Complaints Policy v1.2

Purpose:	To set out St Anne's approach to handling complaints. To ensure that any complaints or requests for compensation received by the organisation are investigated and a prompt and clear decision given.		
Scope of Policy:	This policy applies to all St Anne's services and all employees, contractors, and volunteers working in these services.		
Issue Date:	July 2025	Review Date:	April 2027
Author:	Rhiannon Kanneh	Position:	Head of Performance
Legal Framework:	Disability Discrimination Act 1995 Equality Act 2010 Human Rights Act 1998 Race Relations Act 1976 Sex Discrimination Act 1975 OISC Regulations Housing Ombudsman's Complaint Handling Code 2024		

Contents

1. Introduction 2
2. Policy Statement 2
3. Complaints Procedure 2
   3.1. Making a Complaint 3
   3.2. Recording a Complaint 3
   3.3. Investigating a Complaint 3
   3.3.1. Stage 1 4
   3.3.1. Stage 2 5
4. External Review 5
5. Exclusions 6
   5.1. Anonymous Complaints 6
   5.2. Non-engagement 6
   5.3. Legal Proceedings 6
   5.4. Complaints More Than 12 Months After the Issue 6
   5.5. Unacceptable Behaviour 7

Appendix 1: Complaint Form 7
Appendix 2: Complaint Acknowledgement (Resolved) Template 7
Appendix 3: Complaint Acknowledgement (Unresolved) Template 7
Appendix 4: Complaint Response Stage 1 Template 8
Appendix 5: Complaint Escalation Acknowledgement Template 8
Appendix 6: Complaint Response Stage 2 Template 8
Appendix 7: Procedure for Making Complaints 9
Appendix 8: Procedure for Investigating Complaints 9

1. Introduction

St Anne's Hostel is committed to the provision of a high-quality service to our customers. We actively encourage complaints, comments, and compliments.

St Anne's has a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments. The aim of this policy is to take collective responsibility for any shortfalls identified through complaints, rather than blaming others, and to act within the professional standards for engaging with complaints as set by any relevant professional body.

We treat all complaints in line with our *Equality, Diversity, and Inclusion Policy*. We understand that some customers may have difficulty participating in the complaint process as laid out in this procedure, and we will always make reasonable adjustments to enable them to report their concerns and engage in the process.

We treat all complaints confidentially according to our *Confidentiality Policy* and procedure and the requirements of Data Protection legislation. This policy complies with the Housing Ombudsman's *Complaint Handling Code 2024*.

We use all customer feedback as an opportunity to understand our strengths and weaknesses, and drive service delivery towards improvement. We collect and analyse information to promote organisational learning and improvement and furnish trustees with information on incidents to allow strategic overview. We publish our annual self-assessment against Housing Ombudsman's *Complaint Handling Code 2024*.

2. Policy Statement

St Anne's defines 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 or a customer or group of customers.

This means a complaint could be about an action or lack of action by an individual, a decision taken by a service, or a procedure of the organisations. A complaint can be received from anyone who is dissatisfied with the service that they have received from St Anne's. Complaints from groups of customers will be handled in line with this policy, as will complaints made by a representative of customers.

A request for a service is not a complaint. A distinction must be made between a request for a service (e.g. reporting an incident of anti-social behaviour) and dissatisfaction with the service received (e.g. complaining that St Anne's has failed to deal adequately with anti-social behaviour reports). However, a complaint must be raised when someone expresses dissatisfaction with the response to their service request, even if the handling of the service request remains ongoing. If this happens we will not stop addressing the service request.

All customers will be advised of the complaint procedure on entry into the service, the complaints procedure will be published on our website, and awareness of the procedure will be raised through the Customer Newsletter and customer events.

3. Complaints Procedure

Wherever possible, it is helpful if complaints are made within 1 month of the event that is being complained about. Complaints made outside that timescale will still be investigated and responded to as St Anne's understands that complaints may arise from the cumulative effects of events, and that sometimes there may be barriers to making a complaint. However, it may be more difficult to effectively investigate complaints that are about less recent events.

