

**Complaints, Compliments and Suggestions Policy
(Keelman and Karbon Combined)**

Responsible Officer	Managing Director, Keelman Homes
This policy is applicable to	Keelman Homes
Approved by	Keelman Homes Board
Date approved	16 November 2023
Frequency of review	Every 3 years
Date of next review	16 November 2026
Implementation date	1 January 2024
Key related documents (policy, procedure, customer literature)	Karbon’s Complaint, Compliments and Suggestions Procedure (Keelman Appendix) Karbon’s Compensation and Goodwill Payments Policy Karbon’s Unacceptable Customer Behaviour Policy Keelman’s Data Protection Policy Karbon’s Verification Procedure Karbon’s Antisocial Behaviour Policy Karbon’s Repairs and Maintenance Policy
Sources of best practice or guidance used in developing this policy	Housing Ombudsman Complaint Handling Code and Service

Document change history		
Version	Date	Changed sections
1	16 November 2023	New joint policy
2	25 June 2024	Updated joint policy

Consultation	
Consultation Group (if applicable)	Date of Consultation (if applicable)
Staff	2023
Union(s)	N/A
Customers	Customers consulted in 2016,2017,2019,2020,2021 on Karbon’s policy which has been adapted to create the joint policy - customer consultation has not taken place for the joint policy.
Human Resources / Organisation Development	N/A
Health and Safety Working Group	N/A
Data Protection	2023
Other stakeholder (please state)	2023: Keelman Homes Managing Director, Keelman Homes Board of Directors/Trustees.

Policy statement

At Keelman Homes and Karbon Homes, we recognise all forms of customer feedback as valuable pieces of insight that support us to understand how we're performing – where we're doing well and where there is opportunity for improvement.

One of our key strategic aims is to deliver an excellent customer service - however we know that sometimes things can go wrong and that it might occasionally be necessary to raise a complaint with us.

When a complaint is related to a service being delivered by Keelman, Keelman will hear the complaint and lead on the investigation and escalation. Where a complaint is related to a Karbon service, Karbon will hear the complaint and lead on the investigation and escalation.

The purpose of this policy is to provide a framework for dealing with complaints, compliments and suggestions.

It is supported by a procedure document for colleagues and a leaflet for customers, which both aim to simply explain how to use this core Karbon service.

Risk policy is designed to control (see note 3)

SR4 (Keelman) Failure to focus on the customer

SR6 (Keelman) Failure to manage effective corporate governance

4.3b (Karbon) Failure to comply with all statutory compliance and the RSH Regulatory Framework for Consumer Standards

8.2 (Karbon) Failure to deal with complaints, compliments and suggestions effectively or manage criticism leading to damage to our reputation with our customers

Key performance measures

- A quarterly report on complaints, compliments and suggestions is shared with the Keelman Homes Board, Karbon's Customer Committee, Karbon Management Team (KMT) and Karbon Resident Committee (KRC).
- PowerBi reporting is available on complaints, compliments and suggestions for management teams in our Customer Services Directorate and Development & Regeneration Teams.
- Within our organisational KPIs, the number of complaints upheld by the Housing Ombudsman Service is reported on and scrutinised by the Keelman Homes Board, and Karbon's KMT and Leadership Management Team (LMT) each month.
- Complaints, compliments and suggestions are viewable by service area by the relevant leadership team.
- Learnings from complaints are routinely shared across Karbon through Kore, with Karbon's Customer Committee, Karbon Management Team (KMT) and Karbon Resident Committee (KRC) via quarterly reporting and with customers on our website and in our emails, magazine and Customer Annual Report.
- Our Customer Experience Team retains an overview of the following complaint measures:
 - Number of complaints recorded, including stage, service area and category
 - Number of complaints open, particularly any over timescales
 - Number of complaints and service requests raised by MPs into Customer Experience
 - Number of issues and requests raised by the Housing Ombudsman
 - Complaint outcome decision (upheld/not upheld)
 - Details of any lessons that have been learned
 - The amount of any compensation offered

Definitions

A **'customer'** can be a tenant, leaseholder or any person, group or organisation who has reason to make a complaint, compliment or suggestion.

