

Cornwall Housing's Tenant Led Scrutiny Panel Report

What is the Customers' experience for Cornwall Housing's Complaint Handling procedure, (is it in line with Housing Ombudsman Service complaint handling code)?

December 2022

Version 1



CORNWALL
HOUSING

Table of contents

	Page
1) Executive Summary	3-5
2) Background	5
3) Scope and Methodology	6-7
4) Findings	7-20
5) Conclusions	21
6) Recommendations	22
Appendices	
Appendix 1 – Complaint Handling Code Self-Assessment	23-26
Appendix 2 – Q&A with Quality & Information Manager	27-28
Appendix 3 – Q&A with Information & Governance Manager	29-30
Appendix 4 – Q&A with Customer Service Team Leader	31-32
Appendix 5 – Q&A with Customer First & Policy Officer	33-34
Appendix 6 – Step 2 outcomes	35-36
Appendix 7 & 7a - Best Practice, Flow Charts	37-38

1. EXECUTIVE SUMMARY

The Tenant Led Scrutiny Panel ('The Panel') decided to look at complaint handling, as this had been raised as a failing area by officers and senior managers, and as a suggestion from the Interim MD of Cornwall Housing Ltd (CHL) at one of their meetings. The failings were also evident in the KPI's satisfaction survey results.

During their investigation they met with officers and managers. They also completed telephone and online surveys, with CHL customers that had used the service recently.

The Panel have found the customer experience to be inconsistent across Cornwall Housing Ltd (CHL) when dealing with their complaints.

The Complaints Team have worked hard to achieve results and have given the best service that they can, but the process and resources are not there to achieve the results required.

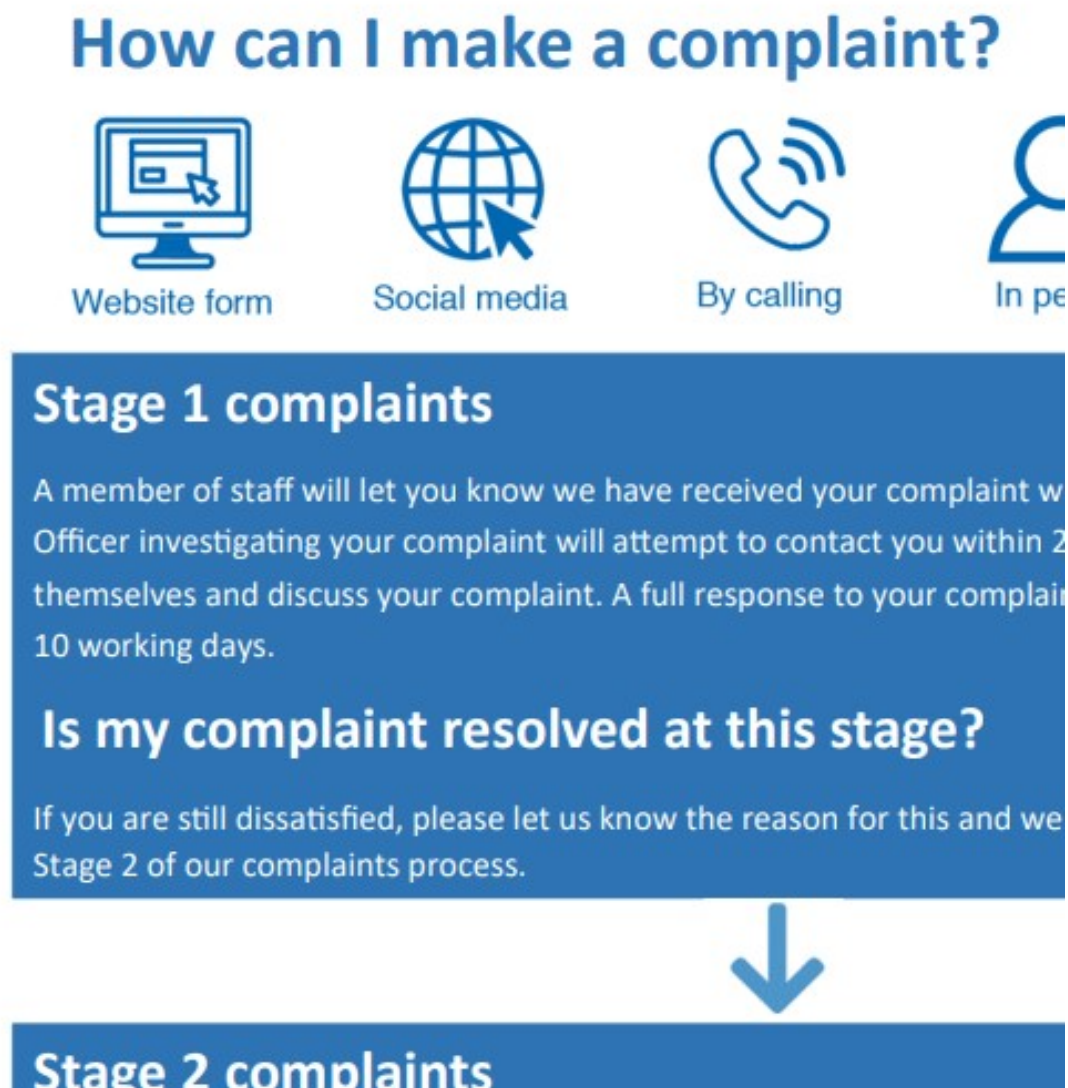
In summary, their findings –

- The Complaint Policy needs to be reviewed and made clearer
 - Complaint process is not available to all CHL customers - the website details various ways to get in touch, but what options are available for customers not online
- Step 1 needs to be more thorough and a service lead/manager to be accountable
 - Very little investigation at Step 1
 - No follow up communication with the complainant
 - Inconsistent responses given at Step 1
 - Compensation not considered for some complaints upheld
- Customers that have used the services are very dissatisfied
- Governing Body and Directors are not involved in the complaints process – do not receive regular updates
- Not enough resources are given to this service area
- The Complaints Officers role profile doesn't give enough emphasis on being a customer first role. Too much about dealing with Councillors and MP enquiries
- Training has not been given to front facing officers when receiving a complaint

During their benchmarking the Panel highlighted good practice by other housing providers and have included these in their report.

Plymouth Community Homes (PCH) and Sovereign Housing have included an easy read flow chart. The Panel would like CHL to look at including this in their Policy and write an article to highlight the complaint process that can be kept.

Good example from PCH -



The evidence collected over the period of this investigation underpins the Scrutiny Panel's judgements and the Panel would ask that the CHL Executive Team consider and respond to their report.

The Scrutiny Panel have included 13 recommendations and would like to discuss these with senior managers about how they will respond.

2. BACKGROUND

The Tenant Led Scrutiny Panel ('The Panel') decided to look at complaint handling, as this had been raised as a failing area by officers and senior managers, and as suggestion from the Interim MD of Cornwall Housing (CHL) at one of their meetings.

This report presents the findings from the Panel who reviewed CHL's website and documents made available to them, to understand the customer experience for the complaint handling process.



The Panel designed a work plan for this exercise so that a number of different activities could be undertaken to test key lines of enquiry.

This included meeting with service area managers and officers and asking customers who had used the service, to complete a short survey.

They also researched other housing providers complaint policies, to identify any good practice.

The Panel want to express their thanks to all CHL customers and officers who supported and assisted them during this investigation, helping them shape their report.

3 - SCOPE AND METHODOLOGY

The Panel wanted to review the CHL customer experience for complaint handling. They began by asking themselves 'How does this compare to the proposed regulatory requirements, outlined in the White Paper?' and then looked at the Housing Ombudsman Code.

