

Introduction

Great Places Housing Group (GPHG) are committed to providing our customers with high quality services and we want to know if we have got something wrong so that we can put things right. If customers are not happy with the quality of the service they receive, or the way they are treated by GPHG staff or our contractors, they have the right to complain.

Complaints may be made by a person who receives or has received services from Great Places or any person affected by Great Places actions, omissions or decisions.

Context

We aim to build on our reputation as an organisation, of being a provider of choice and excellence, ensuring we use complaints as the drivers to delivering improvements that our customers want. We will inform our customers when they have influenced changes to policy and improvements to services and publish our findings. Providing excellent customer services is one of our main corporate objectives and we aim to put the needs and aspirations of our customers at the heart of everything we do. This complaints policy compliments our service standards which promotes:

- QUALITY OF SERVICE - You'll be satisfied with the services we provide
- RIGHT FIRST TIME - We'll do what we promise, the first time you ask us
- AT YOUR CONVENIENCE - We'll adapt our services to be convenient for you
- THE PERSONAL TOUCH - We'll aim to meet your individual needs
- KEEPING IN CONTACT - We'll keep you up to date until your issue is resolved

From 1st April 2012 the HCA introduced a new regulatory framework for social housing in England and this policy adheres to the standards relating to complaints which state:

Registered Providers shall:

- have an approach to complaints that is clear, simple and accessible that ensures that complaints are resolved promptly, politely and fairly

and specifically

- shall offer a range of ways for tenants to express a complaint and set out clear service standards for responding to complaints, including complaints about performance against the standards, and details of what to do if they are unhappy with the outcome of a complaint. Providers shall inform tenants how they use complaints to improve their services. Registered providers shall publish information about complaints each year, including their number and nature, and the outcome of the complaints. Providers shall accept complaints made by advocates authorised to act on a tenant's/tenants' behalf.

Great Places have also signed up the CIH Complaints Charter which sets out the outcomes that an effective complaints handling service can achieve. The five core commitments are:

- Our positive and flexible approach to complaints is embedded throughout our organisation
- Our complaints service is open and accessible to all
- We deliver a quality complaints service
- We work with our customers to shape and improve our complaints service
- We monitor our performance and learn from feedback to continually improve our services

Aims & Objectives

Policy Aims

- To increase customer satisfaction by resolving complaints promptly, politely, fairly and in a consistent manner.
- To achieve continuous improvement by recording and reviewing areas of the service which cause dissatisfaction amongst customers and learning from the trends that are identified.

Policy Objectives

- To set out a consistent framework for dealing with complaints.
- To make the process customer focused and customer friendly.
- To give staff and residents alike a clear set of expectations as to how complaints will be dealt with.
- To clarify who can make a complaint and who will deal with complaints at the various stages.
- To set out the procedures to be followed in resolving complaints.

What is involved?

What is a Complaint

GPHG define a complaint as:

'Where a customer is dissatisfied with the service they have received from Great Places, or one of our contractors, and want us to respond or take action.'

For example, if a customer is upset about the attitude of a member of GPHG staff, or if they feel a service standard, policy or procedure has not been met, or our contractor fails to attend an appointment, they can make a complaint.

What is not a Complaint

GPHG does not class any of the following as a complaint or service failure:

- Reports of fly tipping or vandalism
- Request for a Repair or Improvement Works
- Neighbour nuisance or anti-social behaviour reports
- Complaints about the actions of an organisation that is not working for, or supported by, GPHG

Although we do not treat these issues as a complaint under this procedure, we will deal with them in an appropriate manner.

