

Complaints and Feedback Policy

1 Our approach to complaints and compliments

- 1.1 At Octavia, we are committed to providing our customers with an exemplary service. While we always strive to be reliable, responsive, respectful, and resourceful, occasionally we may not meet our customer's expectations. When things go wrong, we welcome the opportunity to listen to and understand your concerns so that we can act quickly to put things right. When we have provided good customer services we want to capture and recognise this too. We will log compliments we receive about our staff or services.
- 1.2 The purpose of this policy is to ensure you know how to make a complaint and we respond consistently, fairly, and sensitively to complaints. This policy aims to ensure we:
- Empathetically and effectively manage and resolve customer complaints.
 - Have a fair and effective complaint escalation and review process.
 - Learn from customer feedback to evaluate and improve our services.
- 1.3 This policy applies if you are an Octavia tenant, shared owner, leaseholder, service user or are affected by our work in any other way (except where the matters raised relates to employment and Octavia as an employer).
- 1.4 We recognise the significant role the Housing Ombudsman has in setting the standards required for our complaints service. Our Complaints Policy, and Complaints Procedure have been developed in accordance with the [2024 Housing Ombudsman Service's Complaint Handling Code](#), our legal duties and resident feedback.
- 1.5 Any reference to 'we,' 'our,' 'us' refers to Octavia. When we use 'you' and 'your' we mean any resident or customer set out above.

2 What we mean by complaints

- 2.1 We have adopted the Housing Ombudsman's definition of a complaint, which is:
“an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by Octavia, our staff, or those acting on our behalf, effecting an individual resident or group of residents.”
- 2.2 When you raise an issue with us, we will take the time to listen to your concerns. We will provide advice and support and identify if the issue raised falls within the scope of the complaints policy as detailed in this section. You do not need to use the word 'complaint' for us to treat your concern as a complaint.
- 2.3 If you express dissatisfaction with our service through a survey or when we ask for your feedback on our services it is not defined as a complaint. Wherever possible though, we will let you know how to make a complaint.
- 2.4 We will distinguish between a service request, and a complaint. A service request is a request you make to us to put something right. Service requests are not complaints (see section 8 for more details). We will record, monitor, and review service requests regularly to resolve issues for customers as early as possible.

- 2.5 We will raise a complaint if you express dissatisfaction with the response to a service request. This includes when the response to your service request is ongoing. We will continue to respond to your request if you make a complaint.
- 2.6 We will always seek to resolve complaints quickly to achieve a swift and satisfactory outcome for the customer.
- 2.7 Where a Health and Safety risk is identified these will be immediately referred to a senior manager. Any claims of personal injury will be referred to our Health and Safety manager and will be dealt with outside of our complaints policy.

3 Compliments

- 3.1 What is a compliment?
We define a compliment as “praise or saying thanks for the service offered by an Octavia colleague or contractor.”
- 3.2 Compliments make our day, and we appreciate this type of feedback too. We’ll pass on any compliments we receive to the colleague and their manager. We’ll log these for sharing more widely and use them to identify areas of good practice that Octavia can learn from.

4. Exclusions from this policy

- 4.1 There are some issues where we may not consider a complaint. We will consider each complaint on its own merits and make sure our decision is reasonable. We will let you know why the matter isn’t suitable for the complaints process and will respond to your feedback differently. We will advise you of an alternative course of action, including the right to take our decision not to accept your complaint, to the Housing Ombudsman. We will not consider a complaint if:
- It concerns matters that are, or have been, the subject of legal proceedings and where you have, or had the opportunity to, raise the subject matter of the complaint as part of those proceedings. Where legal proceedings have started, this is defined as details of the claim, such as the Claim Form and Particulars of Claim having been filed at court. In such case, please refer to your solicitor (if you have one) as we are unable to respond through the complaint process. Where we receive correspondence initiating a pre-action protocol and legal proceedings have not yet been issued, we will be clear to you on how we are handling the correspondence, whether under our complaint process, the pre-action protocol or both.
 - Your complaint is about a repair, service, or action, where the timeframe for delivering that repair or action has not yet passed. We want to have the opportunity to resolve the issue first and will give you feedback and keep you updated.
 - Your complaint is not about us or our contractors but about another organisation.
 - Your complaint is subject to an insurance claim (unless you are unhappy about how we or the insurance company is handling a claim).
 - The complaint is about anti-social behaviour (ASB) or a neighbour relationships issue; this is dealt with under our ASB and Neighbour Relationships Policy (unless you are unhappy about how we are responding to an ASB or neighbour dispute issue)
 - Service Charges – if you contact us about an increase, or the amount that you are being charged for services, your case will be dealt with as an enquiry and responded to by the

relevant person. A complaint about the standard of service or lack of service is dealt with as a complaint.