Looking through the current CHL complaint processes, that are in place for -

- **Accessibility** ease, simplicity, clarity of what to expect
- **Resources** how many officers are allocated to this area
- **Speed** of processing complaints
- **Fairness and consistency** of service, including compensation awards
- **Support** offered to customers throughout, covering diverse needs

Housing Ombudsman Service (HOS) Complaint Handling Code –

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

The Panel chose the following areas to complete their review:

- Information request, looking through the following documents –
 - CHL Complaints Policy
 - CHL Compensation Policy
 - CHL Appeals Panel Remit 2020
 - Step 2 data – lesson learnt
 - Compensation payments
 - CHL Complaint Standard Operating Procedure 2022
 - Housing Ombudsman Complaint Handling Code (HOS)
 - Complaint Officer role
 - Complaint satisfaction survey for 2020 & 2021
 - The Charter for Social Housing Residents White Paper
- Q & A sessions CHL officers, interviews were with -
 - Customer Service Team Leader
 - Outgoing Quality & Information Manager
 - Outgoing Customer First & Policy Officer
 - Information Governance Manager
- Short surveys sent out
 - Customer Service officers
 - Complaint Appeals Panel

- Customers – complaints marked as resolved
- Benchmarking – researched other housing providers’ policies for best practice

4 – FINDINGS

The Panel used different methods to collect their findings. This included interviewing staff members at Chy Trevail and sending out questions by email, to officers leaving the Business. They also met the Appeals Panel on Teams and sent out a short survey through Let’s Talk, to customers that had recently used this service area.

The Panel asked for a Lead for this investigation. No Lead was allocated, due to the staff restructure and demands on the business. Their support officer secured all the information needed to complete the investigation.

4.1 – Desk top review

The Panel received hard copies of their Information Request and spent the beginning of their investigation reviewing each document. This gave them the tools to prepare their SCOPE for contacting the right people.

CHL policies – do they cover what is required by the HOS and does this reflect the customer experience?

- How many ways to raise a complaint
- How easy is it to access the complaint process?
- How is the complaint process communicated?

Housing Ombudsman Complaint Handling Code

HOS Complaint Handling Code was introduced in July 2020 (updated in April 2022) sets out good practice that will allow landlords to respond to a complaint effectively and fairly.

Key areas of the code –

- Universal definition of a complaint
- Providing easy access to the complaints procedure and ensuring residents are aware of it, including their right to access the Housing Ombudsman Service

- Ensuring fairness in complaint handling with a resident-focused process
- Taking action to put things right and appropriate remedies
- Creating a positive complaint handling culture through continuous learning and improvement

The HOS Code asks that the landlord recognises the difference between a request for service and a complaint –

A service request is a request from a resident to their landlord requiring action to be taken to put something right. Service requests should be recorded, monitored and reviewed regularly.

A complaint should be raised when the resident raises dissatisfaction with the response to their service request.

The Panel went through the Housing Ombudsman Areas Complaint Handling Summary and identified areas not fully covered by CHL.

Accessibility

Detailed in code

The complaint policy must be available in a clear and accessible format for all residents and must be accessible on the website along with information about how to make a complaint.

Panel's comments

Yes, this is detailed on the website and offers various ways of getting in touch.

There isn't a clear accessible route for all residents, those without a smart phone or computer do not know how to make their complaint

Communication

Detailed in the Code

Landlords must accept a request by the resident (or their representative) to escalate the complaint to the next stage unless an exclusion applies

Panel's comments

Where 'exclusions apply', this needs to be made clear in the Policy, especially if the complaint has been upheld

Detailed in the Code

Stage two responses must be issued within **20 working days** of the complaint being escalated

Panel's comments

Not currently happening, with the time to get packs ready and arranging a Panel to meet. Also, they may decide they need more time for additional evidence or to speak to officers and the complainant.

Detailed in the Code

4.14 - A landlord must not unreasonably refuse to escalate a complaint through all stages of the complaints procedure and must have clear and valid reasons for taking that course of action. Reasons for declining to

escalate a complaint must be clearly set out in a landlord's complaints policy and must be the same as the reasons for not accepting a complaint

Panel's comments

This needs to be made clearer in the policy, currently no explanation.

Detailed in the Code

4.16 - Landlords should seek feedback from residents in relation to the landlord's complaint handling as part of the drive to encourage a positive complaint and learning culture

Panel's comments

This hasn't been completed for some time (May'21), due to backlog on complaints

Fairness in complaint handling –

Detailed in the Code

The investigation must be impartial and balanced to ensure fair and appropriate findings and recommendations and the response must be issued within 10 working days of the complaint being logged

Panel's comments

No evidence that the investigations are impartial and most of the complaints are not completed in **10 working days**

Detailed in the Code

Any remedies offered following investigation must reflect the extent of any service failures and the level of detriment caused to the resident as a result.

Landlords must report on wider learning and improvements from complaints in their annual report and more frequently to their residents, staff and scrutiny panels

Panel's comment

These are identified but lack of evidence that they are actioned. **The Appeals Panel do not receive feedback**

Detailed in the Code

7.3 - A member of the governing body should be appointed to have lead responsibility for complaints to support a positive complaint handling culture. This role will be responsible for ensuring the governing body receives regular information on complaints that provides insight to the governing body on the landlord's complaint handling performance

Panel's comments

Not currently available in the CHL process and should be considered in the review

The Panel requested the following information from the HOS -

Housing Ombudsman Tenants' Panel -

- How many are registered with HOS?
- Do they charge for this service?
- What is the membership of these Panels, e.g., just residents or are there officers?
- How many sits on each hearing?

Unfortunately, at the time of finalising this report no information was received by return of email.

CHL Self-Assessment

The Panel reviewed the Housing Ombudsman Complaint Handling Code: Self-Assessment, completed by CHL 9th December 2020.

The Panel have highlighted areas below that they would question being implemented by CHL, in 2020 and currently in place –

- No complaint definition in the policy or on the webpage
- Exclusions – request for service, not detailed in the policy or webpage
- Multiple accessibility routes available to make a complaint – yes, but how do residents know about these if they have no access to the website
- CHL do not regularly advise customers about their complaints process
- Customers kept informed and updated during the complaints process - staff members currently do not have the time to action this
- Continuous learning and improvement – not continued after the assessment was completed

For full feedback, **see appendix 1**

4.2 – Q & A Sessions with Managers and Support Officers covering complaint handling

The Quality & Information Manager and Customer First Policy Officer left the Company before the Panel could meet up with them, but they answered their questions by return of email. They met the Information Governance Manager at the Bodmin Office, asking the same questions and have summarised below.

The full Q&As are attached under **Appendices 2-5**

Only given a generic email response on info email address, have to wait longer for complaint acknowledgement	Big problems with lack of communication and that inflames the situation
Not able to capture complaints dealt with at first point of contact – not technically treated as a complaint	A full Standard Operating Procedure written to help staff members negotiate SharePoint (where they log the complaints)
Inconsistencies on logging complaints	Need time to liaise with service areas and monitor the complaint progression
Need to allocate at least one complaint officer in each service areas, fully trained – need ownership	Complaint officers need resilience to face some complaints and not take it personally
At least 2 x full time complaint officers needed	Even if upheld, the HOS state there is still merit in looking at it again at Step 2
Mixed feelings about complaints going back to each service area and not being centralised, needs to be properly resourced	Senior managers need to review compensation payments
No need to go back to Step 3, Step 1 with business manager and Step 2 with the Panel	There is a high volume of outstanding complaints to get through
We need to do trend analysis, why do we get duplicate complaints	Try to phone as many tenants as possible. This helps to build a rapport
Step 1 response time not dealt with within timeframe of 10 working days	

The Panel also asked for the compensation figures paid out by CHL and were shocked on what had been paid out over a 6-month period-

Finance confirmed that a total of £136,495.39 had been paid out between April and September 2022. This amount breaks down to £132,840.91 to individuals and £3,654.48 paid into rent arrears.

