



# Ongo Homes

## Complaints Procedure

### January 2025

**Owner: Head of Customer Experience**

<u>Version No.</u>	<u>Purpose/Changes</u>	<u>Approval Date</u>	<u>Approved By</u>	<u>Suggested Review Date</u>
V5.1	Compliance update	02/01/2025	Director of Customer Services	April 2027
V5	Compliance update	13/06/2024	Heads of Service	
V4.2	Compliance check	11/05/2023	Heads of Service	February 2025
V4.1	Compliance check	13/10/2022	Heads of Service	
V4.0	Annual check	13/01/2022	Heads of Service	
V3.0	Full Review	08/04/2021	Heads of Service	January 2022
V2.0	Mid-cycle update	30/04/2019	Director for Communities	December 2021

## **1. What is this procedure for?**

- 1.1 This procedure explains how you will respond to and investigate complaints in accordance with the Complaints and Feedback Policy and the Housing Ombudsman Complaint Handling Code.
- 1.2 We welcome complaints as an opportunity to learn across the organisation and recognise that sometimes things go wrong, and we are open to learning and putting things right. This procedure is for the Customer Experience Team, Customer Resolution Team, and the Leadership Team to follow to ensure complaints are handled effectively and in line with our regulatory responsibilities
- 1.3 It should be read in conjunction with our:
- OH, Complaints Policy
  - Unacceptable Behaviour Policy
  - Housing Ombudsman Complaint Handling code
  - OH, Compensation Policy (where necessary)
  - Reasonable Adjustment Policy

## **2. Who does what?**

<b>Position</b>	<b>Responsibilities</b>
Customer Advisor (CA)  All our people	<ul style="list-style-type: none"><li>• Resolving service requests at first point of contact</li><li>• Logging and escalating complaints to Customer Resolution Team for investigation</li><li>• Providing customers information in relation to the complaint process and complaint handling code</li></ul>
Customer Resolution Officers (CRO)	<ul style="list-style-type: none"><li>• Investigating stage 1 complaints</li><li>• Making required decisions in line with the complaints policy and seeking fast and effective resolutions for the customer where appropriate</li><li>• Working with appropriate managers to resolve the complaint</li><li>• Keeping accurate records of investigations and agreements made on QLx</li><li>• Keeping customers informed and supported throughout the investigation in line with the complaint handling code</li><li>• Making sure agreed and regulated timescales are met</li></ul>

	<ul style="list-style-type: none"> <li>Identifying and making recommendations for service improvement actions to reduce complaints where appropriate</li> <li>Escalating complaints to stage 2 to an appropriate member of the Leadership Team</li> <li>Ensuring the administration of Stage 2 Complaints and that timescales are met</li> <li>Assisting with Housing Ombudsman complaint enquiries and investigations</li> <li>Reporting on complaint performance</li> </ul>
Leadership Team (LT) Service Managers	<ul style="list-style-type: none"> <li>Investigating Stage 2 complaints in line with the OH Complaints and Feedback Policy and this Procedure</li> <li>Identifying actions to learn from complaints and improve services to our customers.</li> <li>To promote a positive complaint culture across the organisation.</li> </ul>
Head of Customer Experience	<ul style="list-style-type: none"> <li>Overseeing and monitoring performance of the CRT and the complaints policy and procedure</li> <li>Conduct an annual self-assessment against the Housing Ombudsman complaint handling code</li> <li>Ensuring compliance of the Housing Ombudsman complaint handling code is met</li> <li>Collating and reviewing Investigation requests from the Housing Ombudsman</li> </ul>

### 3. What happens?

3.1 The procedure sets out below how to process a complaint throughout the stages and in line with statutory complaint handling code.

