

Complaints Policy
Curo Group (Excluding Enterprise)

Policy Owner:
Chief Customer Officer

Accountable Lead
Director of Customer Contact



Policy Control	
Policy Level	Operational
Policy Reference	CS/CE/001/2019 (Corp)
Link to Strategy	Trusted Customer Service
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Approved by	Chief Customer Officer
Consultation	Customer Services Leadership Team, Resident Engagement Panel
Equality analysis	October 2022
Next review date	October 2025

Complaints Policy

1. Policy Statement and Aims

- 1.1** We try to make sure things don't go wrong, but occasionally they do. When that happens, the way we manage, resolve, and learn from our mistakes is critical to our objective of providing great customer service.
- 1.2** At Curo we welcome complaints. We encourage customers to give feedback and when they do, we'll listen, we'll try to resolve things quickly, and if we can't we'll explain why.
- 1.3** Customers have the option to request representation for their complaint, should they prefer it. They may also choose to have their representative accompany them during any meetings with the landlord.

- 1.4** One of our strategic priorities is really listen to customers, value their feedback and support, and act on what we hear. Curo looks to drive a complaint obsessed culture, encouraging and enabling all our colleagues to respond quickly and positively to complaints as soon as we know about them.
- 1.5** This policy supports those aims by setting out principles for the way we manage complaints. Our procedures put those principles into practice.
- 1.6** Curo publicises their complaints policy along with their self-assessment against the Housing Ombudsman Code on their webpage, providing clear guidance on how customers can directly contact the Housing Ombudsman.
<https://www.curo-group.co.uk/contact-us/feedback/complaints/>
- 1.7** At any time, customers have the option to reach out to the Housing Ombudsman. <https://www.housing-ombudsman.org.uk/>

2. Definitions

- 2.1** Curo means any or all organisations in the Curo Group, with the exception of Curo Enterprise Ltd, who maintain their own separate complaints policy.
- 2.2** A complaint is any expression of dissatisfaction; however, it is made, about the standard of service we have provided, actions or lack of action on Curo's part, our colleagues, or those acting on Curo's behalf, affecting an individual or group of residents.

A resident does not have to use the word 'complaint' for it to be treated as such. Whenever a resident expresses dissatisfaction landlords must give them the choice to make complaint. A complaint that is submitted via a third party or representative must be handled in line with the landlord's complaints policy. Third party permission is still needed to discuss the details of the complaint after it has been logged.

Initiating a report for the first time, such as for a repair or noise disturbance, typically doesn't constitute a complaint. However, the subsequent handling of the issue might evolve into one. For instance, if a resident expresses dissatisfaction with the response to their initial service request (e.g., suggested repair date), even while the request is still being addressed, it necessitates raising a formal complaint.

- 2.3** An unreasonable complainant is someone who makes repeated complaints, often on similar issues that have previously been

investigated, and may do so with the intention of causing inconvenience, harassment, or expense.

2.4 Unacceptable behaviour means being aggressive, making demands in a threatening way, not explaining what has gone wrong, and refusing to listen. This may be an isolated incident or persistent; it makes it difficult for us to consider a complaint and in extreme cases may mean that we cannot do so. We do not consider a customer to be behaving unacceptably just because they are assertive or determined.

3. Scope

3.1 This policy applies to complaints made by anyone about Curo or anyone working on its behalf.

3.2 The policy applies to all Curo organisations, with the exception of Curo Enterprise Ltd. Sometimes there will be variations between organisations; where this is the case, our procedures make it clear.

3.3 The policy also applies to services provided by others on our behalf. We'll deal with the customer's complaint and work with the contractor concerned to resolve the matter.

4. Roles and responsibilities

4.1 The Board and Executive, through the Policy Owner, make sure that the policy delivers Curo's strategic objectives and reflects corporate values.

4.2 The Accountable Lead is accountable to the Executive for the effective implementation of the policy in Curo, so that

- The principles are achieved through appropriate team plans and objectives, and
- procedures translate the policy objectives into practice.

4.3 The Customer Resolution Manager reviews the policy and recommends changes. They lead the Customer Resolution Team by providing support and guidance as well as by monitoring the standards of the service we provide.

4.4 Any colleague receiving the complaint will look to resolve this at Stage 1.

4.5 If the complaint remains unresolved or the complainant requests formal escalation, a Customer Resolution Adviser (CRA) will manage the next stage of the complaint at Stage 2. This is the final stage of Curo's internal complaints process. If the complainant remains unhappy with the outcome of the Stage 2 investigation, they will be

referred directly to the Housing Ombudsman, should they wish to request an independent review of their complaint.

