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1. Our purpose

We're proud to be able to support tens of thousands of people across England by providing affordable housing and care to help people live independently.

Everything starts at home, and we are privileged to be able to do work which makes a real difference to the lives of people in our communities. Everything we do is about people – whether that's providing a good quality, safe home or providing care which helps someone to live an independent life.

We live and breathe this social purpose.

2. Introduction

Our Complaints Policy ensures you have easy access to tell us when things go wrong, so we can promptly address concerns and improve our services.

When we receive your complaint we want to show you we:

- ◆ care about your complaint
- ◆ can be trusted to act on the feedback you give us
- ◆ are committed to improving the quality and delivery of our services.

Each year we provide services for thousands of customers. We recognise sometimes things can go wrong and you may not always be happy with the level or type of service you receive

from us. How we manage complaints when we receive them is important to improving our service delivery and achieving high levels of customer satisfaction in all we do.

We encourage, welcome and value complaints as a form of customer feedback together with compliments and survey responses. All feedback we receive helps us to understand what you value most, and which parts of our service provision we need to maintain, change or improve.

We do not consider high volumes of complaints to be a negative as they can represent a well-publicised and accessible complaints process.

We want the service we offer you to be fair, consistent, and easy to access and to achieve our aims, we follow and meet a set of service standards which are:

- ◆ Encouraging you to let us know when you are unhappy with the service you have received
- ◆ Enabling you to raise your complaints in any way you prefer and with any of our colleagues
- ◆ Ensuring all colleagues are aware of our complaints process and are empowered to take responsibility and ownership for complaints
- ◆ Treating you with respect and responding positively to complaints
- ◆ Giving you clear information about how you can make a complaint. This includes making it easy for you to give us feedback by accepting complaints in a range of ways including in person, by phone, email, letter and form through our customer website. We will investigate complaints in the same way regardless of how you make them
- ◆ Supporting you if you ask for or need help in making your complaint. You can be supported by an advocate, friend or family member for example. With your written permission this person may complete forms and attend meetings with you
- ◆ Accepting your view that you have a genuine complaint and make you feel we are taking it seriously; considering the individual circumstances and understanding what you want to see happen because of your complaint
- ◆ Handling complaints positively, fairly and within agreed timeframes and offering apologies and resolutions at the first point of contact wherever possible
- ◆ Ensuring you are aware of your rights to access the relevant Ombudsman. For Landlord services this includes the Housing Ombudsman and any other relevant regulatory services including the First Tier Tribunal for rent and service charge challenges. For complaints relating to the delivery of care and support, this is the Local Government and Social Care Ombudsman. Contact details of these organisations are included in Appendix 1.
- ◆ Keeping you informed of how your complaint is progressing, any actions agreed and the outcomes following our investigations
- ◆ Ensuring any action agreed to resolve a complaint is taken

- ◆ Respecting confidentiality and ensuring we manage complaints in accordance with Data Protection legislation
- ◆ Ensuring good, clear records of complaints are made and kept, actions are taken, and lessons are learnt using all feedback to improve our future service delivery
- ◆ Monitoring, analysing and publishing information on complaints performance for you and colleagues.
- ◆ We will not:
 - pressure, intimidate or discourage you from making a complaint by suggesting or giving an impression there may be a comeback which affects the service you receive from us.
 - create any barriers to making or chasing a complaint by insisting complaints can only be made in writing for example.

3. Scope of Policy and Exclusions

This policy applies to anyone who has been affected by us, our homes or our services which includes:

- ◆ Current, former and potential customers (including shared owners and leaseholders) whether they live in our properties or receive care or specialist support from our Care and Support team.
- ◆ Owner occupiers
- ◆ Members of the public and anyone living in our communities
- ◆ Suppliers and contractors
- ◆ Partner agencies

Family members, health workers, MPs, local councillors or other advocates and those with legal Power of Attorney or acting as a Court of Protection appointed Deputy making a complaint on someone's behalf, providing the customer has authorised in writing for them to do so.

