



Circle Voluntary Housing Association

Feedback and Complaints Policy

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1. Our Values

The actions we take underpin our vision to make a difference by providing quality homes for people in housing need. At Circle Voluntary Housing Association (CVHA), we firmly believe that how we interact with our tenants, communities, colleagues and stakeholders is of fundamental importance. Our passionate commitment to caring about our tenants and the services we deliver has led to the development of our core values - six behaviour-based principles that speak directly to the characteristics we hold high.

WE HEAR

Willingness to embody all our values in a driven manner.

Empowerment of our staff and tenants.

Honesty allows for complete understanding, it aids in the delivery of integrity and putting our tenants' best interests at the heart of our decision-making.

Excellence reminds us of our continuous strive to be better.

Accountability benefits all, transparency will foster this, and the creation of solid and reliable documentation will ensure that this accountability is enforced.

Respect is the foundation of these values, without respect for ourselves, others and the service we provide we must ask ourselves why we put so much of our valuable time into the job we do.

2. Policy Statement

CVHA endeavours to always provide excellent services, but we know that sometimes things may not go according to plan. We have a Feedback and Complaints Policy and Procedure so that individuals can bring issues to our attention. We also recognise the value of Feedback, including Suggestions and Compliments. Through regular Tenant Satisfaction Surveys and the implementation of this Policy and Procedure, we seek to learn lessons from all stakeholder engagement, to continuously improve our services and operations.

3. Equality Statement

CVHA is committed to equality and diversity. We work hard to provide homes and services that meet the needs of diverse communities. We will provide training for our staff on equality and diversity to ensure that individuals are not discriminated against for reasons of:

- Gender
- Civil status
- Family status
- Sexual orientation
- Religion
- Age
- Disability
- Race
- Membership of the Traveller community.

4. Data Protection

CVHA takes its data protection responsibilities very seriously and is compliant with all current data protection legislation.

For further information, please refer to our *Data Protection Policy* located on our website.

5. Purpose

The purpose of this Policy is to:

- ensure all Feedback and Complaints are dealt with professionally, honestly, and appropriately;
- clearly identify and outline timelines for communicating steps taken;
- identify shortcomings in service provision and/or operating standards;
- ensure positive relationships with our stakeholders; and
- realise our WE HEAR values.

6. Scope

This policy applies to any individual or group external to CVHA who have been impacted by our services. This policy does not apply to a Complaint or Feedback from employees of CVHA.

The following issues will be dealt with outside of this Policy:

- Legal and insurance matters will be dealt with by our solicitors and/or insurers;
- Where a tenant is dissatisfied with a rent increase. These issues will initially be reviewed by the Income Management Team as per the Income Policy;
- Antisocial Behaviour (which can be pursued through our Antisocial Behaviour Policy);
- Complaints about services which are not provided by or on behalf of CVHA;
- A case where a tenant, or CVHA, has an outstanding adjudication or appeal to a tenancy tribunal lodged with the RTB, the matter will be dealt with as part of the ongoing RTB case.
- Complaints regarding our handling of your personal data can be forwarded to the Data Protection Commission.

Owner Management Company (OMC) Complaints

Where a CVHA tenant has a complaint relating to facilities and/or estate management where they live, this complaint should be submitted to CVHA, who will submit the complaint on their behalf to the Property Agent employed by the OMC.

As the complaint will be handled by the OMC/their representative, the complaints process will follow their policy and procedure, rather than CVHA's.

Throughout the course of the complaint submission and investigation, CVHA will keep the tenant informed of any developments, as they arise, and continue to advocate on their behalf.

7. Roles and Responsibilities

Responsibility for the approval of this document lies with the Board of Directors and CEO of CVHA.

It is the responsibility of the Leadership Team to authorise adjustment to policies, procedures and forms, and ensure they are effectively implemented.

It is the responsibility of the Management Team to ensure that policies, procedures and forms are effectively and consistently implemented within all departments.

It is the responsibility of all staff to consistently implement policies and procedures, as per the terms and conditions of their employment.

8. Legislation

CVHA complies with all legislative requirements and regulations, and sector performance standards. Specific policies, legislation and/or standards referred to within this document are listed in the References section.

9. Glossary and Definitions

9.1. Glossary

| | |
|-----------------|---|
| CVHA | Circle Voluntary Housing Association |
| CEO | Chief Executive Officer |
| Leadership Team | Director of Property, Director of Services, Director of Finance and Corporate Services, CEO and Executive Assistant to the CEO. |
| Management Team | Various Department Managers. |
| RTB | Residential Tenancies Board |
| TAG | Tenant Advisory Group |
| AHB | Approved Housing Body |
| AHBRA | Approved Housing Bodies Regulatory Authority |

9.2. Definitions

| | |
|-------------|--|
| Complaint | <p>An expression of dissatisfaction by one or more members of the public about CVHA's action(s) or lack of action(s), or about the standard of service provided by or on behalf of the organisation.</p> <p>This may apply where a Stakeholder believes that CVHA or a contractor/agent acting on behalf of CVHA:</p> <ul style="list-style-type: none"> • Has not followed our policies, procedures or service standards; • Has behaved in an unprofessional manner; • Has treated the Stakeholder unfairly; • Has caused an unreasonable disruption to Stakeholders quality of life; • Has not dealt with matters promptly or in full, or there are excessive or unexplained delays; • Has failed to meet the requirements of AHBRA's Standards for AHBs |
| Complainant | The individual or individuals who file a Complaint. |
| Compliment | An expression of satisfaction by one or more members of the public about CVHA's action(s), or about the standard of service provided by or on behalf of the organisation. |
| Contractor | Contractors, Agents, and anyone acting on behalf of CVHA. |
| Stakeholder | Members of the public who use, or are affected, by the services provided by CVHA. |
| Suggestion | Feedback from those using or who are affected by the services of CVHA or a contractor/agent acting on behalf of CVHA. A suggestion, as opposed to a <i>Complaint</i> or <i>Compliment</i> , may suggest areas for improvement and provide us with opportunities to improve services. |
| Tenant | An individual with a signed Tenancy Agreement with CVHA. |

10. Feedback (Compliments and Suggestions)

We welcome compliments and suggestions from all stakeholders. All staff are equipped to receive, action and respond to feedback. In addition, tenants may wish to offer feedback through their tenant representatives on the Tenant Advisory Group (TAG).

