

Customer Feedback Policy

May 2024

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Version number	1.1
Date agreed	May 2024
Agreed by	Executive Leadership Team
Review date	May 2027
Diversity compliant	Yes
Equality Impact Assessment required	Yes
Data Protection compliant	Yes
Health and Safety compliant	Yes

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1. What this policy is about and why we need it.

1.1 At Acis Group Limited (Acis) we value all customer feedback, and listening to customers is integral to our principles. This policy outlines our approach to dealing with complaints, compliments, and comments/suggestions. We need this policy to ensure we are compliant with the Housing Ombudsman's Complaint Handling Code, and to support a positive culture of valuing and using feedback to drive the continuous improvement of our services.

2. Who does this policy apply to?

2.1 This policy refers to customers, who are:

- Acis Residents – those customers with whom we have a landlord/tenant relationship including our social housing tenants, our students, our shared ownership customers and our leaseholders.
- Direct Sales Customers – those customers who have procured a product or service from us including a new home purchased via outright sale, contracted adaptation work or services and other services procured directly from us.
- Learners – those customers that receive skills or welfare training, education and ancillary advice and support from us in a funded learning environment.
- Other Customers – those customers that are in some way impacted by the services that we provide including neighbours and adjoining landowners with whom we don't have a formalised contractual relationship.

2.2 This policy does not apply to individuals or companies where we have a commercial trading relationship.

3. Our policy

3.1 We are interested in all customer feedback, including comments and suggestions which can be extremely valuable in improving our service. We also welcome compliments, as we also want to know when we are doing well. We value all feedback and, when customers complain, our policy approach is to:

- Listen
- Investigate
- Put things right where we need to
- Learn

3.2 When customers complain, we aim to reach a resolution as quickly as we are able to and will seek solutions that are in line with our stated service/policy, meet the needs of our customer(s) and are cost-effective. We want to resolve complaints at the first point of contact whenever possible.

3.3 What is a complaint?

We define a complaint as ***‘an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by Acis, its employees, or those acting on its behalf, affecting an individual customer or group of customers.’***

Complaints could be a consequence of:

- Failure to provide a stated service
- Delays in providing a service
- Failure to follow our own policy or procedures
- An objection against our policy position
- Failure to communicate in a timely way
- Inappropriate behaviour
- Our handling of anti-social behaviour (ASB)

We do not consider the following to be a complaint:

- A request for service - we will distinguish between routine service requests and complaints (see 3.7)
- Reports of ASB - these will be investigated and responded to in accordance with our ASB Policy
- Where twelve months have passed since the initial incident or event. We may, however, apply discretion to accept complaints made outside of this time limit where there are good reasons to do so
- Issues that are not our responsibility
- Issues that have already been considered and responded to through our complaints procedure
- Matters that should be referred to insurers
- Matters where legal proceedings have started. This is defined as details of the claim, such as the Claim Form and Particulars of Claim, having been filed at court.
- Where there is dissatisfaction with decisions made in line with our policies/terms and conditions and there is an existing appeals mechanism or alternative dispute resolution that should be followed

We will accept complaints, unless there is a valid reason not to do so. If we decide not to accept a complaint, a detailed explanation will be provided, setting out the reasons why the matter is not suitable for the complaints process. We will consider the individual circumstances of all complaints, and will not take a blanket approach to excluding complaints. If a decision is made not to accept a complaint, the right to take this decision to the Housing Ombudsman will be explained.

3.4 What is a compliment?

An expression of satisfaction about the service, our actions or employees affecting our customer(s). We welcome compliments and these are important to help share our positive practice and when we have gone 'above and beyond.' Compliments will be recorded on our Customer Relationship Management (CRM) system and shared with the individual or team in question.

3.5 What is a comment?

This is when we have been given feedback on how we could do things differently or better. We always want to hear customer or stakeholder comments or suggestions. These are logged on the CRM system and a response will be made by the service area about which the comment or suggestion was made.

3.6 How to make a complaint

We want to make it as easy as possible for customers to make a complaint, and guidance is available on our website. Complaints can be made verbally or in writing, and through any communication channel to any member of staff who will then ensure that they are logged and assigned to the most appropriate person. If social media is used, the customer will be asked to direct message the Acis account so a communication mechanism can be agreed which maintains their privacy. If a complaint is made verbally, our employees will record this on the customer's behalf. A customer does not have to use the word 'complaint' for it to be treated as such. Whether verbally or in writing, when a customer makes a complaint, it is important that we understand what the issue is and what they want us to do to put it right.

