

1 Policy statement

- 1.1 We value and encourage customer feedback and are committed to ensuring that all our customers have a strong voice to influence decisions and challenge us as their landlord. We are also committed to consistently providing an excellent service to all our customers. However, we recognise that there are times when our service fails to meet the high standards, we have set.
- 1.2 This Policy sets out Rooftop Housing Group's ('Rooftop') approach, obligations and responsibilities regarding customer complaints and extends to all our services including those of our contractors and agents. It applies to all our customers and their designated advocates including non-resident service users, key workers, those in shared ownership properties and leaseholders. Application of this Policy to other parties will be considered on a case-by-case basis.
- 1.3 Rooftop encourages a culture of continuous improvement, both as individuals and as an organisation. Learning from our customer feedback, including customer complaints, is an integral part of that process and this policy sets out our expectations on how we evidence, monitor and deliver any learning points that arise from the complaints we receive.
- 1.4 Customers must be able to raise their complaints in any way and with any member of staff. All staff will be made aware of the complaints process and be able to pass details of the complaint to the appropriate person within Rooftop.

2 Statutory and Regulatory context

- 2.1 The Transparency, Influence and Accountability Standard (Regulator of Social Housing 2024) states:
 - 2.1.1 Registered providers must ensure their approach to handling complaints is simple and accessible.
 - 2.1.2 Registered providers must publicise their complaints process and what tenants can do if they are dissatisfied with the outcome of a complaint or how a complaint was handled.
 - 2.1.3 Registered providers must provide tenants with information about the type of complaints received and how they have learnt from complaints to continuously improve services.
- 2.2 In addition, the supporting Code of Practice notes:
 - 2.2.1 Addressing complaints fairly, effectively and promptly is essential for providers to build trust with tenants. Providers should make every effort to ensure that tenants are aware of their complaints process. Tenants should be able to raise a complaint easily and should be listened to by their landlord when they do so.
 - 2.2.2 In addressing complaints, registered providers should ensure that they provide regular updates to affected tenants about the progress they have made to resolve the complaint fairly and the next steps they plan to take, with clear timescales.
 - 2.2.3 In meeting this outcome, registered providers are expected to consider relevant requirements of other bodies, including those of the Housing Ombudsman (HO) and specifically its Complaint Handling Code.

- 2.2.4 Complaints present registered providers with valuable insight into tenants' experiences of interacting with their landlord. Registered providers should make good use of this learning in order to improve services for tenants, bringing about change at a service or organisational level where appropriate. As part of this learning, registered providers should analyse trends and themes from complaints data.
- 2.3 This Policy is also compliant with the rights enshrined in the General Data Protection Regulations (2018).

3 Definitions

- 3.1 A **Contact** is the day-to-day correspondence we have with our customers. This might include reporting anti-social behaviour (ASB), requesting a repair or providing a customer with an update on a service we are providing. We may classify an initial contact as a Service Request when this is our first opportunity to put something right for the customer as part of an early resolution approach. It may, however, be clear that the issues raised are complex or longstanding, or the customer may request to raise a complaint. These interactions will always require us to raise a Stage 1 Complaint at the outset.
- 3.2 A **Service Request ("Early Resolution")** is a request from a customer to the landlord requiring action to be taken to put something right. This is our opportunity to provide early resolution. The difference between an Early Resolution and a Complaint is if we have previously failed to achieve early resolution to the customer's satisfaction, subsequent requests about the same matter must be dealt with as a complaint.
- 3.3 A **Complaint** is an expression of dissatisfaction, however made, about the standard of service, actions, or lack of action by Rooftop, its own staff, or those acting on its behalf, affecting an individual or group. A customer does not need to use the word 'complaint' for it to be treated as such. Whenever a customer expresses dissatisfaction, we will give them the choice to make a complaint.
- 3.4 An **Advocate** is an individual that is representing the customer through this process. This may be a friend, relative or neighbour or someone in a more formal capacity, such as a solicitor. The customer will need to designate an individual or organisation to advocate on their behalf in writing. The customer will also have the right to be accompanied at any meeting with the landlord.