There may be instances in which a Stakeholder wishes to submit a Complaint to CVHA, but the Complaint does not refer to an action or service provided by or on behalf of CVHA. In such instances, the issue will be logged as Feedback, and the Stakeholder will be directed towards the appropriate Body with whom to lodge their Complaint. Where appropriate, CVHA will endeavour to support the Stakeholders submission to this relevant Body.

10.1. How to Offer Feedback

Feedback may be made in person, by phone, in writing (letter or email) or via our website. Feedback received via our social media platforms will be directed towards our website for formal submission. Where the Stakeholder requires support, the member of staff taking the Feedback will record the details on the Stakeholder's behalf.

10.2. Feedback Procedure

Once Feedback has been received, written acknowledgement of receipt will be sent to the Stakeholder within 5 working days.

This will be logged and reviewed on a regular basis at either team, management or leadership team meetings. From this feedback, actionable items are implemented and monitored, as appropriate.

Updates may be sent to the Stakeholder advising them of any actions or implementations arising from their Feedback, as applicable.

10.3. Anonymous Feedback

If Feedback is received anonymously, the Procedure still applies except for the process of correspondence with the Stakeholder.

10.4. Confidentiality

If the Stakeholder has requested that Feedback be submitted in confidence, the Stakeholder's identity will only be known by the recipient, except in the instances where we are legally required to disclose information given or discovered during an investigation, e.g. child/vulnerable adult endangerment/abuse, or any other illegal (or intention to commit illegal) activity. The Feedback will be processed as per the Procedure, with no mention of the Stakeholder.

11. Making a Complaint

11.1. How to make a Complaint

Complaints may be made in person, by phone, in writing (letter or email) or via our website. Complaints received via our social media platforms will be directed towards our website for formal submission. Where the Complainant requires support, the member of staff taking the Complaint will record the details on the Complainant's behalf.

Where a third party is lodging a Complaint, we will require written authorisation from the Complainant appointing the third party to act on their behalf. We will not begin an investigation or correspond with a third party without this.

A Complaint must be made within 12 months from the date of action that gave rise to the Complaint. A person may make a request in writing to have a Complaint investigated outside of

these time frames. The relevant Leadership Team member may extend the time limit for making the Complaint if special circumstances make it appropriate to do so. Examples of this are if new information becomes available or if the Complaint is of such potential seriousness it cannot be ignored. They will inform the person in writing of the decision to extend or not extend the timeframe within 5 working days of the request.

11.2. Confidentiality

If a Complaint is made in confidence, the identity of the Complainant will only be known to the investigating staff member and their line manager, except in the instances where we are legally required to disclose information given or discovered during an investigation, e.g. child/vulnerable adult endangerment/abuse, or any other illegal (or intention to commit illegal) activity.

The Complainant will be informed that it may not be possible to carry out a full and proper investigation of the Complaint without their consent to disclose their identity.

If the investigation of the Complaint requires the identity of the Complainant to be disclosed, the consent of the Complainant must be obtained before this information is disclosed to any third parties.

11.3. Tenant Complaints

A Complainant who has a CVHA tenancy registered with the RTB may contact the RTB to make a Complaint or register dissatisfaction with their landlord. The RTB generally expects tenants to have exhausted their landlord's internal procedures before becoming involved.

11.4. Persistent and Vexatious Complaints

A Complaint may be defined as "persistent" and/or "vexatious" if it meets one or more of the following criteria:

- The Complainant continues to pursue a Complaint when the Procedure has been fully and properly completed;
- The Complainant has been physically or verbally abusive or aggressive towards investigating staff; or
- Excessive contact has been made relating to a Complaint, placing unreasonable demands on staff.

Cases will be considered on an individual basis. The final decision of whether to define a Complaint as persistent or vexatious will be made by the CEO in conjunction with the relevant member of staff. If deemed persistent or vexatious, the Complainant will be notified and the Complaint closed.

11.5. Anonymous Complaints

Anonymous Complaints will be reviewed in accordance with the Complaint Procedure. Due to the nature of an anonymous Complaint, we cannot guarantee that they can be properly investigated. Due to the nature of some anonymous Complaints, they may be deemed malicious or vexatious and will be dealt with in accordance with this policy.

If an anonymous Complaint provides details that enable the identification of individual staff members, these details must be anonymised and there must be no record of any anonymous Complaint on staff files.