Review the Complaints Officer Role Profile

The Panel read through the Complaints Office role profile and were concerned on how this has been written, little evidence on wanting to

deal with customers initial complaints. There was more focused on responding to Councillors' and MPs' enquiries, no evidence that the customer is at the heart of this service area. The Panel would like to see this reviewed, and priority given to dealing with customers at the start of their complaint and meeting HOS deadlines.

4.3 – Q & A Session with Customer Service Team Leader

The Panel spent some time with the CS Team Leader, her Team had just started to support the Complaints Team by logging Step 1 complaints, that arrive via their email address. They also log the complaints that come through the CHL 0300 telephone line.

Summary of interview -

- Her team are trained and have been given a complaints process guide to help them to triage and log. Including information on how to escalate
- Clear definition of a complaint is detailed in the guide, against a 'Request for Service'. They inform the resident if logged as an RFS
- The Team have access to the CHL complaint policy
- They refer to the notes on OpenHousing, for an overview and history of a complaint
- The complaint email address is checked every day by the offline member of the team
- Not able to assign a complaint reference number at first point of contact
- Not fully informed about the HOS Complaint Handling Code

Short Surveys to Customer Service Officers

The survey went out to 14 call operatives, and all responded. Their manager had explained that some members were new and still settling in and this may reflect in the answers.

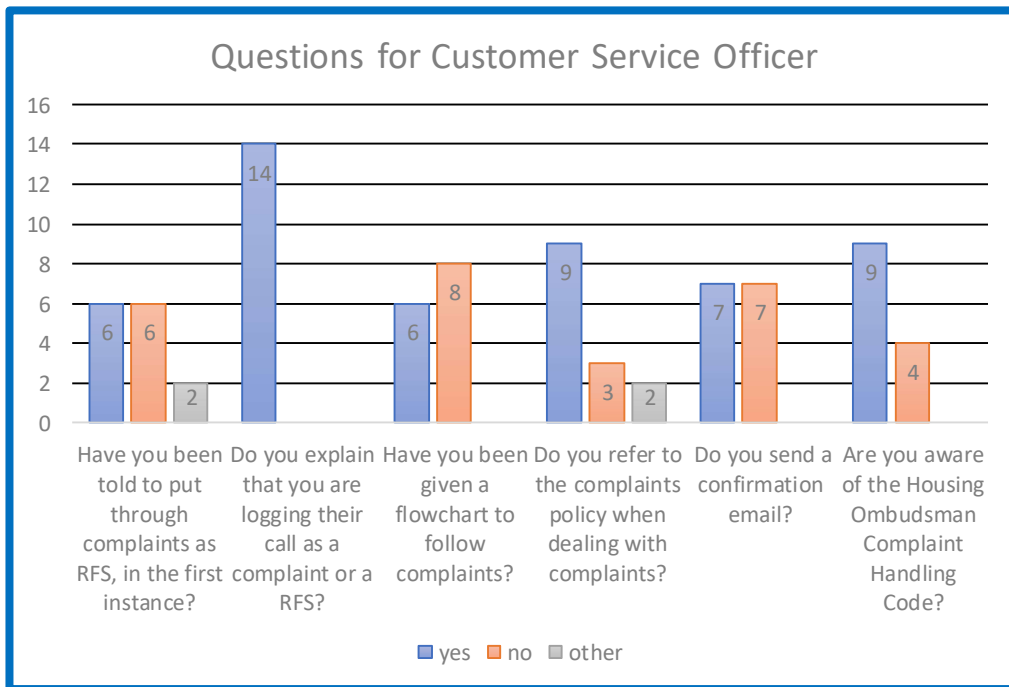
- 7 new members of staff settling in
- 3 have an overview
- 4 of the newest members may have struggled with a good understanding of the questions being asked and therefore unable to answer fully

Even though the above was explained, the results were mainly good. All the questions were answered, and all seem to have a good understanding on how to triage a complaint.

They also confirmed that they manage and check the complaints email address on a regular basis.

Q2 gave a 50/50 response, which highlights more training needed in this area.

Question	Yes	No	Other
Q2 - Have you been told to put through complaints as request for service in the first instance?	6	6	2
Q3 - Do you explain that you are logging their call as a complaint or request for service	14		
Q4 - Have you been given a flowchart to follow for complaints	6	8	
Q5 - Do you refer to the complaints policy when dealing with complaints?	9	3	2
Q7 - Do you send a confirmation email?	7	7	
Q8 - Are you aware of the Housing Ombudsman Complaint Handling Code?	9	5	
Q9 - Do you give customers a reference number from OpenHousing when they phone, if not is this possible?	1	11	2



4.4 – Short survey to CHL Tenant Appeals Panel

A short survey was sent out to 5 of the 8 membership (3 Panel members on the Scrutiny Panel).

A summary to the questions asked -

Question	Overview
Do you feel the Step 2 process is working properly?	<ul style="list-style-type: none"> • All agreed that the Panel works well • Failures happen before it gets to the Panel • Why are they looking at Step 2, when upheld at Step 1? • They know the Housing Ombudsman endorses the Panel's findings – this is reported quarterly on the HOS website • Step 2 packs are lacking in the information needed for a full review
Do you think it worked better with a Step 3 process?	<ul style="list-style-type: none"> • No not necessary, repeating the process may put complainants off • Felt it worked better having a director at a hearing for accountability
Do you feel you are getting all the information you need?	<ul style="list-style-type: none"> • Improvement needed with initial pack being sent out • Getting the relevant information has fallen in years with Step 2 • Wasting the complainants time having to ask for more information • The pre-meetings are useful, whereby we can ask for more information
Do you as a Panel feel your views and recommendations are being listen to and acted on?	<ul style="list-style-type: none"> • Don't receive feedback on recommendations and outcomes • Lack of respect from some officers in CHL
What improvements are necessary, if any?	<ul style="list-style-type: none"> • Timing deadlines to meet HOS regulations – giving a timely conclusion • Offering the complainant the opportunity to meet the Panel at a venue or online – offering different methods • Packs need to be made clearer and delete duplications • Accountability by CHL to the Panel • Need more resources in complaint handling

The Panel decided not to review The Cornwall Housing Appeals Panel – Remit and Responsibility during their investigation. This will be looked at as part of the Appeals Panel review of complaint handling.

Review the Step 2 hearing outcomes from April to Oct'22

The Panel reviewed the results at Step 2 and identified the following –

The Appeals Panel reviewed 17 complaints over this period of time, some customers had more than one complaint.

- The Appeals Panel agreed with Step 1 outcomes, for 11 out of the 17
- Disagreed with 3 of the outcomes
- And responded undetermined or partially upheld for 3 Step 1 outcomes

They also looked at the trends for the complaints

- Homes & Investment issues x 6
- Repairs & Maintenance x 3
- Housing Management x 7
- Lack of communication from Complaints Team x 1

Please see Step 2 outcomes - **Appendix 6** for full results.

4.5 – Short survey to customers that have made a complaint

Our support officer downloaded complaint handling data from SharePoint, for cases that had been marked as resolved by the investigating officer.

