**CSI service review of complaints**

**Report to Executive Team, 28th November 2011**

1. **Introduction**

Customer Service Inspectors, CSI were formed in March 2011. They were formed to scrutinise housing services from Cheshire west and Chester. This is our 2nd service scrutiny report, into the complaints service.

All of our work aims to improve the quality and efficiency of services for tenants and leaseholders of CWAC

We chose to look at complaints due to concerns that the service was not well publicised to tenants and due to the changes which the government is implementing to add a further stage to the complaints process “the democratic filter”. which will allow tenants to be sponsored by tenant panels such as ourselves to take complaints to the ombudsman

For this review, we tested the services promised in the local offer and we also looked further afield at the quality of service and information provided by other landlords.

We have concentrated on what matters most to tenants and we restricted our brief to complaints from tenants, though we are aware that the Council also combines its complaints policy with complements and comments. Those additional services were outside our review.

**2 What CSI looked at**

Prior to starting the review, we received a presentation from CWAC on how complaints were managed and the processes undertaken. This helped us to scope our work and frame the service review.

We reviewed a comprehensive list of documents and performance indicators used by CWAC to manage the complaints service. The following documents were provided and reviewed:

* CWAC Complaints policy
* CWAC Complaints procedures
* CWAC website for standards
* CWAC complaint leaflet
* CWAC local offer
* CWAC annual report
* CWAC website
* Key Performance information to NEPTRO and the Executive Team
* Housemark report on performance
* Housemark and Audit Commission Good practice
* Websites, policies and performance of those who are deemed to be delivering good complaints service

Two of our members observed the operation of the database and paperwork system and reviewed a complaints file from the initial complaint, through to referral to the Ombudsman.

A staff suggestion box was placed in the 2 CWAC housing locations to enable staff to put forward ideas for improving the system.

CSI undertook a series of structured interviews to gather data on officer interpretation, understanding and implementation of the Policy and Procedures.

Interviews were held with:

* Complaints Officer
* Receptionist
* Housing Officer
* Housing Manager
* Assistant Directors
* Repairs Surveyors
* Repairs Manager

CSI also interviewed tenants as follows:

* Held a focus group of recent tenant complainants
* Tested the complaints system with genuine complaints through visit, letter and use of the website
* Undertook mystery shopping of tenants who had made a complaint recently.
* Interviewed 2 tenants who were members of the complaints panel

Whilst CSI were unable to locate the compensation policy of the Council, we still reviewed the practices adopted by the council within the policy and we reviewed other compensation data and leaflets/promises from other landlords.

**3 The purpose of choosing the complaints service for scrutiny**

CSI aims to make suggestions for service improvement, both from a customer service perspective and to improve the management and delivery of the service, so that it delivers maximum value for the rent we pay.

The reasons for the interest of CSI in complaints were:

* Perceived flaws in the service noticed by tenants
* Refused repairs not being accepted as complaints
* Tenants we spoke to were not aware of ability to complain or the procedure
* Active tenants had not been involved in its drafting
* Tenant experiences on the Complaints Panel (stage 2)
* CSI wanted to draw tenants attention to the forms they can complete to complain
* It was a new- ish procedure – so, we wanted to see how well it was working and it was not reviewed after 6 months of implementation of the new policy
* There was little public information and marketing of tenants ability to follow a formal complaints process

**4 Reviewing information from other organisations**

We researched policy, leaflets and practice from other organisations, known for their good practice on complaints. CSI have taken many of our ideas for improvement from what our customers have said and the following landlords who have found solutions to those problems:

* One Vision HA;
* Golden Gates Housing
* Salix Homes
* Knowsley Housing Trust
* Your Homes Newcastle
* Stevenage Homes

**5 What we found**

We have summarised the results of our findings in the order which tenants experience complaints:

**5.1 How tenants make a complaint?**

**5.1.1 We found a number of strengths:**

* Open Door Special Edition set a local standard, though no contact details provided at that time
* A Policy was devised for housing complaint in 2009/10
* A leaflet was produced to accompany the Policy
* Information on complaints is the website
* The annual report gives contact details for complaints and broadly describes the policy. Given that this was in calendar format, it has been retained for use by tenants

