

Complaints service standards

Our promise to you

We are committed to providing excellent customer service, so that every time you contact us you have a good experience. Our Complaints standard sets out what you can expect from us when you make a complaint to Homes Plus.

We will:

- ♦ Log and acknowledge your complaint within five working days. This is the maximum time it will take between making your complaint and hearing back from us. We will respond sooner, if we can.
- ♦ Aim to respond to your stage one complaint within 10 working days of acknowledgement.
- ♦ You can ask us to review your complaint if you are not happy with the response you receive. We will review your complaint and respond to you within 20 working days of your request.
- ♦ Handle complaints fairly and sensitively, in line with our complaints policy and provide a full honest response.
- ♦ Work with you to try and reach a suitable remedy to your complaint.
- ♦ Inform you of your right to contact the Housing Ombudsman at any time throughout the complaints process, as well as your right to have a complaint investigated by them. We will also provide details of how to contact them.
- ♦ Comply with any request for information made by the Housing Ombudsman.
- ♦ Learn from complaints and use them to improve our services.
- ♦ Provide updates to the Homes board to enable them to monitor the issues giving rise to complaints and how we have responded to them.

1. Policy statement and purpose

This policy sets out our approach to managing complaints. It is aligned with our Quality strategy, to ensure that it meets our customer standards, achieves value for money and delivers customer satisfaction.

We will ensure an effective response to complaints in order to:

- ♦ Understand customers' concerns and respond to them without undue delay.
- ♦ Resolve issues at first point of contact.
- ♦ Ensure people who make complaints are kept informed of progress.
- ♦ Minimise customer dissatisfaction with the way we deal with their complaints.
- ♦ Give customers confidence that their complaints will be listened to and acted upon appropriately.
- ♦ Improve customer satisfaction with homes and services.
- ♦ Ensure service failures are addressed.
- ♦ Ensure that lessons are learned.
- ♦ Ensure services are modified and adapted to reduce issues that give rise to dissatisfaction.
- ♦ Comply with requirements of commissioners, Regulators and the Ombudsman service.

This policy should be read in conjunction with the Unreasonable complainant behaviour policy and Compensation policy.

2. What the policy covers

All complaints relating to the provision of housing services and social services provided by Homes Plus and Severn Homes other than matters that are subject to legal action involving either the complainant, their representative or regulatory/law enforcement agencies.

3. Definitions contained in the policy

Complaint. An expression of dissatisfaction, however made, about the standards of our service, actions or lack of action by the organisation, its own staff, or those acting on its behalf, affecting an individual or group of residents.

Customer. Someone who uses – or intends to use – any of the services included in the scope of this policy. This includes people on our waiting lists who may not yet be tenants and anyone waiting to receive a service.

Complainant. Anyone making a complaint, including customers, service users – or their representative – and other people who may be affected by our service delivery.

4. Policy

We will adhere to the Housing Ombudsman's Complaints Handling Code.

A named Executive director and Board member will have overall responsibility for the management of all complaints.

5. How to make a complaint

If someone is dissatisfied with our services, we will encourage them to make a complaint by providing clear information about how to do so. We will accept complaints by email, post, online chat, online customer portals and forms, telephone contact and in person, through conversations with employees or attendance at one of our offices.

Complaints will also be accepted from advocates and elected representatives.

When a complaint is received from a third party who is not an elected representative, we will ensure that the person named in the complaint wishes it to be investigated. We will then agree the approach to responding to the complaint. We will not disclose information to a third party without the consent of the person to whom it relates.

Complaints will be accepted through social media if confidentiality and privacy can be adequately protected.

Any service user, customer, tenant or other person affected by the delivery of our services may raise a complaint that would be accepted by the organisation.

6. Exclusions

In all cases – unless there is sufficient and compelling evidence to the contrary – we will assume that a complaint is genuine and made in good faith. It will be investigated and responded to accordingly.

The list below shows examples of occasions when this policy will **not** apply. Please note: this is not an exhaustive list.

- ♦ **Frivolous or vexatious complaints.** A complaint will be considered to be frivolous or vexatious if it is reasonably believed that:

- It is primarily intended to cause nuisance or annoyance
- It is considered to be motivated primarily by malice towards the organisation or an employee/employees

In such circumstances, a decision may be made by the Director of housing – or a more senior director – not to investigate the complaint. The complainant will be informed and provided with information about the Housing Ombudsman service.

- ♦ **Historic complaints.** If a complaint relates to a situation that occurred more than six months ago, the complainant will be informed that the ability to conduct a robust investigation may be impaired by the passage of time. However, this will not automatically justify a refusal to accept the complaint.
- ♦ **Alternative means of appeal.** If there is an alternative means of appeal, it may be more appropriate to direct the complainant towards that appeal process.
- ♦ **Requests for service.** This could include requests for support with Anti-Social Behaviour (ASB).
- ♦ **Legal proceedings.** The issues identified in the complaint may already be subject to legal proceedings.
- ♦ **Complaint already investigated.** Where a complaint has already been fully investigated and responded to, we may determine that no further investigation is to be undertaken and the complaint will be rejected. The complainant will be notified accordingly. They will be provided with information about the Housing Ombudsman service and advised of any options remaining to pursue their complaint.