How can customers make a complaint

Customers can make a complaint in any of the following ways:

- telephone
- email
- website
- letter
- fax
- text message
- in person
- social media

Advocates

A representative of a person may also make a complaint. The representative must be acting on behalf of a person who had a right to complain where this person:

- Is unable to complain themselves because of: a physical incapacity or a lack of capacity within the meaning of the Mental Capacity Act 2005; or
- Has requested the representative to act on their behalf (proof must be provided in this instance); or
- Has died

The Complaint Resolution Process

Great Places acknowledges that sometimes we get things wrong or don't meet the high levels of service our customers expect. We want to ensure that we resolve any customer dissatisfaction or complaint as quickly as possible and have therefore developed a simple process for resolving complaints. This process adheres to the principles outlined in the Housing Ombudsman Service Advice & Good Practice regarding complaint resolution:

'Nip it in the Bud' (Informal)

If a customer is unhappy with the service they have received from GPHG or one of our contractors they should contact GPHG to express their initial dissatisfaction. An officer from the relevant service will investigate the complaint and try to resolve the issue to the customer's satisfaction within 5 working days.

If the customer is unhappy with the resolution offered at this stage they have the option for this to be moved to 'Right First Time'.

On rare occasions a complaint may be deemed to be very sensitive and requires the immediate involvement of a service manager and will therefore be dealt with immediately at 'Right First Time'.

'Right First Time' (Formal)

Once a complaint has been made formal it will be allocated to an appropriate service manager who will try to resolve the complaint within 15 working days. The service manager will initially discuss the complaint directly with the customer (preferably face-to-face) to gain a better understanding of the issues and resolution that is being requested. The service manager will then carry out a thorough, timely and appropriate investigation. Throughout the investigation the service manager will keep the customer regularly updated on progress before discussing their findings and resolution with the customer directly. The service manager will then confirm their decision, an explanation of why they made this decision and their resolution in a formal letter.

If the service manager cannot complete their investigation within 20 working days, a letter will be sent to explain the reasons for delay and how long they expect the investigation to take.

If a customer believes that Great Places have failed to fully address their complaint they may request a 'case review'. This request must clearly outline the reasons why the complaint hasn't been fully considered and include any supporting evidence.

If a case review is deemed appropriate an independent manager and a Tenant Services Committee member will review the complaint within 15 working days. The Complaint Co-ordinator will then confirm their decision, an explanation of why they made this decision and their resolution in a formal letter.

External Complaint Process

If after the service manager has discussed and confirmed their final decision and resolution the customer is still dissatisfied with the outcome or that the issue is still unresolved the customer can refer their complaint to a Designated Person. A Designated Person acts as an independent person or group who can assist in helping to resolve a complaint locally or may refer the complaint to the Housing Ombudsman.

There are three types of Designated Person who customers can refer their complaint to:

- A local Councillor
- A local MP
- Designated Tenant Panel – Great Places are currently consulting with our tenants on the development of a Designated Tenant Panel.

If a Designated Person becomes involved in facilitating the resolution of a complaint a Great Places senior manager will be allocated as the lead case review officer.

Housing Ombudsman

Customers can also refer their complaint directly to the Housing Ombudsman but must wait eight weeks from the date of the final decision and resolution offered by Great Places. Customers can contact the Ombudsman by:

Writing to: Housing Ombudsman Service
Exchange Tower, Harbour Exchange Square
London
E14 9GE
Telephone 0300 111 3000

Faxing: 020 7831 1942

Emailing: info@housing-ombudsman.org.uk

Policy Exceptions

There are occasions when it is not appropriate to use this procedure. Below are some examples:

- When matters are raised that are already being considered by the Courts
- If a criminal Police investigation is invoked
- If a complaint has arisen out of the alleged failure to comply with a request for information under the Freedom of Information Act 2000.
- If a complaint has arisen out of the alleged failure to comply with a request for information under the Data Protection Act 1998.
- If a complaint is received that relates to a Director the Chief Executive will investigate the complaint and if appropriate appoint an independent investigator.
- If a complaint is received that relates to a member of the Board, the Chair shall determine whether to instigate a disciplinary hearing, with advice from the Chief Executive.

Unacceptable Behaviour

Unfortunately there are rare occasions where Great Places considers the actions or behaviour of a customer unacceptable. The following section explains how Great Places will deal with the very few occasions when this issue arises.