- You have made repeated, minor, and unfounded complaints. We will refer to our Unacceptable Customer Actions Policy where this is the case.
- We have already responded to the matter under our complaint process and stated that the process has been exhausted.

The content or tone of your contact is inappropriate (for example, if the content or tone is abusive, deliberately misleading, or vexatious). We will refer to our Unacceptable Customer Actions Policy.

- The volume of contact from you is unreasonable (where this is the case the response times set out in our service standards will not apply). Please see our Unacceptable Customer Actions Policy for further details.
- The issue giving rise to the complaint occurred over twelve months ago.

4.2 We will accept complaints referred to us within 12 months of the issue occurring, or you became aware of the issue, unless the complaint is excluded in line with section 4.1 of this policy. We will, at our discretion, consider complaints outside of this time limit where there are reasons to do so. These include exceptional personal circumstances, vulnerabilities, where the resident has not been aware of the issue and could not reasonably be expected to have brought the complaint forward sooner.

5. Who can make a complaint?

5.1 We will accept complaints from the following:

- A current Octavia resident (this means a tenant of ours)
- A former Octavia resident (this means someone who was a tenant of ours)
- A prospective Octavia resident (this means you have made an application for housing where we are the landlord)
- A group of residents or Resident's Association that makes a complaint or a petition. You will need to arrange a lead person who is the main point of contact for the complaint or petition.
- An MP (Member of Parliament), Councillor, or advocate acting on behalf of one of the above providing the person has given authority for them to act on their behalf. If the person does not have capacity, the representative must have legal authority to act on the person's behalf through a Lasting Power of Attorney (LPA) or have been appointed by an authority such as the Court of Protection
- Customers who use our Befriending Service
- Customers who access Octavia Foundation services

5.2 We will not accept complaints from the following as they are not considered 'customers' as defined above.

- External contractors
- Managing agents

6 What you can expect from our service

6.1 We will promote and encourage opportunities to raise a complaint. We will accept complaints via any of our contact methods (see section 6.2 below), ensuring it is easy for a customer to make a complaint, including to any member of Octavia staff.

6.2 You can raise a complaint with us by:

- Talking in person to any member of staff, who will pass your complaint on to the appropriate person in the organisation
- Using the [online complaints form](#) on our website
- By phone 020 8354 5500 or video call
- By email at complaints@octavia.org.uk
- By writing us a letter
- Asking a relative or someone else to contact us for you (if you give them permission)

6.3 We will give you the opportunity to have a representative deal with your complaint on your behalf, and you may be represented or accompanied at any meetings with us.

6.4 We will investigate complaints in an impartial, confidential, and respectful manner, agreeing with you how you will be kept informed throughout the process.

6.5 We will seek to resolve complaints quickly to achieve a swift and satisfactory outcome for you, and without the need for escalation to our stage 2 process.

6.6 If you raise your complaint via social media, we will reply and ask you to message us directly with further details so that we can log your complaint and maintain your privacy.

6.7 Everyone at Octavia is empowered to accept complaints. We have a dedicated Complaints Officer who is responsible for training Octavia's staff on how to effectively identify, investigate and resolve complaints. The Complaints Officer is responsible for ensuring we investigate and respond in a way that clearly demonstrates how we have reached a decision. The Complaints Officer will ensure we reference best practice, policy, and/or legal and regulatory requirements.

7 Complaint Handling

7.1 **Complaints Officer** - We have a Complaints Officer assigned to take responsibility for complaint management and co-ordination, liaison with the Housing Ombudsman and ensuring complaints are reported to our governing body. The Complaints Officer has access to all staff (complaint handlers) at all levels to facilitate the prompt resolution of complaints. The Complaint Officer will ensure all Octavia staff know how to recognise a complaint and who to raise it with. The Complaints Officer will ensure complaint handlers are suitably trained in the importance of complaint handling and best practice, policy and/or legal and regulatory requirements.