4 Key Principles

- 4.1 All complaints are dealt with fairly, honestly, consistently and in a timely manner in line with the Housing Ombudsman Complaints Handling Code. We also ensure that our customers are aware of the Housing Ombudsman Service and provided with its contact details.
- 4.2 We will accept a complaint unless there is a valid reason not to do so and each complaint is treated on a case-by-case basis.
- 4.3 All complaints are confidential and are recorded and investigated as such. The complaints process and the handling of related information is General Data Protection Regulation (GDPR) compliant.
- 4.4 Rooftop has a Complaints Team assigned to take responsibility for complaint handling and is responsible for liaison with the Housing Ombudsman. The Customer Experience Manager will lead the team and support on a group wide level ensuring a consistent and compliant approach and championing the Complaints Policy and procedure. They will also ensure complaints are reported to the Group Board.

- 4.5 We have appointed a member of the Group Board to have lead responsibility for complaints. This is the Member Responsible for Complaints (the 'MRC'). The MRC and Group Board will receive regular reports relating to complaints at each Board meeting (see Section 10 for detail).
- 4.6 This Policy is published and promoted on the Rooftop website, through social media platforms and can be made available to customers in multiple formats, including alternative languages and hard copy. Alongside the Policy we provide a guide for customers to explain the complaints process, timescales and expectations.
- 4.7 Our complaints handling performance is measured against our own targets and the standards set out by the Regulator of Social Housing and Housing Ombudsman. We publish a self-assessment of our performance against these standards and the Group Board's response on our website annually. We will also publish complaints performance and a summary of the learning and actions on our website.

5 Process

- 5.1 **Service Request (Early Resolution)** – customer concerns about the service they receive may be responded to as a service request by the relevant colleague who will aim to complete as an **early resolution within five working days**. However, whenever a customer expresses dissatisfaction, we will give them the choice to make a complaint.
- 5.2 **Acknowledgement** – complaints must be acknowledged, defined and logged at Stage 1 of the complaints' process **within five working days of the complaint being received**.
- 5.2.1 **Stage 1** – if early resolution is not achieved to the customer's satisfaction, or the customer clearly wishes to raise a complaint about the service we have provided, their concerns are investigated by the Complaints Team and a full response will be issued **within 10 working days of the complaint being acknowledged**. Rooftop will confirm, in writing and in clear plain language:
- a) the complaint stage.
 - b) the complaint definition.
 - c) the decision on the complaint.
 - d) the reasons for any decisions made.
 - e) the details of any remedy offered to put things right.
 - f) details of any outstanding actions.
 - g) details of how to escalate the matter to Stage 2 if the individual remains dissatisfied.

If new issues are identified during the Stage 1 process that are not part of the investigation, a new Stage 1 complaint will be logged for investigation to avoid any undue delay to the existing investigation.

If an extension to this timescale is needed when considering the complexity of the complaint, we will inform our customer of the expected timescale for response. Any extension must be **no more than 10 working days** without good reason, and the reason(s) must be clearly explained to the customer.

The customer may appeal the findings and/or outcome of the Stage 1 Complaint. The case will be reviewed by the relevant Head of Service. We expect that a customer should have reasonable time to consider the resolution offered at Stage 1 and therefore expect that a request to escalate to Stage 2 should be received **within 30 working days** of the Stage 1 resolution being sent.

- 5.2.2. **Stage 2** – if all or part of the complaint is not resolved to the customer's satisfaction at Stage 1, it will be progressed to Stage 2. Customers are not required to explain their reasons for requesting a Stage 2 consideration. We will make reasonable efforts to understand why a customer remains unhappy as part of our Stage 2 response.

Requests for Stage 2 must be acknowledged, defined and logged at Stage 2 **within five working days of the escalation request being received**.

We will issue a final response to the Stage 2 **within 20 working days of the complaint being acknowledged**.

