



## Gravesend Churches Housing Association

# Comments, Compliments and Complaints Policy

<b>Status:</b>	Approved
<b>Version Number:</b>	1
<b>Last approved date:</b>	8 June 2023
<b>Revision date:</b>	June 2026
<b>Responsible Officer:</b>	Director of Operations

## **1.0 Introduction**

GCHA is committed to 'Putting customers First' by improving the quality of our services and our customers' experience of GCHA services.

As an organisation we promote 'Empowerment'; Underpinned by a clear set of values that embraces a culture of adaptability, responsiveness, inclusivity, trust, and accountability.

We welcome our customers views as it provides us with an insight into what we are doing well and where we may need to focus improvements.

We respond to all customer feedback in a consistent and professional manner and where we have failed to deliver 'customer excellence', or meet our 'customers' expectations', we will hold our hands up, apologise, and work with our customers to rebuild their trust, respect and aim to 'put things right'.

## **2.0 Scope**

### **2.1 Definition**

At GCHA, we believe that effective complaint handling should be customer friendly; enabling our customers to be heard and understood.

The starting point is where all parties have a mutual understanding of what constitutes a 'complaint'. GCHA follows the Housing Ombudsman definition of a complaint, which is: -

*"An expression of dissatisfaction, however made, about the standard of services, actions or lack of action by GCHA, their staff, or those acting on our behalf".*

Our Customers do not need to use the word 'complaint' for us to treat it as such.

### **2.2 Definition of other feedback types**

This policy covers all customer feedback types and the section below details what GCHA considers the definitions of each feedback type.

### **2.3 Compliments**

A compliment is defined as a customer statement of positive recognition or praise for a service or member of staff. This can be received via any form of communication such as in person, by phone, email, social media, and any other way the customer can get in contact with us.

We welcome and encourage compliments as they help let us know when things are going well and what our customers think about our services. They provide positive feedback to employees and boost morale and motivation. Compliments will be recorded centrally, acknowledged, and referred to the manager of the individual or service concerned.

Compliments will be published anonymously using our website, newsletters and social media and may be used in publicity materials.

### **2.4 Comments**

A comment can be described as a customer remark or personal opinion about a service that does not require any action or formal response. This could be an observation, reference, or statement about something delivered by GCHA.

Comments and suggestions for improvement will be used to help inform the delivery of our services. Unless specifically requested, there is not an automatic assumption that a comment

will be replied to. Should the customer indicate they expect a reply, this should be dealt with immediately or no longer than 5 working days.

## **2.5 Service Request**

A service request is a request from a person requiring action to be taken, to put something right or a request for services for the first time. However, a service request could lead to a complaint, where GCHA staff have not carried out the service request leading to an 'Expression of Dissatisfaction' from the customer.

## **3.0 Legal and regulatory compliance**

We operate this policy with due regard to all relevant legislation, regulation, and good practice. We will comply with all regulatory requirements:

- The Charter for Social Housing Residents (Social Housing White Paper)
- The Housing Ombudsman Complaint Handling Code (March 2022)
- Regulator of Social Housing (RSH) – Tenant and Empowerment Standard
- Equality Act 2010

## **4.0 A positive complaints culture**

We want to hear from our residents where they have received poor services or remain dissatisfied with GCHA as a Landlord because of poor services.

We welcome the opportunity to speak to our residents and put things right where we have failed to deliver 'customer excellence' or meet 'customer expectations'.

Every customer will receive the same standard of service regardless of their background, appearance, age, beliefs, or lifestyle. We will focus on the individual by considering the person and their circumstances.

We will train our staff on 'early resolutions' and delivering 'customer excellence' so that our staff have the skills and ability to support and deliver positive resolutions and outcomes.

## **5.0 Key Principles**

At the point that a Customer expresses any areas of dissatisfaction, we empower our staff to resolve your concerns at the first point of contact.

We will seek your feedback at the end of your enquiry to check your customer satisfaction levels.

