

Policy statement

At 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.

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.

Definitions

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 support with an antisocial behaviour issue. It may also be a query for information or an explanation.

A **'make it right'** request is where we will act on issues and concerns which can be resolved quickly and informally, outside of the formal complaints process, at the first point of contact.

In line with the Housing Ombudsman Complaint Handling Code, our definition of 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".

If a customer wishes for their concern to be recorded as a formal complaint, **'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.

If the complainant is unsatisfied with the response provided at stage one, they may request that their complaint is escalated to **'Stage Two'** of our process. At stage two, a more senior colleague will investigate these concerns.

A **'compliment'** is an expression of satisfaction with a service that we, or anyone acting on our behalf have provided. This could be satisfaction with an individual member of staff, a team or a particular service area.

A **'suggestion'** is an idea shared with Karbon to change the way we deliver our services for the benefit of the wider audience, such as a change in policy or process.

Examples of entry points for each scenario and transition between each is also explained in detail in the Complaints, Compliments and Suggestions Procedure.

Abbreviations

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

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 the organisation. 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 Our approach to complaints, compliments and suggestions:
- Ensures consistency and fairness in complaint case handling and in handling of compliments and suggestions – with a customer-focused approach.
 - Commits to taking action to put things right and find appropriate remedies.
 - Supports a positive complaint handling culture through continuous learning and improvement.
 - Is non-discriminatory.
 - Is easily accessible and well publicised.
 - Is simple to understand and use.
 - Allows timely handling, with established timescales for responses and ensures customers are informed of progress.
 - Ensures a full and thorough investigation.
 - Respects customers' confidentiality.
 - Provides information to colleagues, Team Leaders, Managers and Directors so that services can be continuously improved.
 - Follows the Housing Ombudsman's Complaint Handling Code. We will continue to self-assess against it annually, as well as respond whenever the Code is revised.
 - Meets regulatory requirements.
 - Delivers a better service to customers by monitoring and measuring complaints, compliments and suggestions and taking action to listen and learn.

3.0 Policy detail

3.1 HOW DO CUSTOMERS MAKE A COMPLAINT?

- 3.2 We will make every effort to make sure all customers are able to access the complaints process and are aware of their rights and responsibilities. We offer a range of ways for customers to express a complaint:

- By telephone to our Customer Relations Team on 0800 533 5442 between the hours of 8am and 6pm, Monday to Friday
- By email to our Customer Relations Team at: enquiries@bykerct.co.uk or info@karbonhomes.co.uk
- In writing to our office address: 17 Raby Cross, Byker, Newcastle upon Tyne, NE6 2FF or our Head Office address: Number Five, Gosforth Park Avenue, Gosforth Business Park, Newcastle upon Tyne, NE12 8EG
- Face to face with any Karbon colleague or a contractor working on our behalf
- Via our website www.bykercommunitytrust.org or www.karbonhomes.co.uk
- Via BCT's or Karbon's social media pages, using Twitter Direct Message and Facebook Messenger
- Via a Councillor or MP or other relevant third party (e.g., Housing Ombudsman or consumer rights organisation).

- 3.3 We accept complaints from a customer's authorised representative. Our Verification Procedure outlines the process required for a 'Consent to Authorise'.
- 3.4 We will support the principle of customers seeking assistance and support from third party consumer rights organisations such as the Citizens Advice Bureau in pursuing their complaint. Karbon's Verification Procedure outlines the process required for a 'Consent to Authorise'.
- 3.5 Our Verification procedure outlines the position for MP and Councillor enquiries subject to following the legitimate interest lawful basis for processing the information. This means that unless the query is particularly sensitive in nature then the 'Consent to Authorise' process is not always required as a customer would have given implied consent when approaching their MP to contact us. Whilst we do not need to have a copy of this consent, if it is offered then colleagues should accept a copy and record it in our contact management system.
- 3.6 We will accept anonymous complaints, even though it can be difficult to conduct a full investigation without knowing the identity of the complainant. If a customer approaches us with a complaint but wishes to remain anonymous, we will explain the process to the complainant and ask how they want to be advised of the outcome of an investigation. Where we do not have any details of the complainant, colleagues will still log and investigate the complaint.
- 3.7 Customers are asked to explain; what they are unhappy with, the reasons for this and what they would like us to do about it.
- 3.8 Information on our approach to Complaints, Compliments and Suggestions can also be found within our starter packs for new tenancies and on our website at <https://www.karbonhomes.co.uk/about-us/open-and-transparent/complaints>. For the avoidance of doubt customers have the right to access the Housing