- 5.3 We will contact the customer as early as possible at each stage to understand the outcome that they are seeking to enable their involvement and to facilitate a swift resolution.

Stage 2 is our final response. Rooftop will confirm, in writing and in clear plain language:

- a) the complaint stage.
- b) the complaint definition.
- c) the decision on the complaint.
- d) the reasons for any decisions made.
- e) the details of any remedy offered to put things right.
- f) details of any outstanding actions.
- g) details of how to escalate the matter to the Housing Ombudsman if the individual remains dissatisfied.

- 5.4 Where the complaint is from a leaseholder or freeholder regarding a service charge, they may choose to take the matter to a Leasehold Valuation Tribunal.

- 5.5 If an extension to this timescale is needed when considering the complexity of the complaint, we will inform our customer of the expected timescale for response. Any extension must be **no more than 20 working days** without good reason, and the reason(s) must be clearly explained to the customer.

- 5.6 We will support investigations by and the determination of the Housing Ombudsman or Leasehold Valuation Tribunal.

- 5.7 The outcome of every complaint will be recorded on the housing management system. Lessons learned from complaints will be recorded by the relevant Head of Service on the Learning Log.

- 5.8 If a customer has a complaint about a contractor, we will ensure that our own complaints process is followed to ensure that our customers do not have to go through two complaints processes.

- 5.9 Where the resolution for a complaint involves complex works, we will arrange for pre and post inspection by a Building Inspector.

6 Exclusions

- 6.1 Complaints will not be investigated in cases where:

- The issue giving rise to the complaint occurred over twelve months ago.
- Disrepair have started. This is defined as details of the Claim Form and Particulars of Claim, having been filed at court. Please note, where a customer has started a disrepair claim, this will not prevent us from inspecting the property, providing repairs to the property, or logging complaints until we are notified that court proceedings are beginning.

- Matters that have previously been considered under this Complaints Policy.

6.2 The complaint relates to persons or bodies, over which we have no control, and actions or services which we are not responsible for providing.

6.3 The complaint relates to anti-social behaviour (this is covered in the Anti-Social Behaviour Policy) unless the complaint concerns the management of the case.

6.4 If the complaint is not accepted, an explanation must be provided to the customer setting out the reasons why the matter is not suitable for the complaints process and the right to take that decision to the Housing Ombudsman. If the Housing Ombudsman does not agree that the exclusion has been fairly applied, it may instruct Rooftop to take on the complaint.

7 Putting things right

7.1 Where something has gone wrong, Rooftop will acknowledge this and set out the actions it has already taken, or intends to take, to put things right. These can include:

- Apologising.
- Acknowledgement, where things have gone wrong.
- Providing an explanation, assistance or reasons.
- Taking action if there has been delay.
- Reconsidering or changing a decision.
- Amending a record or adding a correction or addendum.
- Providing financial remedy (see Compensation).
- Changing policies, procedures or processes.

8 Unacceptable Behaviour

8.1 In line with the Code, we aim to deal fairly, honestly and consistently with all customers. Where a customer's actions are considered unacceptable, such as aggressive or abusive behaviour, unreasonable demands, or persistent and / or unsubstantiated complaints, the complaints process may be withdrawn or otherwise restricted. Where appropriate we may refer matters to the police or other agencies. Please refer to Rooftop's Unacceptable Behaviour Policy.

9 Compensation

9.1 We recognise that occasionally we may deliver services that fail to meet our customers' and our own service expectations. In these circumstances, compensation may be appropriate. In awarding compensation, we will consider whether any statutory payments are due, if any quantifiable losses have been incurred and the time, inconvenience and distress caused to the customer.

9.2 Compensation may be awarded at any stage of the complaint process if a complaint is upheld in line with our Compensation Policy.

10 Member Responsible for Complaints (the MRC)

10.1 The MRC will be responsible for ensuring the Group Board receives regular information on complaints that provides insight on Rooftop's complaint handling performance. They must have access to suitable information and staff to perform this role and report on their findings.

10.2 As a minimum, the MRC and the Group Board must receive at each meeting:

- a) regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance.