Policy exclusions

We do not have a blanket exclusion policy and will consider all complaints individually. The following are exclusion categories we will consider.

- ◆ Service requests which are defined later in this policy
- ◆ The cause for complaint happened over 12 months ago although we may choose to apply discretion where there is good reason to do so for example:

- Individual personal circumstances such as illness or bereavement
 - Vulnerabilities
 - Where you were not aware of the issues and could not reasonably have been expected to have made the complaint sooner
- ◆ Legal proceedings have started where details of the claim, such as the Claim Form and Particulars of Claim, having been filed at court.
 - ◆ Any issues which have already been fully investigated through this policy and its associated procedure.
 - ◆ Reports of anti-social behaviour, nuisance, hate crime or harassment as these are covered by our Anti-Social Behaviour Policy. Dissatisfaction with our handling of reports of anti-social behaviour would be considered and investigated as a complaint
 - ◆ Dissatisfaction with lettings policy decisions, as this policy has its own process for appeals although we would review claims of failure to follow the Lettings Policy as a complaint
 - ◆ Compensation claims - the reason for claiming compensation may need investigation as a complaint, however the compensation claim itself is considered in line with our Compensation Policy and Guidelines.
 - ◆ Anonymous reports, although these may be investigated if they are a cause for concern
 - ◆ A consultation petition or objections to building work or planning applications.

When a decision is made not to deal with an issue through our complaints process, the full reasons for this will be clearly explained to you and, for landlord services, you will be advised of your right to contact the Housing Ombudsman Service regarding our decision not to investigate. This will also be reported to our Board as part of our quarterly complaints reporting.

Where issues raised are excluded from this policy, we will ensure feedback is captured and used when this policy is reviewed.

An expression of dissatisfaction with services made through a survey is not defined as a complaint, although you can ask us to raise the matter as a complaint if you wish.

Negative comments or messages on social media do not need to be tracked or logged as complaints although it may be appropriate to signpost customers to our complaint process.

4. Definitions

Use the below table to define key phrases that the reader may not have full understanding of. Below are some examples:

Complaint	The Housing Ombudsman Service Complaint Handling Code effective 1 April 2024 defines a complaint as:
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	<i>‘an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the landlord, its own staff, or those acting on its behalf, affecting a resident or group of residents.’</i>
Service Request	The Ombudsman define a service request as: <i>‘a request requiring action to be taken to put something right’.</i>
Remedy	“Remedy” means the action we take to put things right when we have made a mistake, for example where we have caused unreasonable delay or handled an issue badly. Remedy could include any number of things, but i involves acknowledging and owning a mistake.

4.1 Complaints:

You might contact us to complain about being unhappy because we have:

- ◆ done something badly or wrong
- ◆ done something we should not have done
- ◆ failed to do something we should have done
- ◆ treated you unfairly or without respect
- ◆ failed to deliver what was promised

and we want to:

- ◆ put things right for you as soon as possible
- ◆ say sorry when we need to and
- ◆ learn from our mistakes.

You do not have to use the word ‘complaint’ and if you express dissatisfaction, we must offer you the choice to make a complaint unless our policy exclusions apply.

A complaint made by a third party or representative on your behalf will also be handled in line with this policy, subject to the relevant written consents being in place.

4.2 Service Requests

As guided by the Housing Ombudsman, we recognise the difference between a service request and a complaint.

Examples of service requests include when you ask us:

- to complete to a repair
- to carry out a damp and mould inspection
- for information on service charges
- for a change to the menu of Care & Support services
- to record and act on a report of anti-social behaviour.

Although service requests are not complaints, it is important we record and action them within our published timescales. We will use our reporting systems to ensure service requests are tracked to completion and that this is set out in the policy.

If you are dissatisfied that we failed to complete a service request or did not complete it to the required standard this will be recorded as a complaint.

