



HONEYCOMB
GROUP

Complaints Policy (Group)

Policy owner/author:	Policy and Performance Co-ordinator
Team:	All
Next review date:	September 2024
Approved by:	Customer Services Committee
Date approved:	7 September 2022

1. Introduction

Honeycomb Group and its brands Staffs Housing, Revival, Concrete and Glow (referred to collectively in this policy as Honeycomb) aim to provide high quality services for all customers. Our value of 'being dead genuine' means being authentic with customers and creating a memorable experience.

However, there will be times when we get things wrong, and customers may have a reason to complain about the actions or activities of Honeycomb or the way they feel they have been dealt with. A customer may feel they have not received the standard of service they wanted or an outcome they expected.

Honeycomb will take a positive and conciliatory approach to complaints. When we get it wrong, we will be open and transparent about it, apologise and learn from it. If a complaint is not upheld, we will explain why.

Complaints will be treated as an opportunity to put something right or to do something better. They will be an indicator to learn from and will help prevent further problems from happening. Customers include people living in Honeycomb properties and accessing its services. This may also include stakeholders such as local authorities, health agencies, partner organisations and contractors.

2. Our aims

- Customers feel they are listened to, taken seriously, and are kept informed when making a complaint.
- The complaints process is easy for customers to use.
- To be open and accountable in our response and approach to complaints.
- To resolve complaints quickly and effectively taking prompt action to investigate problems and put things right when it is our responsibility.
- To learn from complaints to help us to improve.
- To follow the Consumer Standards set by the Regulator of Social Housing (RSH) and guidance issued by the Housing Ombudsman Service.

3. Outcomes

The complaints process has been developed to achieve the following outcomes, agreed as priorities with customers.

- Customers find it easy to make a complaint and feel it's not a negative experience and they are listened to and treated with respect.
- Services are improved from the lessons learned from customer complaints.
- Complaints are perceived by customers to be dealt with in a fair, consistent, and timely manner.
- Most complaints are resolved at the first stage of the process.

4. Definition

Honeycomb is aware that some customers may be put off from voicing their feelings because of social or cultural barriers. We will not use a restrictive definition of what defines a complaint. Honeycomb's priority will be to deal with the situation itself rather than assessing whether the issue is a complaint or something else.

We use the Housing Ombudsman Service's definition of a complaint:

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 customer or group of customers.

Examples of a complaint include any occasion when a customer believes that:

- Honeycomb or someone acting on Honeycomb's behalf has failed to deliver a service e.g. a maintenance contractor has let them down in a specifically identifiable way, such as missing an appointment without giving notice, or taking several visits to complete a job.
- Honeycomb has broken a promise; for example, we have not done what we said we would do or kept to a customer standard. This could include occasions where a customer has reported a repair to us, and we have failed to complete the job within stated timescales or to an acceptable standard.

- Honeycomb has failed to uphold or protect legal or contractual rights; for example, we have not responded to a request for a mutual exchange or a right to acquire application within the timeframe set out.
- The manner or attitude of a member of staff, contractor or representative of Honeycomb has been inappropriate; for example, impolite, indiscreet, or behaved in some way which is not acceptable to a customer.

A complaint will not be recorded under this policy if it is about the actions or behaviour of others e.g. local authority refuse collection service or an anti-social behaviour (ASB) incident. The customer will be supported to complain to the relevant agency when it is not Honeycomb's area of responsibility. The matter will be dealt with directly if it is an ASB issue.

Access to Honeycomb's complaints process is readily available for anyone who receives a service (or may be seeking a service) from Honeycomb or who is directly affected by Honeycomb's services. This includes, but may not be limited to:

- tenants, leaseholders, and licensees
- applicants for housing or support services
- neighbours of Honeycomb tenants or residents
- customers receiving services directly from any team within Honeycomb, Staffs Housing, Revival, Concrete or Glow

Customers can make complaints directly to staff verbally, in writing and by completing forms on the website. A customer does not need to use the phrase 'formal complaint' for us to identify an issue and treat it as a complaint.

We will accept complaints made by face to face or on the phone from customers, by post, email, web form or any other recognisable method customers choose to use.

We will accept complaints made on behalf of our customers by MPs, local authority councillors, or close family members where we can confirm the person has been authorised to act on the customer's behalf.

5. Regulatory requirements

The regulatory framework for social housing (2012) states that registered providers should:

'...have an approach to complaints that is clear, simple, and accessible that ensures that complaints are resolved promptly, politely and fairly'. (Tenant Involvement and Empowerment Standard).

This policy makes sure that our complaints handling process meets these requirements.

6. Confidentiality and data protection

We respect the confidentiality of anyone making a complaint. The collection, storage, access to, provision and disclosure of data will be completed in accordance with the Data Protection Act 2018 and UK General Data Protection Regulation (UK GDPR).

