

Customer Feedback Policy

Document owner	Denise Allen
Approved by	Executive Team
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Interim Review	7 March 2023
Review date	December 2025
Version	8.4
Scope	This policy applies to all customers of The Regenda Group

1. Introduction/ policy statement

As set out in The Regenda Group Corporate Plan, a hallmark of our brand is that *'we put our customers at the centre, deliver high quality services, build a positive and emotional connection and use customer feedback to drive continuous improvement.'* Having a clear and accessible Customer Feedback Policy is a fundamental tool that aligns to our Customer Centric Strategy and regulatory requirements.

The Group is committed to delivering an approach to complaints that is clear, simple and accessible, ensuring that complaints are resolved promptly, politely and fairly. The way we respond to feedback from our customers will reflect our values. It matters to us what our customers think - we want to know where a service may have fallen short of expectations so that we can put things right, or where we have provided a fantastic service so that we can learn and further improve.

We aim to be fair, committed to equality for all and to have a flexible, open and transparent approach to customer feedback. Complaints, compliments and comments are welcomed and are seen as a way of gaining valuable insight into the services we offer. We will listen to our customers, treat them with respect and work hard to get the right outcome for them and the organisation.

This policy sets out how The Regenda Group deals with customer feedback and is supported by a set of procedures which explain the processes for complaint handling and recording compliments and comments.

This policy supports the 'Our Customer Centricity and Communities' and 'Our Product Excellence' Pillars of the Group Corporate Plan and is integral to the successful delivery of all other strategic objectives around our brand, our people, growth and efficiencies and value for money.

2. Scope and Exemptions

The Regenda Group is made up of Regenda Homes and its wholly owned subsidiaries; Redwing (private rented properties, leasehold and apartment block management and



shared ownership and sales), M&Y Maintenance and Construction, Petrus Community, Positive Footprints, Centre 56, The Learning Foundry, NCRC and Ecogee.

This over-arching policy will apply to all members of The Regenda Group. However, Group members will have documented processes to reflect the needs of a diverse customer base and comply with individual operating practices and regulatory requirements.

3. Policy Detail and Definitions

3.1 Compliments and comments

We define a compliment as 'any feedback which tells us that we have provided a service well, or how helpful a member of staff (or another person acting on our behalf) has been'. When we receive a compliment, we will acknowledge it, record it, and forward it to the relevant person/team and their manager. If we can learn from the feedback, we will advise the person making the compliment of any action taken.

We define a comment as 'an idea, suggestion or opinion on how we can improve our services'. This might be a suggestion of how we can improve a process or a suggestion for a change to policy. When we receive a comment, we will record this and pass it on to the relevant manager to see whether this suggestion can be implemented. We will advise the person making the comment if any action is taken.

3.2 Complaints

We define a complaint as 'an expression of dissatisfaction, however made, about the standard of service, actions or lack of actions by The Regenda Group, our staff or those acting on our behalf which affects an individual customer or group of customers'.

Such expressions of dissatisfaction may relate to:

- The standard or failure of a service.
- Action or lack of action in response to a request for service.
- Failure to follow an approved policy or procedure.
- Perceived poor attitude or performance of The Regenda Group staff, or people working on behalf of the Group.

We will raise a formal complaint when a customer expresses dissatisfaction with the response to their service request, even if the handling of the service request remains ongoing.

Customers that reside in our High-rise Residents Building can report any safety concerns about the building they live in. We will log these concerns as a formal complaint and provide a full written response as per this policy.



Our complaints process is made up of two stages:

Complaint Stage	Time Scales	Detail
First Time Resolution	Acknowledge with the customer at the same time the complaint is raised (by telephone where possible) with details of conversation noted. Resolution and response sent to customer within 5 working days.	Summary of complaint and action taken in writing. Complete follow up actions.
Final Resolution	Acknowledge with the customer within 48 hours of the complaint is escalated. Draft resolution and response sent to Director within 8 working days. Resolve and response sent to customer within 15 working days	Director to provide sign off for all Final Resolution complaints. Provides our final response.

At the end of each stage, we will confirm the following in writing to our customer:

- the complaint stage complaint is being investigated at
- the complaint definition
- the decision made against the complaint
- the reason(s) for any decisions made
- the details of any remedy offered to put things right
- details of any outstanding actions
- details of how and the timescales required to escalate the matter to the next stage if the customer is not satisfied with the result
- details of how often we will communicate if there are any outstanding actions, to ensure actions are completed satisfactorily.