Where a customer remains unhappy with our approach, we will escalate their concerns through our internal formal complaint's procedure.

## **6.0 Ways to provide feedback.**

We encourage our customers to contact us directly to discuss how we can make things right at first point of contact.

The easiest way for you to do this is by contacting one of our housing officers who will aim to make it right when they hear from you.

We understand that you may wish to contact us by other methods, so feel free to use any of the following ways to do so:

- Email: [general@gcha.org.uk](mailto:general@gcha.org.uk) (available for use 24/7)
- Telephone by calling 01474 369 830
- Website: Complete the complaints form online: <https://www.gcha.org.uk>
- In person: 14 London Road, Northfleet, Gravesend, DA11 9JQ (Available weekdays 9am – 5pm)
- In writing: 14 London Road, Northfleet, Gravesend, DA11 9JQ
- Via social media platforms: Twitter, Facebook, and LinkedIn

- Directly to any of our colleagues in person
- Via a representative or advocate (We must have written permission from yourself the customer to speak to a third party acting on your behalf)

Where we receive feedback via social media, we will contact the individual directly; not via (social media) to discuss the situation with them.

We will adapt our complaints policy, procedures, or processes to accommodate an individual's needs as much as possible, making any reasonable adjustments where necessary.

## **7.0 Our approach**

### **7.1 Stage One – Investigation and Resolution**

We will aim to resolve the complaint as early as possible. If we cannot resolve your concerns at the first point of contact, your complaint will be referred to the Operational Lead for (Housing/Repairs), to review and respond to your complaint.

In line with the Housing Ombudsman guidance, GCHA will acknowledge your complaint within five working days of receipt.

The Operational Lead will explain what steps will be taken to investigate your complaint, which may include visiting you in person if they felt it would help them understand the context of the complaint and contribute towards the overall solution or outcome.

The target time for responding to complaints is 10 working days from the receipt date.

Although due to the type of complaint and complexities to resolve, it may not always be possible to complete all agreed actions within this period.

If that is the case, the Operational Lead will contact you and agree a new response date and explain the reasons for this. The Operational Lead will keep in touch with you by telephone or email to keep you informed of the progress of your complaint.

Once we have agreed a resolution and confirmed our decision in writing, we will either close the complaint at stage one or inform you that we will need to monitor the progress of any outstanding actions until these are complete, before making the decision to close.

Together, we (GCHA/Customer) will agree what is an appropriate timeline to provide regular updates until the complaint is resolved.

Where customers raise additional complaints during the investigation, these will be incorporated at stage one if they are relevant, and the stage one response has not been issued. If the stage one response has been issued, or it would unreasonably delay the response, the complaint should be logged as a new complaint. Where the complaint issues are very different to the initial complaint at stage one, we will log as a separate complaint.

### **7.2 Escalation**

If the customer is dissatisfied with the resolution or outcome, and requests to escalate their complaint to stage two, then we will communicate with the customer to try and understand the customer's reasons for their continued dissatisfaction and what will help resolve the complaint.

If there is a way that we can resolve the complaint at stage one, we will.

We will seek further clarification from the customer and if after a discussion with the customer, and they remain unhappy with our response, giving clear reasons why they believe their complaint should be escalated, then GCHA will make a decision to decline or escalate the complaint based on a number of factors: -

- Has the complaint been fully responded to at stage one and upon escalation, the response will remain the same

- Whether the complaint is vexatious and or the resident has demonstrated unreasonable behaviours towards staff making it difficult to resolve the complaint to a satisfactory level.
- We will only escalate a complaint once it has completed its stage one complaints process.

If the decision is made to 'not escalate' the customers complaint to stage two, GCHA will explain clearly to the customer, the reasons why. This would deem GCHA's complaints process as closed allowing the customer (should they wish) to pursue their complaint directly with the 'Housing Ombudsman'.

Any decisions to not escalate the complaint to stage two should be an exception to the rule and not common practice.