11.6. Complaint Management

We offer a multi-stage Complaint Procedure, however, we aim to close the majority of Complaints at the earliest possible stage. There are two possible outcomes of a complaint, whether it is upheld or not upheld, however, we cannot guarantee the actions that will arise out of a complaint.

| | |
|---------------------------------------|---|
| Frontline Complaint Resolution | Is managed by the member of staff who received the Complaint, or is delegated by their Line Manager/Supervisor, if necessary. Complaints relating to members of staff or more complex complaints (eg multi-departmental) will not be dealt with at this stage but will be internally escalated to Stage 1. |
| Stage 1 | The Line Manager/Supervisor at Frontline Stage will delegate to a member of staff for management at Stage 1. Complaints relating to members of staff will be handled by their Line Manager. |
| Stage 2 | The relevant Department Director will delegate to a member of staff for management within their Department at Stage 2. Complaints relating to members of staff will be delegated by the Leadership Team. This is the final stage for Complaints relating to staff. |
| Stage 3 | Leadership Team will delegate management of Complaints at Stage 3 to a Manager/Department Director from a different Department. |

11.7. Complaint Procedure And Timescales

| Stage | Procedure | Timeframe |
|---------------------------------------|--|----------------|
| Frontline Complaint Resolution | When a Complaint has been received, the staff member managing it will issue a response within 5 working days. This response will be either a concluding response, or to advise that the matter has been internally escalated to Stage 1. | 5 Working Days |

| | | |
|----------------|--|-----------------------|
| | If the Complainant is not satisfied with the concluding response, they can request the matter to be further investigated at Stage 1, no later than 10 working days from the response date. | 10 Working Days |
| Stage 1 | Once a Complaint has been escalated to Stage 1, a written acknowledgement, including contact details of the member of staff handling the investigation, will be sent to the Complainant within 5 working days. | 5 Working Days |
| | The Complaint will be investigated, and a response will be sent to the Complainant within 20 working days. Some Complaints may require a longer investigation, and in such instances, this will be communicated to the Complainant. Once the investigation is completed and the concluding response sent, the Complaint will be closed. | 20 Working Days |
| | If the Complainant is not satisfied with the concluding response, they can request the matter be escalated to Stage 2, no later than 10 working days from response date. | 10 Working Days |
| Stage 2 | If a Complaint has been escalated to Stage 2, the same process and timeframe will follow as per Stage 1, but this will be handled by a member of staff delegated by the relevant Department Director. Complaints about members of staff will be handled by a member of staff delegated by the Leadership Team at Stage 2. | Same as Stage 1 |
| | If the Complainant is not satisfied with the concluding response, they can request the matter be escalated to Stage 3, no later than 10 working days from response date. For Complaints related to members of staff, the response at Stage 2 will be final and binding. | 10 Working Days |
| Stage 3 | If a Complaint has been escalated to Stage 3, the same process and timeframe will follow as per Stages 1 and 2, but will be delegated by the Leadership Team to a Manager or Department Director of another department. | Same as Stage 1 and 2 |
| | The decision at this Stage is final and binding. | N/A |

11.8. Complaints Investigation

The investigation of Complaints is about fact finding and will relate solely to finding information to ensure a thorough and fair assessment of the Complaint, and will not include an investigation about the Complainant themselves.

The staff investigating the Complaint will only gather information that is relevant to the events surrounding the Complaint and will have training to do so.

11.9. Process Appeals

In the event that the Complainant believes that CVHA has not followed their Feedback and Complaints Procedure, once the Complaints process has been exhausted, they can bring a Process Appeal to the CEO.

The Process Appeal sits outside of the Complaints Process. An Appeal on Process is a separate investigation where the CEO will determine whether the member(s) of staff managing the Complaint correctly followed CVHA's internal Feedback and Complaints Policy and Procedure.

A Process Appeal must be made within 8 weeks of the date of Complaint closure. A person may make a request in writing to have a Process Appeal investigated outside of this timeframe. The CEO may extend the time limit for making the Appeal if special circumstances make it appropriate to do so. The CEO will inform the person in writing of the decision to extend or not extend the timeframe within 10 working days of the request.

The CEO will inform the Appellant of their decision within 45 working days from the date of receipt of the Appeal.

12. References

- [AHBRA Standards for AHBs](#)
- CVHA Data Protection Policy
- CVHA Anti-Social Behaviour Policy
- CVHA Income Policy
- CVHA [Feedback Section](#)
- Residential Tenancies Act
- [RTB Complaints Section](#)

13. Appendices

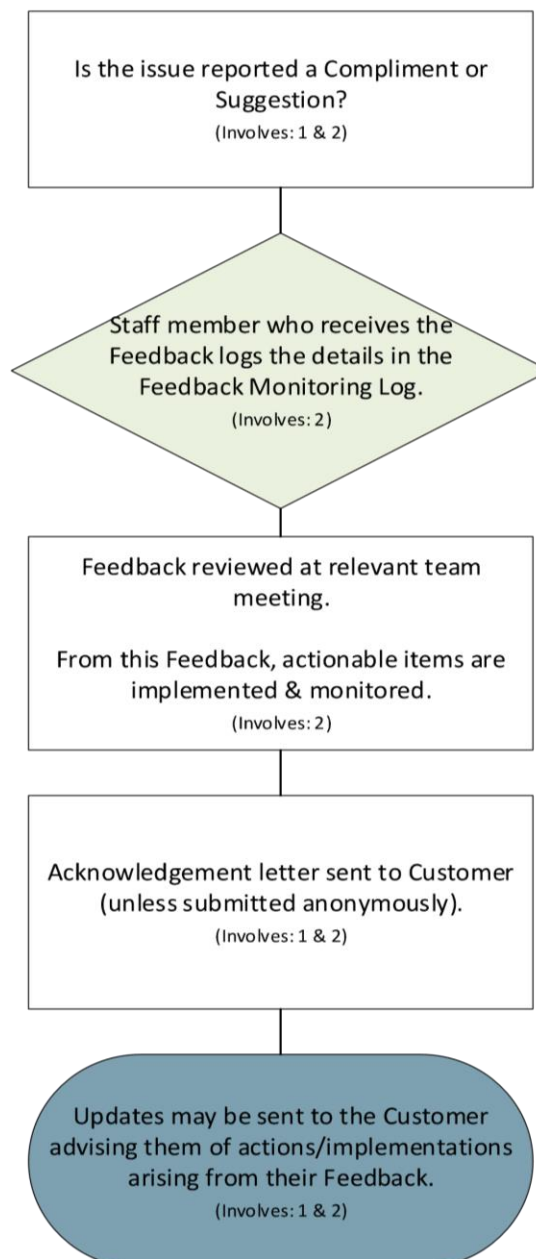
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|------------|--|
| Appendix A | Process Maps |
| Appendix B | Examples of Complaints vs Non-Complaints |