**5.1.2 We suggest the following changes to improve the service:**

* The policy says there will be posters and leaflets displayed. We could not locate a poster and we had to ask staff for a leaflet and they had to go to search for one
* Reminders about the complaints policy and that complaints’ are welcomed in every “Open Door” and “In the know”. The summer 2011 edition of Open Door included a list of useful phone numbers, but complaints ‘was not listed. There was also no phone number to report complaints in the Local Offer special edition on Open Door
* Tenants would like a formal involvement in the Editorial group for open door
* Open door does not include a “we said, you did” section to encourage tenants to know that their views are welcomed and are changing services for the better.
* Leaflets are not on display in offices
* The website section for housing complaints is hard to find
* Contact details for complaints on the leaflet are out of date, in terms of phone number and office address. There is little space to include a full explanation of the problem and whilst stage one is defined quite clearly, stage 2 is not. We feel that simple messages are required by tenants on complaints and we liked the plain English in the Salix Homes leaflet.
* Complaints are not defined for tenants. Staff do not know the definition of a complaint. Many complaints are interpreted as repairs and other issues for officers to deal with by receptionists and those answering the telephone. There must be many complaints which are never reported as such
* Staff clearly feel that a complaint is to be avoided rather than welcomed. None were aware of the CWAC policy definition of a complaint. The culture which the council is trying to set to welcome and encourage feedback is not being communicated to front line staff who process many complaints as service requests, sometimes over and over again.
* Staff have not had any training on the complaints. Staff have not seen or read the complaints policy and procedure and complaints are not discussed in team meetings and staff briefings
* CSI are concerned that the annual report performance information on satisfaction may not be accurate as we have been informed that few complaints satisfaction forms have been returned and we have been unable to establish any information from tenant feedback on complaints.
* The automated 0300 number for contacting the council does not offer the option of making a complaint amongst the choices of services and those operating the switchboard are unaware of the correct advice to give.
* Tenants have to pay the postage to return the forms and feedback, no advanced paid envelopes are provided

**5.1.3 What we liked that other landlords were doing:**

CSI are recommending a revision of policy, procedure, leaflet and publicity on complaints. Our investigations led CSI to review all data which had been commended by the Audit Commission and Housemark for complaints:

Poole HP; Homes for Islington; Sheffield Homes; Berneslai Homes; Solihull CH; Stevenage Homes; East Durham Homes and Northwards Housing.

We would like you to include the following when you revise the ways of working on complaints with us:

* The Knowsley Housing Trust (KHT) leaflet, has a tear off slip which is sealable to return, free of charge (though we believe it collects too much data on the tenant and leaves little space for the tenant complaint).
* The KHT leaflet also includes a flowchart which is clear on what will happen
* Northwards complaint procedure says that the complaint will not be held against you if you make other requests for services which gives reassurance to tenants
* The Salix leaflet fully explains what will happen and who will do it. It also defines the stages of complaint process well and the timeframes
* The websites of those who are recognised for good practice were reviewed, we felt that Your Homes Newcastle was the best in terms of access and clarity It showed tenants how to complain, and they use a freepost address for sending in complaints
* CSI felt that Stevenage Homes had the best procedures on their website
* We did not restrict ourselves to housing providers in reviewing complaints. The post office leaflet draws your attention to how to finds information or make a complaint. The colours are easy to read and there are contact details for each stage of the complaint.

**5.2 Are the Council delivering their promises on complaints?**

**5.2.1 We found a number of strengths:**

* The website test got an immediate automated response
* There is a clear timescale when action should occur
* Complaints accepted are given a unique reference number, which tenants would like to be provided on acknowledgement of complaints, to enable them to follow up issues
* Only 7 of 48 complaints went over 10 days in the first quarter to make a first response to complainants
* A complaint feedback form is sent out to gather opinions from tenants
* There is a data base for complaints recording. It allowed the pulling up of complaints and the pulling off of management reports
* There are designated officers to receive complaints in each department
* A permanent staff member now works on complaints and want to make positive changes to the procedure, to review and standardise the letter to complainants and update the website with the latest information.

**5.2.2 We suggest the following changes to improve the service:**

In testing the service using CSI members and local complaints they were aware of, CSI have a number of concerns:

Website test:

* Tenant had no phone call or no letter since then and is still waiting for the complaint to be responded to, it has now been about 10 weeks
* After 10 weeks it was dealt with after a follow up phone call
* Tenant has received nothing back on the complaint ever

In person test:

* No complaints leaflet in reception and there was no leaflet offered by the receptionist.
* Tenant had to inform staff that there was a leaflet and the receptionist had to go and find it
* Acknowledgement took 8 days (not 2 as per procedure)

Test by letter

* A letter was sent in in mid August and no response has yet been received

A response is to be provided in 10 days:

* The 10 days only starts when the complaint officer has passed this to the officer to response to stage one.
* The councillor and MP enquiries require an officer response is dealt with in 5 days by officers, which could be persuasive to circumvent the complaints policy

Communication and feedback

* CSI feel the feedback form asked more information on the complainant, than qualitative information about the complaint, we would be happy to assist the council to write a more tenant friendly feedback questionnaire
* No data is reviewed from complainants
* Cases are slow to close and so feedback is slow and late
* Communications with tenants are poor, within and outside the 10 days timescales. If a complaint has been submitted this is not acknowledged if officers choose not dealt with it as a complaint
* Complaints are being closed by officers without informing the tenants
* Complaints are being closed verbally by telephone with no written acknowledgement to tenants

Information on complaints closed was not up to date on the database, and so tenants had not received a survey form

* Out of 111 complaints, only 49 were closed at stage one, but only 3 on stage 2 (we know that from the number of complaints panel cases which tenants had sat on and not from the report which does not report on stage 2) and one had gone to the ombudsman, we know that as we have been told this
* The database does not link to other housing management systems
* We would like to see KPIs monitoring stage 2 complaints and outcomes as well as stage 1
* Departmental performance on response is not measured individually – only collectively and so it is not possible for managers to review their performance against other teams

Promises in the Policy:

* The complaints policy was to have been reviewed after 6 months of introduction, but it has not
* There are no posters on complaints
* Open door does not have a “you said we did” feature
* New employees are not trained in complaints as part of their induction.