Ombudsman service throughout the complaint, not only when the complaint is exhausted, and the customer may wish to do so to obtain impartial advice from the Ombudsman's dispute support advisors during the complaints process.

3.9 WHO CAN COMPLAIN?

3.10 Anyone who may have been affected by a service that we provide.

3.11 COMPLAINTS WE WILL INVESTIGATE

3.12 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."

3.13 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.

3.14 WHAT IS EXCLUDED BY THIS POLICY?

3.15 The following are excluded from our complaints procedure:

- A first-time request for a service, which is deemed to be a 'Service Request', for example a report of anti-social behaviour or a resident requesting a repair. However, complaints about the provision of these services are accepted. Our ASB Policy and Repairs and Maintenance Policy both clearly set out our approach to accessing these services.
- A request for information or an explanation.
- Reporting of data breach incidents'
- Refusal of a Data Protection Rights request or disclosure of redacted or withheld information, where our decision is made on a lawful basis.
- A 'make it right' request, where we will agree to act on issues which can be resolved quickly and informally.
- A matter being dealt with through legal action or an insurance claim, or is currently subject to legal action, an insurance claim or a claim for damages. For the avoidance of doubt, legal action or a claim for damage is defined as action taken post issue of the claim at a civil court and after service of any claim form and particulars of claim upon us, but does not include communication prior to

issue of a claim such as sending a Letter of Claim under any Pre-Action Protocol that may apply. We may however hear elements of the complaint, such as those not related to the legal action and reserve the right to consider if a case should be heard.

- Dissatisfaction with a decision where a complainant has not used the relevant review procedure e.g., if a customer is not happy with a rent increase/decrease letter an alternative appeals procedure exists.
- Complaints about services provided by individuals or companies not within our control e.g. Utility Companies, Local Authorities etc.
- Expressions of dissatisfaction about our decision to take legal action or the outcome of legal action.
- Complaints about our money advice service - customers who wish to complain about our money advice service must follow the separate guidance in Appendix 1.

3.16 WHAT HAPPENS WHEN A CUSTOMER MAKES A COMPLAINT?

- 3.17 Often a customer's concerns can be resolved informally and quickly at first point of contact and do not need to go through our formal two stage complaint process. If a customer wishes for their concerns to be recorded as a complaint, then colleagues should willingly do so using the guidance above, which outlines issues that Karbon will investigate and those excluded from our policy.
- 3.18 If a customer wishes for their concern to be recorded as a complaint, Stage One is the entry point to our complaints service. Colleagues should always try and help a customer correct any issues they have at first point of contact. The emphasis is on resolving problems and putting things right as quickly as possible.
- 3.19 Stage One complaints are expressions of dissatisfaction that cannot always be handled at first point of contact, therefore they cannot be managed and responded to within the same day.
- 3.20 A central record of all complaints will be held on our ICT system. All complaints are logged on the day they are received (or the next working day).
- 3.21 It is possible that customers may disagree with our explanation or suggestion of actions to put things right. After recording the complaint in our ICT system and discussing the issue with a colleague, if an acceptable resolution cannot be agreed upon then customers have the option to escalate their complaint to Stage Two. Customers can request for their complaint to be escalated to Stage Two of our process during the same Stage One conversation they are having about their concerns; or by any of the other contact methods listed in section 3.2.
- 3.22 A lead will be allocated at each stage to investigate and respond to a customer complaint. The assessment of the issue should include:
- What the complaint is about
 - What evidence is needed to fully consider the issues

- What risks the complaint raises
- What outcome would resolve the matter for the customer
- Any urgent action that we need to take.