Appendix A

Those involved at this Stage (listed in steps):

1. Stakeholder,
2. Staff Member receiving Feedback

Feedback Process Map

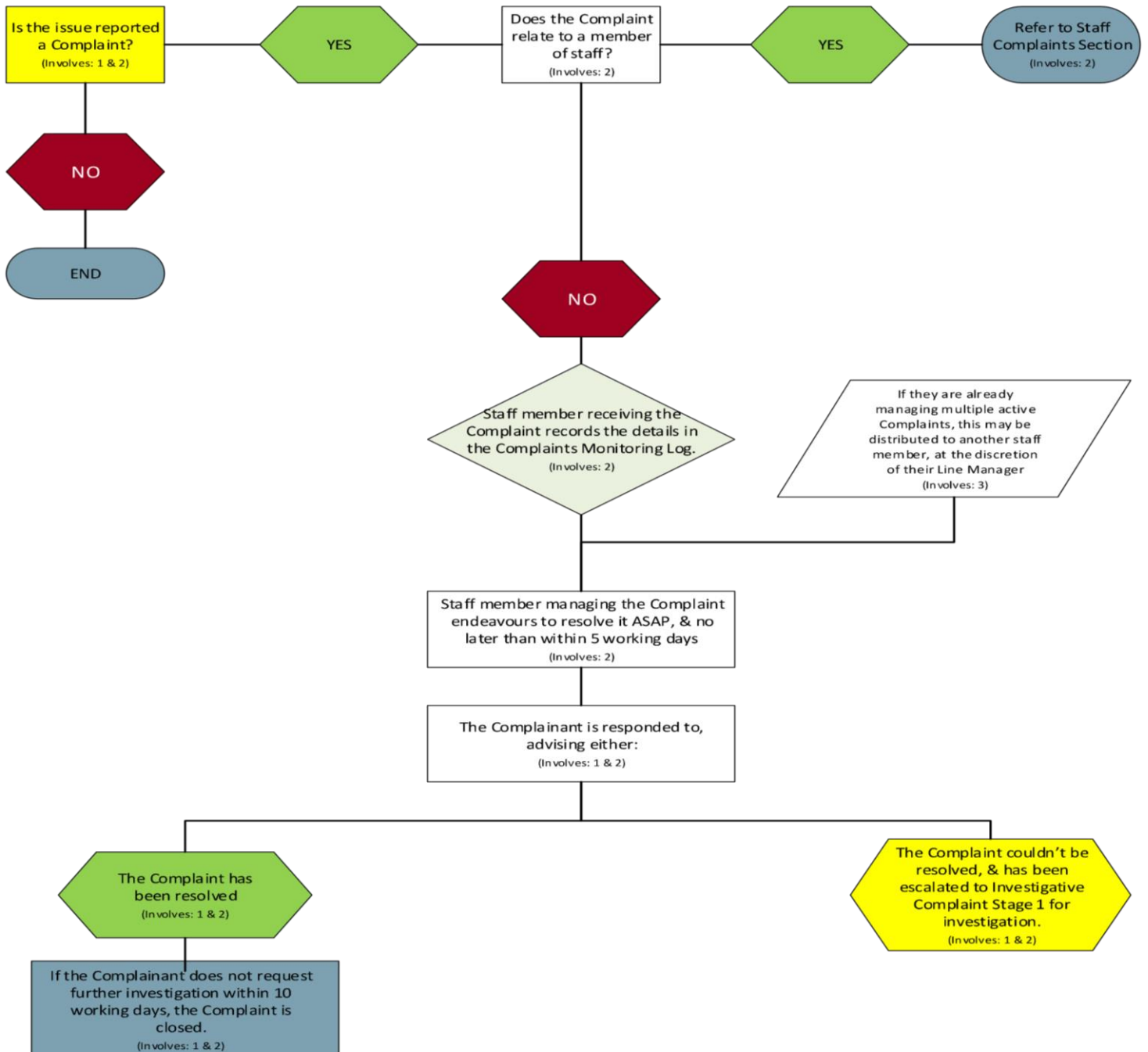


Complaints Process Map

Frontline Complaint Resolution

Those involved at this Stage
(listed in steps):

1. Stakeholder,
2. Staff Member receiving/managing Complaint,
3. Line Manager of the staff receiving/managing the Complaint



