

Customer Complaints & Feedback Policy

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1. Policy Objective

We want to provide the best possible service to our customers and this Policy sets out how we deal with and value the feedback our customers give us.

We value all feedback about our services, whether it's a compliment, a complaint or just an observation. We record all feedback and use it to continually improve our services. Residents will never be treated differently for bringing forward complaints.

There will be times when things don't go as well as we, or our customers, would like and when that happens, we need to know about it so we can take steps to resolve the problem promptly and restore the customer's confidence whilst learning from what went wrong. If you feel we've done something well, we'd also like to hear about it so we can pass it back to the staff member concerned and build on that good practice further.

We take personal responsibility for complaints at the time they're first reported and work with customers to put things right quickly and fairly.

The Housing Ombudsman can provide free, independent, and impartial assistance throughout the life of a complaint and all WCH customers have a right to access the Housing Ombudsman Service by calling 0300 111 3000 or emailing info@housing-ombudsman.org.uk. For more information, customers can visit their website at <https://www.housing-ombudsman.org.uk>.

2. Legislative & Regulatory Requirements

The Regulator of Social Housing (RSH) Transparency, Accountability and Accountability Standard (2024) states that, "registered providers must ensure complaints are addressed fairly, effectively, and promptly".

Transparency, Accountability and Accountability Standard (2024)

2.5 Complaints

2.5.1 Registered providers must ensure their approach to handling complaints is simple, accessible and publicised.

2.5.2 Registered providers must provide accessible information to tenants about:

- a. how tenants can make a complaint about their registered provider
- b. the registered provider's complaints policy and complaints handling process
- c. what tenants can do if they are dissatisfied with the outcome of a complaint or how a complaint was handled, and
- d. the type of complaints received and how they have learnt from complaints to continuously improve services.

The Social Housing (Regulation) Act 2023 (the Act) empowered the Housing Ombudsman to issue a code of practice about the procedures members of the Scheme should have in place for considering complaints. It also placed a duty on the Ombudsman to monitor compliance with a code of practice that it has issued. This Policy accords with guidance from the Housing Ombudsman's "Complaint Handling Code", the Financial Ombudsman Service's complaints handling requirements, the 2010 Equality Act, and the Localism Act 2011 (as amended).

3. Scope & Definitions

Scope

This Policy applies to the Watford Community Housing (WCH) Group, including its subsidiary and joint venture companies.

This Policy covers all our customers and anyone else receiving a service from WCH. We welcome and listen to all feedback about our services whether provided by our customers or other parties / individuals.

The Housing Ombudsman has no authority over complaints brought by individuals other than a landlord's tenants, shared owners or leaseholders. Where we receive a complaint (as defined at section 3.2. below) from someone other than a tenant, shared owner or leaseholder, we have discretion as to whether or not to deal with the complaint. This is considered at Stage 1 of the Procedure (see section 5.1 below) taking account of the subject-matter and the issue's relevance to us whilst informing the complainant accordingly.

NB: where we accept a complaint brought by a person who is not our customer, we will inform them that we are doing so on a purely discretionary basis and in accordance with the spirit of this Policy. We will also inform them that we reserve the right to truncate or adapt the Procedure we subsequently follow (see section 6 below) accordingly.

If customers feel unable to report a problem themselves, they can do so through a recognised third party such as an advocate, Councillor or Member of Parliament, all of which may act as a customer representative. In these cases, we will ask for the customer's written permission to discuss the situation with the third party.

Under this complaint's procedure, we are not able to deal with issues already being dealt with by a solicitor or legal advisor where details of the claim form or particulars of claim have already been filled at court; these would be classed as a legal dispute and are therefore approached separately.

We have a separate Goodwill Gesture Policy which sets out the circumstances where our tenants are entitled to financial compensation for a failure by us to deliver a chargeable service, or where a tenant suffers damage/loss due to our actions or omissions. This does not extend to damage/loss which would fall under a home contents insurance policy or matters beyond our control.

Definitions

Compliment: A positive comment or observation about our service, activities, processes, or a member of staff.

Complaint: An 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 a resident or group of residents.