- b) regular reviews of issues and trends arising from complaint handling.
- c) regular updates on the outcomes of the Ombudsman's investigations and progress made in complying with orders related to severe maladministration findings.
- d) the annual complaints performance and service improvement report.

11 Learning

- 11.1 We actively seek to identify learning from customer complaints and use them to improve services.
- 11.2 The Complaints Team will complete a lessons-learned report, including any opportunities to improve that have been identified.
- 11.3 Rooftop will maintain a database of all lessons learned and ensure that any actions identified are monitored for completion and effectiveness. This will be the responsibility of the Head of Service.
- 11.4 The relevant Head of Service is responsible for implementing and communicating any lessons learnt within their own team and across the wider business.
- 11.5 Any service improvements are implemented by those Heads of Service whose business areas are the subject of the complaint.
- 11.6 Where a complaint concerns a colleague or colleagues acting inappropriately, the Human Resources department will be notified to support the investigation.

12 Performance Monitoring

- 12.1 Overall compliance against our Policy will be monitored by the Customer Experience Manager through the Executive Director – Operations/Head of Customer Experience. Team compliance will be responsibility of the relevant Head of Service.
- 12.2 We are seeking to develop a culture of 'gain not blame' through harnessing customer feedback to genuinely improve the service we provide and offer opportunities for continuous learning within our service teams.
- 12.3 Complaints performance is reported to the Leadership Team, the Executive Team and Group Board. The MRC will receive detailed information relating to volume, categories and outcomes as specified at Section 10.
- 12.4 Cases that are under notification to or review by the Housing Ombudsman are reported to Executive Team through the Compliance, Health and Safety report, including any impact against our existing risk assessment and risk score.
- 12.5 This Policy is reviewed by the Customer Scrutiny Panel. Our performance will be shared more widely with our customers via the website quarterly and each year through the annual report to customers.
- 12.6 In line with the Code, each year we will carry out an annual self-assessment of our performance which will be reported to the Group Board and made publicly available via our website together with the Group Board's response.

13 Equality and Diversity

- 13.1 We will make it easy for customers to complain by providing different channels through which they can make a complaint under our duties under the Equality Act 2010. We will discuss the requirements with the person concerned and seek to reach agreement on what may be reasonable in the circumstances. We will not make assumptions about whether a disabled person requires any reasonable adjustments or about what those adjustments should be.

13.2 Our Reasonable Adjustment Policy and the Vulnerability Policy outlines our approach. We will keep a record of any reasonable adjustments agreed, as well as a record of any disabilities a resident has disclosed. Any agreed reasonable adjustments will be kept under active review.