An **'advocate'** is customer's designated representative. This could be an MP, Councillor, third party or a family member

A **'service request'** is a request for one of the services we offer customers, such as a request for a repair to be completed or reporting antisocial behaviour issue. It may also be a query for information or an explanation or a request to put something right. Service requests are not complaints. Where a customer is dissatisfied with our approach to resolve the issue, or the outcome, they will be given the opportunity to make a complaint.

A **'complaint'** 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".

A **'Complaints Officer'** is the responsible person or team assigned by Keelman or Karbon to take responsibility for the complaint and ensure this policy is implemented correctly when handling individual complaints.

The **'Member Responsible for Complaints' (MRC)** is the Managing Director of Keelman Homes, who will liaise with the Housing Ombudsman on matters relating to Keelman Homes customers.

'Stage One' is the entry point to our complaints service. The emphasis is on resolving problems and putting things right with the minimum of delay. We carry out an investigation into any service failures at this stage.

If the customer is unsatisfied with the response provided at stage one, they may request that their complaint is escalated to **'Stage Two'** of our process. At this stage the complaint would be reviewed by a more senior member of staff to ensure that stage one was conducted thoroughly and that the right decision was reached.

A **'compliment'** is an expression of satisfaction with a service that we have provided, or regarding an individual colleague or team.

A **'suggestion'** is an idea to change the way we deliver our services for the benefit of all customers

Abbreviations

Karbon Management Team (KMT)
 Karbon Resident Committee (KRC)
 Leadership Management Team (LMT)
 Antisocial Behaviour (ASB)
 Information and Communications Technology (ICT)

1.0 Purpose of policy

- 1.1 The purpose of this policy is to provide a framework for dealing with complaints, compliments and suggestions.

The policy ensures that an open, non-defensive learning culture is embedded across both organisations. It will do this by having the necessary procedures and colleague training that recognises and celebrates success; welcomes complaints as a valuable learning tool and helps meet customer expectations by being clear on roles, responsibilities and service standards

2.0 Objectives

- 2.1 Both Keelman and Karbon are committed to providing an excellent customer service, through the effective handling and learning from complaints, compliments and suggestions.
- 2.2 The policy aims to provide an accessible, clear, consistent, fair and customer focused complaint experience, enabled through a positive complaint handling culture. We'll seek to listen, act, and make appropriate remedies in a timely fashion, which may include adapting to the individual customer or case.
- 2.3 To assure compliance with the Housing Ombudsman's Complaint Handling Code.

3.0 Complaints policies

3.1 How we communicate how to make a complaint

- 3.1.2 We want to ensure all customers can raise a complaint when they want to and the process is clear and easy to follow. To do this we:
- Provide information in our starter packs for new tenancies.
 - Have a dedicated section on our website.
 - Have a customer leaflet on how to make a complaint, including an easy read format and this is available in other formats on request.
 - We have a customer audio video, to explain how to make a complaint.

3.2 How customers raise a complaint

- 3.2.1 We offer a range of ways for customers to express a complaint:
- By telephone to Karbon's Customer Relationship Team on 0808 164 0111 between the hours of 8am and 6pm, Monday to Friday, or telephoning Keelman Homes office on 0191 4325820 between the hours of 9am-5pm, Monday to Friday.
 - By email to Karbon's Customer Relationship Team at: info@karbonhomes.co.uk or Keelman Homes at: enquiries@keelmanhomes.org
 - In writing to Karbon's Head Office address: Number Five, Gosforth Park Avenue, Gosforth Business Park, Newcastle upon Tyne, NE12 8EG or Keelman's Head Office address: Office's 19-20, Gateshead International Business Centre, Mulgrave Terrace, Tyne and Wear, NE8 1AN.
 - Face to face with any Keelman or Karbon colleague or a contractor working on our behalf
 - Via Karbon's social media pages, using X (formerly Twitter) Direct Message and Facebook Messenger

- Via Keelman Homes Facebook page and Facebook Messenger
- Via a Councillor or MP or other relevant third party (e.g., Housing Ombudsman or consumer rights organisation) or advocate.

3.2.2 We accept complaints from a customer's authorised representative. Our Verification Procedure outlines the process required for a 'Consent to Authorise'.

3.2.3 Customers are asked to explain; what they are unhappy with, the reasons for this and what they would like us to do about it. If they are unable to do this, we will use the information available to us.

