



# Complaints Policy

## Introduction

- 1.1 We aim to deliver good customer experience through the services we provide. We recognise that we may not always achieve this and there may be times when customers are unhappy with the service they receive. If this happens, we want to know about this so that we can make it right and learn from it to prevent it from happening again.
- 1.2 We welcome complaints and aim to deal with them effectively, empathetically, and in-line with the regulatory requirements of the Transparency, Influence and Accountability Standard and the Housing Ombudsman Service (HOS) Complaints Handling Code.
- 1.3 We are committed to learning from complaints to drive improvement and prevent issues happening again. This is a key part of our policy.

## Policy

### 2.0 How to make a complaint

2.1 Complaints can be made through the following channels:

- Over the telephone
- Online using Live Chat, our on-line customer portal, a form on our website, or via our own social media channels.
- In writing - by e-mail or by post.
- In person with one of our colleagues.
- Through surveys we send to customers.

2.2 Any complaints received via an MP or local councillor that meet the complaint definition will also be resolved using our complaints process.

2.3 A person may choose to use an advocate to act on their behalf. Where this happens, we will get the expressed permission from the customer for us to discuss the matter with their chosen advocate. This will be done using a 'permission to discuss' form that once received will be stored on our housing management system. The matter will then be resolved using our complaints process.

2.4 We will ensure everyone can access our complaints service. At the point of receiving the complaint we will ask the person if they need any support and will make any reasonable adjustments they need. We will keep a record of any adjustments agreed, as well as a record of any additional needs the person discloses, and these will be kept under active review throughout the process.

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### **3.0 What we view as a complaint**

3.1 We use the Housing Ombudsman's complaint definition (Housing Ombudsman code 1.2) which is:

*'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 resident or group of residents.'*

3.2 A person does not have to use the word 'complaint' for it to be treated as such. Whenever a person expresses dissatisfaction, we will give them the choice to make a complaint. A complaint that is submitted via a third party or representative will be handled in line with Irwell Valley Homes complaints policy. Complaints can be received via a Local Authority, Councillor, MP, or a 3rd party acting on behalf of a customer, with their consent, unless there is a legal basis, under the Data Protection Act 2018, to share personal information with a 3rd party representative without consent.

3.3 This policy also applies to complaints relating to heat network services. Additional provisions are set out in Appendix 1 – Heat Network Complaints Addendum.”

3.4 Additional provisions apply to data protection complaints and are set out in Appendix 2 – Data Protection Complaints Addendum.

### **4.0 What is not classed as a complaint**

4.1 We will always accept a complaint unless there is a valid reason not to do so. For example:

- If the issue occurred over twelve months ago (unless the concern was around safeguarding or health and safety). However, we will accept complaints made outside this time limit where there are good reasons to do so.
- Where legal proceedings related to the matter have begun. This includes Claims having been filed at court.
- Concerns that have previously been dealt with under the complaints policy; however, where the problem is a reoccurring issue, we will consider older reports as part of the background to the complaint.
- If a customer continues to complain about issues that have already been responded to where no additional information has been provided and/or no additional actions can be taken. (Please refer to the Acceptable Behaviour Policy).

4.2 When considering whether to exclude a complaint from our process we will consider the exclusions above and consider the circumstances of the complaint, any vulnerabilities which may have impacted the matter, and whether any reasonable adjustments should be considered.

4.3 If we do not accept a complaint, we will explain why not and provide details of how to raise the matter with the HOS.

