

Customer feedback and complaints policy

Version Control:

Version	Date	Author	Verifier	Comments
1.0				
2.0	27 April 2024		Resimanagement Customer Committee	Updated to reflect new Housing Ombudsman Code.
2.1	15 May 2024		Resimanagement Customer Committee	Response times aligned to HO Code



1 Introduction

- 1.1 Heylo Housing Group Limited (HHGL) is the parent company of the Group, which includes Heylo Housing Registered Provider Limited (HHRP) and a number of property owning investment vehicles (Pods) (collectively referred to in this policy as 'Heylo'). The Heylo Group's purpose is to provide home ownership solutions across England. HHGL currently provides two different Shared Ownership products – HomeReach and YourHome.
- 1.2 All customer facing services to Heylo customers are provided by employees of ResiManagement, a separate, but commonly controlled company.
- 1.3 A customer of a new home will usually have their first interaction with a housebuilder partner. Heylo will facilitate the purchase of the home as Shared Ownership, and become the landlord of the Shared Ownership lease. There may also be a relationship between the customer and a managing agent, in particular in blocks of flats.
- 1.4 If an issue arises with the new home during the purchase process, or soon after moving in, we support customers to try and resolve the issue directly with the housebuilder.
- 1.5 Where the property is a flat then the services to the vast majority of these developments are provided by managing agents appointed by the Freeholder or Superior Landlord. In these cases, where there are issues about managing agents, we ask customers to try and resolve these locally, as service failures in the first instance. Where this fails then Heylo will take up the complaint on a customer's behalf and liaise with the managing agent to try and achieve a resolution.
- 1.6 The Regulator of Social Housing's 'Transparency, Influence and Accountability Standard' requires that we "must treat tenants and prospective tenants with fairness and respect" and we "must ensure complaints are addressed fairly, effectively, and promptly." This Policy accords with guidance from the Housing Ombudsman's "Principles of Good Complaint Handling" and "Complaint Handling Code" and the 2010 Equality Act.
- 1.7 All local authorities and registered social housing providers are required to be members of the Housing Ombudsman Scheme. The role of the Ombudsman is to investigate complaints and resolve disputes involving the tenants and leaseholders of social landlords (housing associations and local authorities).

HHRP, as a Registered Provider is a member of the Housing Ombudsman Scheme, but it is important to note that homes held within the group outside of HHRP are not covered by the Ombudsman Scheme. All other parts of this policy do apply however.

2 Purpose

- 2.1 This policy sets out how Heylo Housing Group Limited and Heylo Housing Registered Provider (Heylo) manages customer feedback including complaints through ResiManagement in a timely, transparent, and fair manner.
- 2.2 Customers are able to pursue complaints via the complaints procedure, see Appendix 1.

3 Aims

- 3.1 It's important to us to know what our customers think. If we've got something wrong, we want to know, and do what we can to put it right. When things have gone well, we're equally keen to hear positive feedback. In both cases, we will share this with colleagues and managers, learn and improve our services.
- 3.2 Heylo aims to deliver high standards of service satisfaction and if we don't meet expectations then we want to hear from our customers. The aims of the Customer Complaints Policy are:
- To understand where and why our service has fallen short of customer expectations. We will accept the feedback, put things right and improve services for the future.
 - To inform customers of how to, and who to make a complaint to about the service we provide directly or indirectly through house builder partners, managing agents or professional service firms etc.
 - To inform customers of how a complaint will be treated if it cannot be satisfactorily settled by the initial response of front-line staff. Our 2 stage complaints procedure can be found on the website, <https://Heylohousing.com/make-a-complaint>.
 - To assure customers that Heylo takes complaints seriously and in line with a transparent and accountable two stage process. HHRP are a member of the Housing Ombudsman Service and therefore that part of the Group specifically adhere to the Housing Ombudsman's Complaint Handling Code, a copy of which can be found at: <https://www.housing-ombudsman.org.uk>
 - To try and resolve the complaint as swiftly and efficiently as possible in line with our procedure.
 - To ensure that Heylo has a reasonable and fair opportunity to properly investigate complaints and to provide a considered response.

4 Principles

- 4.1 Heylo welcomes feedback in the form of both complaints and compliments as a means of improving services, developing staff decision-making and customer engagement, giving senior staff an insight into front-line operations, and improving our landlord and resident relationship.
- 4.2 Heylo recognise the difference between a service request and a complaint.