### **7.3 Stage 2 – Review and Decision**

The Chief Executive or where the Chief Executive is not available, another member of the Executive Management Team, will carry out a review of the complaint. This may include a Board Member.

The identified lead will contact the customer within five working days to discuss the complaint concerns with them.

The lead person will listen, ask the customer what a successful outcome would look like, investigate the complaint further and write back to the customer within a further 10 working days, with the outcome of their investigation.

If the Lead is not able to resolve the complaint within this timeframe, a reasonable timeframe will be agreed with the customer.

Stage two of the complaint process will be the final review process. If a customer remains dissatisfied with how their individual situation has been handled and / or with the outcome, they may refer their complaint to the 'Housing Ombudsman'.

### **7.4 Stage 3 – The Housing Ombudsman**

At this stage of the complaints process, GCHA will await to hear from the Housing Ombudsman. On contact, GCHA will cooperate with the 'Housing Ombudsman's' requests for evidence and provide this within 15 working days.

If a response cannot be provided within this timeframe, we will provide an explanation for the delay. If accepted as reasonable, the 'Housing Ombudsman' will agree a revised date with us.

### **7.5 The Housing Ombudsman Service**

GCHAs aims to resolve complaints before they get to Stage one or Stage two. However, should the customer remain dissatisfied at Stage two of our complaints process, they can ask for a review of the case by the Housing Ombudsman Service.

The Housing Ombudsman will only investigate a complaint where the customer has exhausted GCHA complaints process, although this must be done within six months of having completed GCHAs formal complaints process. The customer must be a GCHA resident to raise a complaint with the Housing Ombudsman. The Housing Ombudsman contact details are:

Housing Ombudsman Service  
 81 Aldwych  
 London  
 WC2B 4HN  
 Tel: 0300 111 3000  
 Lo Call: 0845 712 5973  
 E-mail: [info@housing-ombudsman.org.uk](mailto:info@housing-ombudsman.org.uk)  
 Web: [www.housing-ombudsman.org.uk](http://www.housing-ombudsman.org.uk)

## 8.0 GCHA Complaints Process



## 9.0 Compensation for service failure

GCHAs is committed to providing an efficient and responsive service. Where we have failed, we will offer an explanation and an honest apology. In some cases, however a gesture of goodwill may be appropriate. These can occur when:

- Specific evidenced financial losses have incurred.
- The complainant has spent an undue amount of time pursuing their concerns.
- Where exceptional hardship and inconvenience has been caused by events surrounding the complaint

## 10.0 Continuous learning

We see complaints as an opportunity to learn from our mistakes and improve our services. Complaint numbers, outcomes and satisfaction levels help to inform policy reviews and reshape our services in the future.

We will act on recommendations and feedback from others involved in the complaint's resolution process i.e., Staff, Customer and their advocates, or the Housing Ombudsman.

The Executive Management Team will discuss and review complaints at the monthly staff and Executive Management Team meetings. This will enable trends, root causes and lessons learnt to be identified so we do not repeat our mistakes.

## 11.0 Petitions

A complaint made in the form of a petition on behalf of multiple residents will be treated as one complaint, with contact via the nominated signatory.

## 12.0 Anonymous complaints

Anonymous complaints may not be acted upon; they will, however, be brought to the appropriate manager's attention and investigated if necessary.

## 13.0 Monitoring complaints

All formal complaints will be recorded by GCHA and will remain open until all agreed actions have been resolved.

The Housing Operations team will review the complaints monthly via EMT meetings with regular updates to GCHA Board. Assuming there are no further occurrences, the complaint will be closed at this point.

## 14.0 Where the policy does not apply.

The complaints policy does not apply where:

- There is already a live complaint, or the matter has already been considered under the complaints policy.

