

COMPLAINTS POLICY

1. Introduction

Citizen is committed to providing excellent, responsive, and accessible services for our customers. Feedback is welcomed for all our services.

There are times when we get things wrong. To put things right, we have an effective complaints policy and procedure in place. This gives us the tools to consider complaints quickly, in a fair way and with confidence. Complaints are also an important part of ongoing improvement and quality management.

Our complaints policy has two stages. We aim to consider and put things right during stage one. If a customer is not happy with our response at stage one, they can ask for a review at stage two. During stage two a new investigating officer will consider the complaint.

Stage two is our final response. If the customer feels the complaint is not resolved at stage two, they can contact the Housing Ombudsman to request a review of the complaint.

This policy is aligned to the relevant regulatory requirements of the Housing Act 1996 (schedule 2), the General Data Protection Act 2018, Equality Act 2010, the Housing Ombudsman Scheme and complaint handling code, and the Social Housing Regulator's Transparency, Influence and Accountability Standards.

Citizen provides clear information about complaints on our website. Information includes how to complain, our complaints policy, and details about the Housing Ombudsman Service with their contact details. Our website has accessibility features.

We have developed this policy in consultation with our customers.

This policy and our procedures set out how we will respond to complaints. They also detail how we will use complaints to shape and improve our service delivery.

This policy aims to ensure that:

- We have a positive approach to customer feedback. We see all feedback, including complaints, as an opportunity to learn and to improve our services.
- There are enough resources and training in place to give excellent complaint handling.

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- We treat customers fairly, consistently and without discrimination. We take account of customers needs and vulnerabilities and record reasonable adjustments.
- We will not treat a complainant less favourably after a complaint has been made.

When we have failed, we put it right to the standards in our policies and procedures.

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. Payment may be made when there has been an impact to the customer, for example where;

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

We will use our compensation framework to decide how much to pay.

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 applies, then it is usually a request for a service. We will deal with service requests through our normal delivery or as customer feedback. We will record customer feedback to consider in any future service reviews.

We consider the circumstances of each individual complaint; however, we are unlikely to accept a complaint at stage one or review a complaint at stage 2 if;

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- the problem happened more than 12 months ago,
- the case is already going through a court or tribunal. In these circumstances court procedures, timescales and judgements would take precedence, or
- it has already exhausted our two-stage process.

When we decide not to accept a complaint, we will tell customers of the reasons why and their right to take this decision to the Housing Ombudsman.

If a complaint is particularly sensitive e.g. it names individual staff or is about very inappropriate behaviour, the complaint will be handled by our Feedback and Resolution Team or another impartial member of staff.

3.2 Making a complaint

‘My Account’, our online customer portal is our main point of customer contact and a customer can raise a complaint here.

However, people can tell us about their complaint in the most convenient way to them. This includes calling our Customer Experience Centre, visiting our website, social media, in person to a Citizen staff member, or in writing. Customers are informed about how they can make a complaint, through a variety of different methods.

When we receive a complaint through social media, we may continue our response through other communication channels. This makes sure that we can keep the complaint confidential and private.

We aim to resolve all dissatisfaction raised at the customers point of contact. If this is not possible, we will give the customer a choice to make a complaint. If it is a simple complaint, it will be investigated by the relevant service area management team. Where a complaint needs a more in-depth investigation, our Feedback and Resolution Team (FRT) will handle it. The team will carry out an assessment to decide the action to take, as set out in our complaint’s procedure.

We will contact the customer to:

- Tell them what will happen next and when they will receive a response. We will also confirm the stage of the complaint. We will make it clear which parts of the complaint we are responsible for. We will signpost customers to other organisations who are responsible for any other parts of the complaint.

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- Talk about the progress of the complaint, confirm any points and to tell them the outcome.
- Where more investigation is needed, we will agree revised timescales with the customer.

When the investigation is complete:

- We will write a full response outlining our findings. This may include any action we will take to resolve the complaint. The letter may include an apology, information about a change in our processes and an offer of compensation. We will provide the customer with appropriate updates until all actions have been completed.
- We will identify the root cause of the complaint and record learning to feed into future service improvements. This means that we will investigate what has caused the problem so that we can take appropriate action.

If all or part of the complaint is not resolved to the customers' satisfaction at stage one, customers can ask for the complaint to be reviewed at stage two. An independent officer will investigate the complaint at stage 2. The customer needs to ask for a stage two review within 6 months of our stage one response.