#### 3.2 Our OH Complaints Procedure

Step	Detail	Who?
<b>Step 1</b> <b>First contact</b> <b>resolution and</b> <b>service requests</b>	<p>Wherever possible colleagues should try and resolve customer's concerns at first point of contact.</p> <p>An advisor will not react on an assumption that a customer wants to complain immediately, they will identify if the</p>	<p>CA</p> <p>All colleagues</p>

Step	Detail	Who?
	<p>concern is a service request and gain clarity with the customer.</p> <p>If a service request is resolved this should be logged on QLX using the classification:</p> <p><b>15COMPLAIN – RESOLVE – FCR.</b> This will not log a complaint.</p> <p>Brief description should state the service area and a brief line about the service request</p> <p>Full description should detail the nature of the service request and what action was taken to resolve the issue.</p> <p>The service request should be tracked through to completion.</p> <p>If a resolution cannot be found immediately the complaint should be raised by logging a complaint on QLX (see details in Step 2 below).</p>	
<p><b>Step 2</b> <b>Logging a complaint</b></p>	<p>To accept the complaint, you should consider the following pre complaint checks:</p> <ul style="list-style-type: none"> <li>• Complaint is within 12 months of the issue arising</li> <li>• Complaint has not already been investigated and responded to a stage 1 of the complaint process</li> <li>• Has the issue been through the Lettings Appeals Process? If so, the complaint must be logged as a stage 2 complaint on QL-x and sent to the appropriate member of the Leadership Team – go straight to step 10 of this procedure</li> </ul>	<p>Customer Advisor</p> <p>CRO</p>

Step	Detail	Who?
	<p>To log the complaint, log on QLx using the following classification:</p> <p><b>15COMPLAIN – DIRECTORATE – SERVICE AREA - THEME</b></p> <p>Please make sure the correct classification and theme is selected as it is important to understand the theme of complaint received.</p> <p>When logging the complaint, you should capture the following information with the customer:</p> <ul style="list-style-type: none"> <li>• A full description of What is the complaint about ensuring you clarify all points of the complaint</li> <li>• When, where and what has happened.</li> <li>• Who did it involve? E.g. contractors name, Ongo employees etc.</li> <li>• What does the customer want us to do to put things right?</li> <li>• How does the customer prefer to be contacted about this complaint?</li> <li>• Does the customer have any specific needs or reasonable adjustments we need to be aware of in relation to this complaint?</li> </ul> <p>Please explain to the customer that the complaint has been logged and has been sent to the Customer Resolution Team who will review the complaint and respond in writing within 5 working days to acknowledge the complaint.</p> <p>Please explain to the customer that once the complaint has been acknowledged the</p>	

Step	Detail	Who?
	<p>Customer Resolution Officer has 10 working days to investigate and respond. On occasion complaints are extended depending on how complex they are but if this is the case the customer will be informed in writing.</p> <p>It is important to confirm all the customer contact details are correct on our system.</p> <p>Complete the recording of the complaint On QLx.</p>	
<p><b>Step 3</b> <b>CRT triage and complaint acknowledgement</b></p>	<p>The Customer Resolution officer will always seek to resolve a concern at the earliest opportunity this may still be achieved during the acknowledgment stage.</p> <p>When you receive a complaint, you will carry out the following actions:</p> <ul style="list-style-type: none"> <li>• Set out your understanding of the complaint definition</li> <li>• Triage the complaint to understand if it can be completed within 10 working days or would reasonably need to be extended</li> <li>• You will seek clarity on any part of the definition with the complainant</li> <li>• Will ensure that there are no conflicts of interest on taking on the complaint and will change the complaint handler if this is the case</li> <li>• You will state who will be dealing with the complaint</li> <li>• You will set out the date that the customer can expect a response (no more than 10 working days)</li> </ul>	<p>CRO</p>

Step	Detail	Who?
	<ul style="list-style-type: none"> <li>You will consider the seriousness of the complaint in relation to the risk posed to the customer and how the tenant vulnerabilities could impact that risk. Ensure any high-risk cases are prioritised.</li> <li>You will always send the acknowledgement in writing even if you have acknowledged this verbally with the complainant</li> </ul> <p>Please add the details of your findings on QLx under the complaint action code of:</p> <p>COMPAK – For stage 1 - complete with the relevant outcome code.</p> <p>CO2PAK – For stage 2 - complete with the relevant outcome code.</p> <p>Extensions</p> <p>You will always triage a complaint during the acknowledgement process to understand the complexity of the complaint.</p> <p>If a complaint is identified as needing longer to investigate you will set this out in writing to the complainant explaining why the complaint will take longer and giving the customer a new date (no more than a further 10 working days).</p> <p>When extending a complaint, you must include the contact details of the Housing Ombudsman within the written extension confirmation.</p> <p>A complaint will only be extended for good reason and by exception.</p>	