3.1. Making a Complaint

A flowchart is available to support this procedure in *Appendix 7: Procedure for Making Complaints*.

A complaint can be made to any staff member. Some ways in which a complaint can be made are:

- saying in person
- writing an email
- making a phone call
- filling in a complaint form
- using St Anne's website

A staff member receiving a complaint should listen to the person's concerns and explain the Complaints Policy to them. If the person would like to make a complaint verbally, the staff member should take the details of the complaint. If the person would like to make a complaint in writing, the staff member should explain ways they can do so and offer them a complaint form (*Appendix 1*). Complaints do not have to be made on a complaint form, but they can be helpful to make sure all the information is clear.

A staff member receiving a complaint should try to resolve the matter. If they are able to do so to the person's satisfaction, they should confirm whether the customer would like someone to further investigate the complaint.

3.2. Recording a Complaint

A staff member receiving a complaint should make a record of the complaint and send it to complaints@springhousing.org.uk to be recorded centrally. If a complaint is made by a customer, the record of the complaint should also be placed in their customer records by the person receiving the complaint. They should include in the record:

- the name of the complainant
- the contact details of the complainant
- the details of the complaint
- the complainant's desired outcome
- whether the complaint has been resolved
- whether the complaint needs to be further investigated

The administration team will record the complaint on the complaint log and save the complaint and all associated correspondence in the complaints folder on SharePoint. Complaints must be acknowledged, defined, and logged within 5 working days of the complaint being received. The administration team will send a letter to the customer acknowledging the complaint, explaining the complaint process, and setting out the actions taken to resolve the complaint. If the complaint needs to be further investigated, the letter must also advise them that they can have a representative deal with their complaint on their behalf and/or be accompanied to any meetings about the complaint, and clearly state who will be investigating their complaint.

3.3. Investigating a Complaint

A flowchart is available to support this procedure in *Appendix 8: Procedure for Investigating Complaints*.

There are two stages to complaints investigation and St Anne's aims to resolve the complaint at the earliest stage possible. In very rare cases there may be a need to respond to a complaint differently (outside the normal procedures) in order to enable an investigation to be completed fully or to meet the needs of the complainant. In such a case, the decision would be taken by the Complaints Lead, and the decision and the reasons behind it would be discussed with the complainant at the earliest opportunity.

3.3.1. Stage 1

At Stage 1 the complaint is investigated by a staff member separate from the situation about which the complaint is made. The investigation must be completed and a response sent to the complainant within 10 working days of the complaint being acknowledged.

The investigating staff member must decide whether an extension to this timescale is needed when considering the complexity of the complaint and then inform the complainant of the expected timescale for response. Any extension must be no more than 10 working days without good reason, and the reasons must be clearly explained to the complainant. They must also be given the contact details of the Housing Ombudsman Service.

The investigating staff member will contact the complainant to confirm the details of the complaint and the complainant's desired outcome. The complaint may be broken into separate parts or considered as a whole depending on the nature and complexity of the complaint. If the complainant makes additional complaints during the investigation, these can be incorporated if they are raised in a timely fashion and are relevant to the original complaint. If the issues are unconnected or would unreasonably delay the response, they may be dealt with separately.

The investigating staff member will examine appropriate records, speak with relevant people, and review applicable policies and procedures in order to investigate the complaint fully. The investigating staff member will then decide whether the complaint, or the separated parts of the complaint, has been upheld.

