

Complaints, Compliments and Comments Policy

1.0 Policy Statement

- 1.1 This policy sets out how Stonewater Group approaches complaints, compliments and comments. We will ensure it is shared widely with customers, including on our websites, through our social media channels, and across our regular communication to customers.

2.0 Policy Scope

2.1 This policy applies to

- all existing Stonewater Group customers
- former customers who have left a property within the last twelve months
- any individual or group affected by the services that Stonewater Group and those acting on its behalf, provides

2.2 Stonewater Group will treat a complaint submitted via a third party or representative, including, for example, friends, family, and Citizens Advice, in line with our policy and procedure for customer complaints (this is not an exhaustive list).

2.3 Stonewater Group will only share personal information with representatives where customers have given explicit permission for us to do so or otherwise as permitted by the data protection law.

2.4 MP, councillor, and stakeholder enquiries will be dealt with in line with the timelines outlined in this policy and the relevant data protection laws.

3.0 Objectives

3.1 Learning from customer complaints, compliments and comments is a priority for the Stonewater Group. We embrace a positive complaints culture, where we welcome complaints as an opportunity to learn and improve our services as well as to restore and maintain good relationships with our customers.

3.2 The purpose of the policy is to ensure a fair and consistent approach to complaint handling. It has been developed in accordance with the Housing Ombudsman Service's Complaint Handling Code. We continuously seek customer feedback on our complaint handling service, looking for ways to innovate and improve customer satisfaction.

3.3 We will ensure all our colleagues understand our approach to Complaints, Compliments and Comments and how a complaint can be made. We will ensure that all relevant colleagues know the policy and processes and can also refer customers to our complaints service.

4.0 Regulatory and Legal Considerations

4.1 We've developed this policy in line with all relevant legal and statutory duties, resident feedback and the Housing Ombudsman Code including:

- Localism Act (2011)
- Housing Act (1996)
- Schedule 2 Data Protection Act (2018) and General Data Protection Regulation (GDPR)
- Equality Act (2010)
- Building Safety Act (2022)
- Housing Ombudsman Scheme
- The Social Housing (Regulation) Act (2023)
- Regulator of Social Housing's Consumer Standards, including the Transparency, Influence and Accountability Standard
- The Supported Accommodation (England) Regulations 2023 (the Regulations)

5.0 Policy Definitions

5.1 A *request for service* is defined as a request by or on behalf of a customer or group of customers for something to be provided or put right.

5.2 A *compliment* is defined as positive feedback for a job well done. We record compliments to allow us to identify and strengthen best practice and to celebrate the success of our colleagues and partners when we get it right.

5.3 A *comment* is defined as any other form of feedback about our services. It could include customers' ideas for improvements, observations about our services, and include negative feedback separate to a complaint. We record comments to understand our customers' views about services, helping to drive service improvement.

5.4 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.' Customers do not need to use the word 'complaint' for it to be managed as a complaint.

6.0 Policy Detail

6.1 *When customers make a request for service*

6.1.1 When a customer makes a request for service, we will triage their request seeking to resolve it first time. When required, issues may be passed to specialist colleagues. We will communicate with customers as required to provide updates. Service requests should be sent to our Customer Service Centre in the first instance, either through telephone, website, social media direct messages, in writing or through email.

6.2 *When customers share compliments and comments*

6.2.1 We will accept compliments and comments shared with us through face-to-face contact, over the telephone, through email or in writing. We will publish what we have changed having heard the customer voice, so that customers know how customer voice shapes Stonewater Group's services. This includes in our Customer Annual Reviews, Reports to Customers, Customer newsletters, Stonewater Customer Hubb, websites and any social media channels.

6.3 *When customers complain*

6.3.1 Making a complaint

We will accept complaints face to face, over telephone, email, online form on our websites, or in writing. Complaints made over social media should be made over direct message to Stonewater's Facebook Messenger and Twitter accounts.

Our Customer Relations Team is our "complaint officer". The Customer Relations Team is responsible for liaising with the Housing Ombudsman Service and reporting our performance on complaints to our Board.

We will ensure we manage complaints sensitively, fairly, providing support to our customers and focusing on fast resolution. Our colleagues have authority to act to resolve complaints and have access to colleagues at every level.