Step	Detail	Who?
	If an extension is required, please add the code EXTEND to QLx with the relevant dates this will enable us to track and monitor extensions	
<b>Step 4 - Refusing a complaint</b>	<p>During the acknowledgement stage you may find there is an appropriate reason to refuse the complaint as per section 3 of the complaint policy.</p> <p>If there is, you must put this in writing to the customer stating and explaining the reason for the refusal and how they can contact the Housing Ombudsman should they wish to do so.</p> <p>Refusing a complaint should be the exception and only done so if it falls completely in line with the policy to do so.</p>	
<b>Step 5 Investigating the complaint</b>	<p>The investigation should contain the following information:</p> <ul style="list-style-type: none"> <li>• Who you have spoken to during the investigation</li> <li>• What information you have used during the investigation</li> <li>• Information about any emails or further contacts with the customer during the investigation</li> <li>• Identify your findings</li> <li>• A clear decision</li> <li>• Details of how the decision was made</li> <li>• What actions have been taken to put things right if applicable?</li> <li>• How you have communicated the decision with the customer</li> <li>• Is the customer satisfied with the decision and outcome?</li> </ul>	CRO



Step	Detail	Who?
	<ul style="list-style-type: none"> <li>• Please record any learning for the service area</li> <li>• Please ensure all the evidence relied upon is recorded and can be recalled should it need to be reviewed again either at stage 2 or by the Housing Ombudsman</li> </ul> <p>During the investigation it is important to inform the relevant service manager a complaint has been received and work with them and their team to investigate the complaint fully.</p> <p>It is best practice to visit the customer at their home if it is appropriate to do so and agreed in advance with the customer. Appropriate reasons for visiting would include where it is a repair or a defect to their home where it is important to understand the extent of the issue, where reasonable adjustments have been made to communicate with the tenant at their home. There may also be times to conduct other face to face meetings in the office where a customer requests to do so. This step is important to fully understand the complaint, build a rapport with the customer and to ensure the customer feels heard and their matter is being treated with respect and importance.</p> <p>It is important to consider customer vulnerabilities throughout an investigation and work with customer advocates when the need arises.</p> <p>If within the complaint investigation there is a conflict of interest or working relations</p>	

Step	Detail	Who?
	<p>break down, you should consider a change of case handler to try and promote a positive way forward.</p> <p>Please use all systems to consider evidence of contacts and the services we have provided.</p> <p>If during an investigation the customer add further points to their complaint it is important to add these into the complaint if it does not unreasonably delay the complaint. If it does delay the complaint, then consider raising the new points as a new complaint to be investigated.</p> <p>During an investigation it is important to ensure all findings, actions and agreements are documented on QLx. All investigation information should be recorded on: CINVES – for stage 1 investigations 2INVES – for stage 2 Investigation</p>	
<b>Step 6 - Remedies</b>	<p>If the decision is to uphold the complaint, there may be remedies you need to put in place for the complainant when something has gone wrong.</p> <p>You will need to set out any action already taken, intend to take or to put things right and these can include:</p> <ul style="list-style-type: none"> <li>• Apologising</li> <li>• Acknowledging where things have gone wrong</li> <li>• Providing an explanation assistance or reasons</li> <li>• Acting if there has been delay</li> <li>• Reconsidering or changing a decision</li> </ul>	

Step	Detail	Who?
	<ul style="list-style-type: none"> <li>• Amending a record or adding a correction or addendum</li> <li>• Providing a financial remedy</li> <li>• Changing policies, procedures or practices</li> </ul> <p>Any remedy offer must reflect the impact on the complainant considering any vulnerabilities or reasonable adjustments the complainant has or had at the time of the complaint.</p> <p>It is important to find the most effective remedies at stage 1 of the process to resolve the complaint. You should not be escalated to stage 2 just to increase financial compensation or to escalate your decision making, you are empowered to make the right decision to reflect the complaint and its impact.</p> <p>All remedies should have a timescale attached where appropriate and where a timescale cannot be achieved when communicating the decision, a timescale of when the tenant will be contacted to communicate the remedies effectively.</p>	
<b>Step 7</b> <b>Communicating the decision</b>	<p>When you have made your final decision regarding the outcome of the complaint it is important to communicate this to the customer and the reasons why you have come to this decision. It is best practice to have a verbal discussion with the customer before written correspondence is sent, this allows the customer opportunity to ask questions and understand how you have come to the final decision.</p> <p>A written response to the complainant must be completed for every complaint.</p>	CRO

