

Biield Improvement Group

Scrutiny Report

'The Life of a Complaint'

May 2019



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1. Introduction

This is the Bield Improvement Group's (BIG) third scrutiny report. The focus for this report has been to work through the complaints process within Bield through tracking the 'Life of a Complaint' and it includes recommendations that the group believe would have a positive impact in this area of work in the organisation.

BIG was launched in 2016 and is made up of Bield tenants across Scotland. Through this scrutiny exercise the group has been working with Bield staff to identify where differences can be made to the complaints process. We would like to take the opportunity to thank the BIG members for their voluntary time and commitment and the staff of Bield Housing & Care for participating in this scrutiny review.

2. Background and development of the Bield Improvement Group

In planning for the Scottish Social Housing Charter, Bield Housing & Care, in discussion with tenants, agreed to develop a body which would have a role in scrutinising the services provided by Bield.

The group initially undertook a training programme provided by the Tenants Information Service (TIS) which covered the following key areas:

- The Scottish Social Housing Charter and the new regulatory requirements
- The role of tenants in the self-assessment process
- The role and remit of a tenant scrutiny group
- Practice examples of how tenants are involved in scrutiny across Scotland
- How to develop a terms of reference and code of conduct
- The range of scrutiny activities that can be used to assess services.

BIG was developed during this training programme and the main role of the group is to:

- Work on behalf of Bield tenants and service users to ensure that housing services are delivered to a high standard
- Ensure that tenants and service users are at the heart of the business of Bield
- Work with Bield to continually review and improve housing and care services
- Make recommendations to the Senior Management Team (SMT) and the Board of Management on how housing services can be improved
- Independently review the performance and delivery of housing and care services by Bield
- Take account of tenant satisfaction, and value for money for tenants and service users.

The work of BIG is based on the following core standards:

- Being accountable to tenants and service users
- Being transparent
- Reflecting the needs and aspirations of tenants and service users
- Respecting the decision making role of the board
- Making recommendations based on robust evidence.

Following the establishment of the group further training and support from the Tenants Information Service was provided on:

- Understanding the Charter
- The Annual Return on the Charter
- How to understand performance data and benchmarking.

The support from TIS and other tenant groups was invaluable in assisting the development of the group to be able to carry out scrutiny exercises resulting in recommendations that will benefit tenants and Bield.

3. The third scrutiny activity

Following the report of recommendations to SMT and the Board for the second scrutiny activity, 'The Life of a Repair', the next area of scrutiny was considered. The group had previously been advised by TIS that there are several issues to consider when selecting an area for scrutiny. These are:

- Personal views of tenants
- Performance information
- Views of the landlord
- Complaints information
- Any regulatory concerns

After considering the above, the group agreed that they would like to review the complaints process within Bield, considering the different steps of the complaints process and how this could be made more transparent for tenants, or other parties that wished to raise a complaint.

4. The Life of a Complaint

Following agreement by the group that this would be the topic to work through in this scrutiny exercise, an action plan was developed which included the following activities:

- Review of relevant legislation
- Review of publicity material and communications from Bield relating to making complaints and suggestions
- Review of policies and procedures used by Bield
- Review of policies and procedures used by other landlords
- Review of performance information presented by Bield relating to complaints and submitted for the ARC
- Survey to be sent to staff about the complaints process

Over the course of the exercise BIG met monthly to carry out the tasks listed above, to understand how this area of work operates in more detail.

Following consideration of the above information and discussions amongst the group we noted the following recommendations.

5. Findings and Recommendations

Using the above activities as a basis for information gathering and analysis, the group decided to group the recommendations into 4 themes: Overall Process, Communication, Process and Training. The following recommendations are grouped under each of these themes.

A. Overall Process

Recommendation 1:	<p>A <i>Complaints Action Group</i> should be created to analyse a sample of complaints received by Bield.</p> <p>This group should consist of both staff and tenants who would meet on a quarterly basis. Staff on this group should represent different areas of the organisation to ensure any feedback or further recommendations can be implemented so improvements can be made going forward.</p>
Reasoning:	<p>Creating a Complaints Action Group would enable any common themes and trends to be identified and highlight whether complaints of a similar nature are dealt with consistently across the organization.</p>

Management Action	Timescale
This is a reasonable recommendation and would be helpful to analyse complaints made to Bield, particularly in terms of how complaints are addressed and the consistency of responses. Under the new structure the group would be within the remit of the Head of Policy and Customer Standards, but may also need to consider including other Head of Services or operational staff as required. There would also need to be consideration given how tenant representatives are selected.	To be actioned after the full organisational restructure has been implemented.