Service request: A service request is a request from a resident to the landlord requiring action to be taken to put something right. Service requests are not complaints, but must be recorded, monitored and reviewed regularly. An expression of dissatisfaction with services made through a survey is not defined as a complaint, though wherever possible, the person completing the survey should be made aware of how they can pursue a complaint if they wish to. Where landlords ask for wider feedback about their services, they also must provide details of how residents can complain.

Customer Representative: refers to a person who represents the customer raising the complaint throughout the complaint process. Customers have the opportunity to have a representative deal with their complaint on their behalf.

Tenant Panel Customer Representative: refers to an impartial representative selected from our Tenant Panel who carries out the Stage 2 Appeal alongside a WCH Assistant Director or Head of Service.

4. Reporting Feedback

All feedback we receive is valuable, it can help shape our services and the future direction of the organisation positively.

Customers can give us feedback in a number of ways:

In person:	To any member of our staff
Digital Service:	Register at www.wcht.org.uk
By telephone:	0800 218 2247
Online:	Via our website: www.wcht.org.uk/contact-feedback ; or through our social media platforms, Facebook and Instagram
By email:	feedback@wcht.org.uk
In writing to:	Gateway House, 59 Clarendon Road, Watford Hertfordshire, WD17 1LA

All feedback we receive is valuable, it can help shape our services and the future direction of the organisation positively.

Customers can request for reasonable adjustments when providing feedback to us. WCH will accommodate all requests so far as possible in accordance with the Equality Act 2010 and our Translation & Interpretation Policy. We want to ensure that all customers receive equitable outcomes. Where customers are considered vulnerable, they will be treated in accordance with our Vulnerable Customers Policy.

Where customers provide feedback via our social media platforms, the Communications Team will direct the feedback to our Customer Relations Team who will handle it accordingly following the procedures below at section 5.

Customers can also provide feedback through a third party such as an MP or Local Councillor who will be able to handle the complaint on behalf of the customer. In these cases, the customer must provide their express permission through our permission to speak process. Customers may be accompanied to any meeting with the landlord.

We encourage customers making a complaint to outline what they feel would be a satisfactory resolution to the problem at the outset so that everyone's clear about expectations. We will work with the customer to understand the individual circumstances of their complaint.

Customers have the choice to leave feedback anonymously. We will still log and investigate feedback without contact details; however, we will not be able to respond or provide any update if this is the case.

We categorise customer feedback in three ways:

1. Service requests - where the customer wishes to pass make us aware of an issue and put something right. We treat these cases as defined above at 3.2.3; or
2. Complaints – as defined above at 3.2.2; or
3. Compliments – as defined above at 3.2.1.

Compliments: The definition of a compliment is detailed above at 3.2.1. Compliments are valuable pieces of feedback for us, we record and report on them in the same way as we do for complaints. We have set an ambitious target to increase the number of compliments we receive to equal complaints under a commitment to drive improvements across all areas of our activity.

We feed individual compliments back to the staff member concerned (as well as their line manager) and try to build on this good practice further across the organisation.

Complaints: A complaint is defined above at 3.2.2. This is the Housing Ombudsman's definition of a complaint which generally refers to situations where we have fallen below our core Service Standards:

Examples of a complaint could include:

- Failure to provide a service in accordance with our policies or Service Standards
- Unacceptable quality of work or service

- Delays in responding to an enquiry, in providing a service or completing work
- A failure to provide information or providing the wrong information
- Unacceptable behaviour or attitude of a staff member or contractor
- A complaint about unfairness e.g. of a policy or procedure

What is not a complaint?

- A first request for a service (e.g. a repair) or general follow-up enquiries about the status of that request
- 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
- An explanation of a policy, practice or decision
- A report (itself) of anti-social behaviour about a neighbour (we have a separate Anti-Social Behaviour Policy & Procedure to deal with this) although dissatisfaction with our handling of an ASB case could be considered a complaint
- Dissatisfaction with legal or legislative requirements (which we are not responsible for) e.g., local authority nominations processes
- A matter which is already being dealt with under our internal Complaints Procedure (section 5 below) or the External Complaints Procedure (section 6)
- Dissatisfaction with something arising more than 12 months ago – it would be at our discretion whether or not to deal with this under our Complaints Procedure. An expression of dissatisfaction with services made through a survey is not defined as a complaint, though wherever possible, the person completing the survey should be made aware of how they can pursue a complaint if they wish to. Where landlords ask for wider feedback about their services, they also must provide details of how residents can complain.