Step	Detail	Who?
	<p>This can be either emailed or sent in the post depending on the customers' requirements. This response must be saved within Docuware in the complaints file and indexed by the complaint ID.</p> <p>The written correspondence must include the following:</p> <ul style="list-style-type: none"> <li>• The complaint stage</li> <li>• All points raised in the complaint definition</li> <li>• The decision on the complaint</li> <li>• clear reasons for any decisions made referencing any relevant policy, law, or good practice</li> <li>• The details of any remedy offered to put things right</li> <li>• Details of any outstanding actions</li> <li>• What organisational learning has been identified?</li> <li>• Details of how to escalate the matter to stage 2 or the Housing Ombudsman</li> </ul> <p>Please ensure a complaint is closed even when there are outstanding actions to remedy the complaint. Any outstanding action will be tracked through the Follow-on process.</p>	
<p><b>Step 8 - Follow on process</b></p>	<p>Follow on Process</p> <p>On occasion it will not be possible to put in place all remedies to a complaint within 10 working days in this case you will log all outstanding actions on the action code REPUP.</p> <p>You will ensure that the date is set for the action to be completed, and you will</p>	

Step	Detail	Who?
	ensure the follow up actions are communicated to the tenant in writing which will include what is outstanding and the date these will be completed.	
<b>Step 9 Recording individual complaint learning</b>	<p>It is important to record the learning from each complaint at either stage 1 or 2.</p> <p>Record the learning on the action <b>FLEARN</b> and in the notes include what you have found during the complaint and then details on the improvements and changes that need to be made to ensure that we prevent future complaints.</p> <p>This will create a clear and accurate log of what we have changed from the information we have received on complaints.</p> <p>The complaint can now be fully completed and closed on QLx.</p>	CRO
<b>Step 10 Escalating to stage 2</b>	<p>A complaint must be escalated through all stages of the complaint process unless there is a valid reason to do so, and this must be set out in writing to the complainant and comply with the provisions of the complaint handling code.</p> <p>Confirm with the customer that the complaint has been escalated, explain the stage 2 complaint will be acknowledged within 5 working days and advise them who will be reviewing the complaint.</p> <p>Capture the following information in the action notes:</p> <ul style="list-style-type: none"> <li>Why the complainant wishes to escalate</li> </ul>	<p>CRO</p> <p>Investigating Manager</p>

Step	Detail	Who?
	<ul style="list-style-type: none"> <li>• What the initial complaint did not resolve</li> <li>• What the customer wants to put things right</li> <li>• How the customer wants to be contacted</li> <li>• Any specific needs the customer has</li> </ul> <p>Complainants do not have to explain their reasons or justify their choice to escalate to stage 2. You should make reasonable efforts to understand why the complainant remains dissatisfied.</p> <p>The CRO will acknowledge the stage 2 complaint in writing to the customer within 5 working days please follow the process in Step 3 of this procedure for the acknowledgement process</p> <p>Allocate the action to the appropriate Head of Service. The Stage 2 complaint will be dealt with by an appropriate member of the Leadership or management team but will be independent from the stage 1 decision.</p> <p>Stage 2 investigations and timescales must be completed within 20 working days and only extended by exception (no more than a further 20 working days).</p> <p>Please follow section 5-8 of this process for investigations. For stage 2 there is an investigation template and response letter templates to support the investigation process and are stored on the intranet under the policy and procedure library.</p>	

Step	Detail	Who?
	<p>Stage 2 is our final response; please ensure we have involved all relevant staff and leadership needed to issue such a response. Please review where appropriate with the relevant director of the service.</p> <p>The CRO will make sure the administration of the complaint is handled effectively and recorded on QLx.</p> <p>The Customer Experience and Resolution Team Leader will monitor timescales for responses to ensure they are responded to within the complaint handling code timescales.</p>	
<p><b>Step 11</b> <b>When a complaint has exhausted the complaint process</b></p>	<p><b>Housing Ombudsman Service</b> A customer can discuss their complaint with the Housing Ombudsman Service at any point and throughout the lifetime of a complaint. This service will be able to provide advice and guidance to the customer and the landlord to try and find early resolutions where it can.</p> <p>The Housing Ombudsman will request an investigation by email.</p> <p>The email will request specific information they require and will give a deadline to respond by. The Housing Ombudsman will be specific on each case with what they require.</p> <p>An email will be sent to the appropriate Head of Service and / or Director informing them we have received a request.</p>	<p>Head of CXT and CXT Team Leader</p>