## **5.0 How we deal with complaints**

5.1 We will deal with complaints effectively and empathetically using the HOS Dispute Resolution principles:

- We will recognize the difference between a service request and a complaint. A service request is where a resident may be unhappy with a situation that they wish to have rectified while a complaint is about a service they have/ have not received. Service requests are not complaints, but will be recorded, monitored and reviewed regularly.
- We will raise a complaint when a resident expresses dissatisfaction with a service they have received, or our response to a service request even if the handling of the request is ongoing.
- Making a complaint will never stop us dealing with a service request.
- We will provide easy and accessible ways for customers to make a complaint and communicate with customers in their preferred way, making any reasonable adjustments, where appropriate.
- We will log all complaints and provide customers with a complaint reference number, and details of who is dealing with their complaint. The Complaint Officer will be responsible for keeping the customer informed.
- Throughout the process we will continue to remind the customer of how to contact the HOS for any advice and guidance.
- The individual circumstances of each complaint will always be considered and where there is more than one element to a complaint, these will be investigated and responded to individually.
- We will make every effort to keep to the timescales at each stage of the complaint process. If there are valid reasons why this may not be possible, we will explain why and agree revised timescales with the complainant and keep them updated on progress.
- We will provide advice and support for customers and deal with issues at the earliest possible opportunity.
- If we have failed a customer, we will apologise. We will agree and implement a solution with them, and provide compensation, where appropriate.
- We will be fair, put things right and learn from complaints to stop issues happening again to improve customer experience.
- Details of complaints will be recorded including the reasons behind the complaint, the outcome, and any learning or action taken. We will monitor this information and publish it on our website.
- An expression of dissatisfaction with services made through a survey is not defined as a complaint, though wherever possible, the person completing the survey will be made aware of how they can pursue a complaint if they wish to. Where IVH ask for wider feedback about services, details of our complaints process will be provided.
- We will act on any guidance issued by the HOS when deciding on appropriate remedies.

## **6.0 Our complaints process**

### **Acknowledgment**

When we receive a stage one complaint, we will acknowledge it within 5 working days and will share with the complainant:

- Their unique complaint case reference
- A summary of our understanding of the complaint
- The resolution we believe the person is looking for
- Details of the Complaint Officer/Service Manager
- A copy of our complaints policy
- Details of how to contact the HOS

When we receive a request to escalate to stage two, we will acknowledge it within 5 working days and will share with the complainant:

- A summary of our understanding of the reasons for escalation
- The resolution we believe the person is looking for
- Details of the Leadership team member, Head of Service or Service Manager
- Details of how to contact the HOS

### **Stage 1**

The Complaint Officer will contact the person to discuss the issue. They will thoroughly investigate the complaint and will aim to provide a response within 10 working days from the date of acknowledgement. On occasion, a Service Manager will investigate and complete the complaint response.

If this timescale is not achievable, the Complaint Officer or Service Manager will explain the reasons why and agree a revised timescale with the complainant. This will not exceed a further 10 working days without good reason and in agreement with the complainant. When a customer is informed about an extension, they will be provided with the contact details of the HOS.

Within the response letter, the complainant will be advised that they can escalate their complaint to stage 2 if they remain dissatisfied with the outcome of the process. They will be asked to notify the Complaints Team of this within 10 working days of receiving their stage 1 investigation response if they wish to escalate it.

We reserve the right to decline complaint escalations, if we do, we will explain why and provide details of how to contact the HOS.

Outstanding actions will be tracked and actioned promptly with updates provided to the customer.

Where customers raise additional complaints during the investigation, these will be incorporated into the stage 1 response if they are related to the original issue, and the stage 1 response has not been issued. If the stage 1 response has been issued, or the new issues are unrelated to those already being investigated, this will be logged as a new complaint.

### **Stage 2**

If the customer is dissatisfied with this response at stage one and asks to escalate the complaint to stage two, this will be assigned to a Head of Service, a member of the Leadership Team or on occasion a Service Manager.

The stage two investigator will contact the customer to discuss the complaint and carry out an investigation. They will prepare a response to the complaint within 20 working days of the escalation acknowledgement. If they need longer to investigate the complaint the complainant will be informed of the reasons why, and we will agree to a revised timescale.

This will be within 20 working days unless there is a valid reason why this is not possible. If an extension beyond 20 working days is required to enable us to fully respond to customers' complaints, this will be agreed by both parties and clearly explained to the customer.

Customers do not have to provide the landlord with their reasons for expressing dissatisfaction with their stage 1 complaint. We will not refuse an escalation request based on the residents not providing their reasons.

Within the stage 2 response we will always make the customers aware of their right to escalate their complaint to the HOS if they are still unhappy with the decision and how to do this.

All complaints will be recorded on our contact management system, and a full record will be kept of the complaint; including the original complaint details, date received, all correspondence, reports, and communication (including third parties), any review and the outcomes at each stage.

