

Complaints and Compliments Procedure

Procedure relates to: All saha residents and employees

Introduction and purpose

We are committed to providing a high-quality service for our customers and working in an open and accountable way that builds trust and respect. We strive to deliver excellent services but know that sometimes things go wrong.

We will listen to what has happened and aim to respond positively and effectively to complaints. We will apologise for our mistakes, put things right when they have gone wrong and ensure we learn from these situations to improve our services.

The purpose of this procedure is to ensure compliance with the Housing Ombudsman Service Complaint Handling Code, the Tenant Involvement and Empowerment Regulatory Consumer Standard and the Social Housing White Paper (progressing through Parliamentary stages in 2021).

Definition

We have adopted the Housing Ombudsman's definition of a complaint:

'A complaint shall be defined as an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the organisation, its own staff, or those acting on its behalf, affecting an individual resident or group of residents.' (Code 1.2)

Customers do not have to use the word 'complaint' in order for us to treat it as such.

Feedback concerning disputes between customers is not considered a service complaint. Such feedback is more appropriately addressed through our Anti-Social Behaviour (ASB) Policy and Procedure, unless the feedback refers to how we have managed the process itself.

How can a complaint be made

We provide residents with a number of channels through which to make a complaint including, but not limited to

- Verbally to any saha employee
- By text
- By telephone
- Social media (complaints via this channel will be taken off line by the Customer Insight Team on receipt to ensure confidentiality)
- By email
- Through our website
- In writing
- Through our Customer Service Centre
- Via the Housing Ombudsman

Who are our Designated Complaints Officers?

- Supported Housing Regional Managers
- Supported Housing Service Managers
- General Needs Housing Service Managers
- Senior Housing Services Manager
- Customer Services Team Leader
- Senior Asset Manager
- Asset Managers
- Customer Insight Manager

Responsibilities of our Designated Complaints Officers

Our Designated Complaints Officers will:

- Make initial contact with the complainant agreeing how they prefer to be contacted throughout the process and be the main contact point for the complainant
- Be responsible for carrying out the investigation within the procedure timescale
- Be responsible for the outcome decision of the investigation and responding in writing
- Review the circumstances of the complaint, identifying wider learning outcomes for the organisation and whether anything needs to be 'put right' in terms of our process or systems to the benefit of all residents, making sure this learning and associated actions are captured within the workflow process

Role of the Housing Ombudsman

The Housing Ombudsman can assist residents through the life of a complaint with access to one of the Ombudsman's dispute support advisors.

Residents may complain directly to the Housing Ombudsman if they are still dissatisfied after exhausting our internal complaints process. This should be through a *Designated Person* (with the resident's authorisation) within **eight weeks** of the final decision or directly by the resident after **eight weeks**.

Housing Ombudsman Service, PO Box 152, Liverpool L33 7WQ
Telephone: 0300 111 3000, Fax 020 7831 1942
info@housing-ombudsman.org.uk

We will cooperate with the Ombudsman request for evidence and provide this within **15 working days**. If a response cannot be provided within this timeframe, we shall provide the Ombudsman with an explanation for the delay. If the explanation is reasonable, the Ombudsman will agree a revised date with us.

Failure to provide evidence to the Ombudsman in a timely manner may result in the Ombudsman issuing a complaint handling failure order.

Designated Persons

Residents may approach a "designated person" (introduced by the Localism Act 2011), where they are still dissatisfied after exhausting our internal complaints process. The following are referred to as "designated persons":

- Member of parliament (MP)
- Councillor

The role of a “designated person” is to facilitate the resolution of resident complaints, which may involve; providing advice to residents; advocating on a resident’s behalf; discussing matters with us; engaging with other “designated persons; carrying out other actions

Mediation

Mediation is a voluntary and structured process where an impartial and neutral third party can assist to resolve the complaint.

The offer of mediation will be made within **one working day** of contact from the complainant and if required will be funded by us.

Advocates

A definition of an Advocate is a person who speaks on behalf of the complainant. This would normally include a friend, relative or Support Worker. For this purpose, it does not include members of the legal profession.

An advocate of a resident may also make a complaint in circumstances where the person they are acting on behalf of has the right to complain and

- has requested the representative to act on their behalf
- is unable to complain themselves because of a physical incapacity or a lack of capacity within the meaning of the Mental Capacity Act 2005

Clarification will be sought within **one working day** of contact from the complainant whether an advocate is acting on their behalf and authorisation gained.

Continuous Learning and Improvement

A positive complaint handling culture is integral to the effectiveness with which we resolve disputes, the quality of the service we provide and our ability to learn and improve, and our relationship with our residents.

