



NLM Housing Association

Customer Care Policy

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Contents

| | | |
|----|--|----|
| 1 | Aims and Objectives..... | 3 |
| 2 | External References..... | 3 |
| 3 | Legal and Regulatory Framework | 3 |
| 4 | Purpose and Scope..... | 4 |
| 5 | Definitions | 4 |
| 6 | Policy Statement | 4 |
| 7 | Complaints | 5 |
| 8 | Complaints not dealt with under the Customer Service policy..... | 6 |
| 9 | Escalation and Outcomes | 7 |
| 10 | Unreasonable and unresolved complaints | 8 |
| 11 | Reasonable adjustments..... | 9 |
| 12 | Equality and Diversity | 9 |
| 13 | Related Policies and Procedures | 9 |
| 14 | Monitoring | 10 |

1 Aims and Objectives

- 1.1 This policy sets our commitment to provide services that are tailored to the needs of our customers. Customers can expect us to deliver our services fairly, with empathy and to communicate with us through a channel that best suits their needs. Our customer focussed approach will enable us to deliver services in a timely manner which our customers find easy to access and flexible to their needs.
- 1.2 We expect our people to treat our customers in a professional, courteous and helpful manner, and take ownership for their interactions with each customer. We will facilitate customer feedback to improve the quality and delivery of our services with the aim of developing continuous improvements through effective and innovative solutions.

2 External References

- 2.1 Tenant involvement and empowerment standard – sets out the regulatory expectations in relation to customer service and complaints.
- 2.2 The Housing Ombudsman – sets out good practice guidance in resolving disputes.
- 2.3 Care Quality Commission guidance for providers – sets out care providers' responsibilities in relation to receiving and acting upon complaints.
- 2.4 The Local Government Ombudsman – responsible for unresolved disputes relating to care services.
- 2.5 The Property Ombudsman – provides an impartial, independent service for unresolved disputes with property agents.
- 2.6 Consumer Code for Home Builders – provides protection and rights to the purchasers of new homes.

3 Legal and Regulatory Framework

- 3.1 The Regulator of Social Housing regulatory framework requires registered providers to provide choices, information and communication that is appropriate to the diverse needs of their tenants, and have an approach to complaints that is clear, simple and accessible that ensures complaints are resolved promptly, politely and fairly. This is set out in the Tenant Involvement and Empowerment Standard.
- 3.2 The Health and Social Care Act 2008 requires care providers to meet a number of fundamental standards. These include Regulation 9, delivering person-centred care, and Regulation 10, treating people with dignity and respect. These regulations are monitored by the Care Quality Commission (CQC),

4 Purpose and Scope

- 4.1 The purpose of the policy is to advise staff and customers of the consistently high standard of customer service that should be delivered.
- 4.2 The policy applies to the NLM Housing Group and its subsidiaries, including NLM Housing Association, NU Living, NLM Care and Support and Hera Management Services. Contractors and other partners working on the group's behalf must also adhere to the policy.

5 Definitions

- 5.1 Customers are any person or group that receive services or goods from NLM. This includes tenants, homeowners, housing applicants, domiciliary care clients, property management clients, new home buyers, partner agencies and other stakeholders.
- 5.2 Customer service refers to assistance and advice provided by NLM to its customers. It is a series of activities designed to enhance the level of customer satisfaction i.e., the feeling that a product or service has met the customer's expectation.
- 5.3 A complaint is an expression of dissatisfaction, however made, about the standard of a service, actions, or lack of action by NLM, our own staff, or those acting on our behalf, affecting an individual resident or group or residents.
- 5.4 Service Standards set out our specific commitments to service delivery and have been designed to maximise customer satisfaction by delivering a consistently high level of service and customer care.

6 Policy Statement

- 6.1 NLM is a customer focused organisation, committed to providing excellent services to people who live in the communities we serve. Our customers will remain at the heart of everything we do as we deliver services in a flexible, transparent and uncomplicated way.
- 6.2 We aim to be accessible to all customers and for them to find us easy to deal with. We recognise trust as a key value, and we will ensure our services are accessible to our customers by:
 - Regularly reviewing our customers' preferred communication channels. We will maximise our use of digital technology to enable customers to choose the most appropriate channel for them.
 - Setting out information about our services clearly and simply so all customers can understand it. This includes information on how to complain or give feedback and we will respond to all communication in a professional, timely and efficient manner which is specific to each customer's needs and expectations.
 - Measuring and assessing our accessibility and the quality of our services through regular customer satisfaction feedback, including surveys, customer

complaints, compliments, and comments.

- Ensuring our people treat customers in a professional, courteous and helpful manner. Customers can expect us to respect their privacy and dignity, we will treat people as individuals and aim to make every contact a positive experience by taking ownership of issues and keeping customers informed.
- Gathering customer Insight and using the data to help us understand our customers' needs and the drivers behind their satisfaction. This will enable us to focus on the issues that matter to our customers through strategic analysis of our customer data to identify behaviours and beliefs.
- Valuing diversity and supporting people to realise their full potential. We will use insight on our customers in order to tailor services to their specific needs and ensure staff are properly trained, competent and demonstrate appropriate behaviour and attitude.