Where a complaint or a petition has been received from a group of customers, the employee who has been assigned the investigation will arrange a meeting with one or two of the group members who will be asked to act as contact persons and report back to the wider group.

Advocates or representatives can make complaints on behalf of our customers, providing we have written consent from them. We will give customers the opportunity to have a representative deal with their complaint on their behalf, and to be represented or accompanied at any meeting with us about their complaint. .

Queries from MPs or councillors which reference matters of complaint will be investigated in accordance with this policy. All parties will be notified accordingly.

3.7 Service Requests

In line with our aim to resolve issues as quickly as possible, some feedback will be identified and dealt with as a service request. This requires action to be taken to put something right, and can usually be done promptly. Examples of service requests are when we have failed to attend a repair appointment or have not contacted a customer within an agreed timescale. In any such instances we aim to make prompt contact with the customer and make arrangements to respond to the service request.

All of our people are required to respond to service requests. They are recorded, monitored, and reviewed regularly, so that any learning can be identified. A complaint will be logged and investigated in accordance with this policy if:

- A customer requests what we consider to be a service request be logged as a complaint
- A customer expresses dissatisfaction with the response to a service request, even if the handling of it remains ongoing. We would not usually stop our efforts to respond to a service request if a complaint is made.

An expression of dissatisfaction with services made in responding to a survey is not defined as a complaint though, wherever possible, the customer completing the survey will be made aware of how they can make a complaint if they wish to. Where we ask for wider feedback about our services, we will provide details of how customers can complain.

3.8 Acknowledging complaints

Most complaints will require investigation and, once they have been logged, we will contact the customer within two working days of receipt. Telephone contact is preferable, but is dependent on the customer's contact preference which we will respect.

As well as seeking any further details of the complaint and the resolution being sought, we will confirm who is handling the complaint and any other ongoing communication arrangements.

3.9 How we will handle complaints

When a complaint is made at either Stage 1 or Stage 2, we will set out our understanding of the complaint and the outcomes that the customer is seeking. This is known as "the complaint definition" and, if any aspect of the complaint is unclear, the customer will be asked for clarification.

When a complaint is acknowledged at either Stage 1 or 2, we will be clear which aspects of the complaint we are, and are not, responsible for and clarify any areas where this is not clear.

We have standard objectives in relation to complaint handling for all relevant employees or third parties that reflect the need to:

- a. have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments

- b. take collective responsibility for any shortfalls identified through complaints, rather than blaming others.
- c. act within the professional standards for engaging with complaints as set by any relevant professional body.

At each stage of the complaints process, we will:

- a. deal with complaints on their merits, act independently, and have an open mind
- b. give the customer a fair chance to set out their position
- c. take measures to address any actual or perceived conflict of interest
- d. consider all relevant information and evidence carefully

All third party complaints (eg. about contractors working for us) will be handled by us in accordance with this policy. Customers will not be required to go through separate complaints processes.

We recognise that we must comply with the Equality Act 2010, and will apply our Reasonable Adjustments Policy to the management of complaints. We will keep a record of any reasonable adjustments agreed, as well as a record of any disabilities that a customer has disclosed. Any agreed reasonable adjustments must be kept under active review.

We operate a two stage complaints process, and will take account of the guidance in the Housing Ombudsman's Complaint Handling Code when deciding on appropriate remedies.

Stage 1

Following the initial contact with the customer, we will investigate the issue raised. This may involve a desk top review, a visit, a property inspection, commissioning a survey, or speaking to other colleagues/stakeholders. Our target time for completing the investigation and responding to the complaint is ten working days.

We aim to keep in touch with customers about the progress of the investigation whilst it is ongoing, or at an agreed frequency. We also aim to contact customers, preferably by telephone but taking contact preferences into account, to advise them of our findings prior to providing our written response. This will address all points of the complaint, and include:

- The complaint stage
- The complaint definition
- The decision on the complaint – the findings of our investigation and why the complaint is upheld or not
- An apology if we got something wrong
- The details of any remedy offered to put things right
- The details of any outstanding actions (and associated timescales to put things right)

- Any actions we might take to help prevent a similar kind of complaint from occurring again.
- Any compensation offered and how the sum has been derived in accordance with this policy
- Details of how to escalate the matter to Stage 2 if the customer is not satisfied with the response.