Complaints and personal details will only be disclosed to Honeycomb employees and appropriate representatives of contractors or partners, where necessary to allow us to respond to the complaint.

Specific staff and contractor's names will not be revealed unless it is appropriate to do so, and the parties concerned are aware.

7. Equality, diversity and inclusion

We recognise and value the diversity of the communities we work in. We aim to reduce barriers and make sure that everyone has equal access to the complaints service. We are committed to treating everyone fairly and to making sure we comply with all relevant legislation under the Equality Act 2010.

We will make reasonable adjustments to make sure there is equal access to the complaints process including access to a telephone interpreter which might be needed to help a customer whose first language is not English.

8. 'Informal' complaints

In practice, most customers will normally try to resolve a problem without making a formal complaint and will usually approach a member of staff they are familiar or have regular contact with. Most grievances or potential complaints are usually resolved at this stage.

Customers may use satisfaction surveys as a way of feeding back comments. Staff will make sure potential complaints are picked up from surveys and will respond directly to the customer.

Honeycomb will keep records of informal complaints to make sure they are responded to in a timely, solution focused manner and that the organisation learns from them. Guidance on procedures and training will be provided for staff about identifying, recording, and responding to informal complaints.

Customers will be made aware of the formal process if the informal complaint isn't resolved to their satisfaction. A transition from an unresolved grievance to a formal complaint will be handled sensitively. Customers will be assured that using the formal procedure, if unhappy, is an entirely normal and reasonable option.

Front-line members of staff will be encouraged to adopt a proactive approach and will prompt customers to make a formal complaint when necessary.

9. Stages of the formal complaint process*

Honeycomb has a two stage complaints process:

Stage One – complaints will be acknowledged within one working day and investigated at manager level. Where possible they will try to resolve the complaint within 10 working days.

Stage Two – complaints or appeals will be investigated at director level and where possible they will resolve the complaint within 10 working days.

Complainants will be consulted whenever it is necessary to extend the reply date beyond the target date, making sure to explain why and to agree a new response date.

Closing complaints

A complaint will be closed when the investigation is completed, corrective action has been taken or agreed (if required) and a response sent.

Although Honeycomb aims to resolve and close as many complaints as possible within the target dates this will not always be possible (e.g. when planned works are to be carried out or where a wider consultation process is necessary). In these cases, the aim will be to reach an agreement with the person making the complaint over what needs to be done and by when. The complaint will not be 'closed' until the actions agreed have been completed.

If after sending a response and there is no further contact after 10 working days, the complaint will be closed. This will be made clear in the response letter and the complaints information.

There may be occasions where a customer comes back after the complaint has been closed wanting to escalate the complaint. We will only decline to do this if we assess the request as unreasonable. A full explanation will be given to the customer.

*This section of the policy describes the formal complaints process. We reserve the right to change the process but will notify anyone affected. We will attempt to follow the principles set out in this policy at all times.

External appeals process

When an issue has been through Honeycomb's complaints process and the person making the complaint is still not satisfied, they will be advised of their right to take their complaint to a designated person or directly to the Housing Ombudsman Service.

Designated person

Members of parliament (MPs) or local councillors may receive housing-related complaints from tenants or leaseholders. They may then act as a 'designated person'.

This designated person role officially begins when a complaint has been responded to at the final stage of Honeycomb's complaints procedure (although MPs and local authority councillors may be involved prior to this stage). The role of the designated person is to help resolve the complaint in one of two ways:

- try and resolve the complaint themselves in any way they see fit
- refer the complaint to the Housing Ombudsman Service if they feel it is more appropriate.

The designated person may independently review the complaint. Honeycomb will cooperate with suitable agencies if a customer chooses to use to use an MP or local councillor as their designated person. Honeycomb does not have to accept the review outcome and the designated person can refer the complaint directly to the Housing Ombudsman if a resolution cannot be achieved.

Housing Ombudsman service

Only tenants, residents and applicants who use Honeycomb's housing services have a right to use the Housing Ombudsman Service. Information about the Housing Ombudsman will be provided to anyone eligible.

The Housing Ombudsman Service is not available for other customers who do not pay for services from Honeycomb's housing service (such as customers of Revival and Concrete or Glow support services). This will be explained to any customers at the time of appealing a complaint.

Honeycomb has adopted the Housing Ombudsman Service's complaint handling code of practice and will complete an annual self-assessment and report the outcome to the Board of Management.

10. Complainants not able to use the Housing Ombudsman service

Externally funded projects

Customers receiving a service funded externally by a public body, such as a local authority or health trust, may be able to take their complaint to that organisation if they are still dissatisfied once it has completed Honeycomb's complaints process. Staff will make sure customers are aware of this option where it applies.