B. Communication

Recommendation 2:	<p>Revising and improving the language used in the complaints leaflet to ensure that compliments and suggestions were also highlighted and included in the contents to ensure that positive feedback could also be given.</p> <p>A new complaints brochure should be developed with clear guidance on how to make suggestions and give compliments as well as making a complaint.</p>
Reasoning:	The current complaints leaflet is limited to the complaints process and does not give information on how positive feedback can be provided to highlight good customer service or other aspects of Bield.

Management Action	Timescale
The complaints brochure should be redesigned in the way that it looks and the way that it reads, including the opportunity for tenants or other stakeholders to provide positive feedback.	New complaints brochure designed and consulted on by the end of September 2019 and to be published in October 2019, both online and in hard copy.

Recommendation 3:	<p>Creation of a mission statement within Bield's complaints literature to summarise the organisational perspective on this topic. The suggested mission statement is:</p> <p><i>Bield are dedicated to providing a high level of service. You will receive the assistance of well trained staff who are here to respond to your complaint, complying with any Policies and Procedures maintained by us. We are here to listen and learn from what you have to say and act upon it.</i></p>
Reasoning:	<p>There is need to summarise the complaints process and the expectation customers should have and also to highlight that the organisation uses complaints for learning and improving performance.</p>

Management Action	Timescale
<p>The mission statement suggested may need some adjustment in language, but including something similar to this can be accepted as a recommendation.</p>	<p>New complaints brochure designed and consulted on by the end of September 2019 and to be published in October 2019, both online and in hard copy.</p>

Recommendation 4:	<p>Information within the complaints brochure should be provided to reassure tenants that any complaint will be treated confidentially. The language used should be sensitive to the various needs of Bield's tenants.</p> <p>It should be clear that an anonymous complaint can be made, but that Bield would only be able to investigate this to a certain extent and would not be able to report on any outcomes.</p>
Reasoning:	<p>If a tenant feels they need to complain they should be able to do this confidentially and without any fear that doing so will have repercussions for them.</p>

Management Action	Timescale
<p>The language used in future complaints literature can be adjusted slightly to include this reassurance to tenants.</p>	<p>New complaints brochure designed and consulted on by the end of September 2019 and to be published in October 2019, both online and in hard copy.</p>

<p>Recommendation 5:</p>	<p>The design and layout of the complaints brochure should be changed to make it more user friendly and easier to navigate.</p> <p>The following points should be taken into consideration when developing a new complaints brochure:</p> <ul style="list-style-type: none"> ▪ An index to be added ▪ A section about ‘need help to complain’ should be more prominent and nearer the front of the brochure ▪ All Bield Office contact details should be separate from the ‘useful’ contact information ▪ Reference to receiving a unique complaint reference number once a complaint has been logged should be provided at key points in the brochure. <p>The design of the brochure should include some colour-coding, similar to the approach adopted in the new Bield at Home brochure.</p>
<p>Reasoning:</p>	<p>The current complaints brochure is difficult to understand in some places and the layout is not conducive to being able to be read clearly. It can also be difficult for a complaint to be identified without a reference number and it would be helpful to know the content of the leaflet and be able to easily navigate through the brochure.</p>

Management Action	Timescale
<p>Many of the recommendations can be implemented through the redesign of the complaints brochure. These recommendations are reasonable and will provide tenants/stakeholders with clearer guidance in a more user friendly format.</p>	<p>New complaints brochure designed and consulted on by the end of September 2019 and to be published in October 2019, both online and in hard copy.</p>

C. Process

Recommendation 6:	<p>There should be formal confirmation that a complaint has been made and this should include the unique complaint reference number.</p> <p>A complainant should be offered a choice in the way they are contacted, whether this is by letter, email or telephone and the complaint should always be referred to by a reference number to allow this to be followed up.</p>
Reasoning:	<p>There could be the potential of complaints not being recorded and there is not any way for a complainant to follow this up and the process may need to start again.</p>