We will support colleagues in effective complaints handling through the provision of annual training ensuring they are engaged in the complaints process including the valuable learning that can be gained.

An effective complaints process enables us to learn from the issues that arise for residents and to take steps to improve our services and our complaints process.

During our complaints process, we will look beyond the circumstances of the individual complaint and consider whether anything needs to be ‘put right’ in terms of our process or systems to the benefit of all residents.

We recognise the importance of resident involvement in our complaints handling process. Through our T4R resident panel we will consult with residents on the formulation of our complaints policies and procedures. We will also include residents in panel hearings as part of the dispute resolution process, where appropriate.

Recording and Monitoring of Complaints Handling

We will collate a set of measures to evidence compliance with the Complaint Handling Code. We will generate and collect this data through the UH and W2 complaints process.

The Customer Insight Team will gather and monitor customer satisfaction by using transactional satisfaction surveys with complainants once their complaint has been resolved.

The Head of Property and Customer Services will provide a summary of feedback relating to complaints to the Executive Management Team on a monthly basis. This will include the number of complaints that have been agreed and the stage at which they were resolved.

Assurance reporting on performance relating to complaints and customer feedback will be submitted to the Executive Management Team on a quarterly basis and to Board on an annual basis by The Head of Property and Customer Services.

The Head of Property and Customer Services Annual Assurance Report will include the self-assessment outcome and confirmation of compliance with The Housing Ombudsman's Complaint Handling Code alongside scrutiny of the Ombudsman's annual landlord performance report. It will identify and assess themes or trends to identify any systemic issues, serious risks or areas for improvement for appropriate action. It will identify the wider learning and improvements that we have made as a result of the complaints we receive.

We will publish to residents our annual self-assessment against The Housing Ombudsman's Complaint Handling Code via the saha website. This will include the number of complaints and learning outcomes.

We will include wider learning and improvements from the complaints we receive in the saha Annual Report for Residents.

Complaints handling performance including numbers, trends and learning outcomes will be published on an ongoing basis in The Loop newsletter.

UH and W2 Processes

This procedure has associated workflow processes within the UH system which must be followed to ensure that standardised documentation is generated and records created against the tenancy / scheme / contact. The relevant UH processes to be completed are documented within the procedure statement below. All records must be logged on the UH file, correctly labelled including records of any conversations.

Procedure Stages / Actions / Timescales

Stage 1			
1	Complaint received	<p>Any employee receiving a complaint will be responsible for starting the process in W2 and assigning to the relevant Designated Complaints Officer.</p> <p>As a Designated Complaints Officer, once a complaint has been received and assigned to you, there will be a process in your W2 work tray and you will also receive an email alert.</p>	

2	Acknowledging the complaint	The first step is to acknowledge the complaint by contacting the resident, within 1 working day , to introduce yourself, to determine how they would like to be contacted through the process, whether they need an advocate or friend to support them through the process and clarify what the complaint is about You must acknowledge your complaint in writing in 5 working days using the letter contained in W2.	Within 1 and 5 working days
3	Investigating the complaint	During the investigation, you should remain in contact with the resident, keeping them informed of progress, what you have found and the likely decision. You should give the resident the opportunity to correct any misinformation and provide further information before making a final decision.	
4	Complaint Response	You should write to the resident with the outcome of the complaint, using the letter contained within W2.	Within 10 working days
5	Continuous Learning and Improvement	Throughout the process you will be gathering learning outcomes based on your investigation evidence. Looking beyond the circumstances of the individual complaint and considering whether anything needs to be 'put right' in terms of our process or systems, you should log any learning outcomes and associated actions clearly within the W2 process before final complaint closure.	

Stage 2			
1	Complaint escalation	Once a complaint has been escalated to Stage 2, the CSC team will assign the process to a saha senior manager.	
2	Acknowledging the complaint	The first step is to acknowledge the complaint by contacting the resident, within 2 working days , to introduce yourself, to determine how they would like to be contacted through the process, whether they need an advocate or friend to support them through the process and clarify what why they are not satisfied with the Stage 1 outcome. You must acknowledge your complaint in writing within 5 working days using the letter contained in W2.	Within 2 and 5 working days
3	Investigating the complaint	During the investigation, you should: <ul style="list-style-type: none"> • Review the original complaint • Review the initial investigation / specific areas highlighted for dissatisfaction • Review the complaint outcome • Review the stage 1 process / findings / conclusion with the Designated Complaint Officer • Review the continuous learning and improvement outcomes 	
4	Complaint Response	You should remain in contact with the resident, keeping them informed of progress, what you have found and the likely decision. You should give the resident the opportunity to correct any misinformation and provide further information before making a final decision. You should then write to the resident with the outcome of the complaint, using the letter contained within W2.	Within 20 working days
5	Continuous Learning and Improvement	Throughout the Stage 2 process you will be gathering further learning outcomes based on your findings. Looking beyond the circumstances of the individual complaint and considering whether anything needs to be 'put right' in	

	terms of our process or systems, you should log any learning outcomes and associated actions clearly within the W2 process before final complaint closure.	
--	--	--

