Guide to Best Practice for Complaint Handling

v7 Oct 2015

Introduction

The purpose of this guide is to summarise the Best Practice procedures that CIGA Members are expected to operate in complaint handling. The intention is that by consolidating existing procedures and providing guidance on complaint investigation all complaints will be handled efficiently, professionally and promptly. It will also form the basis of assessment of complaints procedures and review of specific complaints during annual CIGA audits.

While occasional problems with cavity wall insulation installations are, to some extent, inevitable, dissatisfied customers are not. Member companies who demonstrate best practice can learn from mistakes and make appropriate changes to their procedures. A swift and equitable resolution reflects well on the company involved whereas, perhaps more importantly, negative customer experiences impact on the entire industry. Where appropriate additional help should be sought from the System Designer or CIGA to ensure a satisfactory conclusion to all complaints.

This guide is arranged into 3 main sections:

- Part 1 General Complaint Handling Process
- Part 2 Specific requirements for Complaints referred to Member companies by CIGA
- Appendix I Guide to the effective technical investigation of more complex complaints

Part 1 - General Complaint Handling Process

The key principals of effectively handling any complaint are:

- Record and acknowledge the complaint promptly.
- Advise the customer who is investigating the complaint and provide a contact address and telephone number.
- Carry out a thorough investigation into the matters raised seeking assistance from the System Designers or CIGA if necessary.
- Determine the appropriate remedial steps and instigate action.
- Keep the client informed of the progress and outcome of any investigation
- Explain the recommended remedial actions and ensure that they are completed.
- Check whether the customer is satisfied with the outcome and advise them what to do if they are still unhappy and provide CIGA contact details.
- Throughout the process, any failure to meet previously agreed timescales or actions must be advised to the customer.

An example of a comprehensive complaint management system to implement these principles would encompass:

- Publicising details of how to complain
- Designating a person or department to Receive all Complaints
- Developing systems for recording and filing complaints and relevant data together with reporting systems appropriate to the organisations size to enable management to monitor the efficiency and effectiveness of the complaint management.
- Categorising and prioritising complaints for resolution and assign to one person for handling or escalate if serious to health
- Maintaining a complaints file to record all actions, meetings, conversations and findings.
- Developing systems to track and ensure that any remedial work is completed, and that complaints are closed.
- Ensuring that systems are in place to follow up and determine if the consumer is satisfied with the resolution.

In order to determine the appropriate action and ensure that the most serious complaints are dealt with promptly, it is important that complaints are categorised and prioritised according to the symptoms and circumstances. Although the symptoms do not necessarily reflect the underlying cause, for example mould growth could be a condensation or water penetration issue, it provides a starting point to identify serious problems that require immediate action. Thereby in conjunction with other information it is possible to decide the priority and resources required and whether a formal technical investigation will be required to effectively resolve the problem.

Typical complaint classifications might include:

CLASSIFICATION	PRIORITY/RESOURCES
Blocked Ventilators	***Urgent:***
Water Penetration	
Condensation & Mould	
Non Traditional Building	
Building Defect	***Technical Investigation:***
Blocked Cavity	
Voids & Unfilled areas	
Defective Materials	
Disturbance of Insulation	
Poor performance	
Escape of Insulation	
Damage to Grounds	
Making Good	***Making Good etc.:***
Exterior Damage	
Interior Damage	
Other	

Particular care must be taken to ensure that robust systems are in place to ensure that any complaint involving an imminent physical danger to health and personal safety and particularly combustion vents is identified immediately and swift action is taken.

Generally the aim is to ensure that all simple complaints relating to making good etc. are satisfactorily resolved within 14 days, and that steps are taken to ensure that those requiring technical investigation and resolved within 1 month.

In case of any doubt then the System Designer should be involved at an early stage to ensure that the following timelines can be met:

COMPLAINT TIMELINES	
Acknowledge Complaint	Within 24 Hours
Arrange Technical Investigation if required	5 Days
Final resolution	1 Month

Part 2 - Specific requirements for Complaints referred to Member companies by CIGA

Where the Installer Member is no longer trading, or has failed to remedy a complaint within 2 months of the defect being reported to them, the customer has the right to refer the complaint to CIGA under the Guarantee.