3.3 The Housing Ombudsman

3.3.1 Customers can obtain advice from the Ombudsman throughout a complaint. Acknowledgement, extension and response letters contain their contact details.

3.3.2 Customers can escalate a complaint to the Ombudsman for investigation if they have completed stage 2 of our complaint process and the issues have not been resolved to their satisfaction.

3.3.3 The Ombudsman can be contacted by calling 0300 111 3000, emailing info@housing-ombudsman.org.uk, online at www.housing-ombudsman.org.uk or in writing to Housing Ombudsman Service, PO Box 1484, Unit D, Preston, PR2 0ET

3.4 Who can complain?

3.4.1 Anyone who receives a product or service from us, or anyone affected by a service that we provide.

3.4.2 A complaint made on behalf of multiple customers can be treated as one complaint. Communications will be directed to the nominated representative. We will seek permission from all customers in a group issue before we employ this approach.

3.4.3 Customers may have an advocate or representative complain their behalf.

3.5 Complaints we will investigate

3.5.1 In line with Housing Ombudsman guidance to the housing sector, we recognise complaints as:

"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."

3.5.2 The following list is a (non-exhaustive) guide to the range of complaints we will consider:

- Failure to provide a service or to achieve the required standards or quality
- A colleague/s attitudes and their actions or lack of actions relating to a service
- Dissatisfaction with the manner in which our standards and procedures have been adhered to
- Alleged discrimination.

- 3.5.3 A customer does not have to use the word ‘complaint’ for it to be treated as one. If a customer expresses dissatisfaction, we will give them the option to make complaint.
- 3.5.4 A complaint will be raised at the customer’s request, even if the handling of the service request remains ongoing. We will not stop acting on a service request if the customer complains.
- 3.5.5 Complaints must be raised within 12 months, as close as possible to when the issue first arose or when the customer first became aware of the problem.
- 3.5.6 If a customer wishes to proceed to the next stage, we ask them to do this as close as possible of receiving the stage 1 decision or within 12 months.

3.6 What is excluded by this policy?

- 3.6.1 Complaints will be considered in its individual circumstances and will only be excluded if there is a valid reason to do so. If we decide not to accept a complaint, we will record our reasoning, explain these to the customer and their right to take that decision to the Ombudsman.
- 3.6.2 Unless there is good reason, complaints excluded from our complaints process are:
- A request for a service, which is deemed to be a ‘Service Request’
 - The issue giving rise to the complaint occurred over twelve months ago
 - Legal proceedings have started. This is defined as details of the claim, such as the Claim Form and Particulars of Claim, having been filed at court
 - Issues that have previously been considered under the complaints policy
 - Concerns regarding annual rent and service charge increases, which must be escalated through the First Tier Tribunal.
 - Services not within our control e.g. Utility Companies, Local Authorities
 - Complaints about our money advice service. Customers who wish to complain about this service must follow the separate guidance in Appendix 1.

4.0 Complaints procedure

4.1 The complaints process has two stages

- 4.1.1 Stage 1 is the entry point to our complaints process. The emphasis is on resolving problems and putting things right as quickly as possible.
- 4.1.2 If all or part of the complaint is not resolved to the customer's satisfaction at stage 1, it will be escalated to stage 2. Customers can request for their complaint to be escalated to stage 2 with the person hearing their stage 1, or by any of the other contact methods listed in section 3.2.1. Stage 2 is our final response.

4.2 Keelman and Karbon responsibilities

- 4.2.1 The complaint will be handled by the organisation responsible for delivering the service on behalf of Keelman. At the point that the complaint is received it will be directed to the correct organisation (Keelman or Karbon) to acknowledge the complaint and appoint a lead investigator.
- 4.2.2 A central record of all Karbon complaints will be held on Karbon's ICT system. All complaints are logged on the day they are received (or the next working day).