On occasions where customers raise additional complaints during an investigation, these will be incorporated into the Stage 1 response if they are related and the Stage 1 response has not been made. Where the Stage 1 response has been made, 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.

On occasion, it may not be possible to respond to a complaint in ten working days and, if this is the case, we will contact the customer to agree a new timescale for response. This should not exceed a further 10 days without good reason. If an extension is confirmed, we will send out contact details for the Housing Ombudsman to the Customer.

We expect to deal with most complaints at Stage 1, and within our ten working day target response time.

Stage 2

On occasion, a customer may feel that the Stage 1 investigation and response has not resolved the matter. If this is the case, customers can request that their complaint is escalated to Stage 2, which is the final stage. As at Stage 1, complaints can be made verbally or in writing through any communication mechanism including social media. We will consider any escalation request that is made within 10 working days of the complaint response at Stage 1. Escalations outside this timeframe will only be considered in exceptional circumstances, such as family bereavement or illness.

Customers will not be required to explain their reasons for requesting Stage 2 consideration of a complaint. However, we will make reasonable efforts to understand why a complaint is not considered to have been resolved and what the customer is seeking by way of resolution, prior to the Stage 2 investigation.

If the escalation is not accepted, contact will be made with the customer to advise them of this and the reasons for this decision. Where the escalation has been requested by an Acis resident, if we decide not to accept it, we will explain the right to take our decision to the Housing Ombudsman.

Stage 2 complaints will be assigned to a senior employee, usually a member of the Senior Management Team or the Executive Leadership Team who has not previously been involved with the complaint. We will contact the customer within two working days of receipt of the complaint, ideally by telephone, in order to confirm our understanding of the issues raised and the outcome being sought by the customer. During this contact, the customer will be advised of the timescale within which their complaint will be reviewed.

The member of the Senior Management Team or Executive Leadership Team will then review the process and the investigation carried out at Stage 1. They will consider if the earlier actions were taken in accordance with our values/principles, policies and procedures, and were reasonable and proportionate. They may ask a subject matter expert who has not previously been involved in the complaint to support them in this review.

Our target time for completing the investigation and responding is within 10 working days of the complaint being escalated to Stage 2. If this is not possible; a date should be given as to when this can be expected. This should not exceed a further 10 days without good reason. If an extension is confirmed, we will send out contact details for the Housing Ombudsman to the Customer,

Our written response will address all points of the complaint and include:

- The complaint stage
- The complaint definition
- The decision on the complaint – the findings of our investigation and why the complaint is upheld or not
- An apology if we got something wrong
- The details of any remedy offered to put things right
- The details of any outstanding actions (and associated timescales to put things right)
- Any actions we might take to help prevent a similar kind of complaint from occurring again.
- Any compensation offered and how the sum has been derived in accordance with this policy
- Details of how to escalate the matter to the Housing Ombudsman Service if the customer remains dissatisfied (for Acis residents only)

3.10 Escalation beyond our complaints process

Where a customer has proceeded through the complaints process and feels that the issues have not been adequately resolved, then we will advise them of any further options for external consideration. These options will differ based upon the customer type, but will always be advised to customers as part of our response at Stage 2 as follows:

- Acis Resident - complainants can approach the Housing Ombudsman to support them to either work with us to resolve the complaint or carry out an investigation into our handling and response to the complaint. We will provide details of the Housing Ombudsman Service.
- Direct Sales Customers – Our relationship with Direct Sales Customers will be based around a contract for supply of a product or service. These contracts will contain specific details around an alternative dispute resolution mechanism. We will provide details of that alternative dispute resolution mechanism as part of our response.

- Learners – much of our activities around skills or welfare training, education and ancillary advice and support is funded by third parties including bodies like the Education and Skills Funding Agency (ESFA), local authority funders and other private funding provision. Where these bodies have elected to provide a route to receive and deal with complaint escalation, we will provide details of the respective funder as part of our response. Where such arrangements are not in place, our complaints process will end at Stage 2.
- Other Customers – where we do not have a contractual relationship with our customers, our complaints process will end at Stage 2.

