

Complaints Procedure

Landlord and property service provision

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1. Introduction

The purpose of this procedure is to provide clear guidance on how we manage complaints for our landlord and property related service provision. It details how we will respond at each of the two stages of the process and the timescales we need to meet.

Complaints about the provision of our Care & Support services are managed using a separate procedure due to the specialist nature of these services except for property related complaints which managed under this procedure.

By managing complaints in line with this procedure we will ensure we achieve the aims set out in our complaints policy and the Housing Ombudsman Complaint Handling Code.

While this is a procedure for colleague use, a summary of key information is available. A shorter customer version of our complaints process can be found on our website, alongside an easy-read version of our complaints policy and procedure.

2. Definitions

It is important we are clear and understand the difference between a service request and a complaint.

The Housing Ombudsman define a service request as:

'a request requiring action to be taken to put something right'.

A service request is not a complaint, however a complaint will be raised if a customer is dissatisfied with our handling of or response to their service request.

The Housing Ombudsman define a complaint as:

'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.'

3. Service Requests

Examples of service requests include when customers ask us:

- to complete to a repair
- to carry out a damp and mould inspection
- for information on service charges
- to record and act on a report of anti-social behaviour

If a customer considers we failed to complete a service request or did not complete it to the required standard this will be logged as a complaint.

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'm going to see my local councillor as it's the fourth appointment which has not been met by your contractor!	Complaint - the request for an appointment was the service request, our failure to attend is an expression of dissatisfaction we did not deliver the service requested

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.

Although service requests are not complaints, and are not recorded as complaints, it is important we record and action service requests within our published timescales and in line with our Customer Contact Procedure and ensure that they are monitored for completion.

Service requests received by our contact centre will be actioned and recorded on the relevant system if we are able to resolve them at the customers first point of contact. If the contact centre are unable to resolve the service request it will be recorded and transferred to the relevant team using the relevant system.

Service requests received by other teams need to be recorded on the relevant system and accurate and complete records maintained of who is managing the request and the action taken to resolve it.

If a customer tells us they are dissatisfied because we failed to complete a service request or did not complete it to the required standard, this needs to be logged as a complaint.

If a customer expresses dissatisfaction with our response to the service request, they can make a complaint even if the handling of the service request is ongoing. We should not stop the efforts to address a service request if a customer raises a complaint.

The flow charts provided by the Housing Ombudsman to help assess whether an issue is a service request, or a complaint are included as Appendix 3. They provide more clarity on the point at which dissatisfaction may be still be a service request.

Example:

A customer asks a heating engineer to attend due to loss of heating - this is a service request.

The customer contacts us to say the heating engineer has not arrived.

Scenario 1: you check the system and can see the appointment window has not yet passed. You confirm this to the customer, reassure them the job is booked in and ask them to call back

if the engineer does not attend within the window. This can be recorded on the relevant system as a service request.

Scenario 2: you call the heating team and find out the heating engineer was held up at an emergency and is on their way. You apologise to the customer and confirm the engineer is on their way. This can be recorded on the relevant system as a service request.

Scenario 3: an appointment was made for an engineer to attend in the morning, and they haven't turned up. You make a call and find the heating team have not allocated anyone to attend and no-one is available. This should be recorded on the relevant system as a complaint.

4. Principles of effective complaint handling

4.1 Approach to complaint handling

It's important to recognise by the time customers come to us to make a complaint they may already be upset, angry or frustrated. Good complaint handling involves us ensuring:

- ◆ we deal with complaints on their merits, act independently, and have an open mind
- ◆ we take ownership of issues and say sorry if we've made a mistake
- ◆ customers feel respected, listened to, taken seriously and given a fair chance to set out their position
- ◆ we're attentive and empathetic
- ◆ we investigate fully all the issues raised by reviewing all relevant evidence
- ◆ problems are resolved within our agreed time frames
- ◆ we learn from our mistakes and share the learning with customers and colleagues.

All colleagues are responsible for receiving complaints and managing them sensitively and confidentially when they are made.

We will assure customers will not be adversely treated or suffer any detriment as a result of raising concerns with us.

4.2 Methods of complaint and access

Customers can complain using a range of methods and we're happy to accept and encourage complaints in any format including face to face, by phone, email, and letter.

Customers must not be made to complete a form or put a complaint in writing. All colleagues should be aware of the complaints process and how to record and transfer a complaint to the correct team. This must be without delay to ensure we can meet our timescales to acknowledge complaints.

We will take all reasonable steps to support customers to access the complaints process and ensure their voice is heard. This will include signposting customers to local advocacy services.

Subject to the relevant written consents, we will also give customers the opportunity to have a representative make the complaint on their behalf, and to be represented or accompanied at any meeting with us.

Some customers may need support to make their complaint using interpretation, signing or advocacy services for example. It's essential we establish and fulfil these individual customer needs appropriately if they are reasonable.

Further information in relation to reasonable adjustments in complaint handling is included within our Reasonable Adjustments Policies. We must keep a record of any reasonable adjustments agreed and these must be kept under active review.

5. Process

5.1 Overview of stages

Once we have determined a customer wants to and is making a complaint and not a service request, we need to handle it by following our complaints process.

In line with the Housing Ombudsman Complaint Handling Code our process has two stages, Stage 1 and Stage 2.

All complaints will initially be considered at Stage 1 and escalated to Stage 2 if the customer remains dissatisfied with our response at Stage 1. We will not refuse to escalate a complaint to Stage 2 of the complaints procedure unless we have a valid reason to do so. Any decision not to escalate a complaint to Stage 2 must be agreed in writing with a director.

Stage 1 complaints will be investigated and responded to by either our Early Resolution Team or Customer Care Team. Further information on the handling of Stage 1 complaints is included in section 6.

Stage 2 complaints will be responded to by our Customer Care Team. We will ensure the colleague investigating and responding has had no prior involvement with the complaint.

The quality of responses at Stage 1 and Stage 2 will be subject to our internal quality assurance processes.