- 3.23 To ensure fairness, processes and procedures require the responding colleague to:
- Deal with complaints on their merits
 - Act independently and have an open mind
 - Take measures to address any actual or perceived conflict of interest
 - Consider all information and evidence carefully
 - Keep the complaint confidential as far as possible, with information only disclosed if required for a proper investigation.

- 3.24 We will adhere to any arrangements agreed with the complainant in terms of frequency and method of communication and will keep them regularly updated and informed even where there is no new information to provide.

3.25 COMPLAINTS STAGES ONE AND TWO

- 3.26 A copy of our Karbon Homes Complaints leaflet, or links to the website should be included in acknowledgement letters or emails so that the customer knows how the process works, what to expect and how to get support from the Housing Ombudsman service.

- 3.27 We will comply with the following standards:

Stage One

- Complaints are acknowledged within five working days of being raised.
- Stage One complaints will be heard by a Team Leader, Manager or Head of.
- We will offer to telephone the complainant to assist in investigating their concerns before investigations are concluded.
- We will give the customer a fair chance to comment on any adverse findings before a final decision is made. Where appropriate, offering to talk to the complainant before sending the written response.
- We will respond to Stage One complaints in writing within ten working days of receipt.
- With good reason, the complaint can be extended up to another ten working days by Karbon or the customer, if by Karbon, the complaint lead will inform the customer of why this is.
- If the complaint is particularly complex, another extension of no more than a further ten working days can be agreed between Byker Community Trust and the customer.

Stage Two

- If the complainant is unsatisfied with the response provided at Stage One, they may request that their complaint is escalated to Stage Two of our

process.

- Complaints are acknowledged within five working days of being raised.
- At Stage Two, the relevant Head of Service, Assistant Director, Director or Executive Director will hear the complaint.
- We will offer to telephone the complainant to assist in investigating their concerns before sending a written complaint outcome response.
- We will give the customer a fair chance to comment on any adverse findings before a final decision is made. Where appropriate, offering to talk to the complainant before sending the written response.
- We will respond to Stage Two complaints in writing within twenty working days of receipt.
- With good reason, the complaint can be extended up to another ten working days by Byker Community Trust or the customer, if by BCT, the complaint lead will inform the customer of why this is.
- If the complaint is particularly complex, another extension of no more than a further ten working days can be agreed between Byker Community Trust and the customer.

3.28 To move to Stage Two of the complaints process, complainants are asked to answer the following questions (customers do not have to do this in writing and where necessary we can provide support):

- a. What specific parts of your original complaint have we not investigated?
- b. What part of our response do you disagree with and why?
- c. What would you like the outcome of your complaint to be (what would you like us to do)?

3.29 If a complainant does not provide us with an answer to the questions in section 3.28 a, b and c above, we will ask again and if necessary complete the investigation with available information.

3.30 When escalating a complaint, customers may not add in new or additional concerns or allegations to be investigated that are unrelated to the originating complaint. Any new or additional concerns or allegations that are unrelated must be treated as a separate complaint or be handled as a 'Make it right' if agreeable with the customer.

3.31 If a customer complains about the way in which a complaint was handled or disagrees with the application of the Complaints Policy (e.g. if the customer feels timescales were not met or feels the incorrect person responded to a complaint), it will not be escalated to the next stage of the complaints process. It will be treated as a separate complaint (i.e. given a new reference number and will be investigated by a different colleague).

