

## COMPLAINTS POLICY

### 1. Introduction

Citizen is committed to providing excellent, responsive, and accessible services for our customers and we welcome feedback on all our services.

We recognise that in some cases, we may not always meet our customers' expectations and we need to ensure there is a robust complaints policy and process in place to resolve complaints promptly, fairly and in confidence.

Complaints help us to know how we are performing by listening to our customers. An effective complaint procedure not only helps to resolve customers' problems but is an important part of continuous improvement and quality management.

This policy is aligned to the relevant regulatory requirements of Housing Act 1996 (schedule 2), General Data Protection Act 2018, Equality Act 2010, Housing Ombudsman Scheme, and Tenant and Involvement Empowerment Standards.

This policy has been developed in consultation with our customers.

This policy and our procedures set out how we will respond to complaints and how we will make sure that complaints are used to shape service delivery and produce demonstrable outcomes for customers.

This policy aims to ensure that:

- We adopt a positive approach to customer feedback, we see all feedback, including complaints, as an opportunity to learn and to improve our services.
- There are adequate resources and training in place to ensure excellence in complaint handling.
- Customers are treated fairly, consistently and without discrimination in line with Citizen values.
- Following the resolution of a complaint made in good faith we will not treat a complainant less favourably.
- When we have failed, we put it right; at the earliest opportunity and to the correct standard, as defined by our policies and procedures.

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## 2. Scope

This policy extends to all Citizen services and applies to:

- anyone who asks for or receives services from us or
- is affected by a decision or action taken by us.

This policy also covers compensation payments which may be paid where there has been an impact to the customer, for example where;

- we are found to have failed in our service delivery and where there has been loss of facilities and/or out of pocket expenses because of this failure.
- claims have an estimated value below the policy excess of our insurers.

The amount payable will be considered in line with the compensation framework.

This policy does not cover statutory obligations to provide compensation, and insurance claims for personal injury and disrepair claims.

## 3. Policy Detail

### 3.1 Definition of a Complaint

A complaint is defined as: an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the organisation, its own staff, or those acting on its behalf, affecting an individual resident or group of residents.

If none of the above is applicable, then it is usually a request for a service and will be dealt with through our normal service delivery or as customer feedback. We will record the customer feedback to be considered in any future service reviews.

We will not normally consider complaints, when the problem happened more than 6 months before the complaint being made.

If a customer is unhappy with the outcome of our Stage 1 investigation, the customer is entitled to a Stage 2, final review by an independent investigating officer. The customer needs to advise us that they would like a Stage 2 review within 6 months of our Stage 1 response.

Complaints will not usually be considered when the case is already going through a court or tribunal (including disrepair cases). In these circumstances court procedures, timescales and judgements would take precedence. We will advise customers details of why their complaint cannot be considered.

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### **3.2 Making a complaint**

Our Customer Service Centre is our main point of customer contact. However, people can tell us about their complaint in the most convenient way to them. This includes our online customer portal 'My account', on our website, social media, in person to a Citizen staff member, in writing and by telephone. Customers are made aware of how to make a complaint, through a variety of different methods.

Where Citizen receives a complaint through social media, to ensure that confidentiality and privacy is always maintained, we may continue our response through other communication channels.

We aim to resolve all reported dissatisfaction at the point of contact at the Customer Services Centre. Where a report cannot be resolved at the point of contact the complaint will be investigated by the relevant service area management team within 3 working days. Where a complaint requires a more in-depth investigation, this will be passed to the Feedback and Resolution Team to co-ordinate. The team will carry out an initial assessment to determine the actions to be taken, as set out in our complaints procedure.

We will contact the customer to:

- Advise what will happen next and the anticipated timescales for a response. At this point we will confirm the stage the customer is at in our complaints procedure.
- Discuss the progress of the complaint investigation, to clarify points to answer within the complaint and the complaint outcome where appropriate.
- Where further investigation is required, we will reach agreement with the customer of the revised timescale for the investigation to be concluded and agree the updated timescales.

When the investigation is complete:

- We will write a full response outlining our findings, which may include any action we propose to resolve the complaint. This may include an apology and a change in our processes or procedures or a discretionary compensation payment.
- Identify the root cause of the complaint and record learning to feed into future service improvements.

If all or part of the complaint is not resolved to the customers' satisfaction at Stage 1, it will be escalated to a Stage 2.

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Throughout our complaints process, if a customer remains dissatisfied with either our handling or the outcome of their complaint, they will be advised that they can take further action which is to refer their complaint to a local councillor or MP for review or Housing Ombudsman.

