

Customer Feedback Policy



January 2018

Feedback Policy

1) Purpose

The West Midlands Pension Fund believes in putting our customers first, and we are constantly looking at ways we can improve the services we provide through regular feedback and focus groups.

The Fund encourages engagement from members and employers and has found that one of the best ways to obtain a true opinion on the services we provide is through the comments, compliments and complaints we receive.

This policy sets out how the Fund manages and responds to comments, compliments and complaints and details what service members can expect to receive when providing this feedback.

2) Scope

This policy applies to all correspondence received by the Fund where a member or stakeholder is providing feedback on any aspect of service the Fund provides and should be adhered to by all Fund staff including those representing it (such as Trustees or Pensions Board members).

3) Comments

Comments are statements provided to the Fund that give an opinion on how we performed or the way the member felt when receiving a service. Comments can be good or bad and do not necessarily fall into the category of compliment or complaint.

4) Compliments

Compliments are statements of good opinion. Where the member believes the fund has performed well, are happy with the service they received and want to share that good feeling with others.

5) Complaints

Complaints are the opposite to compliments and often contain an opinion about an alleged breach of service standards, a failure to answer a member's question or a feeling by the member that the service they received is not good enough.

To assist in determining a complaint, the Fund has created the below list which seeks to cover a broad range of matters a member may complain about:

- A failure to provide a service at the level or standard expected by the customer.
- A perceived unhelpful/discourteous attitude from a staff member.
- Neglect or delay in responding to a request for service.
- A failure to follow the Fund's agreed policies, rules or procedures.
- · A failure to consider all information in coming to a decision.
- Malice, bias or unfair discrimination of all natures.

Customers can also ask someone to take their complaint forward on their behalf; this may be a trade union representative, welfare officer, a family member or friend. In order to provide information to a representative the Fund will require confirmation from the member that they have appointed them and are happy for them to receive correspondence.

6) Methods of Communication

When seeking feedback the Fund encourages contact through every available medium and will address any comments, compliments or complaints received in any form,

Contact may be made through our customer helpline, verbally on the phone. By letter, email or through feedback forms from one of our events or roadshows.

We also host a feedback form on our website at www.wmpfonline.com

7) Exceptions

While the Fund will always try to address any contact received from customers, there may be occasions where we will not be able to deal with the query under this process either because it is covered by a different policy or because we are unable for reasons of business/commercial sensitivity.

The types of areas that we won't deal with through this process include:

- staff/ex-staff complaints about employment matters including grievances or disciplinary hearings;
- cases where legal action has started;
- questions or comments that might lead to the release of commercially sensitive information (where this applies the customer will be informed this is the reason);
- complaints about trustees or Pension Board members; and
- where the matter is already being dealt with another way (e.g through the IDRP process).

The Fund will offer support and assistance to anyone wanting to provide feedback on our services and where it is not deemed appropriate to deal with the feedback under this policy, we will try to assist by directing them to a more appropriate channel or procedure.

8) Process - Comments

Any comment received will be recorded in a central file on Sharepoint (the Fund's intranet) by the individual receiving it and highlighted to the team manager responsible for the service being commented on.

It is not usual for contact to be made with a customer who is providing a comment.

9) Process - Compliments

When the Fund receives a compliment in any topic relevant to the work of the Fund, it is recorded on a central log on Sharepoint by the individual receiving the compliment (whether about them or not). The Fund's compliance team have access to this log and will report monthly to the Senior Management Team on the number of compliments received in that period.

Any department or individual who has received a compliment will receive feedback and recognition for the work they have done in assisting that customer.

10) Process - Complaints

When dealing with complaints the Fund will always try to resolve a customer's issues in the first instance through our Customer Contact Centre. However, we understand that sometimes customers may feel that the response they receive does not address their concerns.

What Will Happen to Your Complaint?

To ensure a fair and balanced approach, the Fund has created a three-stage complaints process, each of which progressing in escalation.

Under each process, the Investigating Officer is required to highlight any potential training needs or staff development opportunities feeding this back to the manager for the service area involved.

Informal Process

Where possible the Fund will always deal with complaints at the first point of contact. Often customers contact the Fund via our helpline and it is the responsibility of our call handlers to ensure customers calling to complain are given every opportunity to explain their concerns. The Customer Services Manager is responsible for the Customer Contact Centre and for ensuring the team are skilled and resourced to enable them to resolve the matter at this point reducing the need for further action.

There will be times when our call handlers are unable to resolve a query raised or the customer requires a further explanation. Where this occurs the formal complaints process will begin and the matter will be formally logged as a complaint by the Customer Services Manager and passed to the Fund's compliance and risk team.

Stage One

Where a complaint cannot be resolved in the first instance or is received via email/letter/written correspondence this will start the stage one process which requires the person receiving the complaint to notify the Fund's compliance team.

The complaint will be logged on the central system.

Once the compliance team are notified that the complaint has been received, the complainant will receive an acknowledgment that their correspondence has been received and is being reviewed by an Investigating Officer confirming the date by when a response will be issued. When investigating the complaint, the Fund officer will speak to staff members involved and where necessary review members' records.

A response will be issued within 21 days of receiving the complaint. Should this deadline need to be extended in order to provide the opportunity for further investigation, the complainant will be notified before the 21-day deadline.

Stage Two

Where a complaint cannot be resolved under Stage One or the complainant believes their concerns have not been adequately addressed, the matter will progress to Stage Two.

When a complaint progresses to Stage Two, it will be investigated by a senior manager at the Fund, who will review the complaint, review the response provided under Stage One and consider whether the issue has been addressed.

As with Stage One, an acknowledgment will be sent to the complainant confirming their complaint is being considered under the Stage Two process and a full response issued within 21 days.

Stage Three

Should a complaint not be resolved under Stage One or Stage Two, and a member or employer wants to progress further with their complaint, the matter will then progress to Stage Three where the complainant has a right to ask the Director of Pensions to review their complaint and the responses received.

There may be occasions where a complaint details an event or a circumstance that suggests something has happened that is so serious, it will progress automatically to the Stage Three process.

Under Stage Three, the Director will review all correspondence relating to the complaint and will conduct an investigation as to whether all appropriate action has been taken. A response will be issued within 21 days.

Local Government Ombudsman

Stage Three is the final stage of the Fund's complaints process. Should a complainant remain unhappy with the response received they do have a right of appeal to the Local Government Ombudsman.

The Local Government Ombudsman does not usually investigate or respond to complaints unless the in-house process has been exhausted. Complainants will therefore need to progress through all three stages of the Fund's complaints process before the ombudsman will become involved.

The ombudsman may be contacted at the address below

Local Government Ombudsman

PO Box 4771 Coventry CV4 0EH Tel: 0300 061 0614 Website: www.lgo.org.uk

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The Pension Advisory Service (TPAS)

TPAS offer a free and impartial advisory service to all members of a workplace pension scheme and can be contacted any point during a member's contact with the Fund

www.pensionadvisoryservice.org.uk

Complaints Monitoring

As part of the Fund's objective to be a customer-focused service, we will review all complaints on a monthly basis as part of the Senior Management Team (SMT) meeting. Where it appears that patterns may be emerging in the complaints being received, either by subject or service area, SMT will discuss this with the service area responsible implementing a review of process or training needs as necessary.

In addition the Fund Local Pension Board receive regularly updates on the Customer Engagement Program of the Fund which includes feedback on the Fund's performance in the area of complaints.

Officer Contacts

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