Customers have the right to contact the Housing Ombudsman at any stage of the complaints process although the Ombudsman will not investigate complaints unless we have investigated and responded at both stages of our process.

5.2 Exclusions

We do not have a blanket exclusion policy and will consider each complaint individually. Our complaints policy details our exclusion categories.

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 the customer and they will be advised of their right to contact the Housing Ombudsman Service regarding our decision not to investigate.

5.3 Timescales for acknowledgment and response

All timescales for acknowledging and responding to complaints are in line with the Housing Ombudsman Complaint Handling Code:

	Acknowledgement	Response
Stage 1	Within 5 working days of the complaint being received by the business	Within 10 working days of the complaint being acknowledged. Can be extended by a further 10 working days if necessary. (we should only be extending over the 10 days if it's necessary based on the complexity of the complaint and the customer has been informed of this and the reason)
Stage 2	Within 5 working days of the escalation request being received by the business	Within 20 working days of the complaint being acknowledged Can be extended by a further 20 working days if necessary. we should only be extending over the 10 days if it's necessary based on the complexity of the complaint and the customer has been informed of this and the reason)

The Housing Ombudsman Complaint Handling code defines acknowledgement as a complaint being acknowledged, defined and logged. For Stage 1 Early Resolution complaints we intend to acknowledge and respond to the complaint within 5 working days as detailed in 6.1.1.

The Code refers to ‘working days’ and not calendar days. For the acknowledgement timescales, the day the complaint is received is day zero of the 5 working days.

If a complaint is received on a non-working day or outside of working hours, for example, a complaint received at 11pm, the date received would be counted as the next working day within our working hours. For clarity, our working hours are 8am to 5pm Monday to Friday, excluding bank holidays.

If an extension to the response timescale is needed when considering the complexity of the complaint at Stage 1, we must inform the customer of the expected timescale for response. Any extension must be no more than 10 working days without good reason, and the reason(s) must be clearly explained to the customer. At Stage 2 an extension must be no more than 20 working days.

When we inform a customer about an extension to these timescales, they must be provided with the contact details of the Ombudsman.

Where a response to a complaint will fall outside the timescales set out in this procedure, we must agree with the customer suitable intervals for keeping them informed about their complaint. A record of this discussion and agreement must be kept on the case file.

5.4 “The complaint definition”

The Housing Ombudsman Complaint Handling code requires us to agree the ‘complaint definition.’

When a complaint is responded to at either stage of our process, we must include our understanding of the complaint and the outcomes the customer is seeking. If any aspect of the complaint is unclear, the customer must be asked for clarification.

When a complaint is acknowledged at either stage, we must be clear which aspects of the complaint we are and are not responsible for.

5.5 Responses

Complaints responses should be written in plain English in Ariel and must include the following information:

	Stage 1 Responses	Stage 2 Responses
a)	The complaint stage	The complaint stage
b)	The complaint definition	The complaint definition
c)	The decision on the complaint	The decision on the complaint
d)	The reasons for any decisions made	The reasons for any decisions made

e)	The details of any remedy offered to put things right	The details of any remedy offered to put things right
f)	Details of any outstanding actions	Details of any outstanding actions
g)	Details of how to escalate the matter to Stage 2 if the individual is not satisfied with the response and details of how to contact the Housing Ombudsman	Details of how to escalate the matter to the Ombudsman Service if the individual remains dissatisfied.

All complaint responses, at both Stage 1 and Stage 2 must:

- show empathy and respect
- address all points raised in the complaint definition and provide clear reasons for any decisions, referencing the relevant policy, law, and good practice where appropriate.
- be evidence based using available records
- be provided in line with any reasonable adjustments agreed
- consider any known vulnerabilities we should have considered in our service delivery and complaint handling
- consider performance against our policies, procedures, service standards or other legal or contractual obligations including obligations set out in the tenancy or occupancy agreement.

A complaint response must be provided to the customer even when the answer to the complaint is unknown, not when the outstanding actions required to address the issue are completed.

Outstanding actions will be tracked and monitored to ensure they are actioned promptly with appropriate updates provided to the customer.

5.6 Putting things right

Where something has gone wrong, we must acknowledge this and set out the actions we have already taken, or intend to take, to put things right.

These can include:

- Apologising
- Acknowledging where things have gone wrong
- Providing an explanation, assistance or reasons
- Taking action if there has been delay
- Reconsidering or changing a decision
- Providing a financial remedy
- Changing policies, procedures or practices

Any remedy offered must reflect the impact on the customer caused by any fault identified. Please refer to the Remedies and Compensation policy and procedure.

The remedy offer must clearly set out what will happen and by when, in agreement with the customer where appropriate. Any remedy proposed must be followed through to completion.

We must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies. More information on this is available in our Compensation Policy and Procedure.

In line with the Complaint Handling Code, appropriate remedies can be provided at any point in the complaints process without the need for escalation.

5.7 Complaint Records

A full record must be kept of the complaint, and the outcomes at each stage. This must include the original complaint, and the date received, all correspondence with the customer, correspondence with other parties, and any relevant supporting documentation such as reports, photographs or surveys.

6. Stages

6.1 Stage 1

Where we determine issues fall within the definition of a complaint, and are not a service request, they will be handled at Stage 1 of our complaint procedure. It is important all expressions of dissatisfaction within the scope of the policy are logged as a Stage 1 complaint and an acknowledgment and response are provided to the customer even when issues can be easily resolved.

In line with the Housing Ombudsman Complaint Handling Code, we will determine which complaints can be responded to quickly and which require further investigation by considering factors such as:

- the complexity of the complaint
- ease of resolution
- whether a customer is vulnerable or at risk.

6.1.1 Complaints that can be resolved quickly:

Most stage 1 complaints can be resolved promptly by providing the customer with an explanation, apology and resolution.