A complaint response will be produced and sent to the complainant that explains the decision and the reasons behind it. Where complaints are received from groups of residents or customers, the response will be sent to all members of the group who have provided their names and contact details. The complaint response must include:

- the complaint stage
- the details of the complaint
- the decision (or decisions) on the complaint
- the reasons for any decisions made
- actions that have been taken to resolve the complaint (where this is appropriate to share)
- details of any remedy being offered to put things right
- outstanding actions being taken to resolve the complaint (where this is appropriate to share)
- an explanation of how to escalate the matter to Stage 2 if they are dissatisfied with the response

Where a response to a complaint will fall outside this timescale the investigation manager must agree with the complainant suitable intervals for keeping them informed about their complaint.

If the complainant thinks that the response at Stage 1 has not fully addressed their complaint, they may request that their complaint is moved on to the next stage. Requests to move a complaint to the next stage must be received within 10 working days of the date of the Stage 1 response letter.

3.3.1. Stage 2

The administration team will record the escalation request on the complaint log. Complaints must be acknowledged, defined, and logged within 5 working days of the escalation request being received. The administration team will send a letter to the customer acknowledging the complaint, explaining the complaint process, and stating who will be investigating their complaint.

At Stage 2 the complaint is investigated by a senior manager, who is not the staff member who investigated at Stage 1. The investigation must be completed and a response sent to the complainant within 20 working days of the escalation request being acknowledged.

The investigating manager must decide whether an extension to this timescale is needed when considering the complexity of the complaint and then inform the complainant of the expected timescale for response. Any extension must be no more than 20 working days without good reason, and the reasons must be clearly explained to the complainant. They must also be given the contact details of the Housing Ombudsman Service.

The investigating manager will confirm the issues outstanding with the complainant, examine appropriate records, speak with relevant people, and review applicable policies and procedures in order to investigate the complaint fully. The investigating manager will then decide whether the Stage 1 decision has been evidenced or overturned.

A complaint response will be produced and sent to the complainant that explains the decision and the reasons behind it. The complaint response must include:

- the complaint stage
- the details of the complaint
- the decision (or decisions) on the complaint
- the reasons for any decisions made
- actions that have been taken to resolve the complaint (where this is appropriate to share)
- details of any remedy being offered to put things right
- outstanding actions being taken to resolve the complaint (where this is appropriate to share)
- an explanation of how to escalate the matter to the Housing Ombudsman Service if they remain dissatisfied

Where a response to a complaint will fall outside the timescales St Anne's must agree with the complainant suitable intervals for keeping them informed about their complaint.

The complaint response at Stage 2 will constitute St Anne's final response to the complaint.

4. External Review

If the complainant thinks that the final response at Stage 2 has not fully addressed their complaint, they can bring their complaint to the independent Housing Ombudsman Service within 12 months of the final response. They can also contact the Housing Ombudsman if they have evidence that St Anne's is not following its own complaint procedures and the Housing Ombudsman's Complaint Handling Code.

The Housing Ombudsman Service can be contacted using the below details.

Housing Ombudsman

PO Box 152

Liverpool

L33 7WQ

Telephone: 0300 111 3000

Website: www.housing-ombudsman.org.uk

5. Exclusions

If St Anne's decides not to accept a complaint, an explanation will be provided to the complainant setting out the reasons why the matter is not suitable for the complaints process and the right to take that decision to the Ombudsman by contacting the independent Housing Ombudsman Service:

Housing Ombudsman

PO Box 152

Liverpool

L33 7WQ

Telephone: 0300 111 3000

Website: www.housing-ombudsman.org.uk

5.1. Anonymous Complaints

Anonymous complaints will not be able to receive a response in line with the procedure outlined above. However, depending on the nature of the complaint, it may be necessary to investigate the matter and wherever possible people affected by it will be informed of the outcome.

5.2. Non-engagement

Where a complainant does not respond to contact in relation to their complaint, the investigation will be carried out on the basis of the information they provided in their initial complaint. If the complainant thinks that the response does not fully address their complaint, they may request that their complaint is moved on to the next stage. The Stage 2 review does not re-investigate the complaint, but looks at the investigation process and response. Therefore, information not given to the Stage 1 investigator by a complainant who did not engage, will not be a reason to overturn the response.