7 Complaints

- 7.1 NLM is committed to providing a high-quality service to all customers. In order to do this, we need to know when we get things wrong. We will listen to all complaints, treat them seriously and use all lessons learnt from them for service improvements. We will apply the Housing Ombudsman's Complaint Handling Code.
- 7.2 Complaints can be made by any customer or a representative acting on their behalf. Complaints will also be accepted from members of the public if they have been directly affected by the services provided by NLM. Anonymous complaints will be investigated, however options for their resolution may be limited.
- 7.3 A complaint received as a petition must include a clear and concise statement on what the petition is for, what action the petitioners would like taken and the name, address and signature of all persons supporting. If no-one is identified as being the organiser, NLM will write to all signatories to agree who is the petitioner.
- 7.4 Complaints can be made on-line, in person, by letter, email, telephone, social media, or a third-party complaint handling website. It is expected that when a complaint is logged it should provide a brief explanation of the problem and an indication of the outcome the customer believes could resolve the issue.
- 7.5 Complaints should include details of what the customer is unhappy about, when the problem started, details of any contact they have had with us to try and resolve the issue and how they would like us to resolve the problem.
- 7.6 We will investigate complaints in a confidential and respectful manner, keeping the customer fully informed throughout the process.
- 7.7 All complaints are coordinated by the Customer Relations Team to ensure a quality and timely response. Complainants will be advised of a named contact and the team will maintain contact during the investigation and afterwards to check their complaint has been dealt with.

- 7.8 Each organisation has agreed timescales with all initial complaints acknowledged within two working days. NLM will respond to a complaint in full (when possible) within six working days and Hera and Nu Living within 10 working days.
- 7.9 Whenever possible, we will aim to resolve complaints without a formal approach. The manager responsible for the service area concerned will be responsible for resolving the complaint. Unless a customer explicitly asks that their concern is dealt with as a formal complaint, a member of the Customer Relations Team will determine whether it requires a formal approach.
- 7.10 Where a formal approach is required, NLM Housing Association operates a three stage complaints procedure. Appendix one provides more detail about each stage. Other NLM companies have adopted varying procedures based on good practice guidance set out by the relevant Ombudsman Service.
- 7.11 Where a formal approach is required a two stage complaints process will be used. Stage one: an investigation by a manager from the team providing the service to which the complaint relates to. Stage two: a review of the stage one investigation by a Head of Service, Assistant Director, or a Director. Each stage will include advice on the options open to the customer should they remain unhappy, including referring their complaint to the relevant Ombudsman Service.
- 7.12 All complaints will be taken seriously, and we will ensure all lessons learnt from a complaint investigation will be used to inform service improvements. Customer Services

8 Complaints not dealt with under the Customer Service policy.

- 8.1 There are a number of instances when we will not consider a customer dispute under this policy. These include:
- Old complaints that have had a final response and there is no new evidence or information available.
 - An initial request for a service or information. Customers are asked to follow the correct procedure and can only make a complaint if we fail to deliver the service or information requested.
 - Disagreements with formally agreed policies of the organisation will be dealt with by the manager responsible who will provide a full explanation and a copy of the policy.
 - Neighbour nuisance and anti-social behaviour will be dealt with under the Hate Crime and Anti-Social Behaviour Policy. Complaints about how we have dealt with a report of ASB can be considered under this Policy.
 - Lettings and allocation decisions will be dealt with under the Allocation Policy.
 - The level of rent or service charge, or the amount of an increase if carried out in line with NLM's Rent Setting Policy.
 - Service charge disputes will be dealt with under the Disputes Procedures or referred to the First-tier Tribunal.
 - When legal action has commenced the relevant Head of Service will liaise with

NLM's legal advisors.

- Insurance related claims will be dealt with by the Head of Insurance.
- Complaints relating to a new build property as a result of a build defect or latent defect where the builders of your home or building warranty provider are investigating.
- Objections against a regeneration scheme will be considered as part of the scheme's consultation process.
- Complaints regarding the level of compensation offered, when the decision on the amount of compensation has been made in line with NLM's Compensation Policy.
- Complaints against individual members of staff will be recorded and dealt with by the line manager and supported by the People Team where appropriate.

9 Escalation and Outcomes

- 9.1 All initial complaints will enter the process as either an informal complaint or at stage one. In exceptional circumstances however, a complaint may enter the process at stage two if it is of a sufficiently serious nature. This includes instances where there was/is a risk of harm or reputational damage.
- 9.2 In many instances a complaint can be resolved quickly and without the need for a written response. These complaints can be dealt with by our Customer Relations Team or the relevant department responsible for the delivery of the service. If, however the complaint is not resolved to the customer's satisfaction it can be escalated to our formal procedure at stage one.
- 9.3 The complaints procedure is designed to resolve complaints without the need for escalation. Stage two should not be seen as an automatic progression for a complaint which has been investigated and a full and final response issued.
- 9.4 Complainants, when asking for their complaint to be reviewed again, should set out why they remain dissatisfied and what further action they would like NLM to Customer undertake to resolve the issue. Requests to escalate complaints should be agreed by a Director or Assistant Director.
- 9.5 All complaints will be assessed on their own merit and considered in a fair and impartial way. All formal complaints will be responded to by letter, which will:
 - Use plain English, avoid jargon and show empathy. It will clearly state the stage of the complaint it is addressing, or that it is our final response.
 - Respond to the original complaint and dissatisfaction and address all the elements of the original complaint.
 - Set out our findings and conclusions on each issue and reference any evidence on which those findings are made.
 - Refer to any relevant policy, procedure, legislation or good practice when explaining our decision.
 - Acknowledge and apologise for any mistake or service failure and provide an explanation of what went wrong.
 - Consider the outcome and give details and timescales for any actions we plan