If a customer's complaint:

- is about one issue or service type
- is about an issue which occurred recently and has been ongoing for less than three months
- has a clear and simple remedy

it will be assigned and responded to by our Early Resolution Team within five working days of the customer expressing their dissatisfaction and will be managed as follows:

- Customer contacts and expresses dissatisfaction
- Complaint meets Early Resolution criteria
- Case raised to Early Resolution Team in relevant housing management system
- Customer advised of procedure and to expect response in five working days
- Case allocated to Early Resolution Officer
- Case file created and complaint added to register
- Contact made with customer to agree complaint definition and outcome if necessary
- Early Resolution Officer acknowledges, responds in writing and resolves complaint including offer of compensation if required within five working days
- Case file and register updated, compensation requested, and housing management system case closed

All complaint responses are subject to internal quality assurance processes.

All complaints handled by our Early Resolution Team will be acknowledged and responded to within five working days.

There may be isolated cases where a case allocated for early resolution is more complex than initially thought.

If this is the case, there are two options:

Option 1: the Early Resolution Team will acknowledge the complaint within 5 working days, confirming that the customer will have a response within 10 working days.

Option 2: the complaint will be referred to the Customer Care Team as a more complex complaint. Please note, in this scenario, required acknowledgement timescales will remain 5 working days from receipt in the business, therefore the customer will not be disadvantaged through the internal reallocation.

6.1.2 Complaints that are more complex:

Complaints we cannot resolve quickly and easily are usually those which:

- are about multiple issues or service types
- have been ongoing for more than three months
- do not have a clear and simple remedy
- can be sensitive because they involve vulnerabilities or welfare issues
- have serious implications if we fail to resolve them, health and safety for example

These cases will be assigned and responded to by our Customer Care Team within 10 working days of the customers dissatisfaction being acknowledged in writing and will be managed as follows:

- Customer contacts GSA and expresses dissatisfaction
- Complaint does not meet Early Resolution criteria
- Case raised to Customer Care Team in relevant housing management system
- Complaint acknowledged in writing within five working days of expression of dissatisfaction
- Case allocated to Stage 1 Customer Care Specialist (CCS)
- Case file created and complaint added to register
- CCS investigates, responds in writing and resolves complaint including offer of compensation if required within ten working days of acknowledgement
- By exception responses can be extended up to a further 10 working days in agreement with the customer which must be confirmed in writing
- Case file and register updated.

To investigate a complex complaint a Specialist will need to:

- request and review relevant records
- review relevant policies, procedures, and service standards
- review any contractual agreements relevant to the complaint
- contact relevant colleagues and take advice from subject matter experts in other teams
- respond to any communication from the customer
- refer to our remedies and compensation procedure.

The Early Resolution and Customer Care Teams will use templates and follow guidelines to write their responses to ensure the procedure is followed. All Stage 1 responses must include details on how the complaint can be progressed to Stage 2 and the contact details for the Housing Ombudsman. We will ordinarily ask a customer to contact us within 20 working days if they wish to escalate their complaint. We will exercise discretion outside of the 20 working days.

Where customers raise additional complaints during our investigation, these must be included in our Stage 1 response if they are directly related, and the Stage 1 response has not been sent. If the new issues are unrelated to those already being investigated or it would unreasonably delay the response, the new issues must be logged as a new Stage 1 complaint.

A process map of the Stage 1 Process is included in Appendix 1.

6.2 Stage 2

Customers do not need to explain their reasons for requesting an escalation to Stage 2 and it is our responsibility to make reasonable efforts to understand why a customer remains unhappy.

As the person investigating and responding to a complaint at Stage 2 must not be the same person who investigated and responded to the complaint at Stage 1, they will be managed as follows:

- Customer contacts within 20 working days of receiving Stage 1 response and requests to escalate
- Customer sent acknowledgement within five working days and advised will receive response twenty days after acknowledgment
- Case allocated to Stage 2 Customer Care Specialist (CCS)
- Case file and complaint register updated
- CCS investigates, responds in writing and resolves complaint including offer of remedy/compensation if required within twenty working days of acknowledgment
- By exception responses can be extended up to a further 20 working days in agreement with the customer which must be confirmed in writing
- Case file and register updated.

All Stage 2 responses must include details on how the complaint can be escalated to the Housing Ombudsman.

Stage 2 investigations and responses will relate to issues already raised and responded to a Stage 1. Any new expressions of dissatisfaction about issues not included at Stage 1 must be logged as a new Stage 1 complaint and service requests handled following the relevant procedures: reporting and responding to a new repair for example.

All complaint responses are subject to internal quality assurance processes.

7 External Review

If a customer exhausts our internal complaint process and is unhappy with our response at Stage 2, they can refer the matter directly to the Housing Ombudsman Service, relevant Ombudsman Service and/or First Tier Tribunal.

Customers are advised of the external review option available to them in their response letter from our Customer Care Team. The team can provide further information and support in accessing these options if required.

7.1 Housing Ombudsman Service

The Housing Ombudsman Service (HOS) is set up by law to look at complaints about the housing organisations registered with them. The service is free, independent, and impartial for customers and we are members of the scheme. We must follow the HOS Complaint Handling Code and publish our Self-Assessment on complaints on our website and annually review this.

Customers need to refer their complaints to the Ombudsman within six months of receiving our final response and must do so by using one of the options detailed in this section.

There is a dedicated GSA postholder for liaison with the HOS, this postholder is responsible for providing the Ombudsman with copies of policies, procedures, and relevant complaint documentation and evidence as requested within the timescales set. Where other teams are required to contribute information, this must be provided promptly when requested.

We will maintain records of all enquiries from HOS and monitor all action taken in relation to the referral. Any new case documents including the Ombudsman's acknowledgement and final determination will be saved in the corresponding electronic case file, as well as in the relevant case file within the housing management system.

The Executive Team are responsible for ensuring any determinations or recommendations made by the HOS are implemented.

7.2 First Tier Tribunal

If a customer is unhappy with our complaint response specifically regarding rent or service charges, they may be able to refer the matter to the First Tier Tribunal Property Chamber. We will make details of these services available upon request.

The First Tier Tribunal Property Chamber will advise the customer when they may not be able to assist, for example, a customer with an affordable rent or intermediate rent tenancy is not entitled to have their service charge reviewed by the First Tier Tribunal Property Chamber.