3.32 A final outcome letter sent to the customer at Stage Two signifies the end of our complaints process.

3.33 If complainants believe that their complaint has not been dealt with adequately after

exhausting Stages One and Two of our complaints process, they are encouraged to contact a 'designated person', or the Housing Ombudsman Service as noted below.

- 3.34 Customers have the opportunity to seek support from a Designated Person at any point in their complaint. This is also explained in our Stage One and Two complaint written responses.
- 3.35 A Designated Person can be an MP or a local Councillor. The designated person may help resolve the complaint directly, may refer the complaint to the Ombudsman, or may decline doing either.
- 3.36 The complainant may approach the Ombudsman for their determination of the complaint after exhausting Stage Two of the complaint or they may approach the Ombudsman for advice during any stage of the complaint.

3.37 COMPLAINT DECISIONS

- 3.38 We categorise final decisions about complaints as one of three outcomes:
- 3.39 Complaint upheld - This is where we agree that the complaint was justified, in its entirety.
- 3.40 Complaint partly upheld - This is where we agree that the complaint was justified in at least one element of the complaint.
- 3.41 Complaint not upheld - This is where we do not agree that the complaint was justified.
- 3.42 Where a complaint has been upheld, or partly upheld, any remedy offered reflects the extent of any and all service failures, and the level of detriment caused to the customer as a result. These shall include:
 - Acknowledging where things have gone wrong
 - Providing an explanation, assistance or reasons
 - Apologising
 - Taking action if there has been a delay
 - Reconsidering or changing a decision
 - Amending a record
 - Providing a financial remedy (in accordance with our Compensation and Goodwill Payments Policy)
 - Changing procedures or practices.
- 3.43 We will provide a complaint response when this decision is known and this means not whilst awaiting completion of outstanding actions (e.g. outstanding repairs), so that reasonable complaint process timescales are achieved. Customers' requests for complaints to be left open would only be agreed to in exceptional circumstances.

3.44 PERSISTENT OR VEXATIOUS COMPLAINANTS

- 3.45 Our Unacceptable Customer Behaviour Policy clearly sets out our approach to managing the relatively few customers whose actions or behaviour are considered unacceptable.
- 3.46 We may refuse to deal with a persistent or vexatious complainant, or deal with the complaint on the available information. This may be when difficulty is caused by unreasonably persistent behaviour that is time consuming to manage and interferes with proper consideration of the complaint. Examples may include:
- Refusing to specify the grounds of a complaint, despite offers of help
 - Refusing to co-operate with the complaint's investigation process
 - Refusing to accept that certain issues are not within the scope of a complaints procedure or are outside our remit
 - Insisting on the complaint being dealt with in ways which are incompatible with the adopted complaints procedure or with good practice
 - Making unjustified complaints about colleagues who are trying to deal with the issues and looking to have them replaced
 - Changing the basis of the complaint as the investigation proceeds
 - Denying or changing statements they made at an earlier stage
 - Introducing trivial or irrelevant new information at a later stage
 - Raising many detailed but unimportant questions, insisting they are all answered.
 - Submitting falsified documents from themselves or others
 - Adopting a 'scatter gun' approach: pursuing parallel complaints on the same issue with various organisations
 - Making excessive demands on the time and resources of colleagues with lengthy phone calls, emails to numerous colleagues, or detailed letters daily or every few days, and expecting immediate responses
 - Submitting repeat complaints with minor additions/variations that the complainant insists make these 'new' complaints
 - Refusing to accept the decision; repeatedly arguing points with no new evidence
 - Insisting on responses or actions within an unreasonable timescale.
- 3.47 Where we find the complainant's behaviour is hampering the progress of the complaint, this will be explained to the complainant, including the implications of their behaviour, in order to get to a position to respond to their complaint.
- 3.48 If the behaviour persists and where we are unable to hear the complaint or part of the complaint, we will inform the customer of the outcome based on available information, which may include closing the complaint as not upheld.

