via a repair and can include:

- Non-attendance by a contractor to complete a reported repair
- A repair being completed to an unsatisfactory standard
- A HiS colleague or contractor behaving in an inappropriate or unprofessional way

## 5.4 **What will not be treated as a complaint?**

HiS will strive to resolve all complaints at the first point of contact.

Examples of enquiries that will not be treated as a complaint include:

- Repeat officer contacts for rent arrears
- Reports of fly-tipping or anti-social behaviour
- Issues that have not been reported previously

All requests for service or further information will be logged as an in-bound communication and will be dealt with accordingly, without the requirement for further escalation.

A complaint will not be accepted for consideration in the following circumstances:

- Where the issue giving rise to the complaint occurred over 12 months ago
- Matters contained within the complaint have already been considered and the internal complaints process has been exhausted

Where HiS decides not to accept a complaint, we will provide an explanation setting out the reasons why the issue is not suitable for the complaints process. The customer can challenge this decision via the Housing Ombudsman or may also ask a representative for support to resolve the issue.

In these cases, HiS will continue to provide support, but this may be via alternative channels such as our ASB process, or neighbourhood case management.

#### **5.5. Initial contact if you are unhappy with our service**

All service requests are logged by our Customer Services team, who will always aim to deal with the enquiry at the first point of contact.

In accordance with the Housing Ombudsman Complaint Handling Code, where a customer expresses dissatisfaction, we will always endeavour to deal with the issue at the first point of contact, and offer the customer the option of making a complaint, even if we successfully resolve the issue. This is to ensure transparency, and to enable accurate reporting.

Recording service requests enables HiS to carry out regular monitoring and reviewing of service requests. If a customer states that they do not wish the matter to be treated as a formal complaint, the contact will still be logged as an expression of dissatisfaction and dealt with accordingly but noted that no further escalation is required.

#### **5.6 Stage 1 Complaints**

Where it has not been possible to resolve an issue, the complaint will be progressed as a Stage 1 complaint.

The complaint investigation and response will be passed to a member of the Leadership team, depending on the content and nature of the complaint. E.g. for complaints about our colleagues or contractor it will be more appropriate for a Manager to investigate and respond.

Stage 1 complaints will be acknowledged within 5 working days, and a full response given within 10 working days of this acknowledgement.

All points raised in the complaint will be investigated and clear reasons given for any decisions, referencing the relevant policy, law and good practice where appropriate.



Where additional complaints are raised during the investigation, these may be incorporated into the stage 1 response if they are related and the stage 1 response has not been issued.

Where the stage 1 response has been issued, the new issues are unrelated to the issues already being investigated or it would unreasonably delay the response, the new issues will be logged as a new complaint.

Please note that complaints must be received within 12 months of the issue arising and causing the customer dissatisfaction, and will generally not be considered a complaint if it is outside of this timescale.

## 5.7 **Stage 2 Complaints**

If a customer has received a response to their Stage 1 complaint, and they remain dissatisfied with the outcome, they can ask for their complaint to be escalated to Stage 2. This escalation can be made through all the usual channels including email, by telephone or in person.

Escalation to Stage 2 is not a re-investigation of the complaint, but a review to ensure that we have:

- Followed agreed policy and procedures including any reasonable adjustments being made as appropriate and necessary
- Adhered to our Service Standards
- Dealt with the initial complaint in a reasonable and fair manner
- Our initial response has answered and resolved all the complaint

The customer does not have to provide any additional information or explain their reasons for requesting that their complaint is escalated, but it may be helpful for additional information to be provided as to how the initial complaint has not been answered and the desired outcome achieved that the complainant is seeking.

All requests for escalation of a complaint to the next stage for review, should be directed to the Customer Focus Manager, and will be acknowledged within 5 working days.

The decision of who will complete the Stage 2 process will be made by the Customer Focus Manager.

The complaint will be reviewed by either a panel, our Customer Focus Manager, or a member of our Executive team, and will ensure that the complainant has an opportunity to challenge the initial stage decision, and have their concerns and issues given further consideration. Person(s) reviewing the Stage 2 complaint will not be the same as those involved at Stage 1.

A panel may be convened where the complaint is complex or it has

multiple aspects to it. A member of Executive Team will chair the meeting supported by appropriate persons with sufficient seniority and experience and a formally involved customer. The complainant will be invited to attend the panel with a supporter (advocate) or other relevant person to support them.

A full response to a Stage 2 formal complaint will be issued within 20 working days of the acknowledgement at Stage 2. Where this isn't possible, the Customer Focus Manager will clearly communicate this to the customer providing a revised date and an explanation for the delay.