Complaint handlers – staff responsible for investigating and providing responses to complaints. This includes Officers, Service Managers, Heads of Services, and Senior Managers. Complaint Handlers will be trained to respond empathetically, sensitively and fairly. When dealing with your complaint at each stage of the process they will:

- consider the complaint on its own merits, act independently, and keep an open mind,
- give you a fair chance to present your position,
- take measures to address any actual or perceived conflict of interest,
- consider all relevant information and evidence carefully,
- keep a full record of the complaint and the outcomes at each stage,
- They have access to staff at all levels to facilitate quick resolution of complaints and will have the authority and autonomy to act to resolve disputes quickly and fairly.

7.2 If at any point you are unhappy with how things are progressing, please let us know. You can also contact the Housing Ombudsman Service at any point throughout your complaint for advice. Their details are on page 6 of this document.

7.3 We can offer a mediation service free of charge during the complaints process. Meeting together with the support of a mediator can be helpful in some cases. If you feel you would like a mediation service, you can let us know at any stage of the complaints process and we will make the arrangements.

7.4 Where you need support to make a complaint, there are lots of helpful organisations who you can contact for advice. The Housing Ombudsman has provided a list [here](#).

8 Service requests process

8.1. Where you have raised a Service Request, we will use the opportunity to resolve requests quickly and effectively to obtain the best outcome for you.

Service Requests

What is a Service Request?	What you can expect from the service
<p>A service request is a request requiring action to be taken to put something right. Service requests are recorded, monitored, and reviewed regularly.</p> <p>Examples of issues we would expect to resolve as a Service Request are:</p> <ul style="list-style-type: none"> • Scheduling a repair • Missed appointment • Missed call back • Not attending a scheduled appointment 	<p>An officer for the area you are unhappy with will listen to your concerns, offer you support and investigate your feedback. The officer will put together a plan to resolve the issue immediately. We will apologise and learn from your feedback.</p> <p>Examples of how we expect to handle service requests are:</p> <ul style="list-style-type: none"> • Booking an appointment or re-booking a missed appointment • Completing an outstanding repair • Offering a delayed service update • Reviewing how we handled your service request

9 Complaints process

9.1 There are two stages to our complaints process. At each stage, your complaint will be assigned to a complaint handler.

Our complaint handlers, will listen to your concerns, offer you support, investigate your feedback and respond to all points fully, referencing any policy, law or good practice, where appropriate.

Stage 1

What is a Stage 1 complaint?	What you can expect from the service
<p>Where you decide to make a complaint, the case is handled as a Stage 1 complaint investigation.</p> <p>If you request to raise additional complaints during the Stage 1 investigation, these will be incorporated into our Stage 1 response if they are relevant, and the Stage 1 response has not been issued. Where the Stage 1 response has been issued, or the additional complaint would unreasonably delay the response, we will log the complaint(s) as a new complaint.</p>	<p>Your complaint will be assigned to a complaint handler. This could be an Officer or a Service Manager.</p> <p>On receiving your formal complaint, we will:</p> <ul style="list-style-type: none"> • Acknowledge receipt of the complaint within 5 working days and provide you with the name of the investigating officer and a case reference number. • Contact you to confirm our understanding of the complaint and to find out what resolution you are seeking. We will ask you to clarify any aspects of the complaint we are unclear about, and let you know which aspects we are and are not responsible for. • We aim to respond to Stage 1 complaints within 10 working days of the complaint being acknowledged. <p>If this is not possible, we'll extend the complaint giving a clear explanation and details of when a response will be received. This will not exceed a further 10 working days without good reason. We will agree suitable intervals with you, to keep you informed about your complaint.</p> <p>The extension details will be communicated to you, in writing and we will include the Housing Ombudsman's contact details.</p> <p>We recognise that complaints can be resolved in several different ways. When responding to your complaint we will offer a solution that takes into consideration any service failure and the overall circumstances of the complaint.</p> <p>Examples of solutions we may offer are:</p> <ul style="list-style-type: none"> • Acknowledging when we have got it wrong • Apologising • Providing an explanation • Taking action to resolve the issue • Reconsidering or changing a decision • Offering compensation - in line with our Compensation Policy and the Housing Ombudsman's Remedies Guidance • Amending a record or adding a correction or addendum • Making changes or improvements to our services, policies, or procedures. • We will take account of the impact on you of any faults identified when offering a solution.