3.49 GENERAL GUIDELINES AND INFORMATION

- 3.50 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.

- 3.51 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.
- 3.52 Colleagues that are the subject of a complaint cannot investigate that specific complaint.
- 3.53 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.
- 3.54 If we have formally dealt with a complaint (at Stage One or Stage Two), we will not deal with repeated submissions of the same complaint (we will inform the customer of this in writing).
- 3.55 A complaint made in the form of a petition on behalf of multiple customers will be treated as one complaint. Communications will be directed to the nominated signatory of the petition.
- 3.56 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.
- 3.57 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 our 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.
- 3.58 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.
- 3.59 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.

- 3.60 Letters addressed to Board Members or members of the Executive Team should be handed to our Office Manager and Clerk to the Committee, at BCT Office, 17 Raby Cross, Byker, NE6 2FF, who will notify the relevant Executive Team member and ensure the complaint is correctly logged within our ICT system.
- 3.61 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.
- 3.62 We require any contractor that provides services on our behalf to comply with this policy by:
 - Recording and responding to customer feedback when required
 - Providing us with any information relating to a complaint when requested
 - Assisting us with complaints investigations as appropriate.
- 3.63 All complaints will be handled consistently and equitably through this policy, no matter who raises the complaint, through whatever communication method described, or addressed to any colleague. Equally no preferential treatment such as speedier responses or more favourable outcomes will be given for complaints presented by public officials or advocates, or those raised to a senior colleague.
- 3.64 Complainants 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 our Data Protection Policy.
- 3.65 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.

3.66 TIMESCALES FOR RAISING AND ESCALATING COMPLAINTS

- 3.67 Complaints must be raised within 12 months or as close as possible to the point at which the issue first arose or when the complainant first became aware of the problem. Whilst safeguarding or health and safety issues may continue to be considered after this period.

- 3.68 If the complainant wishes to proceed to the next stage, we ask them to do as close as possible of receiving the Stage One decision or within 12 months.
- 3.69 Our complaint response and resolution timescale standards are in section 3.27.
- 3.70 In the interest of a timely complaint resolution, in line with our published timescales, complaints will be responded to where rectification plans are in place but may not have been concluded, for example if outstanding repairs work remains.
- 3.71 If third party advice, such as legal or insurance, is needed after receipt of a complaint, the complaints process may be delayed until the advice is received if this is fundamental to being able to respond. Any extension would be agreed with the complainant, and this must be confirmed in writing. However, if this delay becomes extensive, or the complainant does not agree to the extension, the complaint stage may need to be concluded based on the available information.
- 3.72 Where the response timelines outlined in this policy are at risk of not being achieved due to customer behaviour, then the complaint will be concluded within the timeline, based on the available information, unless there are exceptional circumstances and an extension is agreed with the complainant.
- 3.73 Priority will be given to resolving substantive live issues ahead of conducting any necessary investigation, without prejudicing consideration of the complaint or delaying response to the complaint within the agreed timescales.

3.74 COMPLIMENTS

- 3.75 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.
- 3.76 Compliments can be made by contacting us via any of the methods outlined in section 3.2.
- 3.77 A central record of all reported compliments will be held on our ICT system. All compliments are logged on the day they are received (or the nearest working day) and shared with the relevant manager to cascade to their team.
- 3.78 Where customers have provided a compliment in writing, we will reply in writing to acknowledge its receipt.
- 3.79 Compliments will be included in quarterly reporting to the Byker Community Trust Committee, Karbon Customer Committee, Karbon Management Team and to the Karbon Resident Committee.

- 3.80 A selection of compliments will be used in a regular round up in our internal communications.
- 3.81 Compliments will also be regularly reviewed at service team level during Team Meetings to highlight best practice.

