

Title	Customer Experience Policy
Document Owner	Director of Business Excellence
Next Review Date	July 2019
Corporate Aim	Take every opportunity to delight our customers

1. PURPOSE AND AIMS

- 1.1 This document sets out whg's policy towards providing a positive experience for our customers across all services and regardless of the method of contact. It includes complaints handling and sets out our regulatory responsibilities and the standards we will meet.

Legal and regulatory framework

- 1.2 This Policy is designed to comply with our legal and regulatory responsibilities.
- 1.3 The HCA Regulatory Framework states that we must:
- treat all customers with fairness and respect;
 - inform our customers about how they can access services and the standards of service they can expect; and
 - have an approach to complaints that is clear, simple and accessible that ensures that complaints are resolved promptly, politely and fairly.
- 1.4 The Data Protection Act 1998 sets out how we handle personal data.
- 1.5 The Equality Act 2010 requires us to safeguard those with a protected characteristic from direct and indirect discrimination and make reasonable adjustments to ensure an equality of access for all.
- 1.6 The Care Act 2015, Mental Capacity Act 2005, and Criminal Justice Act 2003 places additional duties on us to work with relevant agencies to protect vulnerable customers.

2. POLICY

Our customers

- 2.1 We define our customers in relation to this Policy as:
- whg tenants/joint tenants;
 - occupants of whg properties;
 - those owners with which we have a legal relationship, such as leaseholders and shared owners;
 - those applying for our homes;

- those representing our customers, such as local councillors; and
- key stakeholders.

Our values

- 2.2 This Policy is aligned to our values, which include:
- ‘we respect one another, customers, colleagues and partners’; and
 - ‘we put customers at the heart of everything we do’.

Our key principles

- 2.3 In order to deliver our values, we will abide by the key principles set out in 2.4 below.

- 2.4 We will:
- show customers courtesy and respect at all times;
 - listen carefully to our customers;
 - respond promptly and helpfully;
 - record all customer contact on our CRM system;
 - keep customers regularly informed about their enquiry;
 - answer a phone when a call is transferred to us;
 - promptly return customers’ calls;
 - when a customer cannot answer a call we will leave a voice message to tell them who we are and how they can return our call; and
 - respect customer confidentiality and hold their information securely.

Customer care

- 2.5 We aim to deal with the majority of enquiries at the first point of contact. Where we cannot, we will regularly keep customers informed of what is happening with their enquiry (within published target response times and in their preferred method of contact) until it is resolved in order to reduce avoidable contact from customers.
- 2.6 We will take a flexible approach to dealing with customers that is tailored to their needs or circumstances, which includes being professional, informative, polite and respectful.
- 2.7 We will ensure colleagues are well trained and supported by information technology to deliver an effective service, which includes the use of a CRM system.
- 2.8 Our colleagues will demonstrate a wide knowledge about their service area. They will be knowledgeable about how to access information required to help customers with their enquiries. Where they receive an enquiry about another service area, colleagues will use the CRM system to assign a task to the relevant colleague who can resolve the enquiry.

- 2.9 We will inform customers when we need to visit them in their home. We will show relevant identification to ensure we are who we say we are.

Access to services

- 2.10 We will provide ways for customers to access our services, with a focus on encouraging customers to use our online services ensuring we continue to meet the needs of our diverse customer base. This includes providing services that customers can access digitally, by telephone, through offices, and by receiving visits to their home where this is appropriate.
- 2.11 We will publicise all methods of access along with opening times and arrangements for out-of-hours contact. We will also highlight the most cost-effective methods of contact and increasingly encourage customers to access our services online.
- 2.12 Translation and interpretation services will also be available on request.
- 2.13 We will review customer groups who are not accessing our services as frequently as others. Action will be taken to remove any barriers to accessing our services when we identify them or these are highlighted to us.

Information

- 2.14 We will ensure a range of information that customers reasonably need to know is available online or when they visit our offices, including performance information. We will try to ensure information produced will be clear, accurate, up-to-date and in plain language, avoiding the use of jargon.
- 2.15 We will ensure customers are consulted on the content of key customer-facing information.
- 2.16 When recording personal information, we will inform customers of the reason for that record, only use that information for that purpose and only hold it for as long as is necessary.