A number of complaints are referred to CIGA where the customer is already unhappy with the steps being taken to resolve the matter. Therefore it is especially important that these cases are resolved promptly.

On receipt of a complaint CIGA takes the following steps:

- Identify the type of complaint.
- Identify the Guarantee.
- Determine whether the installing company is still registered with CIGA and/or is still trading.
- In the case of an installer who is still trading then contact the Installer copied to the System Designer informing them of the complaint and details, asking them to investigate and report within 1 month.
- In the case of an installer who is no longer trading then contact the System Designer informing them of the complaint details and asking them to investigate and report within 1 month.
- Send a complaint acknowledgement letter to the customer confirming the steps that have been taken.

The action to be taken by the member that the complaint is referred to is then as follows:

Complaints Referred to Installing Members by CIGA

In the case of complaints referred by CIGA the Installing Member should:

- Make contact with the customer within 5 working days of receipt of a complaint and arrange a convenient date and time to make a site visit
- Notify CIGA of the report and findings, in writing, of the site visit within 5 working days.
- Make arrangements with the customer for any required remedial works to be undertaken within 28 days from date of initial site visit.
- Confirm to CIGA, in writing, that the complaint has been resolved to the complainant's satisfaction upon closure of the complaint.
- Notify the System Designer and/or CIGA if the complainant's expectations cannot be satisfied as soon as possible and prior to expiration of the documented timescales, detailing reasons why the complaint remains unresolved.

In the event that a complaint is not resolved within 1 month of notification from CIGA then the Agency reserves the right to carry out its own investigation and arrange for any remedial works to be completed. All costs associated with investigation and remedial works will be the responsibility of the Installing member.

Complaints Referred to System Designer Members by CIGA

In the case of complaints where the installing company no longer trades, or has failed to remedy a complaint then the System Designer member should:

- Endeavour to make contact with the complainant within 10 working days of receipt of a complaint from CIGA and arrange a convenient date and time to make a site visit. Notify CIGA of the report and findings, in writing, and identify a contractor to undertake any required remedial works as soon as practicable. A quotation should be submitted to CIGA for approval prior to the commencement of the works.
- Arrange for the contractor to invoice CIGA direct for the agreed quotation amount, deeming closure of the complaint.
- Notify CIGA if the complainant's expectations cannot be satisfied as soon as possible and prior to expiration of the documented timescales, detailing reasons why the complaint remains unresolved.

In the event that a complaint cannot be resolved by the System Designer then CIGA will arrange for internal investigation and resolution using thermographic imaging if appropriate.

APPENDIX I

Guide to the effective technical investigation of more complex complaints

In the case of complaints requiring technical investigation or where a complaint has not been satisfactorily resolved, then further site investigations may be necessary. Persons carrying out the investigation must be appropriately dressed and, act in a professional manner, demonstrating that they are competent and acting with confidence.

Before carrying out a site visit, ensure that the investigator is well briefed, carrying identification and that any Health and Safety requirements have been assessed and addressed. In particular, ensure that during all investigations correct Access Equipment and PPE is worn and used. As an absolute minimum the following equipment should be readily available:

Equipment to Take with You on Your Inspection

- Installation record.
- All up to date details of the complaint.
- Customer complaint inspection report form.
- Drill.
- Boroscope.
- Metal detector.
- Damp meter.
- Digital camera.
- Suitable Hammer, Bolster Chisel.
- Trowel,
- Sand / Cement or Sealant and Applicator.
- Torch.
- Making good (mortar etc.) for inspection points.
- Dust pan / brush.
- Ladder/Access/PPE equipment.
- Mobile phone.
- Pen.
- Paper / note pad.
- CIGA "your questions answered" guide.
- CIGA best practice guides. (For reference).

Whilst the detailed steps required to investigate a complaint depend on its classification, some of the most serious and challenging problems to resolve relate to water penetration.