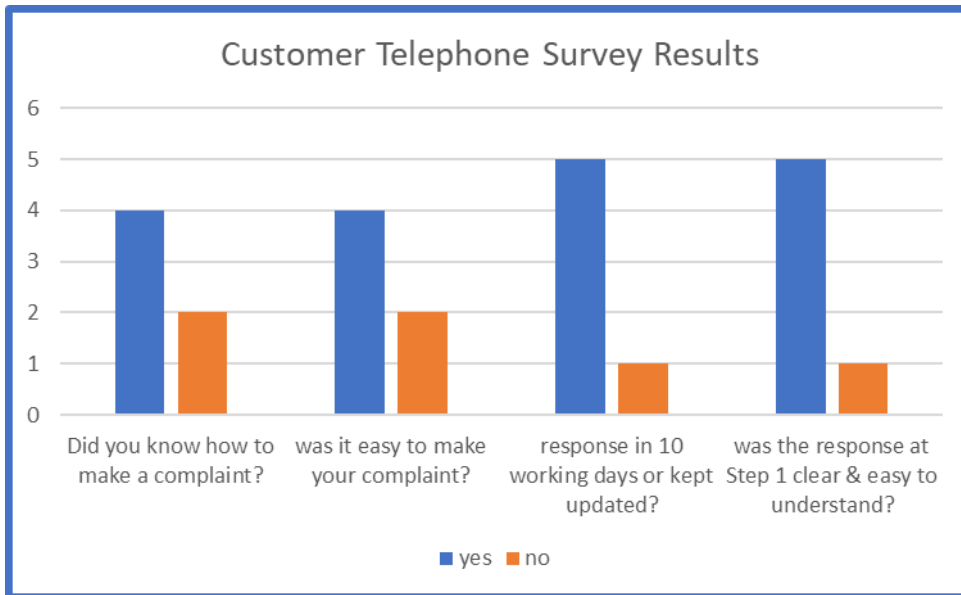
This covered service areas - Housing Management, Homes & Investment, Grounds Maintenance and Service Charges.

It was made clear at the start of the survey that this was about the complaint handling and not the outcome of their complaint.

Telephone survey -

The Panel started by making telephone calls to customers that had made a complaint from April to Sept'22 on the data provided.

- 13 telephone calls made
- 1 refused – didn't trust CHL
- 2 said they didn't have time right now
- 6 answered
- 4 didn't pick up

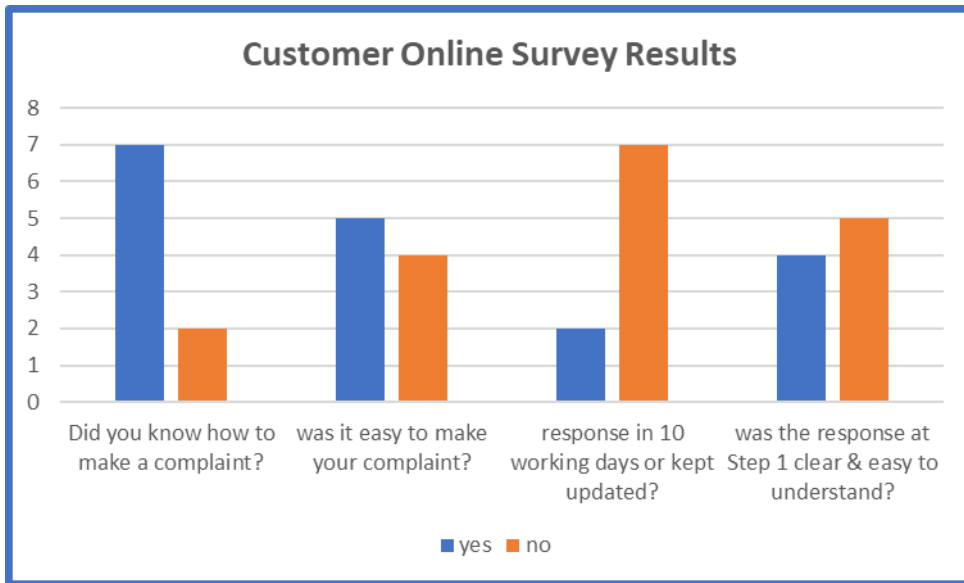


- 2 out of 6 didn't know how to make a complaint
- All found it easy to make/log the complaint, two added that follow ups were poor
- Responses in 10 working days, but not given updates
- Overall satisfaction was poor - 5 more than very dissatisfied, 1 went for the middle ground
- They all thought the response at Step 1 was clear, but no updates

Online Customer survey -

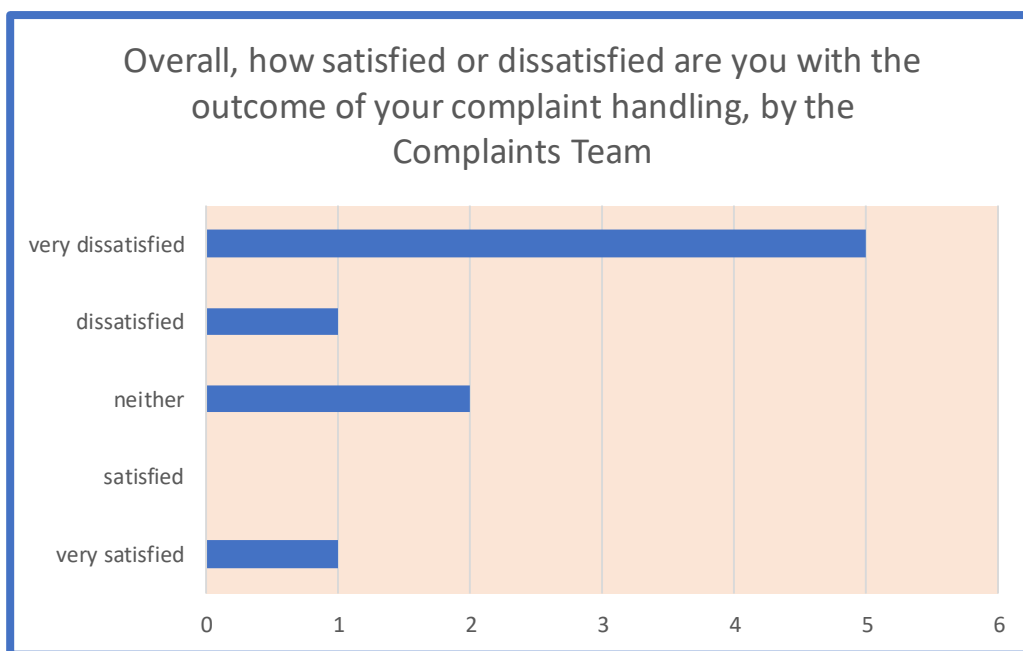
There were 19 emails sent out to complete an online survey, from the data provided. The customer that refused was left out of this survey.

We received 9 returns, which was nearly 50%, results detailed below.



The results were less positive, more negative responses around the ease of making the complaint and responding to the complaint.

Like the telephone survey the online satisfaction rates were poor –



The Panel compared their customer satisfaction results against the last surveys completed by the business in Oct'20 and May'21. Unfortunately, the results didn't show any improvements, this can no longer be acceptable by CHL and confirms that the whole process needs reviewing.

4.6 – Benchmarking – making comparisons against other housing providers and noting best practice

The Panel researched other housing providers to compare procedures and note best practice for dealing with complaint handling.

- **Poole Housing Partnership**
- **Coastline Housing**
- **Stockport Homes**
- **Sovereign Housing Ass**
- **Wolverhampton Homes**
- **Plymouth Community Homes**
- **Solihull Community Housing**
- **Sedgemoor District Council**

Best practices identified by the Panel below and stages completed by these housing providers.