Fundraising complaints

If we are unable to resolve a complaint made to us through our internal complaints process, we will clearly signpost people to the fundraising regulator, the independent regulator of charitable fundraising in England, Wales, and Northern Ireland. (www.fundraisingregulator.org.uk)

11. Compensation

Compensation may be awarded when a customer has incurred a loss or damage because of an error or fault for which Honeycomb is responsible for. Managers, at their discretion, may choose to recognise customer's inconvenience or disruption with a goodwill payment. The compensation amount awarded will in accordance with guidance in Honeycomb's compensation policy.

Compensation will not be used to shortcut the proper investigation or resolution of a complaint. Compensation awards will be approved in accordance with Honeycomb's financial regulations.

In most cases, we expect to resolve claims quickly and amicably but where this is not possible or if the nature or type of claim is not suitable for internal compensation, the claim will be referred to Honeycomb's insurers.

12. Monitoring and reporting

Honeycomb has a complaints team who monitor the complaints process to make sure they are dealt with effectively and targets will be set for key areas of the process. We will measure our performance against our targets and compare with peers through a performance monitoring system.

Honeycomb will identify lessons learned, actions taken and where actions are required to improve service delivery. This information will be shared with staff and customers in a variety of ways including on our websites, the tenants' newsletter and the Annual Report to Tenants.

Complaint's performance and lessons learned from complaints will be reported to and reviewed by the Customer Assurance Group and the Customer Services Committee.

13. Training

Staff training will promote the importance of using the complaints policy and procedures.

We will make sure that customer panels have the training and support they need to assure Honeycomb is providing the most effective complaints service to its customers.

14. Procedures

In addition to the formal complaints' procedure, Honeycomb also has procedures that detail the processes staff follow when dealing with service complaints, anti-social behaviour and neighbour nuisance complaints.

We will provide clear guidelines for customers on the complaints process when we send an acknowledgement letter following a formal complaint.

The procedures will be reviewed annually.

15. Exceptions to the complaints procedures and managing unacceptable behaviour by complainants

There are some occasions when managers or directors will decide it is necessary to deal with a complainant outside of the standard complaint's procedure. For example, where there is unreasonable behaviour by someone making a complaint.

Customers will be treated fairly, listened to and respected. Honeycomb also has a duty to protect staff and make sure they are treated fairly and respectfully during a complaint investigation.

The following examples explain what we consider to be unacceptable behaviour:

- unreasonable demands (e.g., requesting large volumes of information, asking for responses within a short space of time, refusing to speak to an individual or insisting on speaking with another)
- unreasonable persistence (refusing to accept the answer that has been provided, continuing to raise the same subject matter without providing any new evidence, continuously adding to, or changing the subject matter of the complaint)
- verbal abuse, aggression, violence (this is not just limited to actual physical or verbal abuse but can include derogatory or offensive remarks, rude behaviour, inflammatory allegations, and threats of violence)

- overload of letters, calls, emails or contact via social media (this could include the frequency of contact, the volume of correspondence received as well as the frequency and length of telephone calls).

How will unacceptable behaviour be managed?

We will try and reach a voluntary (informal) arrangement with the customer before taking formal action to allow the individual time to consider and adjust their behaviour. Mediation or advocacy through third parties may be considered to try and improve the situation.

If this informal approach fails, we will issue a warning to the customer before taking any formal steps. The warning will explain where the customers' behaviour has been considered unacceptable and the action which may be taken if the behaviour continues.

What formal actions will Honeycomb take?

These occasions will be rare and by exception. A recommendation to deal with the complainant outside the normal procedure will be first agreed with a director. The complainant will then be advised in writing about the alternative process which will be used and the reasons for this decision.

The types of restriction that Honeycomb may introduce should the informal arrangements not succeed would normally include:

- providing a single point of contact
- limiting contact to a single form i.e. letter, email, or telephone calls only
- limiting contact to certain times or to a limited number of times per week or month
- declining to give any further consideration to an issue unless any additional evidence or information is provided
- advising the complainant that further correspondence on the same matter will not be acknowledged, retained, or responded to
- only considering a certain number of issues in a specific period
- in extreme cases, such as threats or harassment towards a member of staff, actions could include reporting the matter to the police, taking legal action and ending direct contact with the customer.

Any restriction on contact or special management arrangements will be for a fixed period. This will be reviewed, and the restrictions may be lifted or extended depending on the outcome of the review.

16. Policy review

We will review this policy every two years. This policy should be used in conjunction with the:

- Equality & Diversity policy
- Data Protection policy
- Anti-social behaviour and Respect policy
- Compensation Policy