4.3 Examples

Some examples are shown below:

Contact	Service Request or Complaint
My neighbours are keeping me up all night playing loud music	Service request - this will be passed to a Housing Officer and will be managed through our anti-social behaviour (ASB) procedure.
I reported ASB to my Housing Officer six weeks ago. They told me they would come and see me, but I haven't heard anything and it's getting worse.	Complaint - the first contact to report the ASB was a service request and the customer is dissatisfied we did not complete the agreed action.
My heating is not working	Service request – we will make an appointment for our heating team to attend.
You should see the mess the plumber has left behind; it will take me ages to clean this up.	Complaint - this is an expression of dissatisfaction about a service we have delivered.

<p>I asked you to contact me if there was any change in my mum’s health. She had a fall in the care home, and nobody contacted me.</p>	<p>Complaint - the request to be told about changes of wellbeing was a service request and the relative is dissatisfied this wasn’t followed.</p>
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If you express dissatisfaction with our response to the service request, you can make a complaint even if the handling of your service request is ongoing. We will continue our efforts to resolve your service request if you raise a complaint.

5. Roles and Responsibilities

The **Member Responsible for Complaints** (‘the MRC’); is a member of the governing body and has lead responsibility for complaints to support a positive complaint handling culture and is responsible for ensuring the GSA Board has information that provides sufficient oversight and assurance of effective complaint handling.

The **Executive Board** is responsible for ensuring that the GSA Complaints Policy is in place, is compliant with legal and regulatory requirements and creates a positive complaints culture based on openness and transparency.

The **Director of Customer Experience** has overall responsibility for the operational delivery of complaints within GSA.

The **Head of Customer Experience** is responsible for the day-to-day management of complaints, including the arrangements in place to ensure complaints are responded to in line with our policy and procedure and in a manner that demonstrates compliance with the Housing Ombudsman Complaint Handling Code. This includes ensuring that complaints training staff are correctly deployed and have the relevant training and competency to fulfil their role and ensuring oversight and management of complaint performance.

The **Director of Quality and Compliance** acts as Senior Lead Person responsible for complaint handling and is responsible for assess any themes or trends to identify potential systemic issues, serious risks, or policies and procedures that require revision.

Directors across each functional area are responsible for overseeing complaints in their area of responsibility ensuring frameworks are in place to address any thematic areas to reduce the risk of recurrence and improve services to customers.

Managers are responsible for:

- Ensuring all colleagues are aware of the complaints policy and procedure
- Providing information to assist any investigation
- Respond to identified actions identified as resolutions
- Use complaints as an opportunity for learning and service improvement

All **colleagues** are responsible for ensuring that they are aware of the GSA policy and procedure and work in line with the principles and processes set out within it.

6. Policy

Effective complaint handling enables our customers to be heard and understood.

We will ensure we have a clear and accessible complaints process you can understand.

In line with the Housing Ombudsman Complaint Handling Code, we have a two-stage complaint process which is overseen by a designated team.

At each stage of our complaints process, we will:

- handle complaints on their merits, act independently, and have an open mind
- give you a fair chance to set out your position
- take measures to address any actual or perceived conflict of interest
- consider all relevant information and evidence carefully.

We have processes in place to consider which complaints can be responded to quickly and which require further investigation.

In determining this, we will consider factors such as the complexity of the complaint and whether you are vulnerable or at risk. Most Stage 1 complaints can be resolved promptly by giving you an explanation, saying sorry and providing a resolution if one is needed.

When something has gone wrong, we will acknowledge this and set out the actions we have already taken, or intend to take, to put things right. These will include:

- saying sorry
- acknowledging where things have gone wrong.
- providing an explanation, assistance, or reasons
- acting if there has been delay.

Dependent on the complaint, other actions may be:

- reconsidering or changing a decision
- amending a record or adding a correction
- providing a financial remedy
- changing policies, procedures, or practices.

Our remedy offer will clearly set out what will happen and by when, in agreement with you where appropriate. It will consider the impact on you of any fault identified. And for our landlord services, we will consider the guidance issued by the Housing Ombudsman when deciding on appropriate remedies.

In line with Complaint Handling Code, we also have processes in place to manage unacceptable behaviour from customers.