4.6 Managers support the resolution of complaints throughout each stage. They also have a responsibility to make sure that their teams take complaint resolution seriously:

- Ensuring complaints are dealt with by the team in a timely and effective manner.
- Working with colleagues in other teams where that will help resolve complaints.
- Setting objectives for relevant colleagues.
- Understanding the root causes of complaints about their services.
- Learning from complaints and making changes to the way we do things.
- Prioritising the resolution of the complaint above other tasks.

4.7 If a complaint is about the behaviour of an individual colleague, this will be managed as a one stage process by the colleague's line manager.

4.8 Contract Leads work directly with contractors to resolve complaints about services provided by others. Complaints about the behaviour of a contractor will be managed as a one stage process by the Contract Lead.

4.9 All colleagues are responsible for responding to complaints in a way that is consistent with this policy:

- Taking the complaint seriously.
- Recording it.
- Understanding what resolution, the customer is looking for.
- Trying to resolve it quickly, at Stage 1 of our process, to the satisfaction of the customer.
- Working with other colleagues to deal with any concerns, queries, or questions.
- Learning from complaints received to make changes which will improve our service.

5 Principles

5.1 We welcome complaints. When things go wrong, we want to know, and we won't be defensive. We also learn from them to improve the way we do things. We want to resolve complaints and we treat them as a priority.

5.2 We know that every complaint, and the circumstances of the individual who makes the complaint, are different and that we need to be flexible in how we respond. We encourage colleagues to use their discretion, whilst recognising that some overall guidelines are necessary so that we can provide a consistent service. When handling complaints, colleagues should consider the customer's individual

needs and/or protected characteristics and this should be reflected in the offer of resolution, where applicable.

5.3 We make it easy for customers to make a complaint.

- A complaint can be made to any colleague, and they will deal with it, even if they work in a different part of Curo.
- Complaints can be made by telephone, email, social media, letter, webchat, WhatsApp, SMS, webform, MyCuro online portal or face to face.
- We accept complaints from a third party or representative, however we need explicit consent from the customer to discuss the complaint after it's logged.
- When we contact a customer about a complaint, we use plain language and, where necessary, provide large print, Braille, translation services or a verbal reply.

5.4 We record all complaints and use the information to improve our services.

- We'll review every individual complaint to see whether there are things we can change immediately.
- We carry out "root cause analysis" of complaints to identify underlying reasons for things going wrong.
- We will survey customers who have made a complaint to ask how we dealt with it.

5.5 The way we manage complaints reflects our values.

- Caring: we support customers who make a complaint, making the process easy for them.
- Respectful: we listen to our customers and act on what they tell us.
- Open: we keep customers informed and where we can't resolve a complaint in a way that satisfies the customer we'll explain why.
- Fair: we review the outcomes of complaints with customers and colleagues to make sure we're consistent in the way we approach and resolve complaints.
- Trusting: when we agree a resolution, we'll do what we say we'll do.

5.6 We will not generally identify individual members of staff or contractors when communicating with customers, except where this information is pertinent to the resolution of a complaint.

5.7 We may offer resolution (which may include compensation) without admission of liability.

5.8 Any resolution offered to a customer will be reflective of the extent of the service failings and the impact on the customer. Factors taken into consideration (length and frequency of situation; severity; impact on the customer; customer circumstances etc.) will apply to all cases.

6 Application

6.1 Our Complaints procedure sets out detailed guidance for colleagues on how to manage complaints. This uses a two-step process:

- **Stage 1:** wherever possible, agreeing a quick resolution.
- We will acknowledge a complaint within 5 working days of receiving it.
- We will offer a Stage 1 resolution within 10 working days, if possible.
- When we have offered a Stage 1 resolution, complainants will be given 10 working days to respond or provide evidence to support their claim, where required.
- If additional complaints are raised during the investigation, these must be incorporated into the stage 1 response if they are related, and the stage 1 response has not been issued.
- Where the stage 1 response has been issued, the new issues are unrelated to the issues already being investigated or it would unreasonably delay the response, the new issues must be logged as a new complaint.
- It is possible for the complaint case manager to ask to extend this timeframe, but they must notify and agree this with the complainant. Any extension must be no more than 10 working days without good reason, and the reason(s) must be clearly explained to the resident. If an extension is agreed the customer must be provided with the details of the Housing Ombudsman.
- If a request for escalation to stage 2 is received, residents are not obligated to provide an explanation for their decision.
- **Stage 2:** where we need to investigate further and propose a resolution.
- The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.
- Requests for stage 2 must be acknowledged, defined, and logged at stage 2 of the complaint's procedure within five working days of the escalation request being received.
- We will offer a Stage 2 resolution within 20 working days of the complaint escalation date, if possible.