7.3 Home Warranty Body

Home buyers who are not satisfied after receiving the response to their complaint can refer their complaint for further external review to the Home Warranty Body. If the complaint falls outside the Warranty dispute resolution scheme, the customer will be offered access to the Independent Dispute Resolution Scheme.

7.4 Considerate Constructors Scheme

Our construction sites and companies, and those of the partners and firms we work with, are all registered with the Considerate Constructors Scheme.

Any complaints received by the scheme will be dealt with by the Scheme's public liaison officer who will mediate between the customer and the relevant site or company manager until the matter has been satisfactorily resolved.

8 MP and Councillor Enquiries

All Member Enquiries (from MPs or Councillors) are received by and responded to by the Customer Care Team. We manage Members Enquiries in the same way as if a customer had made contact. Often, Members Enquiries start as enquiries and lead to service requests being raised.

The Housing Ombudsman Complaint Handling Code states it is reasonable for landlords to have an opportunity to respond to Members Enquiries as service requests for issues reported for the first time. Where we decide to respond in this way, the Member should be informed of the decision and the next steps.

An MP or Councillor enquiry case will be created and used to record and monitor all action taken. All relevant case documents will be saved in the electronic case file, a scanned copy of the enquiry letter and a copy of our response, for example.

MP or Councillor enquiries will be acknowledged within 5 working days and responded to in 10 working days (this may be extended to 20 working days, but this should be by exception, and an update on the revised timescale must be provided).

If Members express dissatisfaction on behalf of a customer with our approach to resolving a service request the customer must be given an opportunity to make a complaint. The Customer Care Team will contact the customer and confirm if they want us to investigate and respond to the issue as a Stage 1 complaint. If they do the complaint will be handled by the Customer Care Team following the process detailed in 6.1.2. In addition to this the Customer Care Team will

respond to the MP and advise we are handling the issue as a Stage 1 complaint and the customer will be advised they can share a copy of our response with them when they receive it.

Where we receive Members Enquiries and our file shows previous repeat contact from a customer about the same issue, this indicates they are still dissatisfied with the handling or outcome of the issue, and they have had to escalate the matter to try and get it resolved. We will contact the customer to explore the reasons they remain dissatisfied and ask if they would like the matter investigated as a complaint. We can still respond to the Members Enquiry to explain the action we have taken.

We should continue our efforts to resolve the service request even if a complaint has been made. We should not wait for the outcome of the complaint investigation to progress the service request.

All third-party enquiries from MPs or Councillors for information about a customer must be made in writing to ensure the request is authentic.

All responses to MP and Councillor enquiries are subject to internal quality assurance processes.

A Head of Service or Director should sign off all responses which are:

- high profile
- complex or
- ♦ involve reputational risk.

9 Complaints made by Third Parties

Where a complaint is made through or by a third party, a relative, friend or advocate for example), we need to establish the third party is acting with the consent of the individual concerned and obtain a signed authority to act form before proceeding if the complaint includes reference to personal information. The consent form is available on the intranet here [Authority to act on a customer's behalf form.pdf](#).

In cases where the person affected is assessed as lacking capacity to consent, we may ask the third party to provide evidence of an appropriate Lasting Power of Attorney. If they don't have the relevant power of attorney, we would make a best interest's decision as to whether the information should be shared. The organisation's Caldicott Guardian must be consulted in such circumstances caldicott.guardian@greensquareaccord.co.uk.

In the case of a person affected who has died, the third party must be a relative or other person who, in our opinion, is the appointed executor, or has a sufficient interest in the customer's welfare and is a suitable person to act as a representative.

In the case of a child, the representative must be a parent, guardian or other adult person who has care of the child. Where the child is in the care of a local authority or a voluntary organisation, the representative must be a person authorised by the local authority or the voluntary organisation.

If authorisation is not received within two weeks the Early Resolution or Customer Care Team will send a reminder restating why it's needed and asking for it to be returned. The customer's wishes and our responsibility to investigate matters of concern brought to our attention must always be considered and the investigation cannot continue until the appropriate consents have been received.

Once consent has been established, the process and investigation will normally follow the same procedure as a complaint made by a customer. However, the Early Resolution and Customer Care Teams must be aware of the confidential nature of the response, and, in some cases, it may be more appropriate to send the reply to the customer concerned advising the third party a reply has been sent. Each case will be considered individually and may vary depending on the degree of personal or sensitive data in the case.

10 Potential safeguarding concerns

Where a complaint relates to a potential safeguarding matter, it is important the agreed safeguarding reporting processes are followed, as detailed in our Safeguarding Policy and Procedure.

In such cases, we are unable to start any investigation until we have received confirmation from the relevant Local Authority safeguarding team that we are the lead agency for investigation purposes. Any resulting delays must be communicated to the complainant.

All such complaints must be logged at the point of receipt, with notes to explain that investigations cannot start until we are instructed to do so by the relevant external agency. In matters referred to the Police, this may require Police approval.

11 Complaints about Contractors or Third Parties

In any circumstance where a complaint is made about a Contractor, it will usually be investigated and managed by us through liaison with the Contractor.

If a complaint investigation and response is handled by a third party, for example a contractor or independent adjudicator, at any stage, it must form part of the two stage complaints process set out in the Complaints Handling Code. Customers must not be expected to go through two complaints processes.

As a member of the Housing Ombudsman scheme, we are responsible for ensuring any third parties handle complaints in line with the Code.

12 Unacceptable Behaviour

We have a policy and procedure in place for managing unacceptable behaviour from customers and/or their representatives.

Any restrictions placed on contact due to unacceptable behaviour must be proportionate and demonstrate regard for the provisions of the Equality Act 2010. We must be able to evidence reasons for putting any restrictions in place and must keep restrictions under regular review.