The written response to the complainant will not be delayed where actions may take longer than 20 working days. All actions agreed to resolve the complaint will be tracked and actions promptly progressed. Timely updates on progress of the resolution will be communicated to the complainant at intervals agreed with them.

## **5.8 Housing Ombudsman Service**

If a customer remains unhappy with our response, they can refer their complaint to the Housing Ombudsman. Invariably cases will only be accepted by the Housing Ombudsman where our internal complaints process has been followed and exhausted.

However, help and advice can be sought from the Housing Ombudsman service at any point in the process.

Customers can contact the Housing Ombudsman service as follows

Email – [info@housing-ombudsman.org.uk](mailto:info@housing-ombudsman.org.uk)

Phone – 0300 111 3000

In writing – Housing Ombudsman Service, PO Box 152, Liverpool L33 7WQ

Website – [www.housing-ombudsman.org.uk/residents/make-a-complaint](http://www.housing-ombudsman.org.uk/residents/make-a-complaint)

## **5.9 When a complaint may be refused**

In exceptional circumstances, HiS may refuse to treat the matter as a complaint. These would include such instances as:

- The complaint is about the same subject matter that has already been considered
- The resolution requested by the complainant is out of the remit or responsibility of HiS
- The complainant is seeking excessive recompense disproportionate to the service failure
- Where a complainant is persistent or unreasonable as per our Unacceptable Behaviour policy

## **5.10 Compensation, Remedies and Redress**

The Remedies and Redress Policy sets out our approach to how we

approach remedies, redress and compensation.

HiS will always seek to resolve the issue at the first point of contact with no escalation or compensation requirement.

Compensation will not be offered where we have not been given an opportunity to rectify matters first.

All awards of compensation will be agreed within the guidelines set by the Housing Ombudsman Service.

## **6. Communication of the Policy**

6.1 In our communication of this Policy HiS will:

- Publish the policy on the organisation's website in an accessible format.
- Provide alternative formats upon request (e.g., large print, translated versions).
- Make the policy available via post, email, and in-person at our offices.
- Promote through multiple channels: newsletters, social media, posters, and colleague email signatures.

## **7. Equality, Diversity and Inclusion Impact**

7.1 HiS is committed to working in a way that treats people equitably, celebrates diversity, and promotes inclusivity - because we believe this builds a better society for all. We believe this approach will enable us to serve our customers better; help our leaders make good decisions and ensure we are a great employer and shape the way we engage with our communities. This approach will also help us to meet the legislative requirements under the Equality Act 2010, including our Public Sector Equality Duty.

The Customer Complaints & Feedback Policy demonstrates a strong commitment to equality, diversity, and inclusion. It ensures that all individuals have equal access to the complaints process and that their feedback is valued and addressed appropriately.

## **8. Monitoring Performance Metrics (what is measured to demonstrate adherence)**

8.1. HiS will produce an annual complaints performance and service improvement report for scrutiny and to ensure compliance with the Complaint Handling Code.

HiS will collect the following information to monitor performance surrounding customer feedback and complaints:

- Complaint handling performance against timescales
- Number of stage 1 and stage 2 complaints
- Number and outcome of Housing Ombudsman Service enquiries

#### Reporting against Tenant Satisfaction Measures (TSMs)

- TP09 – Satisfaction with Complaints Handling
- CH01 - Number of Stage 1 complaints received per 1000 homes and Number of Stage 2 complaints received per 1000 homes
- CH02 - Proportion of stage 1 complaints responded to within the Housing Ombudsman's Complaint Handling Code timescales and Proportion of stage 2 complaints responded to within the Housing Ombudsman's Complaint Handling Code timescales will also be cited in our performance monitoring.

In addition to complaints performance reporting, we will also record and report the themes of our complaints and identify any points of organisational learning on our website, social media and in our newsletters.

- 8.2. Reports will be provided as follows:
- Sedgemoor Tenants Assurance Committee: Quarterly Update
  - Customer Champion Responsible for Complaints; Three monthly
  - Senior Leadership Team: Monthly
  - Executive Team: Three-Monthly
  - Board: Six-monthly

Somerset Council as the lead organisation, will receive updates through Partnership meetings annually.

The Customer Focus Manager will collate all initial and formal complaint communications monthly.

## **9. Policy Review**

- 9.1. We will review this policy annually in line with Housing Ombudsman Complaint Handling and any proposed changes approved by Board.

## **10. Associated Policies, Risk Assessments, Procedures, Safe Systems of Work etc**

- Equality Diversity and Inclusion Strategy
- Vulnerable Persons and Reasonable Adjustments Policy
- Unacceptable Behaviour Policy
- Partnership Pledge Policy
- Remedies and Redress Policy
- Customers First Policy