If a matter reported WCH and is not accepted as a complaint, an explanation must be provided to the resident setting out the reasons why the matter is not suitable for the complaints process and the right to take that decision to the Ombudsman. The customer will be informed of this decision through a stage 1 – decline letter with five working days.

Service Requests: Customers may submit a 'Service Request' (as defined above at 3.2.3 and known as 'General Feedback') where they do not wish to go through the full complaint process but want to inform us that they are dissatisfied with our service. Where a customer submits a Service Request, we will log their feedback on our HM system and respond within 3 working days. Service requests can become complaints at any stage as soon as the customer expresses dissatisfaction in the handling of their service request.

5. Our Complaints Procedure

The following sets out our two-stage complaint handling procedure.

Stage 1 - Initial Investigation

We aim to resolve most complaints at Stage 1. We will acknowledge and log the complaint within three working days of its receipt. If we have your email address, we will generally do this by email unless you ask us not to. Within our acknowledgement letter we will set out our understanding of the complaint and be clear in which aspects of the complaint we are and are not responsible for and clarify any areas where this is not clear.

A WCH Team Manager will carry out the initial investigations. We would then aim to resolve the complaint the same working day if a quick solution can be found. If not, we would look to resolve the issue within a maximum of ten working days, starting from the date the complaint was first logged.

If the problem has been resolved within this timescale, we will agree with you that the complaint can be closed but if there are things outstanding e.g., repair work, we will continue to monitor the situation closely to ensure it is completed within a reasonable timescale. However, if new issues are raised by the customer after the Stage 1 has been issued, they may be raised as a new complaint, so they do not cause unreasonable delays.

In some rare circumstances, we may need to extend a Stage 1 Complaint for a further ten working days. This allows for the relevant manager to conclude their investigation into the complaint and issue a final response.

As 3.2.4, customers are entitled to request for a customer representative to deal with the complaint on their behalf.

Stage 2 - Appeal

Customers can appeal their complaint within ten working days of receiving their Stage 1 response. In some cases, customers may be able to request a further ten working days extension to appeal which is dealt with on a case-by-case basis. These will be acknowledged within five working days of the escalation being received. Within our acknowledgement letter we will set out our understanding of the complaint and be clear in which aspects of the complaint we are and are not responsible for and clarify any areas where this is not clear.

We will not refuse to escalate a complaint through all stages of the procedure unless there is a valid reason to do so. We reserve the right not to accept an Appeal under section 2 of the Complaint handling Code or 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
- Matters have previously been considered under the complaints policy
- The appeal is not sufficiently detailed or clear
- No new evidence is being submitted beyond that already considered
- We consider that the complaint is vexatious or otherwise unreasonable
- The customer has surpassed the ten-day deadline and an additional ten-day extension deadline where required (see 5.3.1 above).

You can ask for the issue to go to Appeal if:

- Our Initial Investigation has been concluded but you're unhappy with all or part of the outcome from stage 1. In this case we would expect an Appeal to be requested within ten working days of the initial investigation being concluded; or
- Our initial investigation has not been concluded but more than ten working days (or a longer timescale we agreed with you) has passed and you're unhappy with progress.

A Stage 2 Appeal would be carried out by a WCH manager at Assistant Director Level or above (at WCH's discretion) together with a Tenant Panel Customer Representative. The WCH manager involved at Stage 2 must be above the investigating manager at Stage 1. It should take no more than fifteen working days from the date WCH are clear of the reasons for escalating the complaint, and in exceptional circumstances, no more than 20 days. If the issue is such that we cannot conclude the Appeal within this timescale we will apologise, explain why this is the case and confirm a new expected response date.

Again, we will generally use email to communicate with you unless you ask us not to. If you're satisfied with the outcome of the Appeal, we will agree with you that the case can be closed.

We reserve the right not to accept an Appeal where any of the situations set out in 5.3.2 above apply.

The conclusion of an Appeal represents the exhaustion of our internal complaints handling procedure. Complainants who remain dissatisfied can pursue their complaint externally, the Procedure of which is detailed further below at section 6.