After First Resolution stage has been finalised, the customer or their representative can request a further review at Final Resolution stage. A request to have a complaint escalated to the next stage should be made within 14 days of First Resolution being closed.

Final Resolution stage is the last stage in our complaints process. However, at any point throughout the process, customers can refer their complaint to an Ombudsman or other regulatory body for further consideration.

In exceptional circumstances, where longer time is required to investigate a complaint, we will agree the reasons and length of time with the customer. The extension period should not exceed 5 working days and will be confirmed with the customer in writing and provide information on how to contact the relevant Ombudsman or other regulatory body for further consideration.



We will ensure that no person subject to the complaint will take part in the complaint investigation and the complaints process will ensure impartiality.

Where a customer raises additional complaints during the investigation, we will incorporate these into the relevant stage, provided they are related, and the stage response has not been issued. Where the stage response has been sent, the new issues are unrelated to the issues already being investigated or it would unreasonably delay the response, the new issues will be logged as a new complaint.

We will not unreasonably refuse to escalate a complaint through both stages of our complaints process. When we decide not to escalate a complaint, we will inform the customer of the reasons why as set out in 3.3 below.

3.3 What is not a complaint?

There are some things that are not classed as complaints under the scope of this policy:

- Service Request - A first-time request for service or advice or making initial contact to report a fault or defect, e.g. informing the Group about a repair that needs doing (for the first time) or requesting a rent account statement.
- An initial request for an explanation of a decision made e.g. about an allocation of housing.
- A report about a neighbour dispute, a report of Anti-Social Behaviour or harassment, all of which are covered by a separate Anti-Social Behaviour Policy.
- A query about organisational policy.
- Where the matter being complained about is or has been the subject of legal proceedings. We should not remove these issues from the complaint until legal proceedings have started (i.e. if customer threatens legal proceedings, we should not close the complaint). Where there are multiple issues and some of these are subject to legal proceedings, we will continue to investigate any other issues in line with our complaints process.
- Contractual disputes.
- A complaint about services provided or decisions taken by another organisation, over which The Regenda Group has no control.
- An attempt to reopen a previously concluded complaint, or to have a complaint reconsidered which has already been through our complaints process and where a final decision has been reached.
- We will not consider a request for compensation as a complaint but may issue compensation as part of the resolution. We encourage all customers to ensure that their goods are suitably insured e.g. home contents insurance.

We will not take a blanket approach to refusing complaints and will take each case on its individual merits.

We will listen to and take seriously any complaints made about members of staff, which may include attitude, behaviour, misconduct, discrimination, or criminal activity. Such complaints will be investigated under separate management policies and procedures. In some cases, we may not be able to provide detailed feedback about action taken against a member of staff. However, we will attempt to provide as much information as possible following any investigation.

We will not normally investigate complaints over twelve months old, unless there are



exceptional circumstances (for example, if the customer has been ill, hospitalised or requires additional support or advocacy services to help them make a complaint). We will always consider each case on an individual basis. If a complaint is about a health and safety or safeguarding issue, we may investigate these, regardless of the twelve-month limit.

When we decide not to accept a complaint, we will provide a detailed explanation to the customer setting out why the matter is not suitable for the complaints process. We will also let the customer know what other options are available, e.g. taking the complaint to the Ombudsman for further investigation.

If there is any doubt about the details of a complaint and it not being in the scope of this policy, we will raise a complaint and investigate regardless, providing a response as per the First Resolution stage of our process.

Where a customer has taken the reason for refusal to an Ombudsman, we will abide by the Ombudsman decisions to open a complaint if necessary and follow our process.

3.4 Who can make a complaint, compliment or comment?

Anyone who receives or requests a service from the Group or is affected by a decision or action taken by the Group or is an advocate of such a person can make a complaint, compliment or comment. These may include:

- Tenants and members of their households
- Leaseholders and shared owners
- Housing applicants
- Service Users
- Representatives of complainants such as friends, relatives, Board or Customer Feedback Panel members, with their written permission
- Designated carers and advocates
- MP's and elected officials
- Former tenants
- Students/learners
- Parents/carers
- Stakeholders

The Regenda Group recognises the benefits of working with external agencies, which can provide a complainant with greater support tailored to their individual needs.

The Group will offer assistance to those customers who do not feel able, for whatever reason, to make a complaint themselves and will provide extra support where necessary, for example – personal appointments, translation of documents into accessible formats.

