

## CUSTOMER COMPLAINT POLICY

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Consultation	Customer Scrutiny Conference 2024	Reviewed By	Ramesh Malhan
EIA	Completed	Responsible Officer	Deputy Chief Executive
DPIA	Completed	Approval By	Board of Management

### 1. PURPOSE

The purpose of this policy is to provide high-quality services to all our customers, recognise when things go wrong, put things right, and value complaints as feedback to learn, improve, and develop our services.

Black Country Housing Group (hereafter referred to as “BCHG”) recognises that handling complaints effectively is not only about processes and time limits but also about the culture within our organisation, as well as the behaviour and attitudes we display. This policy is designed to understand what constitutes a service complaint and to deal with it fairly and promptly.

### 2. AIMS

The aims of this policy are to:

- Clarify what constitutes a complaint and what constitutes a service request.
- Put the customer at the heart of the process and prioritize health and safety in decision-making, providing an outcome as quickly as possible.
- Apologise when we have made a mistake or when something has gone wrong and correct it as soon as possible.
- Keep the customer informed and fulfil our commitments within the agreed timeframe.
- Ensure we address all aspects of the complaint and provide clear explanations for any decisions or actions taken.
- Share our learning from complaints and use feedback positively to improve services.
- Ensure continued compliance with the Housing Ombudsman’s Complaints Handling Code.

### 3. SCOPE

This policy applies to those applying for housing, tenants, and leaseholders of BCHG.

### 4. RELATED DOCUMENTS

#### Externally

Legislation and Regulation
<ul style="list-style-type: none"> <li>• The Housing Ombudsman Service Complaint Handling Code 2024</li> <li>• Social Housing Regulation Act 2023</li> <li>• Equality Act 2010</li> </ul>

- Data Protection Act 2018
- Building Safety Act 2022

### Internally

Strategies	Policies/Procedures
<ul style="list-style-type: none"> <li>• Healthy Homes Strategy</li> <li>• Customer Transparency Strategy</li> <li>• Customer Success Strategy</li> <li>• Equality, Diversity &amp; Inclusion Strategy</li> <li>• BCHG Way and Value Based Service Standards</li> </ul>	<ul style="list-style-type: none"> <li>• Complaint Procedure</li> <li>• Reasonable Adjustment Policy</li> <li>• Repairs and Maintenance Policy</li> <li>• Lettings Policy</li> <li>• Anti-Social Behaviour Policy</li> <li>• Tenancy Agreement obligations</li> <li>• Compensation and Remedies Policy</li> <li>• Disciplinary Policy and Procedure</li> <li>• Neighbourhood Management Policy</li> <li>• Unacceptable Behaviour Policy</li> <li>• Income Collection Policy</li> </ul>

## 5. ROLES AND RESPONSIBILITIES

The Member Responsible for Complaints (MRC) is a Board Member. They are responsible for ensuring the Board receives regular information on complaints and providing insight into our complaint handling performance. The MRC has lead responsibility for supporting positive complaint handling.

The Head of Customer Voice is nominated as the complaints officer and is responsible for reporting to the Board and liaising with the Housing Ombudsman.

All BCHG colleagues are made aware of the complaints process and are trained to understand how to record and monitor all complaints.

Stage 2 reviews are organized by the Head of Customer Voice and involve members of the Tenant Panel, who are trained and selected based on their skills to review complaints alongside a Senior Manager.

The internal Customer Feedback Improvement Panel, attended by the MRC and supported by Heads of Service, meets to gather learning from complaints and promote a positive complaint culture.

## 6. DEFINITION

6.1 A complaint is defined as:

**“An expression of dissatisfaction, however made, about the standard of service, actions, or lack of action by BCHG, its colleagues, or those acting on its behalf, affecting an individual resident or group of residents.”**

6.2 If BCHG is unaware of the issue or it is the first time it has been raised, it is considered a service request rather than a complaint. If the same issue has been raised twice, it will be considered a complaint.

6.3 Ongoing cases where BCHG is acting within parameters agreed with the customer would not normally be deemed complaints if additional information is provided. If in doubt, colleagues should consult the Head of Customer Voice.

6.4 A complaint can be made in any way, and it is up to BCHG colleagues to identify and advocate for complaints. BCHG will assist in defining a complaint when a customer may have difficulty articulating it. A complaint made by petition will be handled based on the first signature. Complaints about a third-party contractor will be received by BCHG.