13 Learning

We want to demonstrate a culture of learning and continuous improvement. Underpinning this are principles of honesty and transparency, acknowledging where we have got things wrong and taking steps to learn from incidents to reduce the risk of recurrence. It is also important we learn lessons from cases which occur in other organisations, taking proactive action to review implications for us and taking action to address any risks or issues.

We collate and share learnings from complaints across teams, to drive service improvements and to inform changes to policies and procedures.

Evergreen sessions are used to review complex and serious complaints with those involved and collate and track actions necessary for service improvement.

On a quarterly basis, a thematic report will be shared across the business, focused on learning from themes identified in complaints and determinations made by the Housing Ombudsman Service. We will use operational newsletters and colleague communications including the Voice of the Customer webinars to share themes and learning.

Themes and trends on complaints, including wider learnings and improvements are monitored and reported on. The Board, relevant Committees and Customer Panel will receive a regular report, produced at least every six months, containing updates of complaints, including the actions agreed and taken.

14 Monitoring and Review

We want to know the complaints service we're providing meets our customers' needs, and the targets we set ourselves ensure we're always striving for service improvement. Performance on complaints is reported in our performance dashboard and through more detailed reporting by the Customer Care Team.

In line with the Housing Ombudsman Complaint Handling Code, we will produce an annual complaints performance and service improvement report for scrutiny and challenge, which must include:

- our annual self-assessment against the Code to ensure our complaint handling policy remains in line with its requirements.
- a qualitative and quantitative analysis of our complaint handling performance. This must also include a summary of the types of complaints we have refused to accept.
- any findings of non-compliance with the Code by the Ombudsman.
- the service improvements we have made as a result of the learning from complaints.
- any annual report about our performance from the Ombudsman; and
- any other relevant reports or publications produced by the Ombudsman in relation to our work.

We will also ensure we share complaints data with customers through our Resident Annual Report. This will include the type of complaints received and how they have learnt from complaints to continuously improve services.

In line with their new statutory powers, we will also be monitored by the Housing Ombudsman.

They will ensure we:

- our Board has scrutinised and challenged our compliance with the Code, complaints handling performance and learning from complaints and published the outcome on our website.
- comply with the Code in policy, and any deviations are explained and are reasonable.
- comply with the Code in practice.

Where a landlord does not meet the requirements in any of the areas and does not move into compliance within a reasonable timescale, the Ombudsman will issue a Complaint Handling Failure Order (CHFO) and publish this.

15 Training

It is important we prioritise complaint handling and embed a culture of learning from complaints across the organisation.

There is a clear expectation that all colleagues:

- have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments.

- take collective responsibility for any shortfalls identified through complaints, rather than blaming others.
- act within the professional standards for engaging with complaints as set by any relevant professional body.

All relevant colleagues must be suitably trained in the importance of complaint handling. This training will be dependent on role and will vary from complaint awareness for all colleagues to more in-depth training for colleagues involved in complaint handling, including the Customer Care Team.

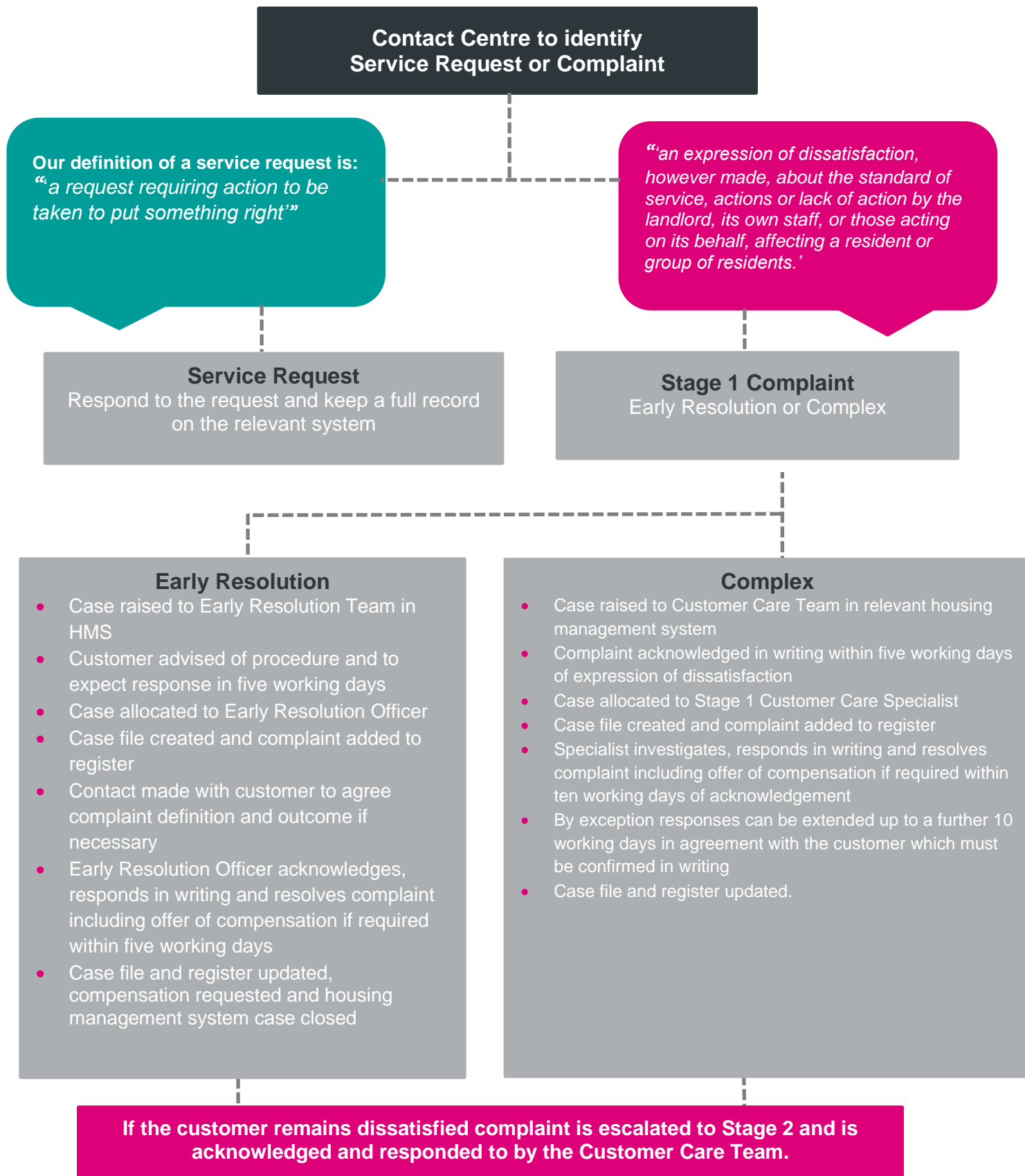
16 Responsibilities

The responsibility for the delivery of our complaints service is not limited to one team, it spans across all departments of the business and post holder levels. This table sets out the different process owners and parts they are responsible for.