3.5 How a complaint, compliment or comment can be made

We are happy to receive customer feedback in a variety of ways and formats to ensure fair access to all customers, including:



- By phone
- In writing
- By email
- In person
- Via The Regenda Group's website / Customer Portal
- Via social media (Facebook, Twitter etc.)
- Via Resolver website

3.6 Complaints made via social media

To ensure confidentiality and adhering to General Data Protection Regulation (GDPR), complaints received via social media will be investigated and responded to by phone, email or letter.

3.7 Anonymous complaints

It is good practice to investigate all complaints, even if the source of the complaint is unknown. Therefore, anonymous complaints will be recorded, along with details of any actions taken. This is in case the complainant comes forward in the future, or a similar complaint is made by another customer.

3.8 Housing Ombudsman, Property Ombudsman and Financial Ombudsman

At any point throughout the complaint process, a customer can refer their complaint to the relevant Ombudsman Service for review. The Housing Ombudsman Service and the Property Ombudsman offer free, impartial and independent advice for the resolution of unresolved disputes between landlords and tenants and property agents and consumers. Financial complaints (such as money or debt advice) can also be made to the Financial Ombudsman Service where a customer is unhappy with how their complaint has been handled. They can contact the appropriate Ombudsman service at any time during our complaints process.

Organisation	Contact details	Telephone Number	Website
Housing Ombudsman Service	PO Box 152 Liverpool L33 7WQ	0300 111 3000	www.housing-ombudsman.org.uk
The Property Ombudsman	Milford House 43-55 Milford Street Salisbury Wiltshire SP1 2BP	01722 333306	www.tpos.co.uk



The Financial Ombudsman	Exchange Tower, Harbour Exchange, London E14 9SR	0300 123 9123	www.financial-ombudsman.org.uk
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3.9 Education Skills Funding Agency

A customer (learner/student) of The Learning Foundry, including parents and guardians, can take their complaint direct to the ESFA for investigation by contacting them directly:

Organisation	ESFA (Education Skills and Funding Agency)
Contact Details	ESFA Redirect - Section 1 - GOV.UK (education.gov.uk)
Telephone Number	0370 000 2288 Monday to Friday, 9am to 5pm
Website	https://www.gov.uk/government/publications/complaints-about-post-16-education-and-training-provision-funded-by-esfa/complaints-about-post-16-education-and-training-provision-funded-by-esfa#what-this-complaints-procedure-covers

Customers of The Learning Foundry can also contact OFSTED directly to make a complaint; see contact details in the section below.

3.10 Early Years Foundation Stage and Supported Accommodation (16-17yrs)

Centre 56 and Regenda Homes Young Parents Service has a process in place to record and monitor any complaints made about its services.

A customer of Centre 56 or Regenda Homes Supported Accommodation for 16-17yrs, including parents or guardians, may also make a complaint to OFSTED by contacting them directly:

Organisation	OFSTED (Office for Standards in Education)
Contact Details	26-32 Store Street Manchester M1 2WD Email: enquiries@ofsted.gov.uk
Telephone Number	0300 123 1231 Monday to Friday, 9am to 5pm
Website	https://contact.ofsted.gov.uk/online-complaints
Further Guidance	Guide to the supported accommodation regulations including quality standards.pdf (publishing.service.gov.uk)



3.11 Construction

M&Y is voluntarily registered with the Considerate Construction Scheme (CCS) and agrees to abide by the Code of Considerate Practice, designed to encourage best practice beyond statutory requirements. If members of the public are unhappy, they can contact the CCS who can act as a mediator between the complainant and us.

Organisation	Considerate Construction Scheme
Contact Details	Considerate Constructors Scheme PO Box 75, Ware SG12 0YX Email: enquiries@ccscheme.org.uk
Telephone Number	0800 783 1423
Website	https://www.ccscheme.org.uk/

3.12 Compensation

Our prime focus for dealing with complaints is to resolve and learn from them and to offer compensation as the exception, not the norm. Where we recognise things have gone wrong, we may offer compensation, for example, by way of a payment, reduction in charge or emotional compensation as a token of how sorry we are.

Further information on how we consider payments of compensation can be found in our Discretionary Compensation Policy. A copy of the policy can be made available at the customer's request.

3.13 Unreasonable and resource intensive customer behaviour

We understand that our customers can get frustrated when things have gone wrong. We also make a clear distinction between those who think we have got it wrong and those customers whose complaints are unreasonable. We will review the merits of each complaint in turn, rather than by the attitude of the complainant.

We appreciate that customers may have been involved in upsetting or difficult circumstances and that people may sometimes act out of character. We will not view an individual's behaviour as unacceptable just because someone is assertive or determined. However, the actions of some customers who are angry or persistent may result in unreasonable demands being made.