4.3 The role of the complaint handler

- 4.3.1 A different complaint handler is allocated at each stage, to investigate and respond.
- 4.3.2 The complaint handler must:
- Deal with complaints on their merits, act independently, and have an open mind
 - Give the customer a fair chance to set out their position
 - Take measures to address any actual or perceived conflict of interest
 - Consider all relevant information and evidence carefully
 - Treat all customers with fairness, empathy and respect
 - Support vulnerable customers through identification of their needs and agreement on reasonable adjustments.
- 4.3.3 Engaging with the customer as appropriate, they will clarify, record and act on:
- What the complaint is about – the complaint definition (in the acknowledgment, we will set out our understanding of the complaint and the outcome the resident is seeking; if any aspect of the complaint or outcome is unclear, the resident will be asked for further clarification)
 - If appropriate, what elements we are not responsible for
 - The evidence needed to fully consider the issues
 - Any risks the complaint raises
 - What outcome/s would resolve the matter for the customer
 - Any customer vulnerabilities and any agreed reasonable adjustments for the complaint, including an explanation for adjustments we cannot make
 - Any urgent action/s that need to be taken.
- 4.3.4 They will consider the context of the complaint including factors in 4.3.2 and 4.3.3, and the customer's preferences, to consider which complaints can be responded to as early as possible, and which require further investigation.

- 4.3.5 Appropriate remedies can be provided at any stage of the complaint, and we will continue to resolve issues alongside any necessary investigation. This is without prejudicing consideration of the complaint or delaying the response timescales.
- 4.3.6 They will agree with the customer the frequency and method of communication and then maintain contact as agreed. Where a response will fall outside original timescales, they will agree with the customer how they will keep them informed.
- 4.3.7 The complaint handler will ensure a full record of the complaint is maintained on our system. This will include the original complaint, date received, all correspondence with the customer and relevant parties, any supporting documentation such as reports or surveys, outcomes at each stage and any learnings.
- 4.3.8 The complaint handler will oversee all remaining actions, including any remedies, closing the complaint once these have been completed.

4.4 Complaint handling standards- Stages 1 and 2

- 4.4.1 We will comply with the following standards at **stage 1**:
- Stage One complaints will be heard by a Team Leader, Manager or Head of Service at Karbon, or an appointed Investigating Officer at Keelman
 - Complaints are defined, logged and acknowledged within 5 working days of being raised.
 - We offer to speak to the customer to assist in investigating their concerns.
 - We give the customer a chance to comment on any adverse findings before a final decision is made.
 - We respond to stage 1 complaints in writing within ten working days of acknowledgement. The response issued will clearly (and in plain language) include the points listed at 4.5.3.
 - With good reason, the complaint can be extended up to another 10 working days by Keelman or Karbon or the customer. If extended by Keelman or Karbon, the complaint lead will inform the customer of why this is.
- 4.4.2 We will comply with the following standards at **stage 2**:
- Complaints are defined, logged and acknowledged within 5 working days of being raised.
 - Stage 2 cases are heard by a Head of Service, Assistant Director, Director or Executive Director.
 - We offer to speak to the customer to assist in investigating their concerns.
 - We will ask the following questions to understand why the customer remains dissatisfied:
 - I. What specific parts of the complaint have we not investigated?
 - II. What part of the response do you disagree with and why?
 - III. What would you like the outcome of your complaint to be (what would you like us to do)?
 - We give the customer a chance to comment on any adverse findings before a final decision is made.
 - We respond to stage 2 complaints in writing within 20 working days of acknowledgement. The response issued will clearly (and in plain language) include the points listed at 4.5.3.

- With good reason, the complaint can be extended up to another 20 working days by Keelman or Karbon, the complaint lead will inform the customer of why this is.

4.5 Responding to a complaint – at both stages

- 4.5.1 We will provide a complaint response when this is known, in line with our published timescales. Complaints will be responded to, where rectification plans are in place but may not have been concluded. This means not waiting for the completion of outstanding actions (e.g. outstanding repairs), so that reasonable complaint process timescales are achieved. Cases are closed once all actions are completed.
- 4.5.2 Where a customer raises additional issues during the investigation, these will be incorporated into the response if they are related, and the response has not been issued. Where the 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 will be logged as a new complaint.
- 4.5.3 At the completion of stages 1 and 2, we will confirm the following in writing, using clear, plain language, to the customer:
- a) Complaint stage
 - b) Complaint definition
 - c) Decision on the complaint
 - d) Reasons for any decisions made
 - e) Details of any remedy offered to put things right
 - f) Details of any outstanding actions
 - g) Details of how to escalate the matter to stage 2 if the individual is not satisfied with the response.
- 4.5.4 We will make reasonable adjustments for residents where appropriate under the Equality Act 2010. Any agreed reasonable adjustments must be kept under active review.