Who	What
Board and Executive Team	<ul style="list-style-type: none"> • Policy approval and ensuring Code compliance. • Approval of annual Self-Assessment and Complaint Performance and Service Improvement report • Implementation of actions arising from Housing Ombudsman determinations. • Forwarding all complaints received directly to them to the Customer Care team to manage. • Performance scrutiny by reviewing quarterly Board Reports.
Operations Committee	<ul style="list-style-type: none"> • Oversight of all complaints data and learnings themes through quarterly report. • Responsibility to escalate issues and concerns to the Board.
Senior Lead Person responsible for complaint handling	<ul style="list-style-type: none"> • They must assess any themes or trends to identify potential systemic issues, serious risks, or policies and procedures which require revision. • Oversee completion of the Annual Self-Assessment against the HOS Complaints Handling Code and annual complaints performance and service improvement report
Member Responsible for Complaints ('the MRC'); a member of the governing body	<ul style="list-style-type: none"> • The MRC has lead responsibility for complaints to support a positive complaint handling culture. • The MRC is responsible for ensuring the Board has information which provides insight on complaint handling.

Health & Safety Committee	<ul style="list-style-type: none"> • Overview of complaints relating to Health and Safety
Leadership Team	<ul style="list-style-type: none"> • Promote a positive complaint culture. • Lead, support and implement policy change. • Performance scrutiny through Performance Committee. • Legislation and regulation compliance.
Director of Customer Experience/ Head of Customer Ex	<ul style="list-style-type: none"> • Operational management and oversight of complaint function • Annual review of Complaints Policy & Procedure
Customer Care Manager	<ul style="list-style-type: none"> • Management of Customer Care team. • Policy and procedure compliance. • Performance reporting and monitoring • Completion and cascade of learning dashboard. • Training planning and delivery.
Customer Care Team	<ul style="list-style-type: none"> • Management, investigation & resolution of complex Stage 1 and Stage 2 complaints and Member Enquiries. • Customer liaison. • Identify and share learning outcomes.
Early Resolution Team	<ul style="list-style-type: none"> • Management, investigation & resolution of quickly resolved Stage 1 complaints. • Customer liaison.
Subject Matter Experts	<ul style="list-style-type: none"> • Timely response to requests for information, guidance, and support regarding the resolution of complaints to ensure timescales are met.
Contact Centre	<ul style="list-style-type: none"> • Identification and correct routing of Stage 1 complaints to Early Resolution or Customer Care Team
Customer facing colleagues	<ul style="list-style-type: none"> • Customer service delivery. • Resolution focus. • Effective customer communication.
All colleagues	<ul style="list-style-type: none"> • Provision of information where required to complete complaint investigations, in line with timescales. • Openness and transparency with a focus on learning and improvement

Appendix 1: Complaints Process



Appendix 2: Example of a complaint which can be resolved quickly by acknowledging and responding in one communication.

Thank you for calling us yesterday, 28 February 2024.

Complaint definition: Dissatisfaction with our contractor who failed to attend a scheduled visit today and let you know they weren't coming resulting in you taking time off work unnecessarily.

Resolution requested: To rearrange the appointment at a time convenient to you and to compensate you for lost time.

We have logged this as a Stage 1 complaint under our procedure, and this email is an acknowledgement of your complaint and a response to issues raised.

I am sorry we failed to attend your scheduled appointment today and did not let you know in advance, resulting in you taking time off work unnecessarily. When I spoke to you yesterday, I was not able to confirm why this error had occurred as I needed to speak with the contractor who was not available.

Having spoken with the contractor, I can confirm the operative mistakenly went to the wrong address as a property with a similar address was nearby. The operative did not realise it was the incorrect address and recorded the job as no-one at home.

I am sorry for your experience today and I would like to offer you £50 for the inconvenience experienced.

Having discussed your availability with you, I can confirm an operative will be with you on Friday morning, 1 March 2024. Given the error, and your work commitments, they will arrive by 8am.