	We will track and promptly action any actions that are outstanding after we issue our response, and keep you informed. We will ensure we follow the solution offered through to completion.
--	---

Stage 2 Internal Review

What is a Stage 2 Internal Review?	What you can expect from the service
<p>If you believe we have failed to resolve all or part of your complaint to your satisfaction, you can ask for an escalation to Stage 2 of our complaints process.</p> <p>You are not required to explain your reasons for requesting a Stage 2 review, but that this can be helpful information for the stage 2 complaint investigation process.</p> <p>Complaints will only be escalated to Stage 2 if a response has not been provided at Stage 1 and it is at your request.</p> <p>Our Stage 2 process is an internal review. The review will check that the decisions at Stage 1 were fair, reasonable and in accordance with our policies. It is unlikely that we will substitute judgement in decision making where the decision was reasonable at Stage 1.</p> <p>In cases where the preferred outcome is not permissible due to regulatory, statutory, or legal reasons, and there are no concerns about our actual handling of the complaint at stage one, it will not be appropriate to escalate your complaint to Stage 2. We will always set out why we think the complaint response at Stage 1 is final and if you choose to escalate to the Housing Ombudsman, we will co-operate with its review.</p>	<p>Your complaint will be assigned to a complaint handler. This may be a Manager, Head of Service or a more Senior Leader. The stage 2 complaint handler will not be the same person that responded to the complaint at stage 1.</p> <p>On receiving your stage 2 complaint, we will:</p> <ul style="list-style-type: none"> • Acknowledge receipt of the complaint within 5 working days and provide you with the name of the complaint handler and the case reference number. We will make reasonable efforts to understand why you remain unhappy and what you are expecting from the Stage 2 review. • We aim to deal with Stage 2 complaints within 20 working days of the complaint being acknowledged. <p>If this is not possible, we will extend the complaint giving a clear explanation and details of when a response will be received. This will not exceed 20 working days without good reason. We will agree suitable intervals with you, to keep you informed about your complaint.</p> <p>The extension details will be communicated to you, in writing and we will include the Housing Ombudsman’s contact details.</p> <ul style="list-style-type: none"> • In the Stage 2 response to the you, we will address all points raised in the complaint definition and provide clear reasons for any decisions, referencing the relevant policy, law and good practice where appropriate. • Our response at Stage 2 will be our final response.

10 What happens if I am still unhappy?

10.1 Housing Complaints:

10.1.1 You can ask a local MP or Councillor to review your complaint once we have issued a final response. They can choose to contact us about it, or they may advise you to refer to the Housing Ombudsman straight away.

10.1.2 You can also access the Housing Ombudsman directly at any times throughout the complaint process.

The contact details for the Housing Ombudsman Service are:

- Online complaint form: www.housing-ombudsman.org.uk/residents/make-a-complaint/
- Phone: 0300 111 3000
- Email: info@housing-ombudsman.org.uk
- Postal address: Housing Ombudsman Service, PO Box 152, Liverpool L33 7WQ

10.2 Care and Support Complaints:

10.2.1 If the complaint is about a Care or Support service provided by Octavia, you can refer the complaint to the Local Authority who commission and contract care and support services.

10.2.2 If you suspect or have knowledge of an Octavia customer experiencing abuse this should be addressed via our Safeguarding Policies:

- Safeguarding - Protecting Adults at Risk of Abuse Policy
- Safeguarding - Protecting Children from Abuse Policy

10.2.3 The contact details for the Local Authorities where we provide Care or Support Services are:

- Royal Borough of Kensington and Chelsea Council hsscusercontent@rbkc.gov.uk
- Westminster Council asccustomerfeedback@westminster.gov.uk
- Hounslow Council complaints.crt@hounslow.gov.uk

11 Continuous Improvement and Lessons Learnt

11.1 We recognise the value that complaints provide, and we have processes in place to ensure we capture the details and learning when we conclude our complaints process. We will:

- Record and monitor all the complaints we receive and use this information to deliver process and service improvements. This information is shared and reviewed with relevant Octavia Committees, Managers, Octavia colleagues, and the Octavia Board.
- Appoint a member of our governing body who has lead responsibility for complaints to support a positive complaint handling culture. This person is our Member Responsible for Complaints (MRC). As a minimum, the MRC is responsible for ensuring our governing body receives:
 - Regular updates on the volume, categories, and outcome of complaints, alongside complaint handling performance including compliance with the Ombudsman's orders.