Complaints should be made within a reasonable timeframe. We will usually only investigate issues that have occurred within the last 12 months or issues which customers have become aware of within the last 12 months. Where the problem is reoccurring, we may consider older reports as background to the complaint.

Stonewater Group will raise complaints where a customer or their representative expresses dissatisfaction with the response to their service request, even if the handling of the service request remains ongoing.

6.3.2 When we will not accept complaints

We will consider the individual circumstances of each complaint. However, there are instances when the Stonewater Group won't accept a complaint.

Whilst this list is not exhaustive, circumstances when we may not deal with something as a complaint could include:

- It is referring to a service not provided by the Stonewater Group.
- The event or issue took place more than twelve months before we received the complaint. We will extend this in exceptional situations if there are mitigating circumstances that led to a delay in the reporting of a complaint.
- The complaint has previously been through the complaints process.
- The complaint has already been made, and is under investigation, including if a customer's representative has raised the issue.
- Decisions which have been made in accordance with our statutory obligations, or in line with legislation or regulation, for example Rent Setting, Succession, or the Right to Rent or relates to a policy approved by our Board. Issues relating to how we handled the matter may be dealt with as a complaint.
- It relates to a service charge, unless the service hasn't been delivered in accordance with the service requirement, or there has been a mistake made in the calculation of a charge.
- If a customer's behaviour is unreasonable, in which case we will follow our Managed Relationships Policy.
- We have a separate policy for how we manage reports of Anti-Social Behaviour. However, a complaint about the standard, or lack of, service will be dealt with as a complaint.
- Where there is a suitable alternative policy in place, which has an appeals process. We may consider complaints about the way a process is handled.
- Where legal proceedings have been started by either party. This is defined as when a Claim Form and Particulars of Claim have been filed at court or a Tribunal.
- If an external process such as a Court of law, leasehold valuation tribunal, Ombudsman or rent assessment committee, has made a determination on a decision, we can't consider it again as a complaint.
- Personal injury and third-party liability claims, which will be dealt with by our insurers.
- We may refuse to consider a complaint where we are taking linked legal action against the complainant, including the issue of a claim against the complainant e.g. a complaint about the conduct of a housing officer who is a witness in a claim for possession.

- We won't consider expressions of dissatisfaction made through a survey as a complaint. However, when we ask for feedback on our services, we will signpost customers to our complaints service.
- The matter is a grievance raised by a member of staff, as this will be dealt with under the relevant personnel procedure.

We will continue to seek complaint resolution with customers pursuing Pre-Action Protocol for Housing Condition Claims in line with the Housing Ombudsman Service guidance.

If we do decide not to accept a complaint, we will provide a detailed explanation to the customer explaining why the matter is not suitable for the complaints process and the right to take that decision to the Housing Ombudsman Service. We will record any instances where we do decide not to raise a complaint.

6.3.3 Group complaints

- If we receive a complaint from a group of customers, including Residents/Tenants Associations, it will be dealt with in line with the process outlined in this Complaints, Compliments and Comments policy. We will request a lead person to be nominated as the main point of contact and all our correspondence will be with them.

6.3.4 Complaints about Building Safety

- Complaints relating to building safety issues, such as complaints about fire safety and structural safety will be managed in line with this policy.

6.3.5 Complaints about Stonewater Group colleagues

- Where a complaint involves a member of staff, the staff member will be interviewed as part of the initial investigation and kept up to date following each stage of the process. Should any action be taken against the member of staff, this will be in accordance with the relevant policy and procedure.

6.3.6 Complaints from Stonewater Group colleagues who also have a customer relationship with us

- Where the customer is also an employee, they will still have full access to the complaint process, but extra steps will be taken to ensure their privacy and restrict access to their complaint records.

6.3.7 Third parties managing complaints on behalf of Stonewater Group

- Where third parties deliver complaints services on behalf of Stonewater Group, we will ensure complaints are managed in line with the Housing Ombudsman Service's expectations and the Complaint Handling Code.

6.3.8 Confidentiality and privacy

- We will only share information as outlined in accordance with the Data Protection Act 2018 and GDPR. Where a complaint involves a member of staff, we will need to share the complaint with them in order to conduct an investigation.
- We will keep a full record of the complaint, any review, and the outcomes at each stage, including all documents, relevant correspondence with the complainant or their representative and other parties, surveys and reports. You can read more about Stonewater Group's approach to privacy at www.stonewater.org.