Housing Provider	Good practice identified	How many stages
Poole Housing Partnership Ltd	<ul style="list-style-type: none"> • Short document • Bullet points the areas highlighted by the HOS 	<ul style="list-style-type: none"> • Informal stage • Stage 1 - service area • Stage 2 - senior Manager – reserves the right to turn down this request on some circumstances
PCH	<ul style="list-style-type: none"> • Clear one page flow chart for making a complaint • Clearly stated a complaint will not be escalated for the purpose of an increase compensation • Staff behaviour complaints dealt with internally • Can raise a complaint on social media 	<ul style="list-style-type: none"> • Stage 1 - officer • Stage 2 - senior manager • Stage 3 – invited to review meeting with Director & Board members
Wolverhampton Homes	<ul style="list-style-type: none"> • List of complaints that can't be dealt with, e.g.6 months old • Support given in making a complaint • Bullet points on putting things right • Details on learning from complaints • Refer to unreasonable complainant Behaviour Policy • Discretionary payments, e.g. gesture of goodwill 	<ul style="list-style-type: none"> • Stage 1 – Service lead • Stage 2 – service lead

Coastline Housing	<ul style="list-style-type: none"> Managers visit at Stage 1 or speak on phone if preferred Complaint Mentor Stage 2 Panel a mix, service director, customer experience committee and non-executive director who will Chair Listening & Learning leaflet 	<ul style="list-style-type: none"> Stage 1 – manager, who will arrange a visit or speak to complainant Stage 2 Panel (service lead, Director, Customer Experience Committee & non-executive Director, who will Chair)- will talk direct to complainant
Stockport Homes	<ul style="list-style-type: none"> Step 1, informal (only if dealt with promptly) and investigate at Step 2 	<ul style="list-style-type: none"> Stage 1 – informal with staff and managers Stage 2 – investigation, not involved in service area Stage 3 – Complaint Review Panel
Solihull Community Housing	<ul style="list-style-type: none"> Aims to visit or speak to the complainant 2 x Board members involved in the final stage; they sign off before being sent to the complainant Details on persistent or unreasonable customers making complaint process 	<ul style="list-style-type: none"> Stage 0 – informal Stage 1 – Team leader, personal contact (visit, Phone call or interview) Stage 2 – Independent review by senior officer from Governance Team Two Board members sign off at Stage 2
Sovereign Housing Association	<ul style="list-style-type: none"> Plain English and good intro and format Customer committee boxes – very clear Won't close a complaint until they have tried everything that they believe they could reasonably have done to resolve 	<ul style="list-style-type: none"> Stage 1 Stage 2
Sedgemoor District Council	<ul style="list-style-type: none"> Lists what is expected All staff responsible to report complaints Lead in each service area for staff to go to Identify failures during the complaint process and review policies Aim to resolve at Step 1 Detailed flow chart for complaint handling 	<ul style="list-style-type: none"> Stage 1 – Service manager Stage 2 – senior officer of the Council

Reading through CHL Complaint Policy, some of the best practice identified above are detailed within it, but are not taking place at the time of this investigation –

- Officer making contact to discuss the complaint to make sure CHL have all the details to put right
- Agree a course of action and timescales
- Single point of contact
- Make contact to discuss findings
- Inviting complainant to a workshop to review policies
- Looking at trends to review services and policies

The Webpage doesn't mirror the policy and needs to be re-written.

Some housing providers have identified a Step 0 approach, but the HOS does not approve this approach, detailed in code section 4.1 – [It is not appropriate to have extra named stages \(such as 'stage 0' or 'pre-complaint stage'\) as this causes unnecessary confusion for residents. When a complaint is made, it must be acknowledged and logged at stage one of the complaints procedures within 5 days of receipt.](#)

Sovereign – their policy is very well formatted, including detailed boxes shown below



These are our customer commitments:

- We make it easy
- We take responsibility
- We get it done

Both Plymouth Community Homes and Sovereign Housing provide a flowchart for their complaint process, which makes it easier to follow – **Appendix 7 & 7a**

5. CONCLUSION

The Scrutiny Panel's question was:

What is the Customers' experience for Cornwall Housing's Complaint Handling procedure, (is it in line with HOS complaint handling code)?

The Scrutiny Panel want to express their thanks to all CHL customers and officers who supported and assisted them during this investigation and helped shape their report.

Throughout this investigation the SP have gained an insight into what is important to CHL customers using this service area and that is **communication**. It also highlighted that this service is under resourced and not given the priority across CHL. Service area managers need to take ownership of complaints and investigate thoroughly at Step 1, too many complaints are being reviewed by the Appeals Panel at Step 2.

It has been apparent that the Complaints Team have worked hard in dealing with incoming complaints. Unfortunately, the process is so inconsistent across the business, and this has made it impossible for the Team to give CHL's customers the experience outlined in the HOS code. Being under resourced also means that complaints are not being resolved in the timescales for Step 1 & 2.

The Panel welcome the opportunity to assist CHL to make improvements to the policy, making it clear and concise for all, recognising that not all their customers have online access. CHL should look at alternative ways to communicate their Complaint Policy and the many ways to get in touch.

6. RECOMMENDATIONS – for CHL to discuss & consider – the Panel have RAG rated for priority (Red is the highest)

1	The role profile for the Complaint Office needs to be reviewed, where the residents are given priority
2	Minimum dedicated complaint officers x 2
3	Traffic light system for complaints to enable easier tracking
4	Email/calendar alert for complaints officers, for contacting the customer to give updates
5	All front facing officers should receive complaint training. A dedicated lead for responses on each directorate <ul style="list-style-type: none"> • Making sure the complainant has a named officer to contact throughout the complaint process
6	A member of the Governing body to be appointed to have lead responsibility – HOS Complaint Handling Code requirement <ul style="list-style-type: none"> • Making sure the Board are aware of the complaints coming through the business
7	Reference number given from the start of the process <ul style="list-style-type: none"> • Need to be clear about logging a RFS on OpenHousing and a formal complaint
8	Is it possible to have a dedicated complaints telephone line?
9	Where possible a complaint officer or senior manager should visit the complainant or listen to their complaint on the telephone. To make sure they understand all the details of their complaint
10	Need to look at a publication that informs all residents about the complaint process and how to get in touch – regular article in the Tenants’ Newsletter and Tenants’ Handbook <ul style="list-style-type: none"> • To include flow chart
11	Priority needs to be given to getting the Tenant Portal up and running – this would reduce officers’ and customers’ time
12.	The Complaints Policy needs to be rewritten and made clearer. It needs to include all the HOS Handling Code requirements and what has been confirmed in CHL’s Self-Assessment
13	Re-starting the complaint satisfaction survey, to have insight on the progress being made in this service area

Appendix 1

Housing Ombudsman Complaint Handling Code:

Self-assessment form

Cornwall Housing Ltd – 09/12/2020

Compliance with the Complaint Handling Code			
1	Definition of a complaint	Yes	No
	Does the complaints process use the following definition of a complaint? No definition on the policy or website <i>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.</i>	Yes	
	Does the policy have exclusions where a complaint will not be considered?	Yes	
	Are these exclusions reasonable and fair to residents? Evidence relied upon: <ul style="list-style-type: none"> • Requests for review of Homelessness Decision • Requests for review of Homechoice Banding • Request for service, when first such request received – not detailed in policy or website 	Yes	
2	Accessibility		
	Are multiple accessibility routes available for residents to make a complaint? – customers need to be able to access website, not available in hard copies	Yes	
	Is the complaints policy and procedure available online?	Yes	
	Do we have a reasonable adjustments policy? Not a specific policy but recognised in wider policy – will review in Q4		No
	Do we regularly advise residents about our complaints process? Not completed for some time, e.g. newsletter	Yes	
3	Complaints team and process		
	Is there a complaint officer or equivalent in post?	Yes	
	Does the complaint officer have autonomy to resolve complaints?	Yes	
	Does the complaint officer have authority to compel engagement from other departments to resolve disputes?	Yes	
	If there is a third stage to the complaints procedure are residents involved in the decision making?		No