### **Complaints related to Building Safety**

A 'building safety risk' is defined as - risk to the safety of people in or about the building (18 metres or 7 floors) arising from either the spread of fire or structural failure; and the performance by an accountable person regarding their duties.

Complaints in relation to Building Safety will only be investigated at stage one of IVH's complaint process before being escalated directly to the Building Safety Regulator.

## **7.0 Compensation**

7.1 We have a separate compensation policy which is used together with the complaints policy. In awarding compensation, we will consider whether any statutory payments are due, if any quantifiable losses have been incurred, and the impact on the customer and anyone else living in the property.

## **8.0 Housing Ombudsman Service (HOS)**

8.1 Customers have the right to go to the HOS at any point in the complaints process and we will provide details of how to do this at each stage of our complaint process.

8.2 Should any findings or recommendations be made by the HOS we will ensure that we comply with these within timescales determined by the by them.

## **Performance Monitoring and Improvement**

9.1 We will use complaints to drive continuous learning and improvement. Themes and learning from complaints are overseen by our Business Improvement Team and action learning sessions are held with all related colleagues where necessary.

- 9.2 Major service failures will always be dealt with as a matter of urgency and without delay. Any learning or actions identified will be raised with the relevant service area and/or contractor to aid service improvement.
- 9.3 We will proactively use learning from complaints to revise policies and procedures, to train colleagues and contractors and to improve communication and record-keeping.
- 9.4 We will report back on wider learning and improvements by publishing information to customers, our Resident Scrutiny Panel, our Customer Standards Group, colleagues, and stakeholders, as well as providing evidence on our website and annual report.
- 9.5 We will complete an annual self-assessment against HOS Complaint Handling Code and an Annual Review of Complaints, which will be reviewed by our Board and published on our website.
- 9.6 Performance information, learning and action (including compliance with the HOS orders) relating to complaints is reported on a quarterly basis to the Board and our Customer Standards Group and published on our website. An appointed member of the board oversees complaint learnings and ensures best practice is shared with other members.

## Roles and Responsibilities

- 10.1 The following colleagues oversee the Complaint Policy:

The Complaints Officers handle all aspects of stage one complaints including investigations, preparing and reviewing responses and arranging remedies where necessary. They will acknowledge and allocate stage two complaints.

Our Customer Resolution and Complaints Team Leader (Maxwell Aldridge) is responsible for the direct management of our Complaints Officers and ensuring all complaints are handled in accordance with the HOS guidelines. They also approve stage one and two resolutions.

The Rents and Complaints Manager (Emma Burke) oversees the day-to-day running of the Complaints Team, ensuring that policies are adhered to and performance is monitored. They also approve stage one and two resolutions.

The Head of Customers and Communities (Ross Powell) is the author of the policy and the Complaints Lead with overall responsibility for ensuring the policy is adhered to by all colleagues and learnings are reported to the Leadership Team. They also approve stage one and two resolutions.

The Chief Operations Officer (Ceris Esplen) owns the policy and is responsible for performance against it including reporting to Board. They sign off all HOS information requests and approve stage one and two resolutions.

Christie Finegan is the member of the governing board who has been appointed as the Member Responsible for Complaints (MRC). The MRC is responsible for complaints to support a positive complaints culture. The MRC is responsible for ensuring that the governing body receives regular information on complaints that provides insight into the landlord's complaint handling performance.

## Equality, Diversity and Inclusion

- 11.1 The Association is committed to treating people with honesty, dignity, respect, and trust. This applies to colleagues, customers, and board members; all of whom undertake not to

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discriminate directly or indirectly or victimise because of race, gender, gender reassignment, disability, sexual orientation, age or religion and belief.

The complaints policy theoretically impacts all customers and all services we provide, so it potentially impacts areas with known inequalities. We will help people through the complaints process and make any reasonable adjustment(s) they need to ensure everyone can access this service. All information can be made available in other formats or translated on request.

To be read in conjunction with the complaints policy EIA.