3.82 SUGGESTIONS

- 3.83 It is important to hear customer views, including suggestions, about how we can improve our policies, processes or the services we provide our customers.
- 3.84 Suggestions can be made by contacting us via any of the methods outlined in section 3.2.
- 3.85 A central record of all reported suggestions will be held on our ICT system. All suggestions are logged on the day they are received (or the nearest working day) and shared with the relevant manager to cascade to their team.
- 3.86 Where customers have provided a suggestion in writing, we will reply in writing to acknowledge its receipt.
- 3.87 Suggestions will be included in quarterly reporting to the Byker Community Trust Committee, Karbon Customer Committee, Karbon Management Team and to the Karbon Resident Committee.
- 3.88 Suggestions will also be regularly reviewed at service team level during Team Meetings to consider opportunities.

4.0 Monitoring and Review

- 4.1 This policy will be reviewed every three years, by the Assistant Director of Customer Experience, 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
- 4.2 On a quarterly basis, information will be reported to the Byker Community Trust Committee, 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.
- 4.3 Learnings from complaints are routinely shared internally through Kore, reported quarterly with the Byker Community Trust Committee, Karbon Customer Committee, Karbon Management Team and Karbon Resident Committee and

published to customers via our website, customer emails, customer magazine, BCT Newsletter and Customer Annual Report.

- 4.4 Each year we will self-assess our complaint handling in line with the Housing Ombudsman's Code. We will further publish information about the number, nature and outcome of complaints (as required as part of the Regulator of Social Housing's Tenant Involvement and Empowerment Standard).
- 4.5 The Executive Director for Customer Services is responsible for delegating the monitoring, review and implementation of this policy.

5.0 Equality and Diversity

- 5.1 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 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.

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.

- 5.2 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 need to
 - Providing our replies and information in a different format such as audio and plain text versions of our Complaints Leaflet
 - 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.
- 5.3 All of our customer policies and key information are made available on the Byker Community Trust website 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.

- 5.4 We work together to look at options and agree what adjustments would be reasonable in our customer's individual circumstances.

6.0 Data Protection and Privacy

- 6.1 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 for the Karbon Homes Group which, along with its associated procedures, must be followed throughout the operation of this policy.

Appendix 1 – Complaints about our money advice service

If your complaint relates to our money advice service, the following process for investigating and resolving it applies. This service is regulated by the Financial Conduct Authority (FCA).

1.0 WHAT HAPPENS WHEN A CUSTOMER MAKES A COMPLAINT?

- 1.1 In some cases, we may feel a complaint can be resolved quickly and within 3 business days .
- The ‘three business days’ rule is calculated by reference to the close of business on the third business day following the day on which a complaint was received.
 - A resolution can be indicated acceptance - it does not have to be in writing and neither does a ‘three business day response’ - we must still record the complaint.
- 1.2 If the complaint is resolved within 3 business days, Karbon Homes will send a summary resolution communication (SRC). This will be in writing and include:
- Reference to the complaint and that it is considered resolved.
 - That the complainant can still refer to the Financial Ombudsman Service (FOS).
 - Whether Karbon Homes decides to waiver time limits to refer to FOS.
 - Refer to further availability of information on FOS website - i.e. how FOS looks at complaints.
- 1.3 If the complaint cannot be resolved within 3 business days, Karbon Homes will:
- Send a prompt acknowledgement stating the complaint is received, being dealt with, by whom and when they can expect a written reply.
 - Send prompt updates where necessary.
 - Provide a final response within 8 weeks, accepting or offering redress, or confirming why a complaint is rejected.
 - Provide a Financial Ombudsman Service leaflet and explain to the customer that they can refer to the Financial Ombudsman Service if dissatisfied.
 - If for any reason Karbon Homes is unable to provide a final response we will advise customers that they can refer to the Financial Ombudsman Service.
- 1.4 All complaints will be recorded, including their outcome and any redress or remediation offered. Records will be retained for three years.
- 1.5 Complaints will be reported to the FCA annually on the GABRIEL system in most cases.