	Residents are involved at Stage 2		
	Is any third stage optional for residents? Only have 2 stages – after which recourse via the Ombudsman		N/a
	Does the final stage response set out residents' right to refer the matter to the Housing Ombudsman Service?	Yes	
	Do we keep a record of complaint correspondence including correspondence from the resident?	Yes	
	At what stage are most complaints resolved?	1	
4	Communication		
	Are residents kept informed and updated during the complaints process? – staff members do not have the time allocated to this	Yes	
	Are residents informed of the landlord's position and given a chance to respond and challenge any area of dispute before the final decision?	Yes	NO
	Are all complaints acknowledged and logged within five days?	Yes	
	Are residents advised of how to escalate at the end of each stage? – not always, some managers have not been using the right response at Step 1	Yes	
	What proportion of complaints are resolved at stage one? 15 out of 453 closed complaints escalated to Step 2	96.68%	??
	What proportion of complaints are resolved at stage two? 1 case has been escalated to the Housing Ombudsman following review by the Tenant Appeal Panel	93.33%	??
	What proportion of complaint responses are sent within Code timescales? <ul style="list-style-type: none"> • Stage one Stage one (with extension) • Stage two Stage two (with extension) <p>We have experienced pressures on our capacity this year as a result of the Covid-19 pandemic which has impacted on our ability to respond within timescales as set out in our policy. We have had to extend timescales and have communicated this to customers when acknowledging complaints. The reported figures are the percentages of complaints responded to within the policy timeframe of 10 days regardless of the applications of extensions. This provides our customers and stakeholders with transparency about how we are performing and our commitment to meet the policy timeframe as often as possible.</p> <p>We have recruited to expand out Tenant Appeal Panel to manage the volume of Step 2 complaints. It invariably takes longer than 20 days to arrange the panel, information for the</p>	71.74% 75.05% N/A	??

	panel and for the panel to hold their hearing. – This is an area of improvement for us.		
	Where timescales have been extended did we have good reason?	Yes	??
	Where timescales have been extended did we keep the resident informed?	Yes	??
	What proportion of complaints do we resolve to residents' satisfaction These are the results of our first satisfaction survey carried out on closed complaints from Q1 and Q2 which coincided with the introduction of our new Policy in April and the initial national lockdown which limited some of our service provision. Feedback has been actioned and a follow up survey will be conducted in Q4 to assess the impact of the improvements made.	35%	??
5	Cooperation with Housing Ombudsman Service		
	Were all requests for evidence responded to within 15 days?	No	
	Where the timescale was extended did we keep the Ombudsman informed? This is an area of improvement for us. With the change in responsibility for complaints within CHL, processes have been improved to manage escalated complaints.	No	
6	Fairness in complaint handling		
	Are residents able to complain via a representative throughout? Detailed in policy, but how else is this promoted. A Policy should also be including in the acknowledgement email/letter, at the start of their complaint	Yes	
	If advice was given, was this accurate and easy to understand?	Yes	
	How many cases did we refuse to escalate? What was the reason for the refusal?	0	
	Did we explain our decision to the resident?	N/A	
7	Outcomes and remedies		
	Where something has gone wrong are we taking appropriate steps to put things right?	Yes	??
8	Continuous learning and improvement		
	What improvements have we made as a result of learning from complaints? <ul style="list-style-type: none"> • Review of compensation policy • Review of Decant Policy • Drafting of Temporary Heating Policy • Commenced a Plain English review of all correspondence • Tenant Scrutiny Panel have undertaken a review of our Service Standards and a project now set up to review and 		

	publish in Q4 Not continued after this assessment		
	How do we share these lessons with: a) residents? – Tenant Newsletter – not for some time b) the board/governing body? – Quarterly Reports, new Board are not getting this information c) In the Annual Report? - Yes		
	Has the Code made a difference to how we respond to complaints? CHL had updated the Customer Feedback and Complaints policy ahead of the publication of the code and we are reviewing the learning we now undertake in line with the Code	Yes	
	What changes have we made? We had already reduced to a 2 step process (Step 1 CHL, Step 2 Tenants Appeal Panel) and we are providing more resources to support resolution of any stage 2 cases – Not in place for at least 12 months		

Completed by:

Alexandra Morgan-Thompson,

Quality and Information Manager

9th December 2020

Appendix 2

Q&A with Quality & Information Manager - returned by email 12th Sept'22

1. Do you know roughly how many complaints are dealt with at first point of contact?

Unfortunately, not – there aren't any categories on CRM to capture that data, they get sent through or resolved as the subcategory that the complaint was about

2. Do you know on average how many outstanding complaints are on file?

As of 13th September 2022

- Current year: 193 as of 27th July 2022 according to message from Adam to Geraldine
- Previous year: 36

I am very concerned that a volume of complaints for Homes and Investment (Assets) have been recorded on the log, and yet there is no visible paper trail or folder for these. This means that the CSC or Geraldine are unable to advise or update customers on progress. I fear this is an area of risk for the business.

3. Do you think one officer allocated to the new staff structure is enough going forward?

Once the Housing Options directorate moves to the Council and the remaining departments take on responsibility for their complaint handling – yes

There are 25 posts within Assets which have Quality and Customer in their job title including co-ordinators, supervisors and a team leader. This should be more than enough staff to manage complaints within this part of the business.

- a. Do you think this area is understaffed?

Currently this area has been understaffed for some time, there is a backlog of complaints and the team have been overwhelmed with work as people leave. With the current redundancies and new structure and staff not yet in place, I believe this will cause significant issues with complaint handling performance for the coming months. However the key issue is the lack of importance and priority given to complaint customers from Interim Directors and this is role modelling poor prioritisation for the managers and teams below them. I hope that the new management and executive team will influence this positively.

4. How does the paper trail work for complaints, can you explain what happens from tenant call to outcomes?

There is a full Standard Operating Procedure written for this process which is attached. A video has also been recorded to assist staff in learning this process.

5. When a complaint is made by email, why doesn't the complainant get an automatic response for their reference and audit trail?

I believe that an automatic response does go out from the info@cornwallhousing.org.uk email address, however this is generic. There is no functionality within the email system to send a bespoke acknowledgement.

6. Do you think one person being responsible for complaints in each department, would be beneficial?

Managers should be responsible for the complaints received regarding their area of responsibility, delegating this to an administrator reduces the accountability of the managers.

7. Why has it gone back to the different departments, instead of all being dealt with at one central point (complaints officer)?

The centralised position has always relied upon the business areas to assist in responding to complaints with information, policy information and resolution actions. Moving responsibility for the complaints process back to the business encourages accountability and improved learning from lessons within the departments which need to enact improvement changes.

8. Do you think that the process has got worse since losing the 3 steps?

No, I think that escalating complaints to the panel at step 2 is the right thing for the customer to get a different perspective on their complaint, especially with complaint handling devolved to the business managers.

I would like to say how much I have enjoyed working with you all during my time with Cornwall Housing Ltd and I am sorry I was not able to meet you in person. I truly hope that things improve, and you receive the service you deserve moving forwards.

Kindest Regards

Appendix 3

Q&A with Information Governance Manager on 12th Oct'22

1. Do you know roughly how many complaints are dealt with at first point of contact?

No, CRM does not allow us to record at first point of contact – not recorded. These are not technically treated as a complaint, if dealt with at first point of contract. We could look at this.