The following section therefore considers how these complaints might be investigated:

Damp / water penetration:

Issues related to damp and water penetration can be extremely difficult to diagnose. To determine the most appropriate resolution, it is essential to identify whether the symptoms are the result of genuine water penetration, condensation or rising damp.

Cavity wall insulation is designed to repel water, and for example mineral wool insulation is water repellent at manufacture.

Cavity wall insulation is installed after an Assessment to determine the suitability of a property. Therefore at the time of installation, the outer wall surface has been assessed as suitable to receive cavity wall insulation. However, ageing and prevailing weather conditions may deteriorate the outer wall surfaces. The, mortar joints, render, paint etc. will eventually require maintenance to maintain the water resistance of the wall

Lack of maintenance will increase the risk of water penetration and excessive amounts of rainwater entering the cavity may flood the cavity and overcome the water repellency of the insulation.

Water Penetration

Water penetration is caused by water moving horizontally across the wall.

- Unlike condensation, water penetration is usually an isolated area bounded by a ring mark and can become evident anywhere across the inner wall surface of the external wall. However, it is more common lower down the wall. The point of water penetrating the outer leaf is unlikely to correspond directly with internal dampness.
- Poor maintenance of a property may be a primary or contributory factor and therefore guttering, downpipes, copings, flat roofs, render or brickwork fractures, penetrations etc. should be fully inspected.
- South/west facing elevations are predominantly reported with complaints of this nature due to more regular wind driven rain. Areas shielded and sheltered from wind driven rain are less likely to report water penetration.
- Identifying the exact point of water penetration may be extremely difficult and at times not possible, as it may be the entire outer leaf is allowing excessive rain water volumes to enter the cavity wall, due simply to porous mortar. Obstructions, debris wall ties etc. may then act as a path for moisture to travel between the outer and inner leaf with the subsequent internal décor damage and dampness.
- Dependant on weather conditions, thermographic images may help identify possible points of water transfer. Unlike condensation water penetration is usually associated with clearly defined lines of dampness, crumbling plaster, mould spores and décor damage. Dampness can be found at low level on the ground floor, as rainwater penetrates higher up and transfers across to the inner leaf when a bridge is found, by way of a dirty wall tie, or mortar obstruction.

- Replacement windows may be fitted directly above an open cavity or on existing clay or masonry cills if water penetration is evident below a window the following should be checked:
  - Investigate the drainage channels within the frame discharge onto a well fitted and sealed cill, not into the cavity.
  - Ensure the rubber seal around the window pane is complete with no breaks.
  - Ensure the window surround and window sill are completely weather sealed with a high specification sealant.
  - If a check scope directly below the window sill identifies water droplets it confirms a poor seal around the window
- Check for evidence of other building works that may be impacting water tightness.

Assessing potential high risk properties

Exposure

Severe wind driven rain in the United Kingdom is predominantly from a south westerly direction, and complaints of water penetration are mainly found on the west coast and particularly South Wales and the South West of England.

A large proportion of properties built in these areas are painted render or pebble dashed outer surface.
A general lack of maintenance to rain water gutters and downpipes and evidence of leakage across the wall surfaces would suggest a high risk of water penetration, and therefore not currently suitable.

- Check internal walls for possible dampness:
- Black mould growth or staining: - Rising damp is generally noticeable by either wet mould or water mark across an internal elevation up to approximately 1.0mtr from the skirting board level.
- Water ingress is generally indicated by localised staining. In most cases the use of the following equipment can indicate the possible root cause of dampness
- Ensuring customers are aware of the water penetration risks involved if properties are not adequately maintained, and repairs completed prior to installation, are essential.
- During the pre-installation survey it is vital that all windows and doors are inspected and confirmed to be suitably sealed around perimeters, the property has no areas of outer leaf open to the cavity, and all penetrations through the outer leaf are adequately sealed.
- A check scope inspection must be completed on all elevations of the property, and on all floor levels to determine the suitability of the cavity width, and the general condition of the cavity walls.
- Properties situated on high level ground and highly exposed to wind driven rain combined with building or maintenance faults should be avoided.