A service request is defined as a request from a customer to Heylo, requiring action to be taken to put something right. Service requests are not complaints, however they are recorded, monitored and reviewed regularly.

We define a complaint as an expression of dissatisfaction, however made, about the standard of service, actions, or lack of action by Heylo or ResiManagement, its own staff, or those acting on its behalf, affecting an individual housing applicant, home buying customer, resident or group of residents, contractors and suppliers.

Customers do not have to use the word 'complaint', for it to be treated as such. Whenever a customer expresses dissatisfaction we will give the customer the choice to make a complaint.

Expressions of dissatisfaction with services which are made through a survey would not be defined as a complaint.

- 4.3 When you first let us know that you're unhappy about a service/experience, we'll try to swiftly resolve the issue.

- 4.4 Heylo accept ownership of complaints made about third parties working on our behalf.
- 4.5 In the first instance customers can direct complaints to the third party directly or Heylo, who will manage that feedback in line with the approved policy and procedure. In the case of our business partners and third-party agents we expect them to forward any complaints to Heylo that require a Heylo and/or landlord response.
- 4.6 If the third party cannot respond to a complaint and they refer the complaint to Heylo, you will then receive responses in line with our complaints policy and procedure.
- 4.7 The complaints process will include a number of stages as set in Appendix 1, and you will be kept informed of the progress of your complaint and informed of the following at each stage.
- 4.8 HHRP will work closely with the Ombudsman in any investigation in an open and transparent manner. Under the Housing Ombudsman's Complaint Handling Code, HHRP have appointed a specific Board member to be a 'Member Responsible for Complaints'.

5 Who can make a complaint?

- 5.1 We welcome feedback from anyone who receives our services. Anyone can make a complaint about the services they receive or failure of those services, including existing shared owners, neighbours of our shared owners, and new applicants. In addition, contractors or suppliers can raise a complaint about their interaction with Heylo.
- 5.2 We will raise a complaint when a customer expresses dissatisfaction with the response to a service request, however, will not stop our efforts to address the service request in this instance.
- 5.3 You can make a complaint within twelve months of the issue happening. We may accept older complaints at the discretion of the manager responsible for the service. For example, when a customer has been unaware of the failure until it had a detrimental impact, or a customer was unable to make a complaint within 6 months due to ill health.
- 5.4 We will treat multiple complaints from the same customer for the same issue as a single complaint. If that customer raises a further complaint but at the same time as an ongoing one, we will record each complaint separately and follow the complaints procedure.
- 5.5 Heylo will give customers the opportunity to have a representative or advocate deal with a complaint on their behalf.

This could be a family member, friend, social worker or support worker. Advocates or representative of the customer can raise a complaint on behalf of the customer where the customer:

- Is unable to complain themselves because of physical incapacity or a lack of capacity within the meaning of the Mental Capacity Act 2005.
- Has requested the representative to act on their behalf (we require written consent from our customer that they have authorised the representative to act on their behalf, alternatively we may write to the customer to indicate that we have been contacted by an individual claiming to be their representative with authority to act on their behalf and give the customer the opportunity to refute it); or
- Has passed away

We adopt the Housing Ombudsman's own procedure when it comes to having a representative or advocate act regarding a complaint, we will contact them and not the customer. When our customer agrees to this, they accept that Heylo may give their representative information about them and the complaint. Customers can only have one representative acting on their behalf of a resident per complaint. We will not liaise with multiple representatives.

5.6 We will accept complaints unless there is a valid reason not to. Where a complaint is not upheld, we will provide an explanation of our decision.

5.7 Examples of where we will not uphold a complaint are:

- If the issue is not deemed to be a complaint, and instead is an initial enquiry or service request e.g. copy of rent statement, buildings insurance policy, etc.
- Where a complainant is currently in the process of taking legal action against Heylo or where Heylo is taking legal action against the complainant.
- A dispute with a neighbour which can be dealt with through our Anti-Social Behaviour Policy/Procedure.
- Complaints relating to rent increases where the rent increase is subject to the terms of the lease and has been charged correctly.
- Complaints about the actions of an organisation that is not working for or supported by Heylo.
- Complaints from applicants because they did not meet Heylo's published eligibility criteria (such as failed credit checks).
- Complaints about service charge budgets and accounts where these are being challenged in the First Tier Tribunal (Property Chamber) for reasonableness and fairness.
- The issue arose over 12 months ago.