to take regarding what the complainant is looking for and whether we might be able to provide this.

- Explain what we have learnt and whether any changes or improvements will be made as a result of any learning.
- Include details of any redress offered, such as compensation, discretionary repairs or decorating.
- Signpost to other sources for advice or support.
- Provide details of how the complaint can be taken further, including information on the Ombudsman Services available.

9.6 Where a complaint is found to be justified and is upheld, NLM will consider whether it is appropriate to offer one or more of the following:

- A compensation payment in line with the compensation policy.
- A goodwill gesture, for example a voucher or some flowers.
- Mediation through an independent service.
- An invitation to contribute to shaping/monitoring customer facing services.

10 Unreasonable and unresolved complaints

10.1 Each complaint will be considered on its own merits, and it will not be assumed that someone who has made an unreasonable complaint in the past will do so again. All customers will be dealt with fairly, honestly, consistently and appropriately on every occasion.

10.2 Customers have the right to be heard, understood and respected. If a customer makes unreasonable demands, it may be appropriate to consider if a family member, friend or support worker are able to represent the customer in the handling of their complaint. Unreasonable behaviour could include:

- Unreasonable demands, such as requesting large amounts of information not relevant to the complaint or refusing to speak to an individual member of staff.
- Unreasonable persistence, continuing to raise the same subject without new evidence, continually raising the same issue or continuously changing the issue.
- Verbal abuse, aggression, violence, including derogatory remarks or rudeness.
- Overload of letters, calls, emails or contact via social media.
- Complaints that are excessive in number or length and/or frivolous or vexatious, including complaints that cannot be resolved.
- Complaints that have been made without grounds, just to cause disruption.

10.3 Mediation or advocacy through a third party should be tried before a formal approach is taken to deal with customers displaying unreasonable behaviour. A formal approach should be for a set time period and could include:

- Providing a single point of contact.
- Limiting contact to a single form and to a certain time, and/or frequency.
- Refusing to further consider an issue unless additional information is provided.
- Only considering a limited number of issues in a specific period of time.

- 10.4 If we decide that someone is making unreasonable persistent complaints, we will write to them to advise that we believe their behaviour is such and what action we are taking, and when we will review our decision.
- 10.5 If a complaint remains unresolved after the formal procedure is exhausted appropriate advice will be given depending on the subsidiary to which it relates. For housing complaints, the complainant will be advised that they have the right to refer their complaint to a designated person or The Housing Ombudsman once eight weeks have elapsed from the final conclusion of their complaint.
- 10.6 Unresolved complaints relating to NLM Care and Support can be referred to the Local Government Ombudsman and those relating to Hera to The Property Ombudsman.
- 10.7 Unresolved complaints relating to NU Living can be referred to the Consumer Code for Home builders dispute resolution scheme. In such instances the customer should also contact the relevant home warranty provider to obtain an application form.
- 10.8 NLM will actively engage with designated persons and the relevant ombudsman services in resolving disputes, respecting the outcome of related investigations and determinations.

11 Reasonable adjustments

- 11.1 NLM are committed to ensure that people who are living with a disability are not disadvantaged in accessing its services. As part of our complaints procedure, we can make a number of adjustments, these include:
- Making it as easy as we can for a customer to make a complaint, through their preferred communication channel.
 - Allowing more time for someone to provide us with information or evidence.
 - Offering face to face meeting or providing an interpreter to ensure we understand a complaint.
 - Communication through a representative or intermediary.
 - Provision of information in appropriate alternative formats
 - Use of plain English or Easy Read Service

12 Equality and Diversity

- 12.1 This policy will be implemented in accordance with NLM's Equality and Diversity Policy. We will be sensitive to the specific needs of all customers and show due regard to a complainant's medical condition and disability-related needs, including any due to mental health issues and learning disabilities.

13 Related Policies and Procedures

- Equality and Diversity Policy

- Complaints Procedure
- Compensation Policy
- Compensation Procedure
- Challenging Behaviour Procedure

14 Monitoring

14.1 The primary indicators for monitoring complaints are:

- Customer satisfaction with the complaints procedure and outcomes
- Performance against response time service standards
- Volume of complaints received.
- Response times for Ombudsman enquires and investigations.

14.2 Each closed complaint will be analysed for:

- Whether service standards are being met and remain fit for purpose
- If changes are required to policy, procedures or working practices.
- Learning opportunities