4.6 Complaint decisions

- 4.6.1 We categorise final decisions about complaints as one of three outcomes:
- Upheld - we agree the complaint was justified, in its entirety.
 - Partly upheld - we agree the complaint was justified in at least one element.
 - Not upheld - we do not agree that the complaint was justified.
- 4.6.2 Where something has gone wrong, any remedy reflects the impact of all failures on the customer. These can include:
- Apologising
 - Acknowledging where things have gone wrong
 - Providing an explanation, assistance or reasons
 - Taking action if there has been delay
 - Reconsidering or changing a decision
 - Amending a record or adding a correction or addendum
 - Providing a financial remedy
 - Changing policies, procedures or practices

4.7 Escalating a stage 1 complaint to stage 2

- 4.7.1 Customers can ask to escalate their complaint when stage 1 concludes if all or part of the complaint is not resolved to their satisfaction.
- 4.7.2 We will escalate a complaint unless there is a valid reason not to do so. Each case will be considered on its own merits.
- 4.7.3 Customers are asked, but not required to explain their reasons for requesting escalation to stage 2, so the review can address these concerns.

4.8 Escalating a complaint after stage 2

- 4.8.1 After conclusion of stage 2, the customer can ask the Ombudsman to consider investigating the complaint if they remain dissatisfied.
- 4.8.2 Leaseholders may refer their complaint in the first instance to the First Tier Property Tribunal in cases of lease or service charge disputes.
- 4.8.3 For complaints about a high-rise residential building, relating to structural failure and spread of fire (building safety risks) or the performance of an accountable person, can be referred to the Building Safety Regulator.

4.9 Handling a complaint differently

- 4.9.1 We may deal with a complaint differently (outside this policy). This would be if circumstances required us to act in the customer's best interests.
- 4.9.2 If there is a need to deal with a complaint differently, we will agree this with the customer, record why this is, and confirm this in writing or in an appropriate way.
- 4.9.3 If a complaint is raised or escalated outside of the 12 months, we apply discretion to accept those outside this time limit, where there are good reasons to do so.
- 4.9.4 For customers requiring adjustments, together we will consider options and agree what is reasonable in the circumstances, keeping this under review, examples are:
- Adding more ways to raise a complaint
 - Pausing a complaint
 - Allowing more time at each stage of the complaint for customers to respond
 - Allowing customers to communicate in ways as they need to
 - Providing replies and information in a different format
 - Providing translation services for documents and discussions
 - Allowing complaints raised or supported through a customer's designated advocate. This could be an MP, Councillor, third party or a family member. Support may include representing or accompanying customers in meetings.
- 4.9.5 Our Unacceptable Customer Behaviour Policy sets out our approach to managing the very few customers whose actions or behaviour are considered unacceptable. If a customer's behaviour is hampering the progress of the complaint, this will be explained to them, to get to a position to respond to their complaint. Where this persists, we will conclude the complaint based on available information.

- 4.9.6 If we are unable to comply with the Code due to exceptional circumstances, such as a cyber incident, we will inform the Ombudsman, provide information to customers who may be affected and publish this on our website. This includes sharing a timescale for returning to compliance with the Code.
- 4.9.7 We reserve the right to deal with a complaint differently (outside this policy) if circumstances require this. In such a rare case, we record why we have dealt with the complaint differently and inform the complainant accordingly in writing. For example, a customer's personal circumstances may change during the handling of the complaint and we may be asked to pause our handling indefinitely. We reserve the right to manage complaints on a case-by-case basis based on individual merit but will only seek to work outside of policy to act in our customer's best interests when there are extenuating circumstances.