5.8 If we decide not to accept a complaint, we will provide you with an explanation, setting out the reasons why the matter is not suitable for the complaints process and the right to take that decision to the Ombudsman (in the case of complaints about HHRP).

If the Ombudsman does not agree that the exclusion has been fairly applied, Heylo will take on the complaint.

5.9 We are committed to providing a feedback and complaints service that is accessible to all of our customers. However, in the unusual event that a customer's actions towards us are found to be unreasonable, we reserve the right to treat this contact differently.

Sometimes, customers may make what we feel to be unreasonable demands, for example if they have a substantial impact on our services due to the scale of information requested, the nature of the request, or multiple approaches. This may also include aggressive or threatening behaviour.

Examples of unreasonable behaviour include:

- Threatening behaviour.
- Physical violence.
- Personal abuse.
- Derogatory or discriminatory remarks.

- Inflammatory statements and unsubstantiated allegations.
- Make approaches to several members of staff at the same time about the same issue after we have agreed a single point of contact.
- Asking for responses within an unreasonable timescale.
- Insisting on communicating with a particular colleague.
- Continual phone calls, emails, or letters.
- Repeatedly changing the substance of the complaint or raising unrelated concerns.
- Refusal to co-operate with the complaint investigation process while still requesting their complaint be resolved.
- Persistent refusal to accept a decision.
- Persistent refusal to accept explanations relating to what Heylo can or cannot do.
- Continuing to pursue a complaint case without presenting any new information.

5.10 NB: Adaptations could be in the form of explanations, warnings or contact restrictions, such as communication by email only.

Any restrictions put in place for unacceptable behaviour will be evidenced and kept under regular review.

6 How to make a complaint

6.1 Complaints can be made in a number of ways:

- Through the Complaints form on our website at [Make a Complaint | Heylo housing](#)
- By email to complaints@heylohousing.com
- In writing to Heylo Housing, 46 Park Place, Leeds, LS1 2RY.
- By telephone to 020 3744 0415.
- In person to any member of our team (though we may ask you to put your complaint to us in writing).

6.2 Complaints made via social media channels and online reviews will be acknowledged, though we may ask you to contact us directly through one of the above channels to confirm the details of the complaint.

6.3 We will in all cases ask you to confirm the exact nature of your complaint, what you are dissatisfied with, and what you want us to do to resolve the complaint.

We will then set out our understanding of the complaint in our response to you. As per the Ombudsman Code, this will be referred to as the “complaint definition”.

We will acknowledge clearly which aspects of the complaint Heylo are or are not responsible for and clarify any areas which are unclear.

7 Responsibility and Conduct

7.1 Complaints will be handled courteously and efficiently and on an individual basis

Heylo have an assigned complaint handler, responsible for handling complaints including liaising with the Ombudsman and ensuring complaints are reported to the governing body. The Code refers to this person as the ‘complaints officer’. The ‘complaints officer’ has access to staff at all levels to facilitate prompt resolution of complaints. They also have the autonomy to act to resolve disputes promptly and fairly.

- 7.2 We will gather information, investigate the complaint, identifying root causes and act as required.
- 7.3 We want to learn from complaints as this helps us improve our services. Once your complaint has been closed, we may contact you to ask for your views on the handling and outcome of your complaint.

8 Reasonable Adjustments - Equality Act 2010

- 8.1 Reasonable adjustments are classed as changes that can be made to remove or reduce a disadvantage related to someone's disability.
- 8.2 In the context of complaints handling, reasonable adjustments can mean changes to policy, procedure and staff training to ensure services work equally well for all people.
- 8.3 What is "reasonable" depends on each situation. We will consider all reasonable adjustment requests and consider each request on an individual basis.
- 8.4 We will, where possible, make changes to our approach or provision to ensure services are accessible to everyone.

A record will be kept of any agreed Reasonable Adjustment, and these will be kept under active review.