Internal inspection.

- Carry out an internal visual inspection and note all area's or position of possible dampness. Check doors / window frames etc. for possible deterioration on reveal to frame sealing.
- Use of a moisture meter is critical to understanding the environment in the building. Confirm moisture / dampness levels of affected areas using a damp meter taking measurements of the dampness size and position in relation to the external wall. Contour mapping of moisture levels in the affected area is also helpful in pinpointing the worst area for further investigation.
- Use a metal detector to indicate the position of wall ties to allow further investigation where required.

External inspection.

- Prior to undertaking any intrusive investigations, check visually to ensure that there are no obvious causes.
- Locate the affected areas externally and drill sufficient holes to allow an adequate Boroscope inspection of the cavity. Take note of voids within the insulation, evidence of rubble / debris, wall ties installed correctly, condition of wall ties / building materials lodged within the cavity during construction or during additional building works.
- In the event that further in depth investigations are required brickwork / masonry may have to be extracted with a hammer / bolster chisel to allow inspection of these areas.
- It is important to ensure that the possibility of debris created during these actions does not either increase or mislead identification of potential causes of the problem. Therefore where brickwork or external masonry is extracted care must be taken to minimise or prevent debris entering the cavity.

Mortar/ making good.

- It very important to re-instate making good all areas of brickwork / external facings following investigations, it is recommended that making good of masonry should not be of a temporary measure.

Possible remedial action

Removing obstructions and then re-insulating the void areas is one solution to the problem, if they can be identified. However, a fully insulated cavity wall may make it difficult to identify the point of water transfer. In these cases and where the insulation has been compromised by repeated cavity flooding then extracting the cavity wall insulation from the affected elevation is ultimately the only solution. However, if the CWI has not been compromised and repairs can be affected then treatment with a suitable weather proof coating can also be considered.

Condensation

Condensation is the most common form of damp, and is caused by moist air condensing on cold spots within the building. However, identifying the causes of excessive water vapour, high humidity and ultimately condensation can at times be extremely difficult, as:

- Water vapour within a property prior to the installation of cavity wall insulation will begin to condense on cool surfaces as overnight temperatures drop and heating and ventilation is reduced. Over a large area, with adequate heating and regular ventilation these small volumes of moisture regularly go unnoticed with mould spores unable to develop and no detrimental effect to décor etc.
- After cavity wall insulation is installed the inner wall surface temperatures are raised as the insulation retains heat inside the property.
- Cooler surfaces i.e. lintels above doors and windows, window reveals, wall surfaces around vents, uninsulated areas etc. will then become more susceptible to an increase in condensation forming as overnight temperatures begin to fall, and water vapour continues to condense in these now isolated areas.
- Properties already showing signs of excessive condensation prior to the installation of cavity wall insulation are likely to be more noticeably affected. Investigating the cause and giving recommendations to reduce water vapour levels prior to installation is vital.

Use of a moisture meter is critical in investigating and diagnosing condensation, and it is important to understand the advantages and limitations of electrical meters versus destructive testing. Other factors to check when investigating include:

- Record moisture levels in soft furnishings: beds, curtains, carpets, settees in rooms affected which indicates high internal moisture levels.
- Look for signs of condensation around windows showing as black mould that may have been wiped off.
- Look at the condition of grouting in the bathroom.
- Check for evidence of whether windows are opened or have trickle vents.
- Check whether internal doors to areas of moisture generation are open allowing moist air to move freely to colder areas and condense or be absorbed in soft furnishings.
- Feel radiators to establish heating use.
- Note positions of TRV's to identify potential under-heating of specific rooms.
- Note any mould near radiators which suggests they are unused.

There are also specific factors that may contribute to condensation that should not be overlooked.

Kitchen Extractor Fans

- Almost all modern kitchens have an extractor fan fitted above the cooker and hob, and most customers will inform you that the extractor is used regularly when meals are being prepared. However, a large proportion of extractor fans fitted are found to be filtering water vapour only, and do not extract water vapour to the outside.
- During the winter it is likely that windows will not be opened after cooking, and therefore large volumes of water vapour will circulate the property, and begin to condense as the temperature inside the property reduces overnight, and the dew point is reached.