Where this type of behaviour is apparent, our Unreasonable Customer Behaviour Policy sets out how we will deal with resource-intensive customers. This relates to those customers whose actions or behaviour we consider unreasonable when making their complaint.

3.14 Group Principles 'Making it Right'

The Group is committed to getting services right first time and ensuring that we accept responsibility and accountability for the times when this does not happen.

All Group members will adopt and embrace the following guiding principles:



- We will have a positive approach to all customer feedback and ensure it is welcomed. All expressions of dissatisfaction will be taken seriously and acted upon appropriately and in confidence.
- Complaints that cannot be resolved first time will be escalated. Our final response will be thorough and explain the next steps for the customer if they remain unhappy.
- We will be responsive, approachable and helpful at all stages of the complaint's procedure. No customer will suffer any disadvantage, reprisal or detriment as a result of making a complaint.
- We are committed to making it easy for customers and other stakeholders to provide feedback – positive or negative – and will use this opportunity to learn about our strengths and understand our weaknesses and improve.
- We will be flexible in our approach and help our customers through the complaints process in a way that works best for them.
- We will take ownership of a complaint, act quickly to identify the problem and put it right straight away. Our focus is always on resolving issues at the first stage wherever possible.
- The complaint handler will be able to act sensitively and fairly, and have the authority and autonomy to act to resolve disputes quickly and fairly, having access to staff at all levels to facilitate quick resolution of complaints.
- Telephone contact should always be our first channel of response to our customer, unless the customer has stipulated differently.
- We will keep the customer informed throughout the complaints process and where the issue is complex and requires further investigation or review, we will respond within agreed timescales. We recognise that quality as well as time is important.
- We will keep clear, transparent and accurate records and will account for the decisions we have made.
- If we are made aware of any customer vulnerability during the investigation process, we may use a risk assessment to ensure that we consider all factors of the complaint that may affect that customer differently.
- We will have clear service standards and simple and accessible procedures to support this policy, so that customers know what to expect. We will involve our customers in reviewing processes to make sure they are inclusive and fit for purpose.
- We will ask customers how satisfied they were with how we handled their complaint and how satisfied they are with the solution.
- We will monitor all comments, compliments and complaints received and provide feedback to customers about how we will use this information to improve our services.
- Where a complaint is closed with outstanding actions, we will agree timescales for contact with the customer to track the progress and ensure they are completed promptly.

4. Access and Communication

The Regenda Group is committed to ensuring that our services are accessible to everyone. We will seek alternative methods of access and services delivery where barriers perceived or real may exist that may make it difficult for people to work for us or use our services.

We will publish our complaints policy on our website for accessibility to all customers. We will also publish our self-assessment against the Housing Ombudsman's Code of Practice.



5. Associated documents

5.1. Associated legislation, regulation, and guidance

Associated legislation, regulation, external standards and guidance
Regulator of Social Housing - Consumer Standard - Social Housing (Regulation) Act 2023
Housing Ombudsman Code of Practice
Equality Act 2010
Localism Act 2011
Children Act 1989
Institute of Customer Service
Education Skills Funding Agency
Housing Act 1996 (Schedule 2)
General Data Protection Act 2018
The Property Ombudsman
Considerate Construction Scheme
Financial Ombudsman
Financial Conduct Authority
OFSTED

5.2. Associated Regenda Homes/Group documents / guidance

This should include any internal documents that may be referred to or sit alongside this policy, this may include any processes, guidance notes and system user guides.

Associated Regenda Homes / Group documents / guidance
Customer Centric Strategy
Unreasonable Customer Behaviour Policy
Discretionary Compensation Policy
Dealing With Customer Feedback Guidance Note
Safeguarding Adults Policy
Safeguarding Children Policy
ED&I Strategy 2022-2026

6. Equality, diversity, and inclusion

The Regenda Group is committed to ensuring that no person or group of persons will be treated less favourably than another person or group of persons and will carry out our duty with positive regard for the following protected characteristics: age, disability, gender reassignment, marriage and civil partnerships, pregnancy and maternity, race, religion, sex, sexual orientation.

Regenda is committed to ensuring that everyone has the same access and output of the services under this policy. Regenda will commit to using 'User Defined Alerts' to identify any needs that may need to be considered when conducting surveys altering services as needed. For example, sending information in a different format.



Regenda acknowledges that some customers may require a service which is individually tailored to suit their needs, due to recognised disability or other factor of vulnerability. Regenda reserve the right to adapt this policy to suit individuals in these cases.