6.4 The complaints process

At the outset of a customer/representative's complaint and at every stage of our complaint process, we will provide clear guidance as to who will be responding to a customer's complaint, including how to escalate if our customer is dissatisfied with the response and how to access the Housing Ombudsman Service for support.

All complaint handlers are suitably trained and have a performance objective promoting complaint handling excellence, promoting collaborative, collective responsibility and acting within professional standards.

All complaints received will be monitored against key milestone dates in line with our two step complaints procedure. We will keep a full record of the complaint, our response and correspondence with customers at every stage.

We also prioritise learning from complaints, taking every opportunity to identify ways in which we can improve our services and customer experience.

6.4.1 Stage One

We will acknowledge customer and representatives' complaints within five working days of receipt but will do so faster where possible. We will ensure we consider the complexity of the complaint and make appropriate reasonable adjustments if needed. The acknowledgement will outline the complaint, clearly stating the issues for investigation and the customer or representative's preferred resolution.

Where the problem is a recurring issue, we will consider any older reports as part of the background to the complaint if this will help to resolve the issue for the customer. If any aspect of the complaint is unclear, we will ask for clarification and, if needed, agree with the complainant or representative exactly what the complaint is about.

We will then work to resolve the complaint as quickly as possible, investigating the issue and responding, having assessed what evidence is needed to fully consider the issues, what outcome would resolve the matter and whether any urgent action is required. Our responses will include:

- The complaint stage
- The complaint definition
- The decision on the complaint
- The reason for any decisions made
- The details of any remedy offered to put things right
- Details of any outstanding actions
- Details of how to escalate the matter to stage 2 if the individual is not satisfied with the response

Once acknowledged, responses will usually be sent within ten working days although in exceptional circumstances, where there is a good reason for it, the process may take longer, in which case we will notify the customer of the timeframe for a response. If we need longer than a further ten working days, we will agree the extension deadline with the customer.

If we're unable to agree a deadline for the extension with the customer or their representative, we'll provide the customer or representative with the contact detail of the Housing Ombudsman Service so they can seek support. Where a complaint takes some time to investigate, we will keep customers and representatives updated as to the progress of the investigation.

Where we make adverse findings against the complainant or any member of staff, agent or contractor of Stonewater Group, they will be given the opportunity to comment on those adverse findings before a final decision is made. This may lengthen the process.

Where customers or their representatives raise additional complaints during the investigation, we will incorporate these into the stage one response if they are relevant and the stage one response has not been issued. Where the stage one response has been issued, or it would delay the response, we will log the additional issues as a new complaint.

6.4.2 *Stage Two*

Complaints which are not satisfactorily resolved at stage one will be escalated to stage two, at the request of the complainant or their representative. We will not require customers to explain their reasons for requesting a stage two investigation.

Stage two complaints will be investigated by a different, suitably qualified colleague.

We will respond to requests for complaints to be escalated to stage two usually within five working days. We will accept stage two complaints in line with the criteria outlined in 6.3 of this policy.

We will then investigate and review the complaint and our response, usually replying to the customer within twenty working days of acknowledging the complaint. Our responses will include:

- the complaint stage
- the complaint definition
- the decision on the complaint
- the reasons for any decisions made.
- the details of any remedy offered to put things right
- details of any outstanding actions
- details of how to escalate the matter to the Housing Ombudsman Service if the individual remains dissatisfied.

Wherever possible we will seek to respond as quickly as possible and ahead of our deadlines. In exceptional circumstances, where there is a good reason for it, the process may take longer, in which case we will notify the customer of the timeframe for a response. Where a complaint takes some time to investigate, we will keep customers updated as to the progress of the investigation.

If we are not able to respond within a further twenty working days, we will contact the customer or representative to agree an extension. If we're unable to agree an extension with the customer or representative, we'll provide the customer with the contact details of the Housing Ombudsman Service so they can seek support.

Stage two is our final response to the complaint, and we will involve all suitable staff members as needed. Once a customer/representative has received their stage two response, they can refer their complaint to the Housing Ombudsman Service if they remain dissatisfied.

6.4.3 Housing Ombudsmen Service

The Housing Ombudsman Service can independently review a customer complaint if they've been through our stage one and stage two complaints process. The Housing Ombudsman is an independent body set up by law to review housing complaints. Visit their website for more details - <https://www.housing-ombudsman.org.uk>.