Customers appealing their complaint to Stage 2 will also have the opportunity to request for a customer representative as set out above at 5.2.4

6. External Complaints Procedure

The Housing Ombudsman Scheme is approved by the Secretary of State under section 51 of, and Schedule 2 to, the Housing Act 1996 as amended by the Localism Act 2011, the Building Safety Act 2022, and the Social Housing (Regulation) Act 2023 (the Act).

The Act requires social landlords, as defined by section 51(2) of the Act, to be members of an approved scheme. The Act 2023 (the Act) empowered the Housing Ombudsman to issue a code of practice about the procedures members of the Scheme should have in place for considering complaints.

The purpose of the Housing Ombudsman Scheme is to enable tenants and other individuals to have complaints about members investigated by a Housing Ombudsman. The role of the Ombudsman is to resolve disputes involving members of the Scheme, including making awards of compensation or other remedies when appropriate, as well as to support effective landlord and tenant dispute resolution by others.

The Statutory Complaint Handling Code (2024) came into effect on 1st April 2024 and replaces the previous Scheme which was in operation from 1st October 2023. From 1st October 2022 customers were no longer required to wait for 8 weeks before taking any complaint to this service. The Ombudsman discuss any contact from customers with Watford Community Housing but will not normally consider a complaint until all stages of our Complaints Procedure have been completed.

Any decision reached by the Ombudsman will be final and we are obliged to abide by the Ombudsman's outcomes / recommendations.

Financial Ombudsman Service (FOS): If you have a complaint about something which falls within the remit of the FOS (e.g., a consumer credit matter) you can refer it to the FOS if eight weeks or more have passed since we received your complaint and you're unhappy with how we have handled it.

When concluding on this type of complaint under our Complaints Procedure, we will let you know that you can refer the matter to the FOS within six months of the end of our Procedure and give you the FOS's website and contact details as well as a copy of its 'Your Complaint and the Ombudsman' leaflet. We will also tell you whether we're happy for the FOS to look into the matter outside of the six-month time limit.

7. Persistent/Unreasonable Behaviour

We maintain a Cautionary Use Database to record instances where contact with individual customers has had to be limited or prevented due to persistent or unreasonable behaviour. Notes are also kept on our systems to limit contact where we need to do so to protect staff from abuse.

The Housing Ombudsman has its own guidance on what constitutes unacceptable behaviour which we follow, and which is reflected in our Persistent & Unreasonable Behaviour Policy at Appendix 1.

This policy sets our approach to the few customers whose actions or behaviour we consider unacceptable. We take the safety and wellbeing of our staff and customers very seriously, and we have a zero-tolerance approach to abusive behaviour.

Persistent / unreasonable behaviour may result in restricted contact and the use or threat of physical violence will be reported to the police in appropriate circumstances. Our Housing team may also invoke legal action against a tenancy/lease.

8. Monitoring & Reporting

We summarise, record, monitor and report quarterly on all feedback we receive to ensure we're meeting our complaint-handling Service Standards and other objectives. These are overseen by our appointed Member Responsible for Complaints. The results are published on our website.

We run weekly reports to monitor feedback, the results of which are presented to the Executive Management Team (EMT) in a quarterly report highlighting areas of concern and what measures to put in place to improve services. This report is presented to Customer Experience Committee (CEC) and the Gateway Membership Team (GMT) twice a year and annually to the Group Board as part of an Annual Report. This information is also reported on our website feedback page for our customers to view.

We publish this policy on our website for our customers. We complete an annual self-assessment against the Housing Ombudsman's (HO) Complaint Handling Code using the template at Appendix 2. This ensures that our complaint handling remains in line with the requirements set out in the Code. The results of these are not published to the HO but where the HO discovers that a landlord is non-compliant, complaint handling failure orders will be issued. This is available to customers on our website.

9. Appendices

- Appendix 1 – Complaint Handling Code Self-Assessment (June 2025)

10. Related Documents

- MRI Feedback Module User Guide
- Service Standards
- Customer Service Strategy
- Corporate Social Media Policy & Procedure
- Goodwill Gesture Policy
- Data Protection Policy
- Customer Complaint (Appeal) Procedure
- Translation and Interpretation Policy
- Vulnerable Customers Policy
- Persistent & Unreasonable Behaviour Policy