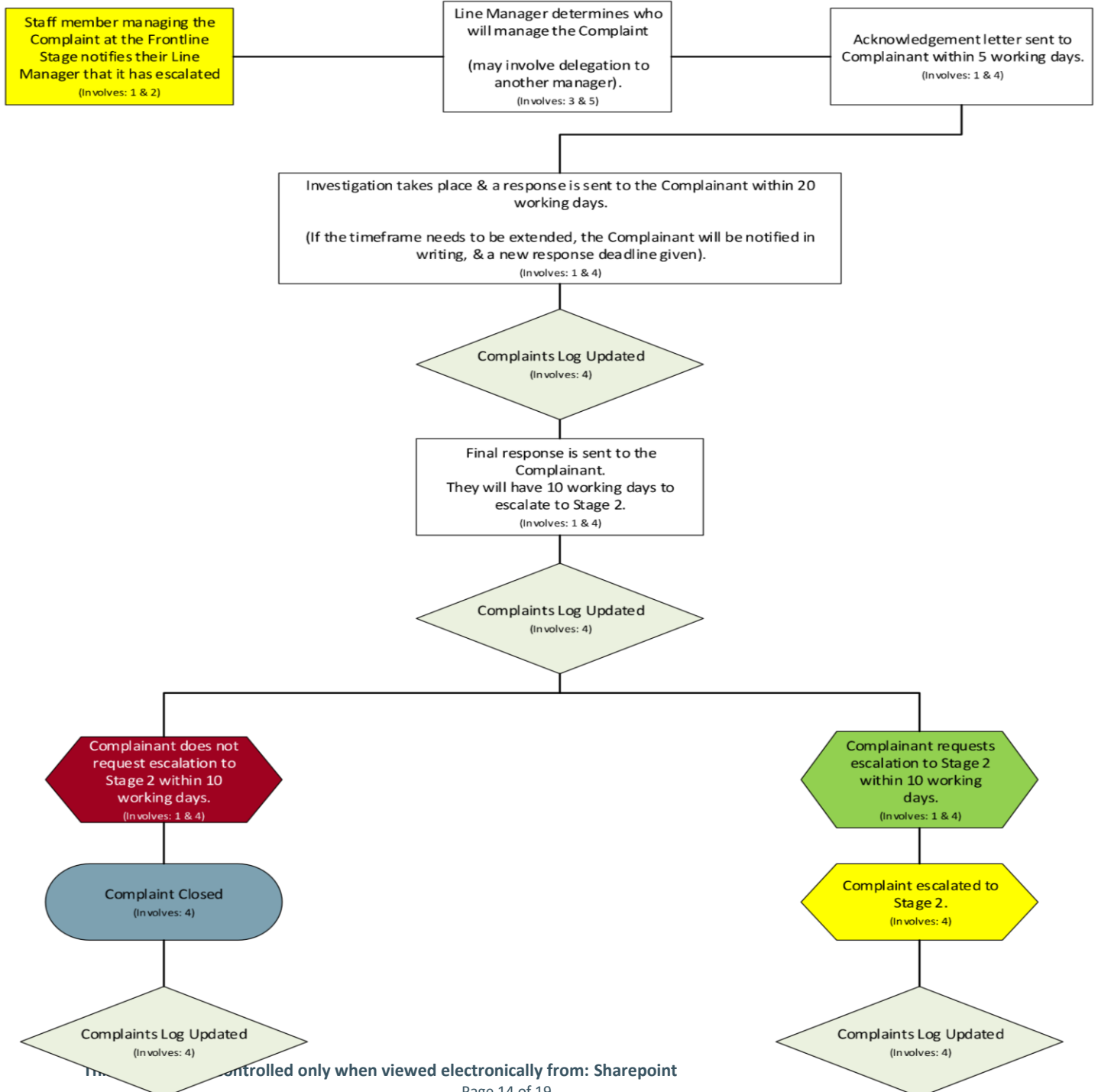
Those involved at this Stage

(listed in steps):

1. Stakeholder,
2. Staff managing Complaint at Frontline Stage,
3. Line Manager of staff who managed Complaint at Frontline Stage,
4. Staff Managing Complaint at this Stage.
5. Line Manager of staff managing Complaint at this stage.