- Complaints of anti-social behaviour, as these are covered by GCHA anti-social behaviour policy. However, a complaint will be accepted if the customer is dissatisfied with how their anti-social behaviour complaint was handled.
- Cases where a legal claim is made against GCHA, including disrepair cases and insurance claims. (If the claim occurs after the complaint has been raised, we will close the complaint)
- Cases where a customer is taking a matter to court, or the matter is being dealt with by another statutory agency, that has the power to resolve the complaint. (If the claim occurs after the complaint has been raised, we will then close the complaint).
- Complaints made by GCHA staff – these are dealt with under the grievance procedure through HR. However, the policy will apply if the member of staff is a GCHA resident making a complaint about GCHA service and not a colleague.
- Complaints relating to staff conduct will be fully investigated in line with our HR policies. We will not be able to divulge the outcome of these investigations for reasons of confidentiality. We will, however, explain what our investigation involved.

Customers are encouraged to raise their concerns at the time of an issue arising so that GCHA staff can respond more effectively. If the customer seeks to raise their concerns six months or longer after an issue occurs, it may reduce the opportunities for better outcomes due to evidence available, staff moving on or information in general. In these circumstances, GCHA will assess each situation individually at the time.

### **15.0 Vexatious Complaints**

We define a vexatious complainant as someone who, because of the nature, or frequency of their contact with GCHA, hinders our ability to deal effectively with their or other customers' complaints.

This applies to a very small minority of residents who make unreasonable demands on GCHA staff time and behave in a manner that is aggressive, intimidating, or refuses to accept GCHA response.

Some examples of these type of behaviours include:

- Refusing to specify the grounds of a complaint, despite offers of help
- Not co-operating with the complaints investigation process
- Changing the basis of the complaint as the investigation proceeds
- Pursuing parallel complaints on the same issue with various organisations
- Making excessive and unnecessary demands on the time and resources of staff with lengthy phone calls, emails to numerous staff, Board members, external parties, including letters, emails, every few days expecting immediate responses
- Submitting repeat complaints with minor additions, variations and insisting they are 'new' complaints.
- Refusing to accept a decision or repeatedly argue points with no new evidence.
- Making a complaint has no serious purpose or value. It may have little merit and investigating would be out of proportion to the seriousness of the issues complained about.
- Unreasonable levels of behaviours towards GCHA and GCHA contractors.

We reserve the right to refuse to deal with vexatious complaints or deal with them differently. For example, we may advise you (the Customer) to approach the Housing Ombudsman Service without a review (if the request is an impossible one). The CEO must agree to this decision.

### **16.0 Unreasonable Behaviour**

GCHA staff will always be professional, friendly and treat our customers with respect and fairness. We ask that our customers do the same when communicating with GCHA staff. Where this is not the case, and the customers behaviours or demands become unreasonable, then the Operational Lead will contact the customer directly and provide options on how to progress their concerns. Please refer to (Appendix A) at the end of this policy for further information on unreasonable behaviours.

Where a customer's behaviour is unreasonable or excessive. GCHA reserves the right, at any stage of the complaints procedure, to review a complaint and put specific action in place which could include:

- The Operational Lead speaking to the customer directly with the intent to set out expectations and agree how the complaint will be managed
- Put in place a designated single named point of contact
- Limited number of emails and telephone contacts
- Seek guidance from the Housing Ombudsman on whether there is any other course of action that GCHA could take in these situations

### **17.0 Anonymous complaints**

Anonymous complaints may not be acted upon; they will, however, be brought to the appropriate manager's attention and investigated if necessary.

### **18.0 Monitoring complaints**

All formal complaints will be recorded by GCHA and will remain open until all agreed actions have been resolved.

Complaints will be reviewed weekly by Operational Leads; monthly at the GCHA (All Staff) meetings, and quarterly updates to GCHA Board.

### **19.0 Complaints made directly to GCHA board**

There will be times where our customers feel that they cannot trust GCHA staff to respond to their complaints and will seek to by-pass the formal complaints policy and procedure. In these situations, the board members are advised to redirect the complaint back to GCHA via the CEO and their Operations Team to respond.