5.0 General guidelines and information

- 5.1 To enable a timely and efficient response when submitting a customer complaint, the issue complained of should be explained as clearly and concisely as possible.
- 5.2 We recognise that customers engage with us in different ways to express the complaint for example in person by speaking or meeting with us or in writing. We support this through the range of ways mentioned in 3.2 and by supporting customers with reasonable adjustments where they are required.
- 5.3 Colleagues that are the subject of a complaint cannot investigate that specific complaint.
- 5.4 Although complaints can be received from a range of individuals, only our tenants, leaseholders, service users, customers where we have formed a legal relationship, or their advocates can escalate a complaint to the Housing Ombudsman Service. Leaseholders may refer their complaint to the First Tier Property Tribunal in cases of lease or service charge disputes.
- 5.5 If a customer complains about several subjects at once (in the same piece of correspondence), the correct person to investigate is the colleague whose service area is affected most. Karbon's Customer Feedback Specialist can be consulted to determine which service area would be best placed to manage the complaint, and in cases of severe complexity, whether their direct, centralised management of the complaint would be best for our customer. Where a complaint crosses a Keelman and Karbon service, we will work together to collectively resolve the issues and respond to the customer using a joined up approach.
- 5.6 Correspondence from public officials and external stakeholders should be responded to by the relevant Manager or Head of Service for the service area the service request or complaint is in relation to. Usually, public officials will communicate with us via email to raise complaints on behalf of constituents or complaints they themselves would like us to respond to. All MP emails should be shared with Keelman's Managing Director and Karbon's Customer Experience Email inbox, where the Customer Experience team will ensure the relevant service Manager or Head of Service is notified, that the service request or complaint is recorded in our ICT system, that a response is provided and that all other relevant stakeholders have been informed of the contact.
- 5.7 Public officials and external stakeholders include (this list is not exhaustive): MPs (or their representatives), councillors, civil servants, partnering contractors and agencies, funders, community organisations and voluntary groups and partnerships, the police, NHS and charities.
- 5.8 A complaint submitted via a public official or external stakeholder will be investigated as a new complaint unless a complaint for the same issue is already under investigation. If an ongoing complaint case already exists, the additional contact will be included in the ongoing complaint as further information, with a status update provided to the public official or external stakeholder.
- 5.9 Letters addressed to Board Members or members of the Executive Team should be handed to Keelman's Managing Director and Karbon's Customer Feedback Specialist, who will notify

the relevant Executive Team member and ensure the complaint is correctly logged within our ICT system.

- 5.10 Customers seeking compensation or financial redress do not need to make a formal complaint to have their request considered. Requests for and offers of compensation within a complaint will be considered in accordance with our Compensation and Goodwill Payments Policy.
- 5.11 Customers have a right to ask for personal information associated with their complaint. To do this they must make a Subject Access Request, as covered in Keelman's Data Protection Policy.

6.0 Continuous Learning and Improvement

- 6.1 Annually we will self-assess our complaint handling against the Code, submitting this to the Ombudsman. It will also be completed following a significant restructure, merger, change in procedures, or following an Ombudsman investigation if asked.
- 6.2 This policy will be reviewed every three years, by the Managing Director of Keelman Homes, Assistant Director of Customer Experience at Karbon, delegated by the Executive Director of Customer Service. The review will be brought forward if there are significant changes to good practice, regulatory or legislative requirements
- 6.3 On a quarterly basis, information will be reported to the Keelman Homes Board, Karbon Customer Committee, KMT and Karbon's Resident Committee. The report must include all complaints, compliments and suggestion statistics, plus details of any 'lessons learned' and recommendations for service improvements.
- 6.4 Learnings from complaints are routinely shared internally at Keelman Homes with staff members and the Non-Executive Board, reported quarterly with the Karbon Customer Committee, Karbon Management Team and Karbon Resident Committee and published to customers via both company's websites, customer emails, customer magazine and Karbon's Customer Annual Report.
- 6.5 On a quarterly basis, information regarding Keelman Homes' customer complaints (if investigated or reviewed by Karbon), compliments and suggestions is reported by Karbon to Keelman Homes. The report contains 'Key performance measures'. Keelman Homes' Operations Manager is responsible for identifying trends in these service areas and considering whether service improvements can be made as a result of any learning from this information.
- 6.6 The Chair of the Karbon Customer Committee, as a member of our Group Board, is appointed to have lead responsibility for complaints to support a positive complaint handling culture at Karbon. Keelman Homes' Managing Director is the 'Member Responsible for Complaints' (MRC) at Keelman, and works alongside Karbon's MRC on all issues relating to Keelman Homes' tenants. Keelman's MRC, working with the Keelman Board, carries out analysis of performance relating to complaint handling.
- 6.7 Keelman Homes Managing Director is responsible for delegating the monitoring, review and implementation of this policy.