Complaints Process Map

Investigative Complaint Stage 1



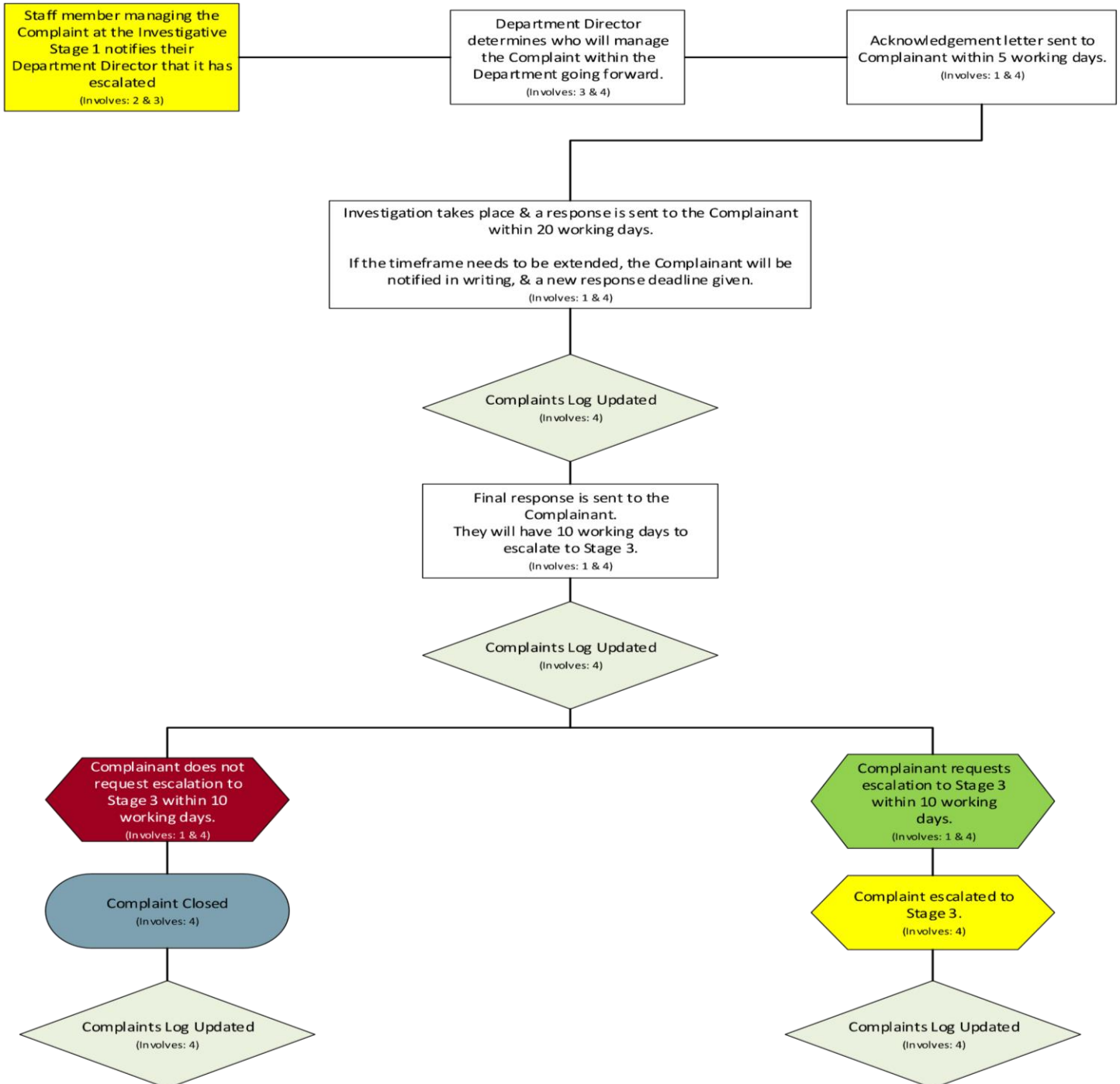
Complaints Process Map

Investigative Complaint Stage 2

Those involved at this Stage

(listed in steps):

1. Stakeholder,
2. Staff managing Complaint at Stage 1,
3. Department Director of staff managing Complaint at this stage.
4. Staff Managing Complaint at this Stage.



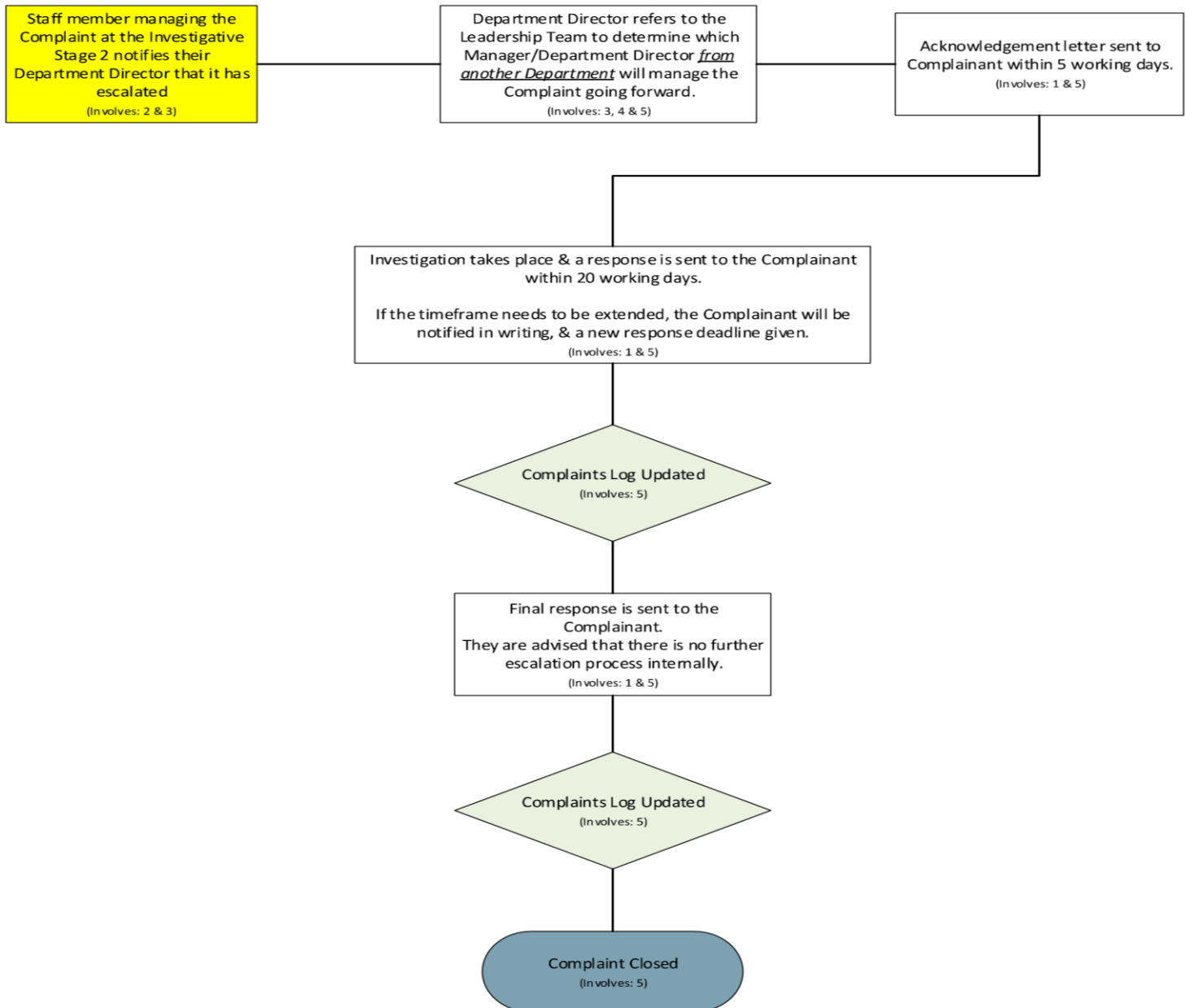
Those involved at this Stage

(listed in steps):

1. Stakeholder,
2. Staff managing Complaint at Stage 2,
3. Department Director of staff managing Complaint at Stage 2.
4. Leadership Team,
5. Manager/Department Director managing Complaint at this stage.