## Associated Documents and Good Practice

12.1 This document is to be read in conjunction with the following documents:

- Compensation Policy
- Equality Impact Assessment for Customer Complaints Policy
- Tenancy Policy
- Tenancy Agreements
- Equality and Diversity Framework
- Acceptable Behaviour Policy
- Customer Strategy 2022/25
- Housing Ombudsman Service self-assessment
- Complaints Handling Code
- HOS spotlight reports
- The Regulator of Social Housing's Transparency, Influence and Accountability Standard
- Heat Network Complaints Addendum (Appendix 1)
- Data Protection Complaints Addendum (Appendix 2)

## Appendix 1- Heat Network Complaints Addendum

### 1.0 Purpose and Scope

1.1 This addendum sets out the additional provisions for complaints relating to Irwell Valley Homes' heat network services.

1.2 It should be read in conjunction with the Customer Complaints Policy. All complaints relating to heat network services will be managed in line with the complaints process set out within the main policy, unless otherwise stated in this addendum.

1.3 This addendum applies to all customers connected to our heat networks, including tenants, leaseholders and shared owners.

1.4 It covers complaints relating to:

- Heating and hot water supply, including outages
- Billing, metering and tariff arrangements
- Pricing and charge transparency
- Customer service and communication

- Service reliability and performance
- Support provided to vulnerable customers

## **2.0 Customer Rights (Heat Network Services)**

2.1 Customers receiving heat network services have the right to:

- Fair and transparent pricing
- A reliable supply of heating and hot water
- Clear and accurate billing information
- Have complaints handled in a timely and fair way
- Reasonable adjustments where additional support is required
- Escalate complaints to the appropriate Ombudsman service

## **3.0 What We View as a Heat Network Complaint**

3.1 In addition to the definition set out in the Customer Complaints Policy, a heat network complaint includes any expression of dissatisfaction relating to:

- Heating or hot water supply
- Delays in restoring service
- Billing, metering or tariffs
- Pricing or charges
- Communication relating to heat network services

3.2 We will treat these complaints in line with our standard complaints process.

## **4.0 Complaints Routes and Ombudsman Access**

4.1 Complaints relating to heat network services will be managed through the two-stage complaints process set out in the Customer Complaints Policy.

4.2 Customers have access to two Ombudsman services depending on the nature of the complaint:

- The Housing Ombudsman Service for landlord and complaint handling issues
- The Energy Ombudsman for heat supply, billing and energy-related complaints

4.3 Customers can contact the Housing Ombudsman at any point during the complaints process.

4.4 Where a heat network complaint remains unresolved after 8 weeks, or where a deadlock position has been reached, customers may refer the complaint to the Energy Ombudsman.

4.5 We will provide details of both Ombudsman services at the appropriate stages of the complaints process.

## **5.0 Billing and Pricing Complaints**

5.1 Customers can raise complaints if they believe their bill is incorrect or unclear.

5.2 We will ensure bills are clear and include:

- Energy consumption or estimated usage
- Tariff rates
- Any standing charges
- Contact details for enquiries

5.3 We will investigate billing complaints promptly. Where errors are identified, we will:

- Issue a corrected bill
- Explain any adjustments made
- Apply appropriate remedies, which may include credits or reimbursements

5.4 We will provide clear information about tariffs and give advance notice of any changes to pricing or charges.

## **6.0 Heating and Hot Water Service Failures**

6.1 We are committed to maintaining a reliable heating and hot water service.

6.2 Loss of heating or hot water is treated as a priority. We will:

- Respond as quickly as possible to restore service
- Keep customers informed of progress
- Provide updates during extended outages

6.3 When investigating complaints, we will consider:

- The length of time without service
- The impact on the household
- Whether the customer is vulnerable

6.4 Where service standards are not met, we will consider compensation in line with our Compensation Policy and any applicable service standards.

## **7.0 Vulnerable Customers**

7.1 We recognise that some customers may require additional support, particularly during a loss of heating or hot water.

7.2 A vulnerable customer may include:

- Older residents
- Residents with disabilities
- Customers with medical conditions
- Customers experiencing financial hardship

- Customers with communication or language needs

7.3 We will provide additional support where required. This may include:

- Priority response to outages
- Welfare checks during prolonged interruptions
- Alternative communication formats
- Referral to relevant support services

7.4 We will take reasonable steps to identify customers who may require additional support and ensure appropriate records are maintained in line with data protection requirements.