14 **Review**

14.1 This Policy will be reviewed **annually** unless there are major changes in legislation or good practice.

15 **Consultation**

15.1 Leadership Team sub-group February 2024

15.2 Executive Team March 2024

15.3 Customer Scrutiny Panel March 2024

16 **Responsibilities**

Responsible body

16.1 Formulation, amendment and approval of policy Board of Rooftop Housing Group

Monitoring of policy Complaints Team

Operational management of policy/policy author Customer Experience Manager

16.2 **Date of formulation of policy** February 2005

16.3 **Dates of policy reviews** March 2024

May 2023

November 2022

December 2020

July 2019

August 2015

16.4 **Date of next review** March 2025

Associated documents

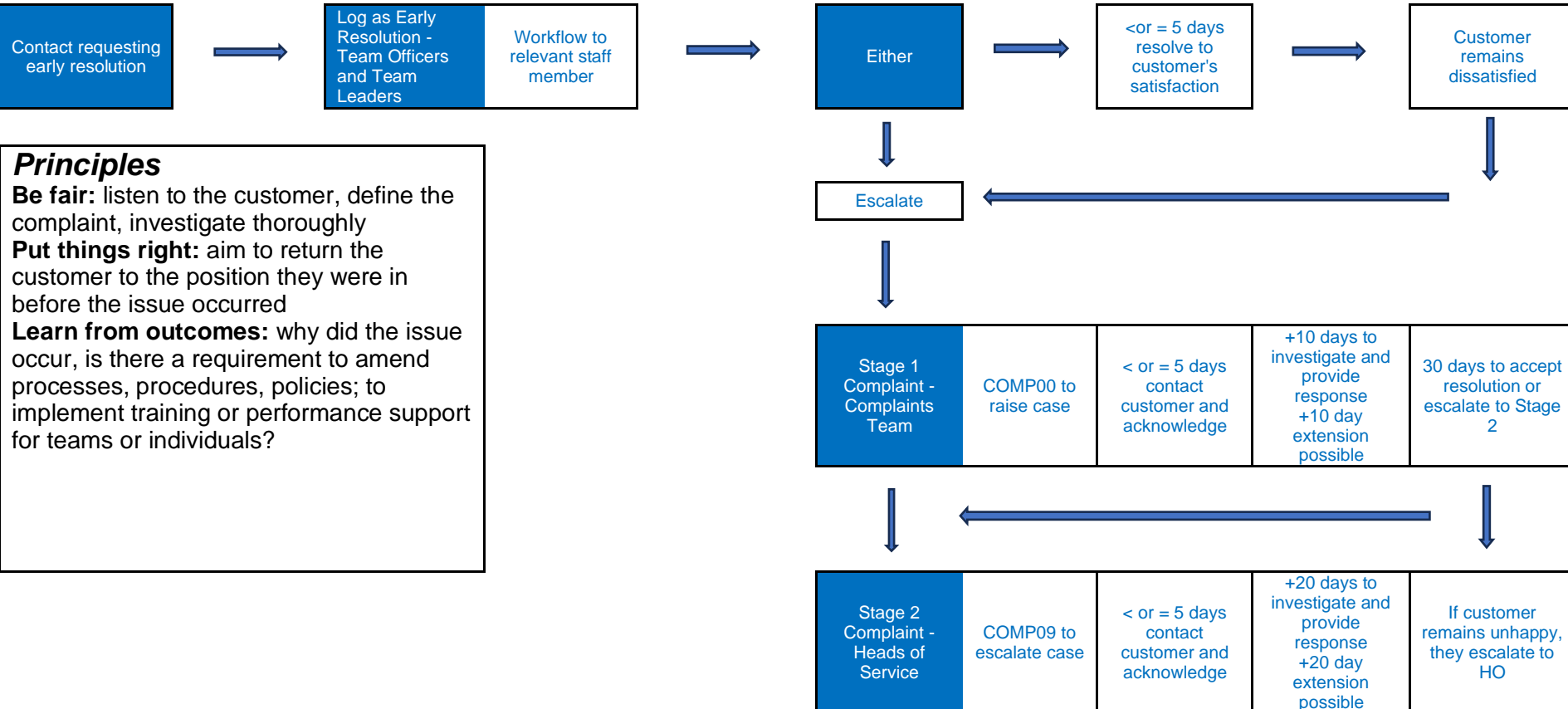
Internal – Rooftop policies and procedures

- Complaints procedure
- Whistleblowing Policy and procedure
- Compensation Policy, procedure and calculator
- Unacceptable Behaviour Policy
- Vulnerability Policy (In progress)
- Receiving Dissatisfaction and Complaints directly – Guidance for Board Members
- Complaints guide to Customers

External

- Regulator of Social Housing Transparency, Influence and Accountability Standard (2024)
- ISO 9001:2015 Quality Management System
- Housing Ombudsman's Complaint Handling Code (2024)
- Equality Act 2010
- Leasehold Valuation Tribunal for service charge disputes
- NHF Code of Governance (2020)

Complaints - Be Fair, Put it Right, Learn from Outcomes



Housing Ombudsman Note: a customer may contact the HO at any time during complaint process	Contacts from HO to us logged on HO client	Cases raised when HO begins an investigation into our work	Governance Team logs contacts and cases	Executive Directors and Heads of Service responsible for delivering required responses
---	--	--	---	--