Complaints Process Map

Investigative Complaint Stage 3



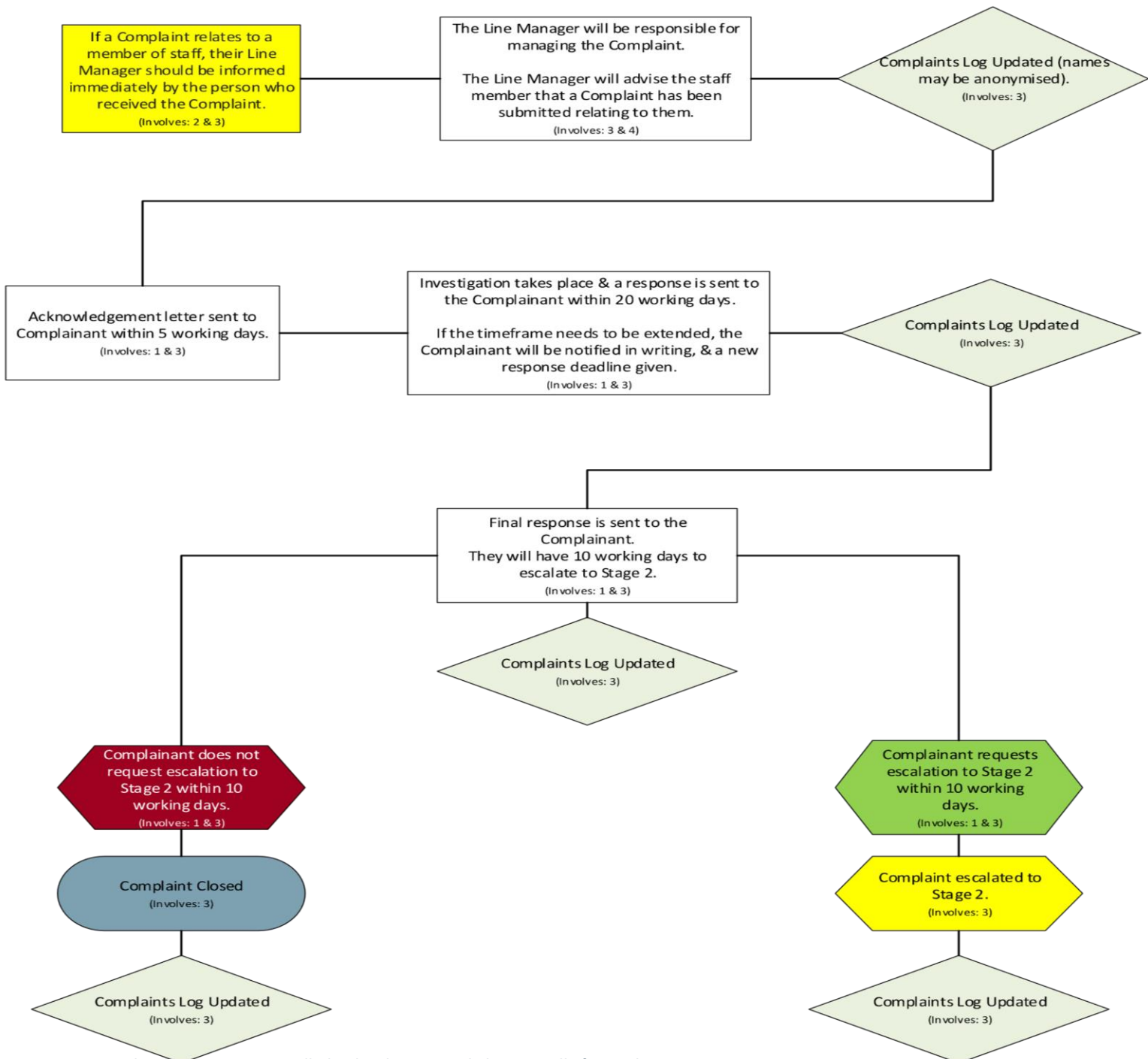
Those involved at this Stage

(listed in steps):

1. Stakeholder,
2. Staff Member who received the Complaint,
3. Line Manager of staff to whom the Complaint refers,
4. Staff to whom the Complaint refers.