Vulnerable customers

- 2.17 Many of our customers have additional needs as a result of health conditions or other personal circumstances, for example needing aids and adaptations to their home, being in need of support as a victim of anti-social behaviour, or someone who has a mental health condition. These conditions or circumstances often make them vulnerable to, or at greater risk of, not managing their home or their tenancy.
- 2.18 Any condition or circumstance that puts a customer at risk of being unable to comply with the conditions of their tenancy or lease, affects their ability to access our services, or places them (or others) at risk of harm or of serious detriment in the full use of their home.

- 2.19 These vulnerabilities might be as a result of:
- physical condition/mobility, for example serious or long term illness;
 - difficulty with communicating, for example language barrier;
 - their behaviour, for example addiction (drug, alcohol, gambling etc.); and
 - personal circumstances, for example domestic violence and abuse.
- 2.20 We will seek to identify customers who are potentially vulnerable. The primary means of identifying potentially vulnerable customers are self- disclosure, disclosure by another agency or colleague identification. These customers will be flagged on whg's housing management system only where they directly impact on our relationship with a customer.
- 2.21 Information will be collected, kept up-to-date and acted upon, which may involve adjusting services to the customers' needs.
- 2.22 We will not assume someone is vulnerable just because they display any of the conditions of vulnerability. This Policy is intended to assist rather than replace colleague judgement.
- 2.23 We are committed to supporting the individual needs of customers to help them sustain their tenancies, access our services and (without the risk of harm or serious detriment) make the full use of their homes. From this foundation, we hope that our vulnerable customers can improve their well-being and overall life chances, for example through a witness support scheme or a referral to the independent living service.
- 2.24 Where identified, we will offer the relevant support and reasonable service adjustments. Where appropriate we will refer cases to local authority care services and other specialist support agencies.
- 2.25 We will safeguard vulnerable adults and children, which will include assessing the need for support or additional services for victims of domestic violence and abuse and anti-social behaviour. We will also share relevant safeguarding concerns with agencies that need to know, in line with our Safeguarding Policy.

Consultation and feedback

- 2.26 We value customer feedback. We will pro-actively seek feedback on the customer experience, our services and our performance. We will then act upon it.
- 2.27 We will actively canvass feedback from customers and use it to drive changes and improvements to the way services are delivered. This will increasingly be gathered online.
- 2.28 We will provide customers with a range of opportunities to get involved, scrutinise our services and performance, give their views and share their experiences.

3. COMPLAINTS

- 3.1 We see complaints as an opportunity to rectify a service failure, turn around dissatisfied customers, address poor customer experience, learn from the complaint and improve our services.
- 3.2 We will seek to investigate and resolve complaints at the earliest opportunity. We will act promptly, ensure that customers are kept informed and make sure we are in full knowledge of the facts before making a decision.
- 3.3 We will offer a range of ways for all customers to report a complaint, and will provide clear information on the process.
- 3.4 We will ensure our handling of complaints is fair, complies with equality legislation and is undertaken within published timescales. When logging complaints, we will seek to identify customers who are vulnerable and account for their specific needs when handling their complaint.

Definition of a complaint

- 3.5 We will investigate all cases where a customer reports they are dissatisfied that we have failed to deliver our service or meet our responsibilities.

Scope

- 3.6 Complaints will be dealt with that meet our definition, which means we will seek to resolve service failures.
- 3.7 This Policy does not cover:
- requests for service;
 - complaints of anti-social behaviour – these are covered by whg’s Anti-Social Behaviour Policy;
 - complaints from providers of services to whg - contractual arrangements will apply in such cases;
 - cases where a legal claim is made against whg, including disrepair cases and insurance claims;
 - cases where a customer is taking a matter to court, or the matter is being dealt with by another statutory agency that has the power to resolve the complaint;
 - complaints reported to us more than six months after the incident or issue occurred – apart from exceptional cases; and
 - the approach to persistent or abusive customers will be dealt with in line with our Challenging Behaviour Policy (see 3.24).
- 3.8 We will accept complaints from our customers or anyone directly impacted by our services, including applicants for our homes. We will also accept complaints from someone acting on behalf of a customer.

Early resolution

- 3.9 When we are informed of a possible service failure, we will seek to resolve the issue at the point of capture to avoid the need for transferring responsibility for the issue wherever possible.

High risk complaints

- 3.10 Complaints identified as being high risk will be immediately escalated to the relevant Director to ensure that they are dealt with appropriately. These include:

- where there is a serious health and safety risk;
- where a large number of people are affected;
- where a customer is particularly vulnerable;
- breach in legislation; or
- very complex complaints.