We will publish the Housing Ombudsman Service's contact details in all complaint related letters, leaflets, newsletters, posters and on our websites. We will also regularly promote the Housing Ombudsman Service and its Complaint Handling Code in our customer communication.

6.4.4 *Monitoring Commitments*

A complaint response will be provided to our customers when the answer to the complaint is known. We will monitor any commitments or outstanding actions made in complaint responses to ensure they are delivered. We will make sure we keep customers updated.

6.4.5 *Helping us to put things right*

We ask our customers to help us investigate their complaints by providing information to help us look into the issues thoroughly, working collaboratively with us to find a solution and remembering to treat all our colleagues and contractors courteously and with respect. This will help us to resolve your complaints more quickly.

We will actively look for ways to resolve our customers' complaints at the earliest opportunity. Where something has gone wrong, we will acknowledge this and set out the actions we've taken, or intend to take, to put things right. These can include:

- Apologising
- Acknowledging where things have gone wrong
- Providing an explanation, assistance, or reasons
- Taking action if there has been delay
- Reconsidering or changing a decision
- Amending a record or adding a correction or addendum
- Changing policies, procedures, or practices.

This can include offering compensation if that's appropriate. Any compensation due as a result of a complaint will be assessed in accordance with our Compensation Policy and will be informed by the Housing Ombudsman Service's policy and guidance on remedies.

7.0 Governance and Oversight

7.1 Stonewater Group monitors and reports the performance of our Complaints service to our Board, our Customer Experience Challenge and Assurance Panel, the Regulator of Social Housing, our investors and partners, our Customer Scrutiny Panel and our customers.

7.2 *Member Responsible for complaints*

7.2.1 The Chair of our Customer Experience Challenge and Assurance Panel is a Board member and is the Member Responsible for Complaints. They have responsibility for ensuring a positive complaint handling culture and ensuring

the Board receives regular information on complaints that provides insight on our complaint handling performance.

7.3 *Oversight of complaints data and learning from complaints*

7.3.1 Stonewater Group's board will receive:

- regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance
- regular reviews of issues and trends arising from complaint handling
- regular updates on the outcomes of the Ombudsman's investigations and progress made in complying with orders related to severe maladministration findings

7.3.2 Stonewater Group will also produce an annual complaints performance and service improvement report for scrutiny and challenge, which will include:

- the annual self-assessment against the Complaint Handling Code
- a qualitative and quantitative analysis of the landlord's complaint handling performance. This will include a summary of the types of complaints the landlord has refused to accept
- any findings of non-compliance with the Complaint Handling Code by the Housing Ombudsman Service
- service improvements made as a result of the learning from complaints
- any annual report about the landlord's performance from the Housing Ombudsman Service
- any other relevant reports or publications produced by the Housing Ombudsman Service in relation to the work of the landlord

7.3.3 This report will be considered by our Board and published on our websites alongside our Board's response to the annual complaint's performance and service improvement report. It will also be shared with the Housing Ombudsman Service.

7.3.4 We will also undertake a self- assessment against the Complaint Handling Code following a significant restructure or change in procedures or if asked to do so by the Housing Ombudsman.

7.3.5 If we find we're unable to comply with the code due to exceptional circumstances, such as a cyber incident, we will inform the Housing Ombudsman Service, provide information to customers, and update our website at the earliest opportunity.

8.0 Equality, Diversity and Inclusion

- 8.1 Stonewater Group believes that Equality, Diversity, and Inclusion matters; that customers, colleagues' customers and partners should be treated as individuals and with fairness and respect. We will ensure that these principles are applied fairly and consistently to all. Our approach is outlined in our Equality, and Diversity policy.
- 8.2 We comply with the Equality Act (2010) and the Human Rights Act (1998). We will not directly or indirectly discriminate against any person or group of people because of their age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation or on any other grounds set out in our Equality and Diversity policy.
- 8.3 When customers have vulnerabilities, we will follow our Vulnerable Persons Policy. We will also have regard to reasonable adjustments (as defined by the Equality Act 2010) required by customers accessing our complaints service. This includes anticipating reasonable adjustments, keeping a record of agreed reasonable adjustments and reviewing these as needed, as well as recording any disabilities disclosed. Customers with support needs may make use of a representative or use organisations, such as Citizens Advice, Shelter, and legal advisors.

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