Bathroom Extractor Fans

- Extractor fans in bathrooms are less common than kitchen extractor fans and very often there is no ventilation whatsoever. Customers will again always inform you that the window is opened after the shower or bath are used, and that would be sufficient to allow water vapour to disperse, replaced by dry air.
- However, opening the bathroom window and also leaving the door open will allow the draught to force the water vapour into the property, going unnoticed until the dew point is reached overnight and condensation begins to form.

Furniture and Curtains

- Very often customers do not fully understand the need to adequately ventilate and allow sufficient air circulation behind heavy furniture and curtains.
- Properties with furniture pushed tight against an external wall, combined with high moisture levels within the property are likely to report dampness, mould growth and a musty odour behind these units. A check scope inspection corresponding with these areas is likely to show cavity wall insulation installed correctly and without any signs of moisture present within the insulation.
- Heavy lined and particularly full length curtains are often an issue in properties of excessive water vapour, with mould spores usually visible on the side of the doorway at skirting board level, or inside the window surround.
- Modern styles of furnishings are minimalistic, with very little furniture, blinds and often laminate flooring. This style of property can potentially see an increase in condensation after cavity wall insulation is installed simply due to a lack of absorbent materials i.e. carpets, curtains etc., which can be sufficient to eliminate any risk of condensation dependant on moisture levels within the property.

Drainage

- Rainwater drainage can increase water vapour levels inside a property if allowed to drain through the masonry of the external leaf and into the void below the timber ground floor.
- Poor drainage around a property with block paving, tarmac, concrete etc. butting the outer brick leaf, and

possible flooding during heavy rain, allows water to soak through the masonry and into the void below the timber floor.
- Evaporation within the floor void as daytime temperatures rise allows water vapour to permeate the timber floor and circulate the property, increasing water vapour levels, humidity and ultimately condensation.

Corners of rooms at ceiling level

- The design of most properties at first floor ceiling level, particularly hipped roof properties does not allow cavity wall insulation to be installed with continuity to the loft insulation. A 200mm to 300mm area around the perimeter of the property is therefore not insulated with cavity wall insulation, and is regularly behind soffit and fascia boards and therefore not detected by thermal imaging.
- Properties with excessive water vapour levels may show a discolouring of internal décor at this point, and in severe cases mould growth may also become evident.
- Carefully installed loft insulation pushed over the wall plate to meet the top of the cavity wall insulation is one solution to reducing the risk of condensation forming at this point. However, care must be taken to ensure the loft insulation is not obstructing the ventilation into the roof space.

Mortar debris

- Mortar obstructions inside a cavity wall are a regular occurrence and for the most part present no serious issues, with cavity wall insulation simply surrounding the obstruction.
- Large mortar obstructions which bridge the cavity wall in areas of a property with particularly high moisture levels i.e. kitchens and bathrooms, may be identified by a discolouring of décor, condensation and mould spores becoming evident.
- Mortar debris at ground level and above the damp proof course can be a particular problem and is usually exacerbated by restricted air circulation behind furniture and curtains. North facing elevations or shielded wall areas are likely to be the most common areas of complaint.
- Rendered, pebble dashed Tyrolean etc. are particularly susceptible to mortar obstructions and complaints regarding condensation due to the drilling procedure for cavity wall insulation. These types of properties have no visible mortar joints and therefore injection points are drilled to the system designer and BBA specifications directly through the outer covering and through the brick or block outer leaf. Damage to the outer leaf is inevitable at times inside the cavity wall, and debris may be large enough to become wedged inside the cavity wall with the subsequent potential point of condensation inside the property.