Step	Detail	Who?
	<p>The Customer Experience Team Leader will convene a meeting with all relevant service heads and leads to discuss the pack and ensure we have all the relevant evidence ready for submitting.</p> <p>The Customer Service Team Leader will compile the pack with all the information requested within the timescale. The pack will then be reviewed and approved by the Head of Customer Experience before submitting it to the Housing Ombudsman.</p> <p>All requests from the Housing Ombudsman will be recorded on QLx.</p> <p>Once the Housing Ombudsman has completed their investigation, they will inform us of their decision. This may be appended with orders and recommendations for further action to be taken.</p> <p>An email will be sent to the relevant Head of Service, Director, CEO and Member responsible for complaints of the outcome and record on QLx.</p> <p>All Housing Ombudsman cases will be raised and discussed at the Ongo Homes Board, Tenants Complaint Panel and published on our website for our customers.</p>	

#### **4. Complaint Learning**

- 4.1 It is important that complaint learning is used to inform and improve services for our customers. It is also important that we are transparent and share this with our customers.



Step	Detail	Who?
<b>Step 1 – Individual complaint learning</b>	On each complaint we will record any learning and where appropriate suggest how further complaints can be prevented	Customer resolution Officer
<b>Step 2 – Collating themes and learning with the wider teams</b>	<p>The Customer Experience Team Leader will be responsible for collating the identified learning which will include identifying the themes.</p> <p>This will be conducted bi-monthly, and a meeting will be set up with the relevant service areas including the Head of Service and the service leads.</p> <p>During this meeting, the complaint types and the learning themes will be cascaded, and a workshop discussion will take place to identify the relevant actions to prevent further complaints and improve services.</p> <p>The outcome of these meetings will be shared with the Head of Customer Experience who report these actions through the relevant leadership meetings and the Customer Complaint Panel where the actions will be scrutinised.</p> <p>The learning actions will be held centrally with our Business Assurance and Risk Team who will ensure the action are complete and evidenced. They will then test these through core controls and audit processes for assurance.</p> <p>The learning from complaints will be shared on our website on the complaints page and through various customer communications</p>	<p>Customer Experience and Resolution Team Leader.</p> <p>Head of Customer Experience</p>

Step	Detail	Who?
<b>Step 3 – Sharing with our customers</b>	<p>It is important that we share what we have learned through our complaints to our customers regularly.</p> <p>We will do this by reporting on the complaints page on our website, sharing in our written publication Key News for non-digitally engaged customers and with our wider involved tenant structures such as Community Voice.</p> <p>We also publish this within our complaint performance and service improvement annual report which will be published to our customers.</p>	

## 5. Enquiries received from MPs or Local Councillors

- 5.1 We often receive communications on behalf of tenants from local MPs or Local Councillors that are sent directly to our Executive Leadership Team. These may be service requests or complaints. To make sure these are dealt with effectively, the following process should be followed when dealing with these types of communications.

Step	Detail	Who?
<b>Step 1</b>	<p>When an enquiry is received from an MP or Cllr. by any method, the contact is logged on the following workflow:</p> <p><b>15COMPLAIN- MP/CLLR – ENQUIRY – MPENQ</b></p> <p>Enter the details of the enquiry into the full description field. Save and close and send the workflow to the CRT. This will also generate an email to alert the CRT.</p>	All colleagues
<b>Step 2</b>	When a workflow has been received, please acknowledge the enquiry with the MP / Cllr's office within 5 working days and agree	CRO

Step	Detail	Who?
	<p>a date within 10 working days to respond when you have investigated the enquiry.</p> <p>You should identify if this is service request or a complaint. If you raise a complaint, please follow the complaint procedure above sections 1-8</p> <p>When investigations have been completed, please add the notes, outcomes and agreements and copies of emails sent on the QLx contact and complete the action or follow the complaint process above if logged as a formal complaint.</p> <p>Please respond to the MP / Cllr's office as agreed and any Ongo customer that requires a response.</p> <p>This will complete the enquiry.</p>	