5.3. Legal Proceedings

Complaints are not progressed through the Complaints procedure when a tenant has started specific legal proceedings against St Anne's with reference to the problem. St Anne's will know that this has happened because details of the claim, such as the Claim Form and Particulars of Claim, will have been filed at court.

5.4. Complaints More Than 12 Months After the Issue

Complaints are not required to be accepted if a complaint is not made within 12 months of the issue occurring or the resident or customer becoming aware of the issue. However, each complaint is considered on its own merits and the Complaints Lead will make a decision as whether to apply discretion to accept a complaint made outside this time limit where there are good reasons to do

so. St Anne's understands that complaints may arise from the cumulative effects of events, and that sometimes there may be barriers to making a complaint.

5.5. Unacceptable Behaviour

We understand that upsetting and distressing circumstances can result in people acting out of character and we do not view behaviour as unacceptable just because a complainant is forceful or determined. St Anne's reserves the right to stop engagement with complaints that are pursued unreasonably or in an unacceptable manner as outlined in The Housing Ombudsman Service's document *Managing Unacceptable Behaviour*. This could include a complainant displaying:

- unreasonable demands (e.g. requesting large volumes of information, asking for responses within a short space of time, refusing to speak to an individual, or insisting on speaking with another)
- unreasonable persistence (e.g. refusing to accept the answer that has been provided, continuing to raise the same subject matter without providing any new evidence, continuously adding to or changing the subject matter of the complaint)
- verbal abuse, aggression, violence (e.g. physical or verbal abuse, but derogatory remarks, rudeness, inflammatory allegations, and threats of violence)
- overload of letters, calls, emails or contact via social media (e.g. excessive frequency of contact, excessive volume of correspondence, excessive frequency of calls, and excessive length of telephone calls)

Where there are concerns about unacceptable behaviour, these will be raised with a complainant and they will be advised of the potential consequences. St Anne's will try and reach a voluntary arrangement with the customer before taking formal action to allow the individual time to consider and adjust their behaviour.

If this informal approach fails, St Anne's will issue a warning to the complainant including examples of where their behaviour has been considered unacceptable with reference to what formal steps may be taken if the behaviour continues. These actions could include:

- providing a single point of contact
- limiting contact to a single method
- limiting contact to certain times
- declining to give any further consideration to an issue unless additional evidence or information is provided.