7.5 We will make reasonable adjustments to ensure all customers can access the complaints process.

## **8.0 Compensation and Remedies**

8.1 Complaints relating to heat network services will be considered in line with our Compensation Policy.

8.2 Where appropriate, remedies may include:

- An apology
- Service improvements
- Billing adjustments
- Goodwill or discretionary payments

8.3 When considering remedies, we will take into account:

- The impact on the customer
- Any financial loss
- The length and severity of the issue

## **9.0 Performance Monitoring and Improvement**

9.1 We will use complaints relating to heat network services to improve performance and customer experience.

9.2 We will monitor:

- The number of heat network complaints
- Response and resolution times
- Outage duration and service performance
- Compensation awarded
- Customer feedback and satisfaction

9.3 We will use this information to identify trends, drive improvements and inform service delivery.

## **10.0 Regulatory Compliance**

10.1 This addendum supports compliance with:

- The UK Heat Networks Market Framework
- Ofgem consumer protection requirements
- The Housing Ombudsman’s Complaints Handling Code
- We will ensure complaints relating to heat network services are handled fairly, consistently and in line with regulatory expectations

## Appendix 2- Data Protection Complaints Addendum

### **1.0 Purpose and Scope**

1.1 This addendum sets out how Irwell Valley Homes will manage complaints relating to the handling of personal data in line with:

- UK GDPR
- Data Protection Act 2018
- Data (Use and Access) Act 2025

1.2 All data protection complaints will be managed through the Customer Complaints Policy unless otherwise stated in this addendum.

### **2.0 What We View as a Data Protection Complaint**

2.1 A data protection complaint is any expression of dissatisfaction relating to how IVH has handled personal data.

2.2 This includes concerns relating to:

- Processing, sharing, storage or retention of personal data
- Accuracy of personal data
- Handling of data subject rights requests
- Data breaches or suspected breaches

2.3 A complaint does not need to be labelled as a “data protection complaint” to be treated as such.

### **3.0 Statutory Requirements (Acknowledgement and Timescales)**

3.1 In addition to the timescales set out in the main complaints policy, IVH will:

- Acknowledge receipt of a data protection complaint within 30 calendar days
- Investigate and respond without undue delay

3.2 Where required, we may pause investigation until:

- Identity is verified
- Authority to act is confirmed

#### **4.0 Investigation (Additional Requirements)**

4.1 Data protection complaints will include:

- Review of relevant systems, records and data processing activities
- Input from the Information Governance function

4.2 Investigations will ensure that:

- Data protection obligations have been fully considered
- Any risks to personal data are identified and addressed

#### **5.0 Outcome (Data Protection Specific Content)**

5.1 In addition to the requirements of the main policy, responses will confirm where relevant:

- Whether data protection legislation has been complied with
- Any remedial actions taken (e.g. correction, restriction, deletion, process changes)

#### **6.0 ICO and Escalation**

6.1 Individuals have the right to raise concerns with the Information Commissioner's Office (ICO).

6.2 IVH will ensure customers are aware of this right where appropriate.

#### **7.0 Roles and Responsibilities (Data Protection Specific)**

7.1 The Data Protection Officer will provide:

- Advice and oversight on data protection complaints
- Support to investigations where required
- Complete SAR requests
- Request advise from the Data Protection People

7.2 Complaints Officers will:

- Recognise potential data protection complaints
- Escalate them in line with this policy

## 8.0 Monitoring and Learning

8.1 Data protection complaints will be monitored separately where appropriate to. These will be recorded on Datwise.

8.2 Learning will inform improvements to:

- Data handling practices
- Record keeping
- Staff training

### Version Control

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<b>Policy Owner:</b>	Chief Operating Officer
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<b>Safeguarding Impact</b>	This does not apply to this policy
<b>Lead Team</b>	Communities Team

The latest version of this policy should be viewed online from The Hub area of the IVH intranet, and any printed version cannot be relied on as the most current version.

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