Complaints Process Map

Staff Complaint Stage 1



Those involved at this Stage

(listed in steps):

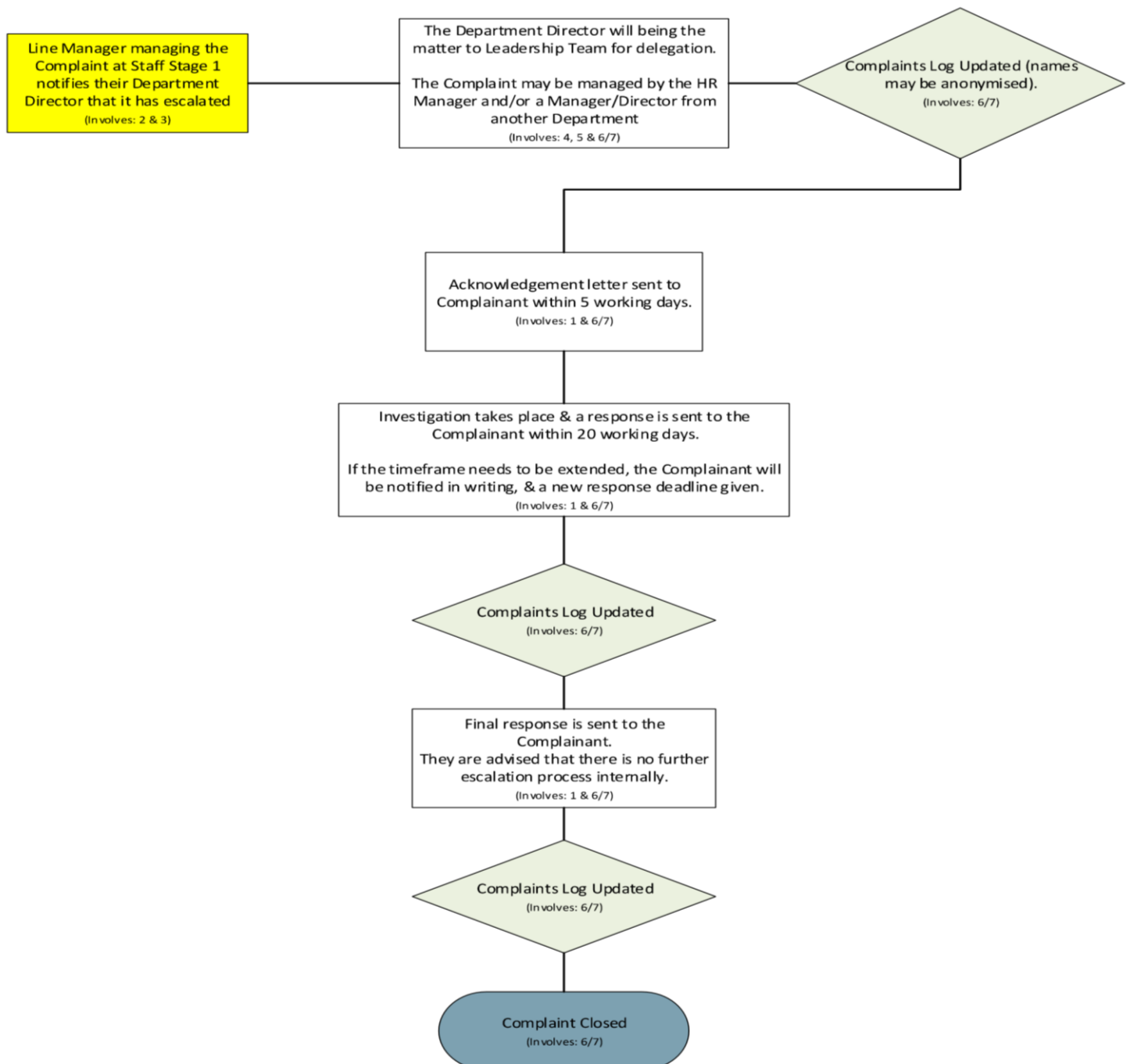
1. Stakeholder,
2. Line Manager of staff to whom the Complaint refers,
3. Staff to whom the Complaint refers.
4. Department Director,
5. Leadership Team
6. Manager/Director from another Department

Possible involvement from:

7. HR.

Complaints Process Map

Staff Complaint Stage 2



Appendix B

Examples of Complaints vs Non-Complaints

| COMPLAINTS | NON-COMPLAINTS |
|---|---|
| <p>"I reported that my boiler 2 months ago. I've phoned and emailed for an update 3 times since then but have had no response. I'm very annoyed about this and want to make a complaint."</p> <p><i>This is a complaint.</i></p> | <p>"My boiler broke today. I'm so angry about this because it's freezing outside. I want it fixed immediately."</p> <p><i>This is a repairs call.</i></p> |
| <p>"My neighbours had a party last night again. This is the third once in 2 weeks. I reported it to Circle already because the noise has kept me awake all night each time. Circle haven't done anything about this despite me raising the issue numerous times. I want to make a complaint about Circle's lack of action."</p> <p><i>This is a complaint.</i></p> | <p>"My neighbours had a party last night and the noise kept me awake until 5am. This is ridiculous and Circle needs to do something about it."</p> <p><i>This is a report of ASB.</i></p> |
| <p>"A contractor has been parking in my marked car parking space for 5 days. I have spoken to them and they won't move their vehicle. I would like to make a complaint about this as he is working for Circle."</p> <p><i>This is a complaint.</i></p> | <p>"My neighbour has been parking in front of my house on the street. I would like you to ask them to move their vehicle."</p> <p><i>This is not a complaint. Neighbours should be able to resolve this issue amongst themselves. Tenancy Services Officers will mediate if necessary.</i></p> |
| <p>Caller: "Every time I call, I can't get through to someone on the phones, this happens too often"</p> <p>Staff: "I am sorry about that, we are getting a new phone line and this should resolve that issue. In the meantime, would you like me to lodge a complaint?"</p> <p>Caller: "Yes, please put that through as a complaint."</p> <p><i>This is a complaint.</i></p> | <p>Caller: "Every time I call, I can't get through to someone on the phones, this happens too often"</p> <p>Staff: "I am sorry about that, we are getting a new phone line, and this should resolve that issue. In the meantime, would you like me to lodge a complaint?"</p> <p>Caller: "No, I don't want it logged as a complaint"</p> <p><i>This is not a complaint. However, this should be logged as feedback.</i></p> |