Appendix 1: Complaint Form

Complaint Form.docx

Appendix 2: Complaint Acknowledgement (Resolved) Template

Complaint%20Acknowledgement%20(Resc

Appendix 3: Complaint Acknowledgement (Unresolved) Template

Complaint%20Acknowledgement%20(Unre

Appendix 4: Complaint Response Stage 1 Template

Complaint%20Response%20Stage%201%2

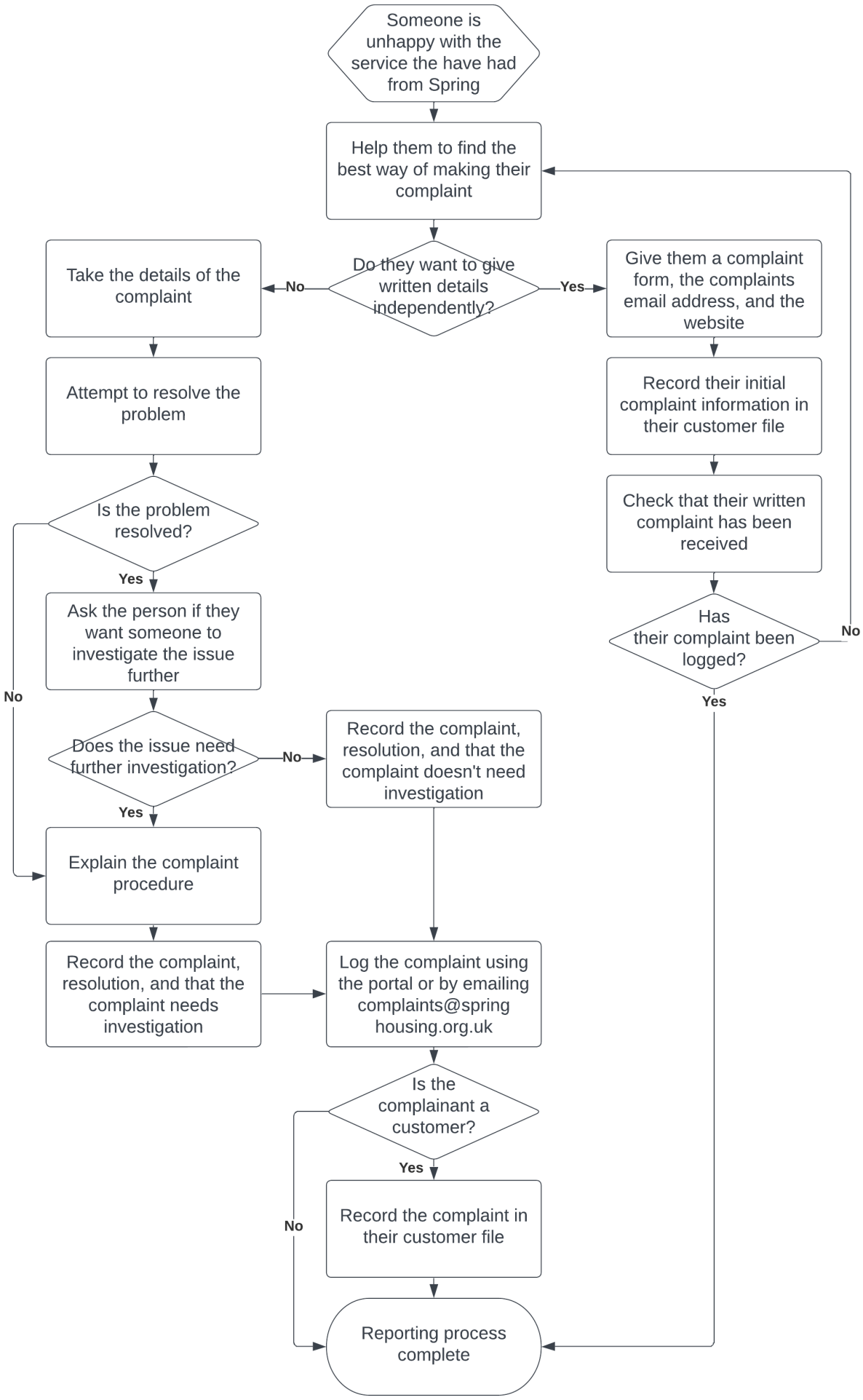
Appendix 5: Complaint Escalation Acknowledgement Template