We will only refer to these processes when necessary to do so and any restrictions placed on contact due to unacceptable behaviour will be proportionate and demonstrate regard for the provisions of the Equality Act 2010.

7. Monitoring and Reporting

We monitor and analyse the types of complaints we receive and the way they have been handled. The monitoring and analysis we do helps us to ensure:

- ◆ responses are fair, consistent and appropriate
- ◆ we do not discriminate
- ◆ you can provide feedback on how we handled your complaint
- ◆ our policy and procedure are fit for purpose
- ◆ complaint volumes and resolution stages are tracked, and trends are identified
- ◆ we achieve our timescales and deliver our resolution promises
- ◆ lessons learnt are shared and used to reduce complaints and improve services
- ◆ our colleague training programme is appropriate
- ◆ feedback is given to colleagues on good and poor areas of performance

We regularly report on complaints performance to our leadership and management teams, Boards and relevant Committees and Customer Panel.

A summary of the performance reports produced, complaints outcomes and improvements made is included in our Annual Report and shared on our website.

Our annual complaints performance and service improvement report will be reported to the Board and published on the complaints section of our website. Our Board's response to the report will be published alongside this.

A copy of our most recent annual self-assessment against the Housing Ombudsman Complaint Handling Code will also be available on our website www.greensquareaccord.co.uk

This policy will be reviewed on an annual basis unless there are significant changes in legislation, the Housing Ombudsman Complaint Handling Code or where there are relevant findings from other independent organisations.

8. Assurance

Adherence to this policy is monitored by internal quality checks. This covers both our adherence to complaint timescales and the quality of complaint responses.

- ◆ First Line Assurance – routine checks are carried out by colleagues within our Customer Experience team
- ◆ Second Line Assurance – checks are carried out by the Quality and Compliance team across Operations
- ◆ Third Line Assurance – our complaint handling is also reviewed by third parties, including regulators (such as the Regulator of Social Housing, Housing Ombudsman and Care Quality Commission) or other commissioning authorities (as relevant to service type).

We also invite you and all complainants to complete satisfaction surveys when your complaint has been investigated and responded to.

9. Equality Impact Assessment

We will ensure this policy is applied fairly and consistently to all our customers and in accordance with our values and the principles contained in our internal policies. We will consider our duties under the Equality Act 2010 and anticipate the needs and reasonable adjustments of customers who may need to access the complaints process.

Examples of the reasonable adjustments we may make in complaint handling are:

- using your communication preference for the duration of the complaint, for example contacting you by email
- Extension of any time limits where it is lawful to do so
- Providing information in alternative formats for example easy read, large print or on coloured paper.

- Meeting you in locations appropriate to your needs for example where a hearing loop is available.

When investigating complaints, we will identify if you have any individual needs or vulnerabilities, we should have considered in reviewing how we delivered our service to you. If your needs change, please let us know and we will update our records appropriately.

We will ensure any customer facing information is available in a range of formats to suit everyone's needs and ensure it is truly accessible to all.

An Equality Impact assessment has been completed, and the outcome of the evaluation is that this policy has no significant negative impact on any group of customers who have a protected characteristic. The likelihood and any impact felt by all customers will continue to be assessed as part of the policy's scheduled reviews.

10. Training and Competency

All colleagues will receive appropriate training on this policy and associated procedures.

Complaint handling teams will receive additional training and guidance on complaints handling and investigation.

11. Communication and Implementation

This policy, and the associated procedure, is published on our website.

This includes a summary complaints procedure for customers and an easy-read version.

12. Legal and Regulatory Framework

This Policy is designed to comply with our legal and regulatory responsibilities.

Landlord Services:

- ◆ **The Housing and Regeneration Act 2008** gives the Regulator of Social Housing (RSH) powers to set regulatory standards that define the outcomes that landlords must deliver. This includes the Consumer Standards, part of the RSH regulatory framework. Under the Transparency, Influence and Accountability Standard. we must ensure complaints are addressed fairly, effectively, and promptly.