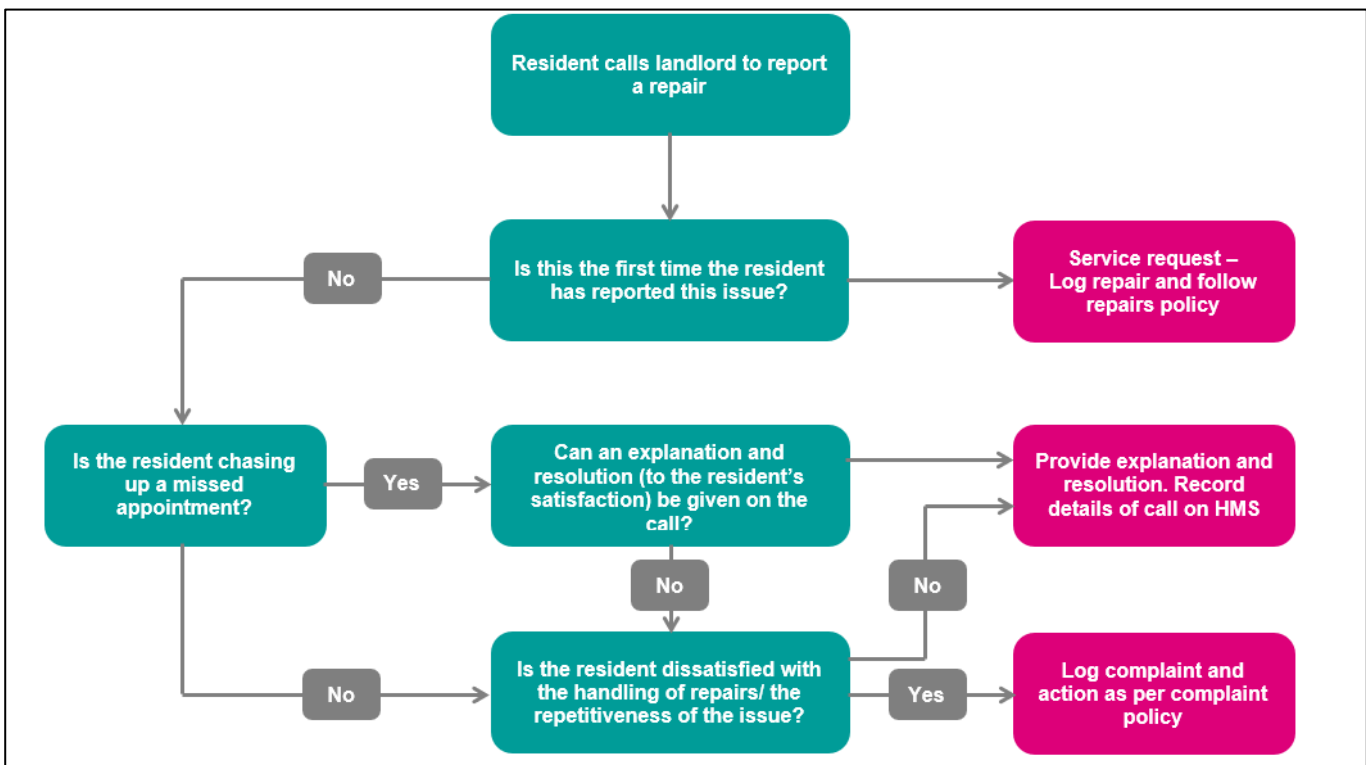
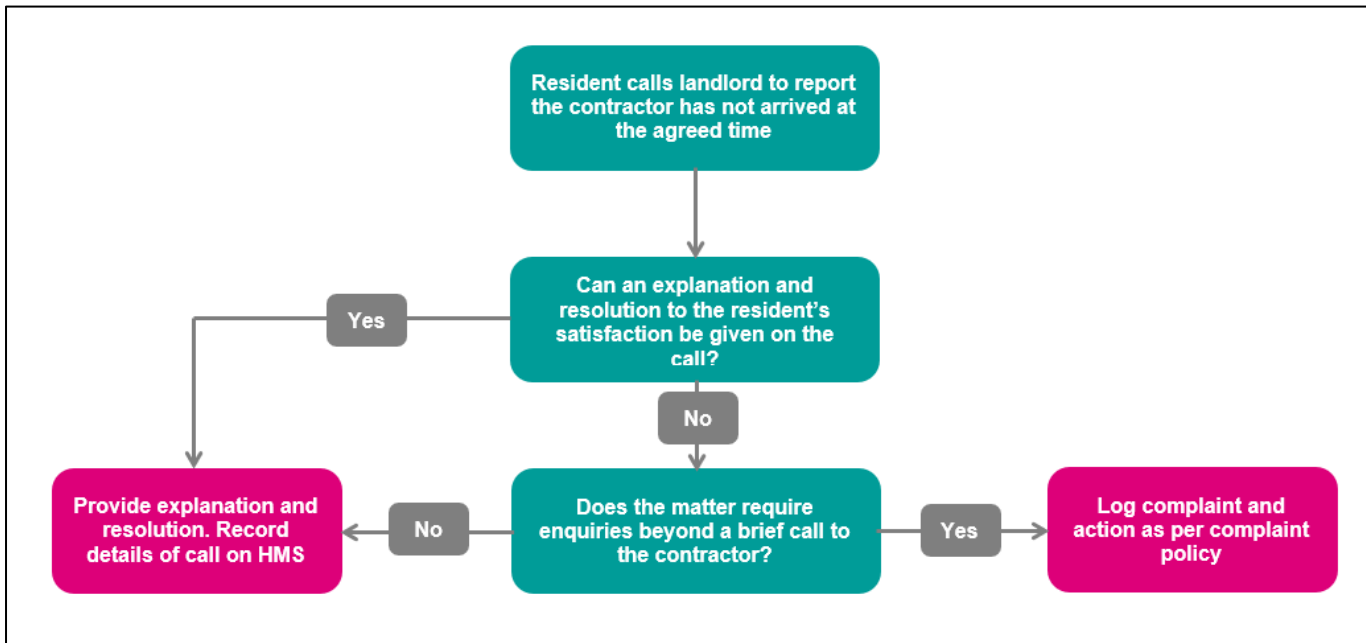
We have made a record regarding the address to avoid any similar confusion occurring again.