### **20.0 Mediation**

In circumstances where the relationship between the customer and GCHA staff has deteriorated to a point where the complaint remains unresolved, and having explored a number of proactive actions which has failed to resolve the complaint or improve the relationship with the customer, GCHA may seek the support of an independent mediator (TPAS) to work with both parties to resolve the complaint and to rebuild relationships.

Once the complaint has been formally responded to and resolved, the CEO and/or Head of Operations will update the board members.

### **21.0 Confidentiality**

All complaints are treated with confidentiality in mind and in line with the Data Protection Act 2018.

### **22.0 Equalities statement**

GCHA will treat all customers with fairness, dignity, and respect. We value diversity and work to promote equality and tackle unlawful discrimination.

Our approach to complaints promotes empathy, openness between residents and GCHA staff to understand the complaint and resolve the complaint in a positive manner. We will take fully into account an individual's needs and preferences and make any reasonable adjustments where necessary by offering support or tailor our approach as appropriate.



We will assess any vulnerability and where necessary make reasonable adjustments to our approach to ensure that the customer receives and fair and equal service.

### 3.0 Policy controls sheet

Date of Last Review	Main changes and why (i.e., change in legislation, internal processes, next review date)
January 2021	Policy was due for a full review
June 2023	Policy reviewed in line with the Ombudsman Complaint code to consider a 2 stage complaints process and also expand on vexatious and unreasonable behaviours and removed the 'designated person' in line with the Housing Ombudsmen Complaint Code which took effect on 1 <sup>st</sup> October 2022).

Approved (on behalf of the Board Review Group) by:	Brian Horton
Signature	
Date	8 June 2023

## Appendix A – Behaviours that constitute as unreasonable

### 1.0 Persistent/Abusive Customers

We accept that at times people may act in a way that is out of character, especially where our customers feel frustrated and distressed because they feel that staff at GCHA are not listening to them.

We know that it is upsetting, when contacting us, customers feel disappointed by our action or inaction. We also need to understand that all our customers have different needs and therefore we appropriate, we need to implement any reasonable adjustments to make it easier for our customers to access our services to make a complaint.

However, we would like our customers to understand that our staff are there to help and support you with your complaint. Becoming angry and frustrated with our services is understandable. What is not appreciated is when that anger or frustration leads to unreasonable behaviour or demands.

We consider the following actions to be unreasonable or vexatious:

- Aggressive or abusive behaviour
- Unreasonable demands
- Unreasonable Persistence

### **1.1 Aggressive or abusive behaviour**

As we would expect our staff to treat our customers with courtesy and respect, we would also expect our customers to replicate the same towards our staff.

We will not tolerate physical violence; language (spoken or written) or behaviour which makes colleagues feel fearful, threatened, or abused. Such behaviours can include making derogatory personal remarks, being rude, inflammatory statements or making unsubstantiated allegations.

### **1.2 Unreasonable demands**

Where the demands of a customer substantially affect our colleagues causing a negative impact on other customers or workload, we will consider them unreasonable. This may include demanding responses within an unreasonable timescale; constant contact whether by phone, email or in writing, repeatedly changing the subject of a complaint or raising unrelated issues and insisting on speaking or seeking specific colleagues.

### **1.3 Unreasonable Persistence**

We will consider actions to be unreasonably persistent when a customer refuses to accept a decision made in relation to a complaint; refuses to accept explanations relating to what we can and cannot do or continues to pursue a case without presenting any new information or evidence.

Where a customer refuses to modify their behaviour when requested, the Operational Lead may make the decision to deal with them outside of the Complaints policy or restrict the customers access to our services. All such restrictions will be communicated to the customer in writing. We will explain our reasons for the restriction and inform the customer of alternative ways of contact GCHA, which may be restricted to dedicated email address; in writing only; by phone or address and identified colleague as the key contact.

In extreme circumstances if the customer remains abusive, we may ask that the customer appoint a representative to act or speak on their behalf and all communications are progress through this method.

We reserve the right to take legal action or possession action if a customer behaviour in such a way that they are breaking the law or the breach their tenancy or terms of their lease.