3.11 Communication with complainants

We aim to communicate with complainants promptly, recognising that timeliness is an important part of effective complaints handling and matters to our customers.

All communication, details of the complaints investigation and any findings or evidence will be recorded and managed in our CRM system.

The preferred method of initial contact when we receive a complaint is by telephone (or to arrange an in person meeting) as this method supports gaining details of the complaint and what action the customer is seeking to resolve the issue. The customer can also confirm at this point if they have a preferred method of contact.

In circumstances where we cannot contact the customer after the initial complaint is made to either acknowledge the complaint, source further information or update on the progress of a complaint, we will still complete the investigation using the information we have available. If there is no further successful contact within 10 days of receipt of the complaint or the timeframe agreed with the customer, a written response will be sent with the investigation findings closing the complaint.

3.12 Compensation and goodwill gesture payments

Sometimes compensation or goodwill gesture payments may be made as part of the resolution of a service request or complaint.

When considering service requests, we may exercise our discretion to offer a £10 voucher in recognition of failing to attend an appointment.

On occasions when we fail to provide the level of service expected and customers experience severe inconvenience or financial loss, compensation may be offered as part of a resolution to a complaint. We will consider each case for compensation on its own merits and in line with the guidance provided in Appendix 1. We will also comply with any statutory obligations to award compensation.

Goodwill gesture payment may be considered for matters that fall outside of the compensation guidance at Appendix 1, and will be considered on their respective merits.

We would not expect to pay compensation when:

- Any loss or damage complained of cannot reasonably be evidenced as being our fault
- Any loss or damage complained of is reasonably assessed as resulting from a fault by the customer, including a delay in reporting a matter requiring attention or not allowing or enabling our employees or contractors access, despite reasonable efforts being made to gain such
- A service or facility has been unavailable due to circumstances outside of our control and/or has resulted from unforeseeable events such as vandalism or severe weather conditions and we have acted reasonably in response
- We have acted in compliance with our legal and regulatory duties
- It is reasonable and appropriate for a customer to make a claim through their contents insurance. Compensation would not be paid in lieu of a customer not having contents insurance
- Any financial loss reported cannot be adequately evidenced

3.13 Unreasonable behaviour

We recognise that customers may be in distress or stressed when making a complaint. Sometimes customers who are angry, demanding, or persistent may demonstrate unreasonable behaviour to our employees.

We expect our employees to be treated courteously and with respect at all times. Violence or threats of violence, aggressive behaviour, swearing and personal and derogatory remarks are all unacceptable and, in some circumstances, might be considered to be a breach of tenancy conditions which we could act upon.

Sometimes customers may make what we consider to be unreasonable demands. Examples include:

- Expecting responses within unreasonable timescales
- Insisting on speaking to certain employees
- Making excessive repeat contact in person, by phone, email or social media
- Repeatedly changing the substance / scope of a complaint. In these circumstances we will be clear as to what we will investigate and respond to

Any incidents of unreasonable behaviour will be logged on our CRM system.

If we experience examples of the behaviour outlined above, we may take one of the following actions:

- Only accept contact on certain days of the week and/or arrange for one named employee to deal with all contact
- Require the customer to make an appointment to see a named employee before visiting
- Ask that all contact is in writing

- Refuse to accept any further complaints regarding matters that have already been investigated
- Any other action that we consider to be appropriate and proportionate.

We will always explain what action is being taken, why, and when we will review our position.

Any restrictions put in place due to unacceptable behaviour will be proportionate, and demonstrate regard for the provisions of the Equality Act 2010. They will be kept under regular review.

3.14 Learning

We are committed to learning from feedback to help ensure that any mistakes we make are not repeated. We will regularly review learning outcomes and any identified trends, so that we can improve the service we offer. In some cases, a commitment to change such as reviewing a policy, a procedure or providing training will form part of the resolution of a complaint, so it is vitally important that learning actions are both identified and actioned.

This policy makes a commitment to follow up and assess if learning has resulted in actions which have addressed the cause of complaint to prevent a reoccurrence. We will publicise actions resulting from complaints as part of our annual Complaints Performance and Service Improvement report.