7.0 Compliments

- 7.1 Compliments are important to us as we like to know if customers have received an excellent service, or if our colleagues have been especially polite or helpful. This will enable us to thank the colleague and share good practice.
- 7.2 Compliments can be made by contacting us via any of the methods outlined in section 3.2.1.
- 7.3 A record of all reported compliments will be held on our computer system.
- 7.4 Where customers have provided a compliment in writing, we will reply in writing to acknowledge its receipt.

- 7.5 Compliments will be included in quarterly reporting to the Keelman Homes Board, Karbon Customer Committee, Karbon Management Team and to the Karbon Resident Committee.
- 7.6 A selection of compliments will be used in a regular round up in our internal communications.
- 7.7 Compliments will also be regularly reviewed at service team level during Team Meetings to highlight best practice.

8.0 Suggestions

- 8.1 It is important to hear customer views, including suggestions, about how we can improve our policies, processes or the services we provide our customers.
- 8.2 Suggestions can be made by contacting us via any of the methods outlined in section 3.2.1.
- 8.3 A record of all reported suggestions will be held on our computer system.
- 8.4 Where customers have provided a suggestion in writing, we will reply in writing to acknowledge its receipt.
- 8.5 Suggestions will be included in quarterly reporting to the Keelman Homes Board, Karbon Customer Committee, Karbon Management Team and to the Karbon Resident Committee.
- 8.6 A selection of suggestions will be used in a regular round up in our internal communications.
- 8.7 Suggestions will also be regularly reviewed at service team level during Team Meetings to highlight best practice.

9.0 Equality, Diversity and Inclusion

- 9.1 This policy is applied in line with our Equality and Diversity Policy and the associated legislation including the Public Sector Equality Duty and Equality Act 2010. At Keelman and Karbon we aim to eliminate discrimination, promote equality of opportunity, foster good relations and define the nine protected characteristics of age, disability, gender reassignment, marriage or civil partnership, pregnancy or maternity, race, religion or belief, sex, or sexual orientation.
- 9.2 However, we like to go even further. Beyond these protected characteristics we also take into consideration additional factors such as socio-economic status and language barriers which may also play a part. Our vision is for everyone to be treated fairly, have equality of opportunities, freedom, respect and access to our services.
- 9.3 To help us achieve this, we will work to improve accessibility for all, offering reasonable adjustments, adaptations and discussing ways that we can work to remove any barriers. A reasonable adjustment involves making a change to the way that we usually do things. We work together to look at options and agree what would be reasonable in your circumstances an example of this may be:
 - Allowing more time at each stage of the complaints process for customers to respond
 - Allowing customers to communicate in writing or verbally, as they require
 - Providing our replies and information in a different formats when required
 - Providing translation services for documents and discussions

- Allowing complaints to be presented through customer's designated public official as their advocate, such as an MP, Councillor or relevant third party such as a family member or advocate. Our Verification Procedure outlines where, when and how consent is required.

- 9.4 All of our customer policies and key information are made available on the Keelman Homes and Karbon Homes website. Reasonable adjustments that can help, for example to make our information and services more accessible, are sign language and language interpreters. We will work to improve accessibility for everybody that we deal with offering reasonable adjustments, adaptations and discussing ways that we can work to remove barriers that you may experience. A reasonable adjustment involves making a change to the way that we usually do things.
- 9.5 We work together to look at options and agree what adjustments would be reasonable in our customer's individual circumstances.
- 9.6 This policy is applied in line with Karbon's Approach To Vulnerability Policy. Everyone matters. We want people to be treated fairly, have equality of opportunities, freedom, respect, and access to our services. We will offer support, reasonable adjustments, and adaptations to remove barriers. We will discuss with our customers what is reasonable and appropriate. In delivering this service we may need to escalate a particular case – if we do then customer vulnerabilities will be considered as part of the decision-making process.

We will support people with vulnerabilities to deliver this service. We will work alongside external agencies such as social services, the police and fire services and other appropriate agencies to help and support people with vulnerabilities in the delivery of our services but also to ensure we meet our statutory and regulatory requirements as a social landlord. Details are provided in the appropriate areas in this policy. All our customer policies are available on the website

9.0 Data Protection and Privacy

- 9.1 We have a clear policy on data protection and sharing data with other partners/third parties under the requirements of the UK General Data Protection Regulation, the Data Protection Act 2018 and other associated legislation. This is clearly set out in the Data Protection Policy available on the Keelman Homes website.