6.5 An expression of dissatisfaction made through surveys, including the Tenant Satisfaction Measures, may not be classified as a complaint. However, if there is a significant negative response, BCHG will contact the customer to determine if they wish to formally complain.

6.6 BCHG will agree with the customer on the desired outcome of the complaint before investigation begins and will not close the complaint before directly communicating with the customer (or in writing, if that is the customer's preferred method of communication).

6.7 BCHG will consider its duties under the Equality Act 2010, anticipate the needs of customers, and make reasonable adjustments in a person-centred way. We welcome advocates and third-party support.

6.8 Complaints regarding colleague conduct, attitude, bullying, and discrimination will be investigated under the Disciplinary Policy and Procedure to gather information and determine whether there is a case to answer. Customer communications shall be guided by this policy.

6.9 When investigating a complaint, we will consider a range of remedies that may be appropriate. We will apologise immediately when we have made a mistake or let people down, take corrective actions, and offer financial resolutions when appropriate, in line with our Resolution and Remedies Policy.

6.10 If, after this process, the customer is still dissatisfied with BCHG's response, the case will be reviewed by the appropriate Head of Service or Director of BCHG alongside an independent tenant.

6.11 There may be occasions where it is not appropriate to follow this, Policy. In such instances, the customer will be advised and given a detailed explanation of why, along with alternative procedures, including the right to refer the case to the Ombudsman. These exceptions may include ongoing legal or insurance matters, or if the complaint is made in an unreasonable manner as per BCHG's Unacceptable Behaviour Policy, or if the complaint is raised more than 12 months after the issue occurred. In such cases, we will consider each case on its own merit.

## 7. COMPLAINT HANDLING STAGES

Stage	Definition	Responsibility	Expectation
Health and Safety Screening	"An event assessed by anyone in the team or individual customer to be at significant health and safety risk to building or person."	Appropriate Senior Manager/Executive Team	Screen assessment with customer. If a significant health and safety risk is identified, a 24-hour response is appropriate but under stage 1.
Stage 1 Complaint	"The universal definition and the use of asking twice to differentiate from service request. These will be noted as a complaint and investigated."	Officer (without a conflict of interest)/ Manager/Team Leader	Acknowledge within 5 working days, define the complaint issue, and respond within 10 working days. In exceptional cases, explain the delay and agree on an extension (no more than 10 additional working days).
Stage 2 Review	"Review of how the original complaint was handled and whether the outcome was fair, reasonable, and in line with the Code, policy, legal, and statutory requirements."	Head of Service (without a conflict of interest) or Director	If a customer remains dissatisfied, the complaint will be reviewed by a 2-person panel (Senior Manager and Tenant Panel member). The customer can be accompanied by a person of their choice. The customer must escalate within 7 working days, but each case is considered individually. We will acknowledge the request within 5 working days and respond within 20 working days. In exceptional cases for example complexity, absence, we may agree to extend the response time by up to 20 working days. Final responses will include the Housing Ombudsman's contact details.

## 8. CONTINUOUS LEARNING AND IMPROVEMENT

8.1 BCHG aims to support a positive complaint handling culture by placing learning and improvement at the heart of all we do as part of our "We love to learn" value.

8.2 The BCHG Board and the MRC will consider any systemic issues, serious risks, or areas for improvement for appropriate action.

8.3 We will share with residents the outcomes of our learning and our Housing Ombudsman Complaints Code Self-Assessment.

## **9. DATA PROTECTION**

Confidentiality and data protection apply to the complaints process in accordance with our Data Protection Policy. We will not share personal, or property information gathered as part of the complaint investigation with any third party who is not entitled to receive it, in line with data protection legislation.

## **10. CUSTOMER CONSULTATION**

This policy is consulted on through customer scrutiny, including the Customer Scrutiny Conference.

## **11. PUBLICITY**

This policy will be made available through the website, social media campaigns, customer newsletters, electronic notice boards, onboarding of new customers, and relevant correspondence.

## **12. EQUALITY, DIVERSITY, AND INCLUSION**

An equality impact assessment has been reviewed to ensure that no groups or individuals will be negatively impacted by this policy. There is no evidence to suggest this policy will adversely affect any group. The monitoring log of complaints will help us understand this moving forward.

Where there is any potential impact on groups or individuals, we will consider what reasonable adjustments can be made, as detailed in our Reasonable Adjustment Policy.

## **13. REVIEW OF POLICY**

This policy will be reviewed alongside the annual self-assessment and led by the Head of Customer Voice and will be agreed annually with the BCHG Board.