Agency Managed Services

Our Agency Managed Services (AMS) will investigate and respond to complaints about the service they provide, operating the same principles and timescales as set out in the Complaints Handling Code.

If we receive a complaint relating to our landlord responsibility, we will investigate this through our complaint process.

If we receive a complaint about an agency managed service itself, we will refer this to the managing agent for investigation and resolution and refer the resident to the managing agent's complaints procedure. We will also inform the resident that they are also able to contact the local authority commissioning team where the complaint refers to the support service being provided.

If we receive a complaint about an employee within an agency managed service, we will refer this to their Manager / Area Manager for resolution.

Managing agents will be provided with our Complaints Policy and Procedure at each review cycle.

We will monitor complaints responded to by our Agency Managed Services through:

- Annual onsite quality assurance visits by the saha Regional Manager (Agency Services) and the Quality Assurance Team
- The quarterly reporting of complaints data relating to agency managed services as part of our overall assurance reporting

Compliments

A compliment could be a simple "thank you" or an expression of delight. It might be made in writing, by email, verbally or by any other means.

On receipt of a compliment, using the "Logging Feedback" option within W2contacts, all colleagues will log compliment details on the central register, allowing for periodic reports to be made available to SMT and EMT.

Implementation

Through our equality impact assessment, we will ensure that the implementation of this procedure is proactively inclusive across all activities with particular attention towards the protected characteristics as defined in the Equality Act 2010 whilst also being mindful towards the inclusivity of other vulnerable and marginalised groups that may be affected.

Procedure Review

We will review the operation of this procedure in consultation with our residents (and other stakeholders where appropriate) in light of current best practice, operational requirements, legislation and case law, amending the procedure where required.

Procedure Document History Log

Lead Reviewer	Date			Version	Approval	
	Created	Revised	Expiry		By	Date
	July 2009			1.0	Mon. Com	July 2009
		Oct 2011	Oct 2014	1.1		
BSO		March 2015	March 2018	1.2	DoHCSS	March 2015
HoCS		Oct 2018	Oct 2021	1.3	DoHCSS	Nov 2018
HoCS	Minor amendment	Jan 2019	Oct 2021	1.4	DoHCSS	Jan 2019
BAO	Job title consistency	July 2020	Oct 2021	1.5	n/a	n/a
HoPCS	Full review to align to CHC	June 2021	June 2022	2	SMT	June 2021

Equalities Monitoring Form			
Name of Procedure: Complaints and Compliments Procedure		Carried out by: HoPCS	Date: June 2021
Protected characteristics	Impact <i>(Positive, Negative, Neutral)</i>	Protected characteristics	Impact <i>(Positive, Negative, Neutral)</i>
Age	Neutral	Disability	Neutral
Sex (gender)	Neutral	Race	Neutral
Religion or Belief	Neutral	Sexual Orientation	Neutral
Marriage / Civil Partnerships	Neutral	Pregnancy / Maternity	Neutral
If Negative impact is identified, please complete The Full EMF, including mitigations of risks section, and return to Business Assurance Team.			

Privacy Impact Assessment Form		
Privacy Data Impacting Procedure:	Timescales for Retaining Data:	Notes:
Application form for housing	Duration of tenancy	
Application for transfer		
(including medical assessments result if appropriate)	Duration of tenancy	Must be kept separately from main tenancy file until transfer, after which it can be added to the tenancy file.
Medical assessment form	3 months after transfer	Must never be filed in tenancy file. Must be securely destroyed 3 months after transfer to new property.
Sensitive data consent form	Duration of tenancy	
Rent statements	2 years + current year	NHF best practice
Current tenants' Tenancy Files (including agreement, rent payment history, details of complaints, ASB, etc.)	Duration of tenancy	See above in respect of rent statements

Former tenants' Tenancy Agreements & details of their leaving	Permanently	Independent Housing Ombudsman (IHO) recommendation
Former tenants' Tenancy Files (including rent payment history, details of complaints, ASB, etc.)	3-5 years	IHO recommends 3 years standard. More than this on exception and should be formally authorised