- When we have offered a Stage 2 resolution, complainants will be given 10 working days to respond or provide evidence to support their claim, where required.
- The timeframes set out above are in line with the Housing Ombudsman's Complaint Handling Code.
- It is possible for the complaint case manager to ask to extend this timeframe, but they must notify and agree this with the complainant. Any extension must be no more than 20 working days without good reason, and the reason(s) must be clearly explained to the resident. If an extension is agreed the customer must be provided with the details of the Housing Ombudsman.
- Where a complainant fails to engage with Curo to progress the complaint management and subsequent resolution within the timeframe set by the case owner, their complaint will be closed due to no contact.

We know that for most complainants having their problem heard and acted on as quickly as possible is important. This is why we use a two-stage process so that the majority of cases can be resolved at Stage 1, and Stage 2 provides a more formal process for complaints whereby the customer remains unhappy with the first stage resolution.

- 6.2** We ensure consistency in complaint handling during both stages of the complaint process by delivering regular training, monitoring and sharing best practice from the Housing Ombudsman and completing quality assurance checks on a fair sample of cases investigated. Our complaints review forum advise on our compliance with this policy and review anonymised complaints. They also advise if we are making fair and right decisions when it comes to resolution, including compensation.
- 6.3** We encourage everyone to complain as soon as possible after the event; this increases the likelihood that we can resolve the matter. We won't consider complaints about things that happened more than 12 months ago, unless the issue is still ongoing; however, we will consider extenuating circumstances when applying this principle. We don't hold personal information for longer than we need to, so any complaint about things that happened twelve months or more ago may be more difficult to resolve.
- 6.4** Our approach is different for:
- Complaints to Curo Enterprise. A separate complaints procedure manages more effectively the more commercial nature of the organisation and the different nature of the service.
 - Complaints about termination of starter tenancies. Our starter tenancy policy and procedure outline an appeal process that in

these circumstances will be followed. The appeal process replaces our procedure.

- Complainants whose behaviours are unacceptable; we will decide on a case-by-case basis how to manage these complaints. We will write and explain why we are using a different procedure and how we are going to do this. We will ensure we take into account the Equality Act 2010 when considering managing these complaints.

6.5 It's important that colleagues are seen to be impartial when dealing with a complaint. Colleagues who:

- Have a family or other close connection to the customer.
- Were directly involved in the event that gave rise to a complaint.
- Feel otherwise unable to act impartially are not involved in trying to resolve the complaint.

Can declare this to their line manager and identify and agree handover of the complaint to a new complaint case manager. The customer is advised who the new case manager is.

6.6 We will not always accept a complaint and on those occasions, we will advise the customer why we have taken that decision. In these instances, we will provide the customer with details for the Housing Ombudsman should they wish to escalate this to them to review.

6.7 We would not raise a complaint if it directly relates to matters being pursued via legal channels, however, this doesn't include those being investigated under disrepair. In these instances, the customer will have the option to seek compensation via the complaint or the disrepair case, payments will not be awarded by both.

6.8 We see complaints as an opportunity to leave customers satisfied with our services after something has previously gone wrong. Our complaints procedure has that aim. Where that doesn't happen, customers will have a further opportunity to take the complaint to external arbitration. This means one of:

- A local MP or Councillor
- The Housing Ombudsman
- The National House Builders Federation
- The New Homes Ombudsman
- A support service commissioner
- The Information Commissioner's Office

We'll always write and explain which service is best suited to the customer and how to take a complaint further.

6.9 We provide training on complaints and how to manage them for all colleagues.

6.10 We publish information about complaints annually and this is available online and in a printable leaflet on request. This includes:

- The number, type and outcome of complaints.
- What we've learnt from complaints.
- What we've done as a result.

7 Associated documents

- Curo Strategic Plan
- Customer Resolution Equality Analysis
- Curo Complaint Procedure
- Enterprise Complaint Procedure
- Starter Tenancy policy and procedure
- Relevant care & support procedures which may be required by commissioning bodies and regulators.
- Compensation Policy & Procedure
- Curo Acceptable Behaviour Policy

8 Measures of success

We will measure success of this policy by:

- Reviewing customer feedback about our complaints process.
- Checking colleague conformance through a Quality Assurance process.
- Monitoring the time taken from receipt of a complaint to a resolution being agreed with the customer.
- Monitoring the percentage of complaints that are resolved at Stage 1.
- Using the Complaints Review Forum to check anonymised cases and collate feedback on how we handle complaints.

9 Equality

We've carried out an Equalities Impact Assessment (October 2022) which identified the potential for inequalities in the impact of this policy on different sections of the community. Monitoring of the effect of the policy is therefore in place.