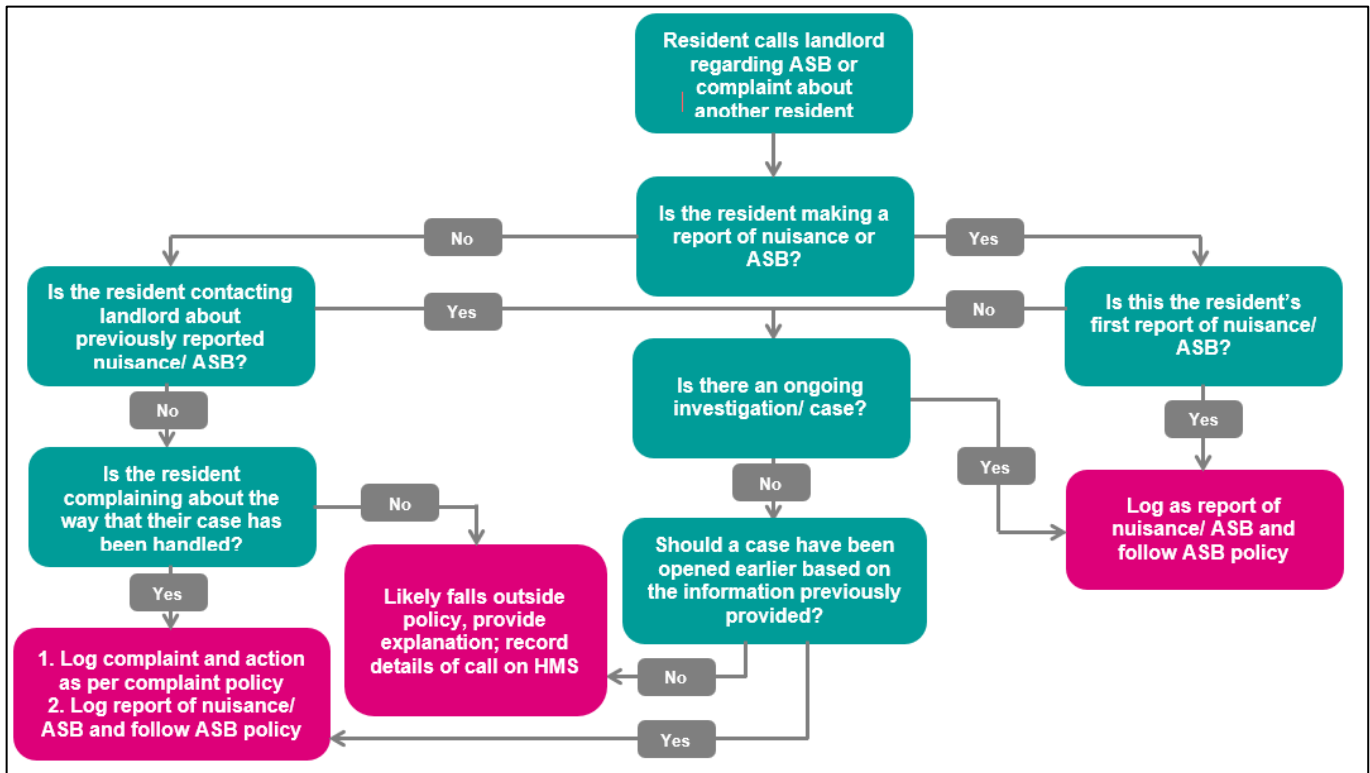
Once again, I am sorry for the service failure you experienced, and I thank you for the opportunity to resolve it for you.

If you remain dissatisfied with this response, you have the right to proceed to Stage 2 of our procedure. A copy of the customer complaint procedure is attached.

This case should be logged as received on 28 February 2024 and recorded as acknowledged and responded to on 29 February 2024.

Appendix 3: Service Request or Complaint Flow Charts provided by Housing Ombudsman





COMPLAINTS PROCEDURE



Procedure Name	Complaints Procedure – Landlord and Property Services		
Date Approved	December 2024	Date of Next Review	December 2025
Date of Issue	December 2024		
Date of Last Review	April 2024	Review Frequency	Annual
Type of document	Procedure		
Leadership Team Owner	Roy Morgan- Director of Customer Experience Alex Hicken- Director of Quality and Compliance		
Subject Matter Expert	Kat Jewell- Customer Care Manager		
Consultation Undertaken	Operational Colleagues		
Approval route	Leadership Team Owner as per Policy Management Framework		
Linked Policies, Procedures and Strategies	Complaints Policy Complaints Procedure – Care & Support Unacceptable Behaviour Policy Unacceptable Behaviour Procedure Remedies and Compensation Policy and Procedure Disrepair Policy Vulnerable Customer Policy and Procedure Customer Contact Procedure Diversity and Inclusion Policy Information Management Policy Data Protection Policy Housing Ombudsman Code on Complaint Handling Customer Engagement Strategy Duty of Candour Procedure Reasonable Adjustments Policy		
Customer Information (where applicable)	Customer Complaints Procedure available on our website		
Forms and Other Links (e.g. links to internal forms and documents and / or external legislation)	Template response letters		
Version Number	V8		

Version	Description of Change	Date Approved
V1	New GSA procedure	May 2021
V2	Care & Support repair and property services complaints are managed by Customer Care from 1 April 2022	March 2022
V3	Amends to reflect revised HOS Code, amend Executive Review response to 10 days (from 5 days), Exec Review responsibilities updated & addition of reference to Evergreen sessions	May 2022
V4	Removal of all references to Designated Person process	June 2022
V5	Annual Review	June 2023

V6	<p>Removed reference to Executive Review NOT being a reinvestigation. Amended wording to explain customer reason for and expectation of escalation is optional Amended to twenty working days to reflect the HOS Code</p>	Oct 2023
V7	<p>Full review to meet the updated HOS code including:</p> <p>Reference to distinction between service requests and complaints. Reference to Stage 1 and Stage 2, removal of Resolve and Step 2 (Customer Care) and 3 (Executive Review).</p> <p>Timescales revised to align with HOS code.</p> <p>Updates to roles and responsibilities/monitoring sections to reflect HOS code changes- including reference to Senior Lead Person responsible for complaints/ Member Responsible for Complaints (MRC).</p> <p>New section on complaints pertaining to Contractors or Third Parties</p> <p>Wording and ordering changes throughout.</p>	March 2024
V8	<p>Update to new procedure template.</p> <p>Added clarification that although this is a procedure, it is shared on our website for openness/ transparency and to demonstrate compliance with the Housing Ombudsman Complaint Handling Code.</p> <p>Changed Compensation policy and procedure title to new title of Remedies and Compensation procedure.</p> <p>General updates throughout to reflect changes in team structure/ names.</p> <p>Updates to 6.1.1- clarification on processes to follow where a case is initially identified as an early resolution case, but it is subsequently identified as more complex.</p>	December 2024