In addition to the following, CSI make the following suggestion related to improving the procedure and customer experience:

* Staff we spoke to would quite like to sit on the panel to see what happens on the stage 2 panel as part of any training provided
* CSI would like a condensed policy to be included in the response to a complaint.
* Tenants are happy to get the acknowledgement of the complaint by phone/e mail, but we would like to know in a follow up letter who is dealing with the complaint and when a response is due
* Tenants should not be told that a lack of funding is an appropriate excuse for a promised service within a tenancy agreement, when complaining about a service.

**5.2.3 What we liked that others were doing**

* Homes for Islington has a form you can download and complete and send back by e mail

**5.3 Stage 2 of the procedure**

**5.3.1 We found a number of strengths:**

* Tenants are involved in the panel
* Papers come out In advance for reading by tenants involved in decisions
* Tenants can give evidence to the panel
* Complaint Panel reps are reminded of confidentiality and are asked if they have a conflict of interest

**5.3.2 We suggest the following changes to improve the service:**

* The policy states that the chair can be a tenant or an officer. Tenants would like to chair the panel, or would like CWAC to look at having an independent chair
* It is not clear how tenants are chosen for sitting on the panel (no rotation)
* Black and white photos do not represent good evidence
* There are too many officers present at the panel. There should be 2 officers and 2 tenants and the a secretary will take minutes as well as witnesses and the tenant presenting their case who will only be there for that time
* Tenants are not given copies of policies relating to the subject they are considering to help them understand the service failure
* Meeting can be called at quite short notice
* The venue for the hearing is quite intimidating
* No feedback or minutes/ record is sent to tenants on the panel and stage 2 information about the panel is not in complaints file
* Tenants do not approve the record of the meeting
* There is no compensation policy but compensation has been given and was not recorded on the database

**5.4 How we compare to others organisations**

**We found a number of strengths:**

* We are now collecting data on complaints
* Basic Complaints data goes to NEPTRO and was included in the annual report 2010

**We suggest the following changes to improve the service:**

Compensation Policy

* There is no policy or procedure
* We would like to see the complaints leaflet say that compensation may be awarded
* We would like to see a separate policy which outlines how CWAC will operate the compensation policy
* It is useful to advise tenants to get household insurance for damage or loss and to point them at the CWAC insurance, but we would like this explained in detail on what that insurance will cover in the complaints policy

Performance information to tenants

* CWAC only have one year’s data and it is not yet compared with others (Housemark benchmarking report)
* There is no data reported at stage 2
* There is no data on complaints upheld
* There is no data on the complaints by department and their performance
* No satisfaction data is reviewed or chased and there are no incentives to complete forms and return them EG: prize draw
* The data reported to NEPTRO is different for the same time period than that reported to Managers. The NEPTRO data shows a better performance.

**What we liked that others were doing**

* We liked the customer feedback leaflet on complaints for Salix which points to why they might consider compensation
* We liked the fact that some policies and leaflets suggested that in the case of abusive behaviour to staff, a Notice to seek possession might be services on a 2nd offence
* Tenant representatives to receive complaints in Berneslai Homes and are trained as customer champions to help them through their complaint
* Suggestion boxes for feedback in reception areas
* Surveys being done and customer opinion captured and services changing as a result

**6 Summary Recommendations – the big issues we want you to resolve**

We would like you to address all of the above issues in reviewing the policy and procedures on complaints, but here is a summary of our key concerns:

1. How CWAC promote the existence of the complaints policy and practices
2. There is no staff training on complaints
3. We want CWAC staff at all levels to welcome and encourage complaints and tenant feedback
4. We want tenant involvement in a revised complaints policy and the new compensation policy and ways of working
5. We feel there needs to be more contact with complainants to let them know what is happening and to put them at ease – it needs to have more of a human touch and show decency and consideration for their physical and emotional need of tenants. we recognise that it’s an ordeal to make a complaint for a tenant – we want more customer care
6. We do not want to see complaints closed without the tenants knowledge
7. We want CWAC to consider some small steps, like an apology, card or flowers and chocolates which can go a long way to repair damage at low cost

**7 Final comments**

We would like to thank the officers and tenants for giving up their time to help us with this review.

We look forward to moving on to improve this service in partnership with the Council.