Peter added - if they did do this, it would improve the complaint figures and results would look a lot better

2. Do you know on average how many outstanding complaints are on file?

Check the figures this morning –

- Last April-March = 129 outstanding
 - 33 being investigated, remainder responded and will be in touch when ready to do the work
- April-September 2022 = 453
 - 223 still open or in progress
- New members of staff on a 6-month fixed contract to clear outstanding complaints

3. Do you think one officer allocated to the new staff structure is enough going forward?

No and reiterated Alex's comments, they need 4 complaint handlers.

Training 4 members of staff from H&I (3 existing and 1 new) on 25th October, they will report to the H&I Team and go through outstanding complaints.

People & Places are responsible for their own complaints.

4. How does the paper trail work for complaints, can you explain what happens from tenant call to outcomes?

Standard operating process and already given to the Panel. If they phone, Customer Service take the call, log RFS on OpenHousing and complaint on SharePoint. An acknowledgement is sent to the customer and notes added on what the complaint is, and they can come back if not right.

If an email received an automatic response is sent.

An email is sent to the appropriate team.

Geraldine liaises with MC for R&M complaints and reports, this works well. Status of complaint changed to, in progress and resolved when work completed.

Hazel asked about the complaint form online.

This is automatically routed through to complaints. There is an automatic generic acknowledgement when they fill in the form, but a personalised email acknowledgement sent 3 days once it has gone through to complaints

5. When a complaint is made by email, why doesn't the complainant get an automatic response for their reference and audit trail?

No ability to do that, just thank you for your correspondence, we will get back in touch.

6. Do you think one person being responsible for complaints in each department, would be beneficial?

Possibly, but they would need to be trained. Potentially going to get more complaints, would like 2 people from each directorate. Look at this as an opportunity to change the situation. Officers need resilience to face some complaints and not to take personally. More complaint responses by email because of this. They need to keep monitoring, need to demonstrate we are following the correct process. Empowering officers to take ownership for the complaint and this is all down to training on what they can resolve.

7. Why has it gone back to the different departments, instead of all being dealt with at one central point (complaints officer)?

Essentially, the Directors wanted to get oversight and take responsibility and aim to resolve quickly.

If Complaints are properly resourced, she would be happy to take back all complaints. Previously, they didn't get answers from the different services areas to resolve quickly.

8. Do you think that the process has got worse since losing the 3 steps?

No, she doesn't think there is an opportunity to resolve one step earlier.

The problems with HOS are they state there is merit to look at it again at Step2, even if upheld at Step 1.

They need to go to senior managers to review compensation payments.

9. Is there anything you think would help to improve the services? Bring back under the central control process, there are big problems with communication and that inflames the situation.

We need to do trend analysis – why are we getting duplicate complaints. Need to keep the oversight.

Appendix 4

Q&A with Customer Service Team Leader on 14th Sept'22

1. How do you triage a complaint – what is the difference between a complaint and request for service, what is the distinction?

A complaint is a call about dissatisfaction about the service received.

RFS – never been told about a repair in the first instance or an appeal

They have a look at the history on the system, look at the notes to see what has happened and then logged.

Listen to what the customer is feeling. May not have reported a problem before and could be the first time CH have been informed.

2. Have you been told to put complaints through as request for service by management?

Not recently, before when complaints went through CS, told it wasn't a complaint it's an RFS. CS put through as a complaint but asked to change to RFS. They may not have looked at the whole picture.

Logging Step 1 in our service since Monday this week (12th September). More departments are investigating their own complaints.

3. Do you explain that you are logging their call as a complaint or request for service?

Yes. They will explain why it isn't a complaint. Customer service will log a complaint and the service area will have 10 working day for a response.

4. How often do they check emails for complaints?

Every day, they manage the main info@ inbox, and they have an off-line member of staff who monitors the inbox for complaints and emergencies and reports.

5. Why isn't there an automatic response for these complaints?

There is from the info@ mailbox, stating email received, 10 working to turnaround the email but not specific for complaints, but complaint should send an acknowledgement email within 3 working days.

6. Do you send a confirmation email?

CS do, as above. They have struggled with staff members; we confirm receipt even if we can't answer straight away.

7. Do you give them a reference number from OpenHousing when they phone, if not is this possible?

No, with CRM it doesn't assign a reference number. Unfortunately, not possible with this system.

8. Are you aware of how many complaints come through the contact centre by phone on a daily/weekly basis?

No, but we could probably run a report on what is logged. This wouldn't give the full picture as advisors could have resolved over the phone. We can't measure them all but could get a report for the ones logged.

9. Are you aware of the Housing Ombudsman Complaint Handling Code?

I know about the Ombudsman, don't know all the details, know about the two steps before the complaint goes to the HO.

10. Do you use a flowchart for complaints, do you refer to the complaints policy? Have you got a copy?

No, not a flow chart, this would be too difficult to create with all the different outcomes. Since taking over the Complaint mailbox on Monday she is creating a process guide to share with the team.

They have a copy of the policy (folder with information on all subjects) and use the web for details.

Appendix 5 –

Q&A with outgoing Customer First & Policy Officer – returned by email 8th Sept'22

1. On average, how many complaints do you receive a week?

Difficult to answer, probably in 50 in a week

2. How many are dealt with at first point of contact?

Not many to be fair. What's happened in the last couple of months - she deals with repairs complaints and housing options complaints; the rest is sent to the relevant teams to deal with. Unfortunately, they are not being deal as well as she would like to see.

She does try to phone as many tenants as possible (5th) to try and resolve the situation.

She is only here until next Friday (9th September), the other person dealing historical complaints has already left.

3. On average how many outstanding complaints are on file?

Over the last 12 months Adam got through many historical complaints up to April this year, but he has now left. She knows there are 30 outstanding from this list.

Can't give you the figure from April, there are many outstanding, logged but not sure what stage they are at from the Sharepoint file, not accountable (mainly H&I). Acknowledgements aren't being made and files not created, this is not being managed properly.

H&I have improved on inspection immensely over the last 12 months

4. Do you think one officer allocated to the new staff structure is enough going forward?

- o Do you think this area is understaffed?

No, need to employ 2 full timers to manage the inbox and part-timer for support when needed. People aren't being communicated with properly and that's the main complaint. People need to be informed of what is happening and rough timeframes and they would be more accepting. Currently, just left hanging or operatives turn up unexpected.

Because there is only one officer, currently she has to pick and choose who to contact. Need to follow up urgent complaints, she checks the inbox for these issues.

People appreciate a call, and she gains a good rapport with customers and that would be her preferred options.

Definitely understaffed!

She came in originally to help with 4 areas and has solely looked at complaints.

Some complaints can require a lot of investigation over several directorates and the easier ones get pushed to one side.

When she is on leave, she has to pass to the Contact Centre and they are already over worked, no cover for sick or annual leave.

We need to be able to speak to the complainant to understand their complaint and look for resolution.

5. How does the paper trail work for complaints, can you explain what happens from tenant call to outcomes?

Inbox, look at the contents of the complaint, she will call 9/10, send to the appropriate directorate to investigate, find out what has happened, have we dealt with issues in the timeframes, respond and look at compensation.

More complex, send to relevant teams, needs to get inspector out, get reports and timeframes, respond to customer and look at compensation.

6. When a complaint is made by email, why doesn't the complainant get an automatic response for their reference and audit trail?

Can't answer this I'm afraid, needs to be set up. Not given a reference number until it has been logged on Sharepoint.

7. What is currently the average response time, is it 3 days for confirmation and 10 working days for an outcome at Step 1?

Trying to keep to this timeframe, acknowledging always. Response at Step 1, not all are completed within 10 days, depends on the responses from the directorate.

Shane – if you are unable to respond in the 10 days, do you report back to the tenant to explain.

Ideally, but she doesn't have the time to do this, this is what is needed. She tries her hardest, but she is only one person. She has a number of customers chasing compensation payments at the moment and this takes time to investigate to check the delays.