All staff receive Equality and Diversity training on joining Regenda and are responsible for ensuring that the Equality and Diversity policy is incorporated into all work activated and all dealings with customers and colleagues.

This policy is to be applied with regards to Regenda Group Equality Diversity and Inclusion Strategy.

7. Data Protection

The Regenda Group has a responsibility to ensure that privacy and data protection is a key consideration in the early stages of any piece of work that includes the use of personal data and then throughout its life cycle.

Where reasonable and in accordance with data protection legislation, we will share personal data, for the purpose of preventing harm or injury to persons and where requested to by law.

Please see our Group's [Data Protection Guidance - The Club \(interactgo.com\)](https://interactgo.com) for more guidance or speak to the Governance team.

8. Monitoring and reporting

The Regenda Group will use complaints as a source of intelligence to identify issues and use the information collected to make positive changes to service delivery for our customers and we will benchmark our performance measures with other organisations as appropriate.

Responsibility for monitoring recorded complaints will sit with each subsidiary and reported internally to each Senior Management Team on a monthly basis.

We will maintain detailed electronic records of all complaints and feedback and provide reports on performance, trends and any lessons learned to meet relevant customer and stakeholder requirements.

We will look beyond the circumstances of individual complaints and consider whether service improvements can be made because of any learning from complaints received. We will use complaints as a source of intelligence to identify issues and introduce positive changes in service delivery.

Lessons learnt and root cause analysis will be considered at monthly operational meetings and within detailed quarterly analysis reports. Any HOS investigation finding of service failure, maladministration or severe maladministration will be subject to a full review and lessons learned identified and communicated.

The Quality Improvement Lead and Director of Innovation and Brand will assess any themes or trends to identify potential systemic issues, serious risks, or policies and procedures that require revision.

We will publish our performance, including the number, nature and outcome of complaints on an annual basis.



Performance on complaints will be monitored centrally within the Business Transformation Team and performance will be reported monthly for Regenda Homes and Redwing, with a wider report being presented to Executive Team and Regenda Group Board on a quarterly basis, covering all subsidiaries. We will also report our performance to our Resident Voice Panel and Customer Feedback Panel.

Regenda Homes and Redwing - We will complete an annual self-assessment against the Housing Ombudsman's (HOS) Complaint Handling Code and submit this to the Ombudsman. We will publish our most recent self-assessment on our website, report the outcome to our governing body, and include the outcome in our Annual Report.

The Board has a Member Responsible for Complaints (MRC) appointed who has lead responsibility for complaints to support a positive complaint handling culture. The MRC is responsible for ensuring the Board receives regular information on complaints that provides insight on Regenda's complaint handling performance. The MRC has access to suitable information and staff to perform this role and report on their findings.

The Regulator of Social Housing expect Registered Providers to report on Tenant Satisfaction Measures (TSM) from April 2023. The data for these measures will be reported on annually to the Regulator and will be used to understand how well a landlord is performing and to inform on areas for improvement for tenants.

Housing Ombudsman Determinations - We will log and review HOS determinations and monitor any actions to ensure that they are completed within timescales. This is a mandatory action and is completed in all cases with findings being shared across the business.

Surveys

We will survey a sample of our customers following the closure of their complaint to assess their satisfaction with how the complaint was handled and the outcome of the complaint.

Responses are reviewed further to understand if there are any further improvements to the complaint process required.

All stage 1, stage 2 and complaints made to the relevant authorities will be monitored by The Regenda Group Quality Improvement Lead.

Risk Management

The following risks have been identified if this policy is not followed correctly

Reference	Name
RG SR01.3	Failure to Comply with the Consumer Standards
TLF OR01	Failure to comply with OFSTED regulatory requirements
C56 OR2.1	Failure to comply with OFSTED regulatory requirements
RW OR01	Failure to comply with regulation and legislation
RW OR4	Failure to manage customer complaints effectively

9.Amendment log

Change	Made by	Authorised by	Effective date
Minor amendments to policy made to bring it in line with the Housing Ombudsman Code of Practice 2024	Denise Allen	Executive Team	April 2024



<ul style="list-style-type: none"> • Timescale to bring a complaint is now 12 months • Review of refused complaints where the HOS orders investigation • Review each case on its individual merits and not use a blanket approach for refusal 			
Section: 3.10 - Amended to include requirements for 16-17yrs Supported Accommodation	Denise Allen	Director of Innovation and Brand	September 2024
Section 8. - Amended following Internal Audit to clarify the process for learning from complaints and undertaking root cause analysis	Denise Allen	Director of Innovation and Brand	September 2024