Investigating the complaint

- 3.11 Where it is not possible to rectify the issue, a Manager will investigate the complaint promptly and check that whg's responsibilities and standards have been met. We will ensure decisions are based on the facts and are impartial.
- 3.12 Where a complaint covers more than one service, this will be investigated by the relevant Managers and co-ordinated by the Insight and Performance Team.
- 3.13 We will identify any failings, seek resolution, learn from the complaint and make any necessary service improvements. We will ensure the customer will be put back in the position they would have been in if there had been no service failure. Financial compensation will be considered in line with our Compensation Guide.
- 3.14 We will keep full records of our complaints investigations to enable clarity and effective review.
- 3.15 We will promptly notify the customer of the outcome of the investigation. If the investigation finds that there has been no service failure, we will explain clearly to the customer why this is the case.

Reviewing the complaint

- 3.16 whg's Insight and Performance Team monitors complaints to ensure they are resolved quickly and efficiently.
- 3.17 If a customer is unsatisfied with the outcome of the investigation, the Insight and Performance Team will review the case and identify any further action required. A functional Director will then review the complaint to check that we have made the right decision.
- 3.18 We will promptly notify the customer of the outcome of the review.

Panel Review

- 3.19 The complaint review panel consists of a Corporate Director and two whg Board or Committee members. If a complaint has been investigated and reviewed, but the customer remains unsatisfied, and if they request it, we will arrange a complaint review panel to hear their complaint.
- 3.20 To access the panel, the customer must first make a case arguing that outstanding issues from the original complaint have not been addressed or identify any failings in whg policy or meeting our legal or regulatory duties.
- 3.21 The panel will not consider cases that are concerned with a request for compensation which is contrary to whg's Compensation Guide. Neither will they consider cases where the action we have taken follows a procedure set out by statute or regulation that whg must comply with.

Designated person

- 3.22 In compliance with the Localism Act 2011, after a customer has completed our internal complaint process we will inform them that they can refer their case to a designated person or tenant panel for review or, after a period of eight weeks, to the Housing Ombudsman Service.

Housing Ombudsman Service

- 3.23 Our approach to complaints handling complies with the Housing Ombudsman Service 'dispute resolution principles'. These state that our approach to complaints should be fair, put things right if they went wrong and learn from complaints.

Persistent or abusive complaints

- 3.24 Complainants who are unreasonably persistent or abusive can lead to excessive demands on whg or unacceptable behaviour towards whg colleagues. In such cases, we may channel our contact with these complainants through agreed and appropriate routes to ensure cases are handled effectively, in line with our Challenging Behaviour Policy.

Data protection and confidentiality

- 3.25 We are committed to safeguarding the rights of our customers to confidentiality and privacy. All whg colleagues are required to maintain that duty of care towards information regarding customers and applicants, in line with data protection legislation and our Data Protection Policy.

Learning

- 3.26 We will learn from complaints, looking beyond the circumstances of the specific complaint, including wider resident feedback and reviews of service, to identify if anything needs to be put right in terms of our procedures, policy and wider service standards.

4. PERFORMANCE MEASURES AND TARGETS

- 4.1 Through the Customer Insight and Improvement Hub, we will measure, monitor and disseminate the customer experience to help improve our performance and deliver a high level of customer satisfaction.
- 4.2 We will specifically monitor and seek to improve the following two customer experience KPIs:
- the percentage of enquiries resolved at the first point of contact; and
 - the percentage of direct avoidable contact.
- 4.3 We will include the performance of our online customer portal in these KPIs as more customers use it to access our services. This will reflect the refocus of resources towards our digital channels and away from our Contact Centre or customer receptions. However, we will continue to maintain our focus on the quality of all contacts and will continue to learn from the customer experience.
- 4.4 We will independently survey customer satisfaction with key customer-facing services and this will be part of our suite of performance indicators.

5. MONITOR AND REVIEW

- 5.1 This Policy will be monitored by the Director of Business Excellence and reviewed every three years by the Customer Services Committee.

6. ASSOCIATED DOCUMENTS AND POLICIES

- 6.1 Documents and policies associated with this policy are:
- Anti-Social Behaviour Policy;
 - Care Act 2015
 - Challenging Behaviour Policy;
 - Compensation Guide;
 - Criminal Justice Act 2003
 - Data Protection Policy;
 - Data Protection Act 1998;
 - Dispute Resolution Principles – Housing Ombudsman Service;
 - Equality Act 2010;
 - Localism Act 2011;
 - Mental Capacity Act 2005
 - Regulatory Standards - Homes and Communities Agency; and
 - Safeguarding Policy.