Properties treated for rising damp

- The treatment of rising damp requires plaster to be removed up to 1 Metre above ground floor level of all external walls. After three months of drying time these areas can be safely re-plastered, which now includes an additive in the new plaster which also helps to prevent further dampness.
- When plaster is hacked from the wall surfaces up to 1 Metre, old lime plaster can easily become detached from the wall surface higher up, and although remaining in place, not fully bonded to the brick surface.
- Properties with excessive water vapour levels and condensation issues can have a detrimental effect on the old lime plaster at the horizontal joint of the new plaster.
- An uneven bubbling effect is likely horizontally where the lime plaster begins to deteriorate and crumble.
- These conditions are most likely to occur in hallways where the front door is in regular use, allowing the wall surface to be cooled as the door is opened and warmed by central heating, conducive for the build-up of condensation if water vapour levels are high.

Rising Damp

Rising damp is caused by ground water moving up through a wall. Most walls allow some water in, but it's usually stopped from causing damage by a barrier called a damp-proof course.

- Use a Damp meter to check and note moisture levels from the skirting up to approximately 1.0 mtrs, where readings diminish after that point it may indicate that there may either be a failure of the DPC or that excessive debris is evident at DPC level.
- Drill adequate number of inspection points via the external leaf to visually check for rubble or debris within the cavity both on or above DPC using a borescope.
- Check the exterior ground level in relation to the DPC to ensure it is not higher allowing water to bypass the DPC. Ground level may have been changed by landscaping, building a patio etc.
- In the event that debris in the cavity is identified as a possible cause of rising dampness, it is advisable to contact either a reputable builder and or a remedial damp course expert to check and confirm the integrity of the DPC.

Overview of Areas to be Considered

- Combustion Vents
- Drilling pattern
- Room Vents
- Sub Floor Ventilation
- External landscaping
- Loft Area
- Condition of Walls
- Condition of Insulation
- Suitability for Treatment
- Internal- Damp Levels

Summary of Specific Checks

- Levels of paths and driveways in relation to DPC level.
- Does the ground or any paved areas slope downwards towards the property without sufficient means of draining away to ground?
- Check roof detail and sarking felt (where applicable) are maintained and in a good state of repair so as not to allow water to ingress into the cavity heads.
- Carry out a visual check of guttering and pipe work to assess condition and identify defects that could allow excessive rain / water discharge to saturate the outer leaf in concentrated areas.
- Finlock guttering -: are these sealed correctly.
- Is the outer leaf in a good state of repair?
- Are all rendered or coated external wall areas in a good state of repair.
- Is there evidence of building works subsequent to installation?
- Are soakers to chimneys damaged or missing?
- Are flat or sloping roofs in a good state of repair?
- Are lead flashings to roofs etc. in a good state of repair and in the correct position?
- Are redundant existing flues totally closed when they require ventilation?
- Are all functional ventilators clear of; insulation material / debris / other.
- Note any areas of cavity wall construction that have not been insulated and reasons for omitting.
- Note position of any voids in the insulation.
- Are cavities free of significant mortar/debris that may enhance bridging to the inner leaf?
- Has the cavity received partial cavity insulation prior to retrofit cavity wall insulation being installed?
- Is the property of masonry/masonry construction?
- Is the cavity width 50mm minimum or greater?
- Re measure property to confirm the net m2 area, assess average cavity widths to calculate volume which allows a quality control installed density check to be carried out following attaining amount of cavity wall insulation material installed.

APPENDIX II

Sources of Further Information

Members may find it helpful to be aware of the contents of the following useful documents:

- The CIGA best practice guides : all available from CIGA website : www.ciga.co.uk and especially:
  - Suitability of external walls for filling with cavity wall insulation.
  - Installing cavity wall insulation.
  - Flues, chimneys and combustion ventilators.
- The CIGA technical notes covering specific issues.
- Cavity wall insulation – your questions answered.
- System Designer suppliers manual
- The relevant cavity wall insulation BBA certificate.

A number of other publications are also available on various web sites referencing damp/water penetration, brickwork and external facings relating to exposures etc.

Footnote:
We would like to thank the many hugely experienced specialists within the industry for contributing to this short guide. However, comments are very welcome, and any suggestions for how this might be further improved should be emailed to info@ciga.co.uk