### 3.3 Timescales

Citizen has a two stage complaints procedure. At all stages, a complaint should be resolved at the earliest opportunity and the following timescales will be adhered to as a maximum, unless otherwise agreed with the complainant:

- When a complaint is made, it must be acknowledged and logged at Stage 1 of the complaints procedure within five days of receipt.
- We will respond to a Stage 1 complaint within 10 working days of the complaint being logged.
- Exceptionally, we will provide an explanation to the complainant containing a clear timeframe for when the Stage 1 response will be delivered. This will not exceed a further 10 days, without a good reason.
- If an extension beyond 20 working days is required to respond to the Stage 1 complaint, this should be agreed by both parties.
- We will respond to a Stage 2 complaint within 20 working days of escalation.
- Exceptionally, we will provide an explanation to the complainant containing a clear timeframe for when the stage two response will be delivered. This will not exceed a further 10 days without good reason.
- If an extension beyond 10 days is required to respond to the Stage 2 complaint, this should be agreed by both parties.

### 3.4 Third Party Reporting

We recognise that some people who wish to complain, may need support to do so. We accept complaints made by a third party on behalf of a complainant only if the complainant is in agreement as set out in our Data Protection and Information Security Policy.

When we receive a complaint on behalf of a customer, we will only deal with the third party where we have a signed authorisation form from the complainant. Where, for reasons of incapacity, it is not possible for the complainant to authorise a third party to act on their behalf in this way, we will require alternative documentation for example, a Mental Capacity Act Assessment or a letter from a partner agency.

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### 3.5 Compensation

Compensation is a discretionary agreement made between Citizen and a customer.

Where there is evidence that the complainant has suffered financial loss, inconvenience or unreasonable impact, a compensation payment may be agreed. However, our primary focus will be in putting right the service failure. All cases will be considered in line with our Compensation Framework.

Where an offer of compensation is refused at Stage 1, we will escalate to our Stage 2 to review any new information provided or reason for dissatisfaction.

Compensation claims are not a substitute for a claim on a home or vehicle insurance.

We do not provide home contents insurance to any customers, and it is the customer's responsibility that a suitable policy is purchased to cover their belongings.

### 3.6 Unreasonably Persistent Complaints

In a minority of cases, customers pursue their complaints in a way that is unreasonable. They may be unreasonably persistent in their contacts and the submission of information. These actions can occur either while their complaint is being investigated, or once we have finished the complaint investigation.

Unreasonably persistent complainants, because of the nature or frequency of their contacts with us, can have significant impact to our resource and can hinder our consideration of theirs or other people's complaints. In some exceptional circumstances, and if the situation is appropriate, we may be unable to progress the complaint.

Where we consider that a complainant is unreasonably persistent, we will deal with that complainant in line with our Unreasonably Persistent Contact Policy.

### 3.7 Training and Performance

Citizen has a designated Feedback and Resolution team to co-ordinate and investigate in depth complaints, who are trained to handle complaints. They ensure all investigations are conducted in an impartial manner.

Citizen reports complaints performance and learning to its customers and customer panels within it, in annual report, and more regularly via its Citizen website. We report our performance to all staff through internal channels.

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#### 4. Roles, Responsibility and Governance

It is the responsibility of the Board to seek assurance that this Policy is successfully implemented. The Senior Leadership Team and Heads of Service are responsible for ensuring the effective implementation of this Policy and that all staff understand the importance of this Policy, the related procedures and that they comply with them.

Managers are responsible for ensuring that their team have undertaken the appropriate Policy eLearning and training,

Any changes to this Policy must be made in line with the requirements set out in Citizens Standing Orders and our Policy framework.

#### 5. Monitoring and Review

This policy will be reviewed every 3 year/s, unless legislation, service delivery or sector developments require otherwise ensuring the policy continues to meet its objectives and take account of good practice developments.

Legal advice will be taken to ensure compliance with legal, regulatory, and contractual responsibilities.

Where appropriate service delivery reports in respect of this policy as incorporated into our quarterly reporting suite.

#### 6. Equality Impact Assessment

This policy has been subject to an Equality Analysis. Staff working across Citizen have considered the impact of this policy on different groups and communities that we work with. In framing this policy, our staff are committed to not discriminate adversely against any group and will respect the diversity of the communities we are working within.

The EIA and any actions identified as needing to be implemented are in Appendix 1

#### 7. VERSION CONTROL

VERSION	DATE	AMENDMENTS	APPROVED AT/BY	REVIEW
V 1.0	30.09.2019	Policy updated to reflect Citizen and reviewed for compliance.	Board 30.09.19	Sept 2022
V 2.0	28.10.20	Definition of complaint updated to reflect requirement set by housing ombudsman	Board 09.11.20	Sept 2022
V 3.0	23.03.2021	Change in template	Policy Owner	Sept 2022

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V 4.0	30.09.2021	Info on compensation added	Policy owner	Sept 2022
V 5.0	14.09.2022	Additions made from updated housing ombudsman code and customer insight	Board	Sept 2025

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