We do not view behaviour as unacceptable just because someone is assertive or determined. There may have been upsetting or distressing circumstances leading up to a customer approaching Great Places and people may act out of character. However the actions of some customers who are angry or persistent may result in unreasonable demands on, or behaviour towards our staff and we will take appropriate action to manage such behaviour. We have grouped the behaviour under two broad headings:

Aggressive or abusive behaviour

Our staff understand the difference between anger and aggression. For example many complainants feel angry about the events that resulted in them contacting us. However, it is not acceptable when anger escalates into aggression towards our staff. Aggression is not restricted to acts that may result in physical harm but also includes behaviour or language that may cause staff to feel afraid, threatened, or abused.

Examples of aggressive behaviour include:

- threats
- physical violence
- personal abuse
- derogatory or discriminatory remarks
- rudeness
- inflammatory statements and unsubstantiated allegations

Reports of this type of behaviour will be investigated and managed by our Managing Abusive and Aggressive Behaviour Policy which can be found [here](#).

Unreasonable demands

Customers may make what we consider unreasonable demands if they impact substantially on our work through the amount of information they seek or provide, the nature and scale of service they expect, or the regularity or number of approaches they make.

Examples of this behaviour include:

- asking for responses within an unreasonable timescale,
- insisting on communicating with a particular member of staff,
- continual phone calls, emails, or letters,
- repeatedly changing the substance of the complaint or raising unrelated concerns
- refusal to co-operate with the complaint investigation process while still requesting their complaint be resolved
- persistent refusal to accept a decision
- persistent refusal to accept explanations relating to what Great Places can or cannot do
- continuing to pursue a complaint case without presenting any new information

The way in which these customers approach us may be reasonable, but it is their persistent behaviour in continuing to do so that is not.

How we manage unreasonable demands will depend on the nature and extent of it. Steps we may take include, separately or in combination:

- restricting contact in person, by telephone, fax, letter or electronically or by any combination of these
- restricting the frequency of contact
- restricting access to the complaints process in future

Customers will be informed in writing of any decision to invoke these steps and the customer can appeal the decision to by writing to the Customer Involvement Manager.

Learning from Complaints

GPHG will produce monthly reports which tracks complaints and highlights areas for improvement. These reports are disseminated to senior management and Directors who use this information to drive change and help improve services where appropriate.

In order to provide this information, learning assessment forms are completed at the resolution of each complaint. This records: timescales, issues, themes, lessons learnt and changes made as a result. From this, we develop learning and make changes to the way we operate and implement this learning across the organisation, sharing good practice and new ways of working.

Who will be involved?

Frontline Staff – First point of contact to record complaints and try to ‘Nip it in the Bud’ if appropriate

Service Managers – To carry out a thorough, timely and appropriate investigation at ‘Right First Time’.

Complaints Co-ordinator – Ensuring that complaints are recorded and responded to within the agreed timescales . To provide support and advice to Frontline Staff and Management to aid effective complaint resolution.

Customer Involvement Manager – Providing strategic management of the complaints policy and procedures

Continuous Improvement Manager - Monitoring and reporting on trends and learning outcomes

Senior Management – Liaise with Designated Person

CSV – overall performance

Board - overall performance

Links to Related Procedures

Complaints Procedure
Compensation Policy

Equality Impact Assessment Screening

Question	Yes/No (add explanatory notes if appropriate)
Could there be any equality issues arising from this policy? (If no, you do not need to answer the following questions but must provide justification for why)	No - All corrective actions around making communication accessible for all have been incorporated into the policy
Is there any reason that some groups may not receive a fair and equal service?	No
Could this issue have a significant impact?	No
Will the policy impact on a significant proportion of people? (include justification for why you think it is significant or not)	No
Is there any reason to believe service user/employee profile is not consistent with community profile?	No
Is there any evidence to suggest that any part of the policy, practice or procedure could discriminate unlawfully, directly or indirectly, against different groups?	No
	0

Score:

5-6 = high priority

3-4 = medium priority

1-2 = low priority

0 = no EIA required

Policy Approval Date:	August 2016 – amendments including revised timescales and IHO contact details
Equality Impact Assessment Date:	N/A
Safeguarding impact	N/A
Policy Review Date:	August 2019
Lead Team:	Customer Involvement
Level of Authorisation Required:	Directors