In any circumstances where a complaint is not accepted, the complainant will be notified of the decision and the reason – or reasons – why will be explained. The complainant will be advised about how they can proceed with their complaint, if they wish to do so, and we will share information about the Housing Ombudsman service. This will happen within five working days of the organisation receiving the complaint.

7. Stage 1

All accepted complaints (those which are not declined for the reasons set out above) will be logged and acknowledged in writing, within five working days of receipt. The acknowledgement will confirm the detail of the complaint. Complaints will be logged as soon as practicable after receipt and will not be unreasonably delayed.

We will maintain a log which contains all relevant details of the complaint and the desired outcome of the complainant. We will also note any relevant discussions that take place with colleagues internally or between colleagues and the complainant and/or their representatives, where applicable.

Complaints will be investigated by – or under the supervision of – the relevant head of service, who will approve all responses and be responsible for ensuring that complaints are responded to in a timely manner.

At the discretion of the responsible Executive director, an investigation may be managed by a head of service who is not responsible for the service that the complaint relates to.

8. Extensions

Complaints will ordinarily be responded to, in full, within 10 working days of the complaint being logged. Where this is not possible, an extension of 10 working days would be permissible and the complainant will be advised of the delay and the reason for the delay.

Extensions to time taken to respond to a complaint will be considered appropriate if:

- ♦ Key staff required to complete the investigation are absent.
- ♦ The complainant is unavailable to enable a site inspection to take place.
- ♦ More information is required from the complainant.
- ♦ A system failure prevents the dispatch of a response.
- ♦ System failure prevents access to information required to complete the investigation.
- ♦ There is a delay in receiving relevant information from a third party external to the organisation.
- ♦ There is unreasonable behaviour by the complainant that delays the response.

If a complaint cannot be responded to within 20 working days, a Director or Executive director will be required to contact the complainant to explain the reason for the delay and agree the timetable for a final response.

If a complaint is not responded to within 20 working days and an extension cannot be agreed between the Executive director and the complainant, the complainant will be provided with contact details of the Housing Ombudsman.

9. Responses

Responses to complaints should:

- ♦ Be empathetic in tone.
- ♦ Provide details of the investigation – the process and the determinations, including any shortcomings.
- ♦ Identify any action to be taken to remediate the situation that gave rise to the complaint.
- ♦ Identify further steps available to the complainant if they are dissatisfied with the response.

The response will be made in a format appropriate to the complainant. Where the complainant is unable to read English well enough to understand a written response, alternative formats will be offered, including audio communications or a face-to-face meeting.

10. Review - Stage 2

Following an investigation, we will respond to a complaint and this concludes stage 1 of the complaints process.

If the complainant is dissatisfied with the outcome or adequacy of the investigation, they may request that the complaint and response are reviewed by a more senior manager or a manager from a

different department. This request should be made within 20 working days of the date of our stage 1 response, however, we will not unreasonably refuse any escalation outside of this timescale.

A request for a review or an expression of continued dissatisfaction commences stage 2 of the complaints handling procedure. A complaint which is escalated to Stage 2 will ordinarily be accepted unless any of the grounds for exclusion at stage 1 have come into effect.

In the event that a complaint is declined at Stage 2, the Director of housing or a more senior manager will explain to the complainant in writing (or otherwise if more appropriate) why the escalation has not been accepted. The complainant will be provided with information about the Housing Ombudsman Service.

A complainant should receive a response to an escalated complaint within 20 working days of receipt, unless there are exceptional reasons to justify an extension (as established above). Any extension will not be more than 10 working days. Where such an extension is considered necessary, the complainant will be informed of the anticipated extension and the reason for the delay.

The final response to a complaint escalated to Stage 2 will be signed off by the Director of the relevant service or a member of the Executive Team, who will satisfy themselves as to the adequacy of the investigation, the reasonableness of the conclusions reached, the remediation that is proposed and the appropriateness of the tone of the response to the complainant.

On completion of Stage 2 of the complaints handling procedure the complainant should be informed of the process for escalating the matter to the Housing Ombudsman if they feel the complaint has not been resolved to their satisfaction.

11. Lessons learned

On conclusion of the complaints procedure at stage 1 or 2, a record will be made of the lessons learned. This will include any actions – or inaction – that gave rise to the complaints, action(s) required for remediation, the target date for remedial action to be taken and confirmation of the date that it was completed. This information will be reported to the Homes board on a six-monthly basis.

The Homes board will also monitor performance against the Housing Ombudsman's Complaints Handling Code and will receive an annual self-assessment from the Executive director responsible for housing. The outcome of the self-assessment will be publicised on the Homes Plus website.

12. Reasonable adjustments

We understand that some complainants may have difficulty in expressing themselves, communicating a complaint and / or participating in the complaint process, especially when they are anxious or upset.

As such we will always make reasonable adjustments and comply with the Equality Act 2010, enabling complainants to report their concerns and engage in the process. We will consider how we can make reasonable adjustments for a complainant if we are asked to do so.



POL006 - v1 Oct22