We aim to respond to all complaints ourselves. If a complaint involves a third party, for example a contractor working on behalf of Citizen, their findings will be used as part of our two-stage process. It will not become a further stage.

During our complaints process, a customer may be dissatisfied with our handling or the outcome of their complaint. They will be told that they can ask the Housing Ombudsman to review their complaint.

3.3 Timescales

Citizen has a two stage complaints procedure. We aim to resolve complaints at the earliest opportunity. The following timescales is the maximum time, unless otherwise agreed with the complainant:

- When a stage 1 complaint is made, we will acknowledge it within five days of receipt.
- We will respond to a stage one complaint within ten working days of the complaint being acknowledged.

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- If all or part of the complaint is not resolved to the resident's satisfaction at stage one, it will progress to stage two of our procedure.
- When a stage 2 complaint is made, we will respond to it within 20 working days of the request for a review.
- If a complaint is complex, we may need to extend our response time. When this happens, we will explain to the customer and agree a clear timeframe for the response and updates. We will also provide them with the Housing Ombudsman's contact details. We will not extend a complaint for more than ten days during stage one or, 20 days during stage two of our process, unless there is a good reason.

3.3 Third Party Reporting

If a third party makes a complaint on behalf of one of our customers, we will accept it if the customer agrees and has provided us with a signed authorisation form. Where, for reasons of incapacity, it is not possible for the customer to authorise a third party to act on their behalf, we will require alternative documentation for example, a Mental Capacity Act Assessment or a letter from a partner agency.

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.

If an offer of compensation is refused at stage one, a customer can ask for a stage two review. The stage two review will consider any new information provided or reason for dissatisfaction.

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

We do not provide home contents insurance to any customers. It is the customer's responsibility to buy a suitable policy to cover their belongings.

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3.6 Unreasonably Persistent Behaviour

In a minority of cases, customers pursue their complaints or service request in a way that is unreasonable for example regular contact through different channels about the same issue, including complaints. These actions may occur either when we are investigating their complaint, or once we have finished the complaint investigation.

Unreasonably persistent contact or complainants can have major impact on our service due to the nature or frequency of their contacts. They can hinder our consideration of theirs or other people's complaints. In some exceptional circumstances, we may be unable to progress the complaint.

Where a complainant is unreasonably persistent, we use our unreasonably persistent contact policy.

3.7 Training and Performance

We have a Feedback and Resolution Team to co-ordinate and investigate in depth complaints. They are trained to handle complaints and make sure all investigations are carried out in an impartial way.

All Citizen staff have an objective relating to complaint handling. All staff receive training to foster a positive complaints culture including prioritising complaints. Customer facing staff receive additional training in how to accept a complaint and those who handle complaints receive further training.

We will publish on our website:

- our annual self assessment against the Housing Ombudsman's Code, and
- a complaints performance and service improvement report for scrutiny and challenge by our Board and our customers.

We report complaints performance and learning to our customers and customer panels and Citizen's Board. We do this through our annual complaints performance and service improvement report, and more regularly in our customer email and on our website. We report our performance to all staff through internal channels.

4. Roles, Responsibility and Governance

It is the responsibility of our Board to seek assurance that this policy is successfully applied and to consider the annual complaints performance and service improvement report. The

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Board seeks assurance from the Customer Assurance Committee. Our Board has a Member Responsible for Complaints (MRC) who has lead responsibility for complaints.

Citizen's Senior Leadership Team and Heads of Service are responsible for ensuring the effective implementation of this policy. They will do this by making sure that all staff understand the importance of this policy, the related procedures and that they follow them.

Managers are responsible for ensuring that their team have undertaken the appropriate 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 three years, 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 are incorporated into our quarterly reporting suite.

6. Equality Impact Assessment

This policy has been subject to an Equality Impact Assessment (EIA). 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

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7. VERSION CONTROL

VERSION	DATE	AMENDMENTS	APPROVED AT/BY	NEXT 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
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
V 6.0	18.03.2024	Amendments made to align with the new HOS Complaint Handling Code and RSH regulation effective from 01/04/25 and to incorporate recommendations from the Customer Scrutiny Panel to make the policy easier to read by customers.	Board	Sept 2026
V7.0	03.04.2024	Reference to incorrect timescale in 3.2 removed	Policy Owner	Sept 2026

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