Her priority is checking the inbox.

8. How good are the directorates in responding?

Some are better than others. She has a good relationship with repairs, and they respond well.

H&I some parts are good others are poor, she has one contact that is really good.

9. Do you think one person in each department would be beneficial?

Absolutely, it's not a job you can dip in and out of. When dealing with people on a daily basis, you gain a good rapport with colleagues and get issues resolved.

You need someone to take responsibility and it needs to be full time position, to follow a complaint through to the end and keep constant contact with all involved. This can't be passed around.

You need to keep in communication with customers, we need a customer first approach.

Appendix 6 - Step 2 figures for Complaints – April to October 2022

Month	Complaint area	Outcome at Step 1	Outcome a Step 2	Venue or online	Compensation
April	Heating	Not upheld	Not upheld	online	
April	Out of hours call out for heating & staff language	Not upheld Not upheld	2 parts Not upheld & Undetermined	venue	
June	Faulty electrics	Not upheld	Upheld	none	none
June	Leak in roof, works to remove chimney & delays in new heating	Not upheld	3 parts 1 & 2 not upheld 3 upheld	venue	None
June	Lack of response from HM & neighbours burning inappropriate fuel	Upheld Not upheld	2 parts 1 upheld at Step 1 & 2 undetermined	Visited his home	none
July	Water damage to contents, due to lack of service	Upheld with £300 compensation	Upheld	none	£636
August	Discrimination from CH & neighbour. Wants another property without neighbours	Not upheld	Not upheld	none	
October	Tenancy & lack of communication	Not upheld Not upheld	2 parts 1 not upheld & 2 upheld	none	£25
October	Consistent car repairs, intimidation & delay in response	3 x upheld	3 parts 1 & 2 not upheld 3 partially upheld	none	£25

October	Heating, lack of communication & promises made at Step not kept	Not upheld	All upheld	none	£1,500
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The Appeals Panel review 17 complaints over this period of time, some tenants had more than one complaint.

- The Panel agreed with Step 1 outcomes, for 11 out of the 17
- Disagreed with 3 of the outcomes
- And responded undetermined or partially upheld for 3 Step 1 outcomes

They also looked at the trends and the complaints covered

- Homes & Investment issues x 6
- Repairs & Maintenance x 3
- Housing Management x 7
- Lack of communication from Complaint Team x 1

The Panel asked for the compensation figures paid out for this financial year

1st April to 30th September 2022 -

Cornwall Housing has paid out £136,495.39 over a 6-month period –

To the individual: £132,840.91

To rent accounts in arrears: £3654.48

Appendix 7

How can I make a complaint?



Website form



Social media



By calling



In person

Stage 1 complaints

A member of staff will let you know we have received your complaint within 2 working days. A Complaints Officer investigating your complaint will attempt to contact you within 2 working days to discuss your complaint. A full response to your complaint will be sent to you within 10 working days.

Is my complaint resolved at this stage?

If you are still dissatisfied, please let us know the reason for this and we will move you to Stage 2 of our complaints process.

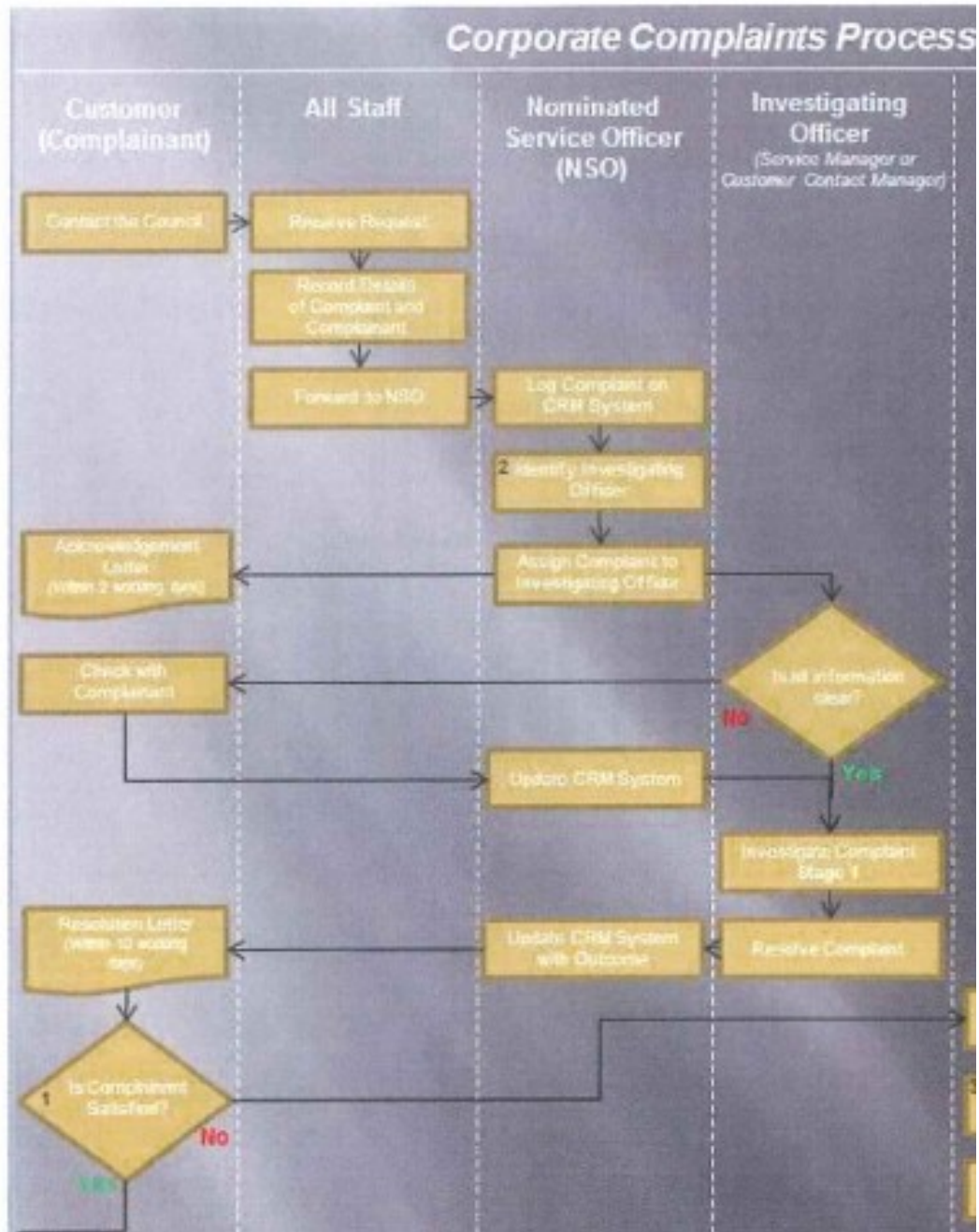


Stage 3 complaints

The Customer Experience Team will let you know they have your Stage 3 report to send to you. At this point you can ask for additional information or a review meeting where your complaint will be discussed with a Director and then send you a response letter with the outcome of the review.

Appendix 7a

APPENDIX A - Complaints Process Map



Alternative formats

Furvasow Erel

If you would like this information on audio CD, audio tape, Braille, large print, any other format or interpreted in a language other than English, please contact: -

Mar mynnowgh hwi kavos an kedhlow ma war son-sidi, sonsnod, yn Braille, prynt bras, furvas aral po styrys yn taves dres Sowsnek, kesteveugh mar pleg: -

Address

Cornwall Housing Ltd
Chy Trevail
Beacon Technology Park
Bodmin
Cornwall
PL31 2FR

Telephone and Text

General enquiries and repairs: **0300 1234 161**