4. How we will publicise this policy

- 4.1 This policy will be publicised on our website and broadcast messages on the MyAcis customer portal. Website content will include links to the Housing Ombudsman Service and the Complaint Handling Code.

5 How we will monitor this policy

- 5.1 Complaints handling performance and compliments received are routinely monitored. Weekly 'snapshot' reports are sent to all operational managers and complaints handling performance is reported to the Senior Management Team and to our Executive Leadership Team complaints lead on a monthly basis.
- 5.2 A quarterly report on customer feedback and learning is a standing agenda item for the Operations Committee.

6. Procedures and other documents that link into this policy

- 6.1 There is an associated complaint handling procedure and guide to this policy. Customer feedback processes are also in place.

7. Links to other policies, legislation and/or regulations

- 7.1 Policies, legislation and/or regulation that links to this Policy are listed below:
- Equality Act 2010
 - Reasonable Adjustments Policy
 - Housing Act 1996

- Social Housing (Regulation) Act 2023
- RSH Transparency, Influence and Accountability consumer standard
- Housing Ombudsman Complaint Handling Code

8. When this policy will be reviewed

- 8.1 This policy will be reviewed in three year's time, or earlier if legislative or regulatory changes require addition or amendment.

Appendix 1 – compensation payments

The employee assigned to investigate and respond to a complaint can offer compensation to a customer in line with the framework within this policy. Prior to authorising any payment, the customer must have accepted the compensation offer by returning the form to us confirming the payment as full and final settlement of the complaint. .

For any customer who owes any debt to us, such as rent or service charge arrears, costs for rechargeable repairs or court costs, the compensation will be applied to their account rather than paid to them. Where we have accepted responsibility for damaging customer fixtures and fittings, we may replace the item(s) rather than offer compensation.

The following table provides guidance on our compensation payments offered. The majority of these payment types are applicable to Acis residents only.

Missed appointment	Where we do not attend a pre-booked appointment or cancel with less than 24 hours notice. If works are sub-contracted by us, payment to be made by the contractor	£10 voucher
Right to Repair (Acis residents only)	For a prescribed list of small urgent repairs (costing less than £250) which are likely to jeopardise the health and safety of the resident(s). To qualify, if we fail to complete the repair in our usual timescales we will then provide a further date by which we will complete the repair. If we do not carry out the repair by the second date, compensation is payable.	£10 plus £2 per day for every day the repair remains outstanding up to a maximum of £50 for each individual repair.
Loss of rooms / facilities	Subject to exceptional circumstances and assessment of any unreasonable loss of the usage of part(s) of their home as a direct result of our actions or inactions or those of any of our contractors, compensation may be payable.	Amount payable based on a % of weekly net rent for the period the room(s) are unusable. For example if two rooms from a six-room property are unusable for two days: $\frac{2}{6} \times 100 = 33\%$ unusable Weekly rent x no of weeks rent charged in year / 365 days = daily rent Daily rent x 33% = amount payable per day for loss of two rooms

		Compensation is not payable for works carried out under a planned maintenance programme or renewals carried out as a repair
Extra fuel costs	For the extra fuel costs of temporary heaters where we do not repair or replace heating within our prescribed policy timescales or if use of a dehumidifier is required	£5. per day for each day over our agreed timescales for repairing or replacing central heating which is only payable from 1 st November to 30th April or for the use of a dehumidifier
Damage to personal possessions	Where customer possessions are damaged, the cost of repair or replacement should be met by the resident's insurance. Where damage is made worse due to delays in us carrying out repairs or making an error, customers are expected to provide evidence of purchase.	Amount is determined on a case by case basis. If reimbursement agreed, amount is based on value of goods at the time of their loss or damage rather than replacement value. We will usually look to replace items rather than pay a monetary amount

General Service Failure			
Acis responsibility	Impact on resident		
	Low	Medium	High
None	0	0	0
Partial	£25	£50	£100
Full	£50	£100	£200

We will have regard to the Housing Ombudsman Service guidance on remedies as appropriate for any complaints from Acis residents. Any other statutory obligation for compensation such as home loss payments or right to payments for improvements are managed outside of this policy.

For any compensation award that is outside the guidance provided, authorisation must be sought from the Customer Experience Manager or the Head of Customer Operations (who holds the compensation budget) prior to any offer.