Escalation%20Acknowledgement%20Temp

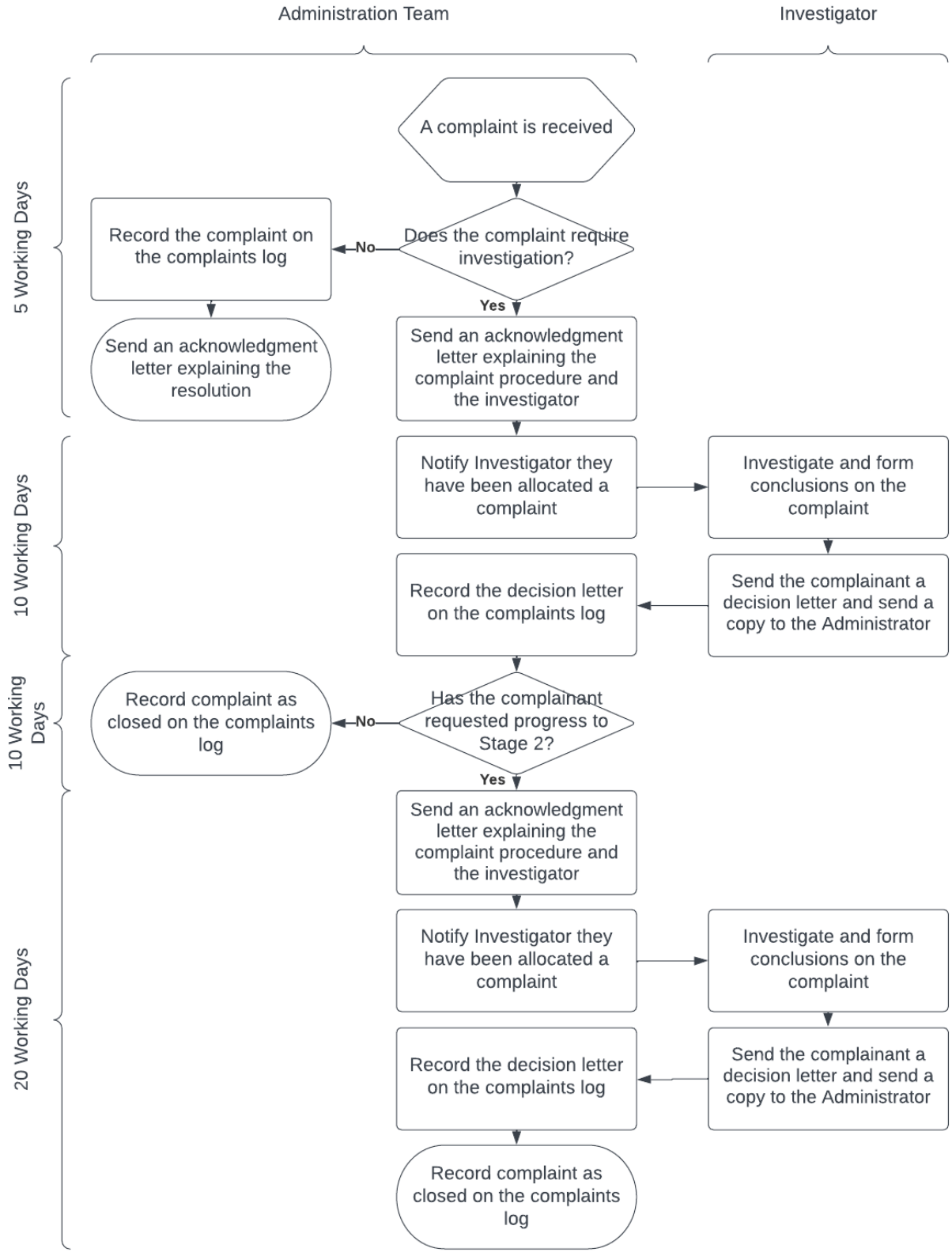
Appendix 6: Complaint Response Stage 2 Template

Complaint%20Response%20Stage%202%2

Appendix 7: Procedure for Making Complaints



Appendix 8: Procedure for Investigating Complaints


Administration Team
Investigator
5 Working Days
10 Working Days
10 Working Days
20 Working Days
A complaint is received
Does the complaint require investigation?
No
Record the complaint on the complaints log
Send an acknowledgment letter explaining the resolution
Yes
Send an acknowledgment letter explaining the complaint procedure and the investigator
Notify Investigator they have been allocated a complaint
Investigate and form conclusions on the complaint
Send the complainant a decision letter and send a copy to the Administrator
Record the decision letter on the complaints log
Has the complainant requested progress to Stage 2?
No
Record complaint as closed on the complaints log
Yes
Send an acknowledgment letter explaining the complaint procedure and the investigator
Notify Investigator they have been allocated a complaint
Investigate and form conclusions on the complaint
Send the complainant a decision letter and send a copy to the Administrator
Record the decision letter on the complaints log
Record complaint as closed on the complaints log