Management Action	Timescale
<p>This recommendation can be implemented through a new complaints brochure, making those who complain aware of the ways they can make a complaint and also the expectations they can have of Bield, such as the provision of a unique complaint reference number.</p>	<p>New complaints brochure designed and consulted on by the end of September 2019 and to be published in October 2019, both online and in hard copy.</p>

Recommendation 7:	<p>Ensuring that after a complaint has been logged, it is being followed up. The current procedure should include a check to ensure that prior to a complaint being assigned, the relevant person to deal with a complaint is available to do so. This would ensure that timescales are kept to and deadlines are not missed.</p>
Reasoning:	<p>Currently complaints can sometimes be assigned to someone who is unavailable due to annual leave, sickness absence or other reasons and so the complaint is not acknowledged or dealt with in given timescales.</p>

Management Action	Timescale
<p>With the current complaints system it is a manual process and so at times a complaint may be assigned to someone who is absent from work, either through scheduled leave, sickness or other absence, but person assigning the complaint may not be aware of this. Currently the most practical way to deal with this is to ensure that the person</p>	<p>This should initially be Included as part of the e-learning training for all staff on handling complaints. Training should be refreshed after the new organizational structure has been implemented.</p>

<p>registering the complaint communicates with the relevant person prior to assigning the complaint. With the introduction of the CX system, the feedback module will allow alerts to be set up to ensure complaints are responded to and timescales are kept to.</p>	<p>CX is due to go live from June 2020 and the complaints systems migrated to this platform at this point.</p>
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D. Training

<p>Recommendation 8:</p>	<p>Ensuring that clear and consistent training on the complaints procedure is provided to all staff who would be logging complaints.</p> <p>As part of this recommendation, the e-learning module on complaints should be modified to include the recording of complaint reference numbers. Ideally this training would be refreshed every 6-12 months and reports could be used to identify the relevant staff who had not completed the training. Further training could also be provided on identifying what should be regarded as a complaint, but also what should not be considered to be a complaint and these messages should be reinforced to all staff.</p>
<p>Reasoning:</p>	<p>The survey replies from a wide range of staff illustrated that there are significant knowledge gaps in the complaints procedure and if these are addressed, the way complaints are logged and dealt with should improve.</p>

Management Action	Timescale
<p>E-learning training on handling complaints should allow staff to understand the procedures in place for dealing with complaints, with an emphasis on how these are recorded, assigned and the communication with the customer. Any complaint received should be assigned a reference number which the complainant is advised about. This could be emphasised to the relevant teams within customer services and business development departments to ensure this is being done.</p>	<p>This should initially be Included as part of the e-learning training for all staff on handling complaints. Training should be refreshed after the new organisational structure has been implemented.</p> <p>CX is due to go live from June 2020 and the complaints systems migrated to this platform at this point.</p> <p>Initial reminders to teams could be carried out immediately.</p>

Recommendation 9:	The complaints brochure should be issued as part of the new tenant packs. This is best practice measure and ensures that a new tenant has the information they need to make a complaint should they wish to do so.
Reasoning:	This information should be readily available from the time someone agrees a tenancy with Bield and also assures the tenant that they have a right to complain if needed and who to contact in this eventuality.

Management Action	Timescale
Complaints brochures can be included in new tenants packs going forward. When new complaint brochures are made, these could be included in any new tenant packs being made in each of the area offices.	New complaints brochure designed and consulted on by the end of September 2019 and to be published in October 2019, both online and in hard copy. To be included in new tenant packs after this.

The group understands that accepting some of these recommendations will require the complaints brochure to be re-designed and various processes and procedures to be adjusted. Where further clarity or assistance is required, the group are happy to support this to enable changes to be made.

6. Next Steps

This report will be shared with the Senior Management Team and after this with the Performance and Audit Committee and Board of Management. Following this and taking into account feedback received from these groups, BIG propose to prepare an article for the next edition of the Bulletin to summarise the recommendations of the scrutiny activity or to highlight the suggested recommendations that will be used in practice.

We anticipate Bield will respond to this scrutiny report through preparing an action plan which will outline the recommendations that will be taken forward and how these will be implemented, providing clear timescales. Where recommendations are not accepted, we hope to be given clear reasons why decisions have been made.

Further to this the Bield Improvement Group will undertake a review of this third scrutiny activity, so that we can continue to learn from the work undertaken and apply this to future exercises.

Appendix - BIG membership

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