- Regular reviews of issues and trends arising from complaint handling.
 - The annual performance report produced by the Ombudsman.
 - Individual complaint outcomes where necessary, including where the Ombudsman made findings of severe maladministration or referrals to regulatory bodies. The implementation of management responses will be tracked to ensure they are delivered to agreed timescales.
 - We will produce an annual complaints and performance service improvement report which includes our annual self-assessment against the Complaint Handling Code for scrutiny and challenge.
 - Each year we will carry out an annual self-assessment against the Complaint Handling Code to ensure our complaint handling remains in line with the code's requirements. We will also carry out a self-assessment following significant restructures, merger, changes in procedure, or when asked by the Housing Ombudsman. Following each self-assessment, we will report the outcome of our self-assessment to the governing body and publish the outcome of the assessment on our website, our Annual Complaints Performance and Service Improvement Report, and our governing body's response to the report.
- Apologise when our service falls short and offer the appropriate solutions to resolve your complaint.
 - Use complaints as an opportunity to learn; we will identify lessons learnt and implement solutions.
 - Publish the results and the changes we made in response to the learning.
 - Seek feedback from you in relation to our complaint handling as part of our commitment to encourage a positive complaint and learning culture.

11.2 Our complaint handling performance is reviewed monthly and quarterly. The performance is provided to the Executive Team, relevant committee, and the Board. We also publish our complaint handling performance in our Annual Complaints Performance and Service Improvement Report.

11.3 All relevant staff have clear performance objectives in relation to complaint handling which reflects the need to:

- Have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments
- Take collective responsibility for any shortfalls identified through complaints rather than blaming others
- Act within the Professional Standards for engaging with complaints as set by the Chartered Institute of Housing.

12 How we will manage your personal data

12.1 We will manage and process personal data in compliance with the Data Protection Act 2018 and UK GDPR. For further information on how we process personal data, see the Octavia Data Protection Policy, and Octavia Privacy Notice.

13 Equality, Diversity, and Inclusion

- 13.1 We are committed to fostering an inclusive environment where every individual's needs are not just acknowledged but actively catered to. Underpinning this, is our commitment to meeting our duties under the Equality Act, which serves as the cornerstone of our approach to addressing diverse needs within our community. Whether it's ensuring accessibility for those with physical disabilities, providing support for individuals with mental health challenges, or accommodating cultural and religious requirements, we recognise and respect the unique circumstances of each resident. Our complaints policy reflects this ethos by prioritising fairness, dignity, and respect for all.
- 13.2 We will make reasonable adjustments for you where appropriate. We will keep a record of any reasonable adjustments agreed and any disabilities you disclose. We will keep any agreed adjustments under active review.
- 13.3 **Accessible Formats**
This policy can be made available in alternative formats upon request.

14 Publicising the policy

- 14.1 We publish our policy on our website with details on how you can raise a complaint and contact the Housing Ombudsman. We will include details of the policy in our tenant newsletter and consult with our tenant panel on changes to this policy. A paper copy of the policy is available on request.
- 14.2 We ensure our staff receive the right level of training for their role, consult colleagues on policy changes, and keep the wider staff group updated on changes to policy.

15 Associated Documents

- 15.1 This policy is implemented by the following procedures:
- Complaints Procedure
- 15.2 This policy is supported by the following policies:
- Compensation Policy
 - Unacceptable Customer Actions Policy
 - Translation, Interpretation and Reasonable Adjustments Policy
 - Safeguarding - Protecting Adults at Risk of Abuse Policy
 - Safeguarding - Protecting Children from Abuse Policy
 - Anti-social Behaviour and Neighbour Relationships Policy
 - Complaints Panel terms of reference

Revision History		
Date	Reviser	Revision Detail
15/9/2022	Louise Alfred	Updated Section 5 regarding removal of democratic filter from 1 st October 2022.
20/03/2024	Mary Noone Elizabeth Rowland	Updated to reflect changes introduced by the 2024 Statutory Complaint Handling Code.
31.05.2024	Elizabeth Rowland	Updated Section to include how Health & Safety and personal injury claims are addressed.

Title: Complaints Policy| Policy Owner: Customer Experience Improvement Manager| Approved by: The Board |
Approval date: 18/06/2024| Effective from: 28/06/2024