Specific expectations are:

- Registered providers must ensure their approach to handling complaints is simple, accessible and publicised.
- Registered providers must provide accessible information to tenants about:
 - how tenants can make a complaint about their registered provider
 - the registered provider's complaints policy and complaints handling process
 - what tenants can do if they are dissatisfied with the outcome of a complaint or how a complaint was handled
 - the type of complaints received and how they have learnt from complaints to continuously improve services.
- ◆ **The Social Housing (Regulation) Act 2023** empowered the Housing Ombudsman to issue a code of practice about the procedures members of the scheme should have in place for considering complaints. It also placed a duty on the Housing Ombudsman to monitor compliance with this code. The statutory Complaint Handling Code took effect from 1 April 2024 and the Housing Ombudsman duty to monitor compliance began at the same time.

You have the right to contact the Housing Ombudsman at any stage of our complaints process.

When we provide you with our Stage 1 complaint response, we will give you information on how you can escalate your complaint to Stage 2 if you remain unhappy and give you the contact details for the Ombudsman should you wish to seek further advice about your complaint.

If you escalate your complaint to Stage 2, we will signpost you to the Ombudsman in our response as you can take your complaint to them for investigation if you consider the issues have not been resolved after using our procedure. The Housing Ombudsman's contact details are also available in Appendix 1 and our Customer Complaints Procedure which is published on the complaints section of our website.

Regulated Care Services registered with Care Quality Commission:

- ◆ The Health and Social Care Act 2008 (Regulated Activities) Regulations 2014: Regulation 16 covers the management of complaints.

CQC regulated services must:

- have an effective and accessible system for identifying, receiving, handling and responding to complaints from people using the service, people acting on their behalf or other stakeholders
- and all complaints must be investigated thoroughly, and any necessary action taken where failures have been identified.

For services regulated by CQC you retain the right to contact CQC regarding your concerns, as well as raising these issues directly with us. Although CQC will not investigate individual complaints, they will use the feedback to link into how they monitor and inspect our services.

Although we would always welcome the opportunity to resolve issues directly with you, anyone wishing to raise a concern with CQC can contact the CQC contact centre, at any point in our internal complaints process. Contact details for CQC are available in Appendix 1.

13. Information Sharing and Confidentiality

We will provide information as required in line with relevant law and regulation.

We collect information (personal data) to enable us to:

- ◆ manage and support our relationship with customers to comply with legal obligations
- ◆ improve our services
- ◆ achieve our legitimate business aims

We are committed to complying with data protection legislation when handling data.

Customers have rights including access to their data and to object to the way it is processed. For more information on how and why we process customer data and how customers can exercise their rights please view our full Privacy Policy on our website at [Privacy notice – GreenSquareAccord](#).

Appendix 1: Contact Details

Complaints relating to Landlord services

Housing Ombudsman Service
PO Box 1484
Unit D Preston
PR2 0ET

Telephone: 0300 111 3000

Email: info@housing-ombudsman.org.uk

The First-tier Tribunal may be able to assist you if you are unhappy with the outcome of rent and/or service charge related complaints as your complaint may be out of the jurisdiction of the Housing Ombudsman.

[First-tier Tribunal \(Property Chamber\) - GOV.UK \(www.gov.uk\)](https://www.gov.uk)

Midlands Region:
Centre City Tower
5-7 Hill Street
Birmingham
B5 4UU

Telephone: 0121 600 7888

Email: rpmidland@justice.gov.uk

Southern Region:
Havant Justice Centre
The Court House
Elmleigh Road
Havant
Hants
PO9 2AL

Telephone: 01243 779394

Email: rpsouther@justive.gov.uk

Complaints related to CQC registered services.

CQC National Customer Service Centre
Citygate
Gallowgate

Newcastle upon Tyne
NE1 4PA

Telephone: 03000 616161

Email: www.CQC.org.uk

Local Government and Social Care Ombudsman

PO Box 4771
Coventry
CV4 0EH

Telephone: 0300 061 0614

Email: [Contact us - Local Government and Social Care Ombudsman](#)