9 Reporting and Monitoring

- 9.1 A log of complaints will be maintained and regularly reported to the Customer Committee and Executive Committee of ResiManagement, HHRP Customer Committee and both HHRP and HHGL Boards.
- 9.2 The Complaints Log is updated when a complaint is made, including the date it was logged, the target response times and action taken, and will continue to be updated for actions and outcomes through to completion and closure of the matter.
- 9.3 Complaints are reviewed regularly and are reported to the ResiManagement Executive Committee and Heylo Board members. The complaints policy and process are reviewed every twelve months. Feedback and learning are reviewed by the Customer Committee and Executive Committee of ResiManagement, HHRP Customer Committee and both HHRP and HHGL Boards, including the HHRP Member Responsible for Complaints. This feedback is used to improve complaints handling and inform the development of customer services. As well as annual complaints performance and service improvement reports to the Customer Committee and HHRP Board, more frequent reports on the topic will be seen at these meetings, and annual results published on the Heylo website.

10 Confidentiality

- 10.1 Heylo and its agents will observe confidentiality in complaints procedures and will only share details of complaints/complainants with external stakeholders with the authority of the complainant. Where applicable Heylo will share complaint details as directed and expected by the Regulator of Social Housing (RoSH).

11 Information Storing

- 11.1 All data is stored securely and in line with our Data Protection and Security Policies.
- 11.2 We are committed to treating all information securely, with respect and in line with data protection law (GDPR).
- 11.3 We may share personal information with other organisations. We will only share information where we have sharing protocols in place and/or confidentiality agreements signed. We will also give information to other organisations where we are required by law to do so.

12 Review

- 12.1 We will review this Policy regularly to address legislative, regulatory, best practice or operational issues.

Appendix – Complaints handling process.

We always try to do our best for our customers but realise that we don't always get things right.

If you're unhappy with something we, or someone acting on our behalf has done, or the service you've received and would like to make a complaint, our team is here to help. Below we have set out how we manage customer complaints in a timely and fair manner.

In line with the Housing Ombudsman Code, we define a complaint 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 housing applicant, home buying customer, or a resident or group of residents.

Stage 1

You can make your complaint by completing the online complaints form, by telephone, post or in person to any member of our team. Complaints made via social media channels will be acknowledged, though we may ask you to contact us directly through one of the above channels to confirm the details of the complaint.

We will register your complaint in our Complaints Log and send you an acknowledgement within five working days (working days for Heylo are Monday to Friday). When raising a complaint, you need to detail what it is you are dissatisfied with and what you want us to do to resolve the complaint.

We will investigate your complaint and you will receive a reply within ten working days of the complaint being acknowledged. We will inform you of our decision, the reason for reaching that decision and what action will be taken, as necessary.

Specifically we will confirm the following in writing at the completion of stage 1 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; and
- g) details of how to escalate the matter to stage 2 if you are not satisfied with the response.

If we cannot respond to your complaint within ten working days, we will explain why and provide a date when you can expect to receive a full response. This will not usually exceed a further ten working days without good reason.

If we receive no further contact within fourteen days of our response, we will consider your complaint to be satisfied and take no further action.

Stage 2

If, once you have received our Stage 1 response you are still dissatisfied, you can escalate your complaint to Stage 2. A Stage 2 complaint will be responded to by a senior member of staff, usually a member of the ResiManagement Executive Committee. It would be helpful if you could detail why you are dissatisfied with our response and explain what it is you want us to do to satisfy your complaint. However, we will make reasonable efforts to understand why you remain unhappy as part of our stage 2 response.

You will receive an acknowledgement of your Stage 2 complaint within five working days of us receiving notice you remain dissatisfied.

Within a further twenty working days of receiving the escalation request we will send you a full response. If we require additional time to investigate your complaint further, will write to say when you will receive a response. This will not usually exceed a further twenty working days without good reason.

Specifically we will confirm the following in writing at the completion of stage 2 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; and
- g) details of how to escalate the matter to the Ombudsman (if applicable) if you are not satisfied with the response.

If we receive no further contact within fourteen days of our response, we will consider your complaint to be satisfied and take no further action.

If still dissatisfied with the outcome at Stage 2, then if the complaint relates to HHRP, the complaint can be escalated to the Housing Ombudsman. They can be contacted at www.housing-ombudsman.org.uk in writing to Housing Ombudsman Service, PO Box 152, Liverpool, L33 7WQ or by telephone to 0300 111 3000

If still dissatisfied with the outcome at Stage 2, and the complaint does not relate to HHRP, then the complaint cannot be escalated to the Ombudsman. In this instance, the outcome of the stage 2 complaint will be final.

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