

## Complaints service standards

### Our promise to you

**We are committed to offering excellent customer service, so that every time you contact us you have a good experience. Our complaints and feedback policy sets out what you can expect from us when you make a complaint or provide feedback on our services.**

**Our customer advocacy team will work with our customers, colleagues and stakeholders to put right what has gone wrong, wherever possible. They will make sure all necessary learning has taken place and services are improved as a result of a complaint.**

#### We will:

- ◆ Log your complaint or feedback within five working days and get in touch to let you know that we've received it. We will respond sooner if we can. Please note that our working days are Monday to Friday and don't include evenings, weekends and bank holidays.
- ◆ Aim to respond to your stage 1 complaint within 10 working days of letting you know that we have received it. Please note that County Town Homes complaints will follow a different timescale and process to comply with the relevant code for homebuilders.
- ◆ Contact you to discuss your complaint.
- ◆ Review your complaint again if you let us know that you are not happy with the response you receive. We will do that within 20 working days of us acknowledging your request. Please note that County Town Homes complaints will follow a different timescale and process, to comply with the relevant code for homebuilders.
- ◆ Our customer advocacy team will work with you to find a solution to your complaint that you are happy with and they will keep you informed throughout the process.
- ◆ Provide you with information regarding the relevant Ombudsman service and your rights to contact them at any time regarding your complaint. Contact details of the relevant service will be provided to you.
- ◆ Learn from complaints, comments and compliments, and use them to improve our services. We will share news about our improvements through customer newsletters and e-bulletins, in our annual report and on our websites.
- ◆ Give updates to the Customer Partnership Panel and Homes Board so that they can review the issues giving rise to complaints and understand what improvements we have made as a result.

Policy	Complaints and feedback policy
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Version	2
Responsible board	Housing Plus Group board
Responsible officer	Director of improving the customer experience

## 1. Policy statement and purpose

This policy sets out our approach to managing complaints and other feedback. It is linked to our quality strategy, to make sure that it meets our customer service standards, achieves value for money and delivers customer satisfaction.

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

### Complaints

We will:

- ◆ Understand the customers' reasons for dissatisfaction and respond to them without unnecessary delay in our role as customer advocates.
- ◆ Make sure customers are kept up to date with progress of the complaint.
- ◆ Use learning from complaints and other feedback to improve services and our customers experience.
- ◆ Keep to the requirements of commissioners, Regulators, and the relevant Ombudsman service.

### Comments

We will use comments to influence service improvements.

### Compliments

We will use compliments to make sure we are identifying and celebrating behaviours and actions that customers value so they can be replicated and expanded on.

## 2. What the policy covers

All comments, compliments, and complaints about the provision of housing services and care services provided by Homes Plus, Severn Homes and Care Plus. This includes complaints about employee conduct, attitudes and approach.

All complaints relating to the outright purchase of a home from County Town Homes are covered by this policy but have different timescales. You can find details of the County Town Homes complaints process in **Appendix A**.

### Out of scope of this policy

It does not include matters that are subject to legal action involving the complainant, their representative or regulatory/law enforcement agencies.

### 3. Definitions contained in the policy

**Advocate.** An advocate is someone who gives voice to someone else by supporting them and helping them express their views.

**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.

**Comment.** A note about the services we provide or a suggestion for improvement. This includes feedback from customers about one of our policies. We will consider this feedback when we next review the relevant policy.

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

**Compliment.** A customer thanking us for a service we have provided.

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

**Elected member.** An official chosen by election. This will be the Ward Councillor from your local council or your Member of Parliament (MP).

**Service request.** A request from a person to the organisation, which asks for action to be taken. Please note that service requests are not complaints. If you are not happy with the response to your request, we will raise a complaint for you. We will do this even if the service request is still being carried out.

### 4. Anonymous complaints

If a complaint is made anonymously, we will still investigate it as long as we have enough information. We would prefer that you leave us your name and address so that we can let you know the outcome of your complaint.

### 5. Applying the policy

#### Care Plus customers

Care Plus aims to make sure that all complaints and compliments are managed in line with The Health and Social Care Act 2008 (Regulated Activities) Regulations 2024.

#### County Town Homes customers

For complaints that relate to outright sales from County Town Homes, we will follow the relevant consumer code.

#### Homes Plus customers

We will follow the Housing Ombudsman's Complaint Handling Code.

### 6. Safeguarding concerns.

If a complaint involves alleged abuse or the suspicion that abuse has occurred, we will refer to our safeguarding policy.

### 7. How to make a complaint

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.

We will accept complaints through social media if the customer's confidentiality and privacy can be adequately protected.

We will accept complaints from any customer, service user, tenant or any other person affected by the delivery of our services.

Customers might like to have someone deal with their complaint on their behalf. They may also like to have someone attend meetings for them or accompany them, for support. This may be an advocate, carer, family member, elected member, agency or professional body.

If a complainant would like to be represented, we must have signed authority from the customer to give us permission to work with the appointed person. We will make sure that the person making the complaint wishes it to be investigated. We will then agree the approach to responding to the complaint. Please note that we will not share any information with a third party, without the approval of the person making the complaint.

## 8. Exclusions

In all cases – unless there is enough 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.

### Complaint already investigated

When a complaint has already been fully investigated and responded to, we may decide that no further investigation is to be undertaken and the complaint will be rejected.

### Frivolous or unreasonably persistent complaints.

A complaint will be considered to be frivolous or unreasonably persistent 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.

If this is the case a decision may be made by the director of housing, the head of regulated care if the complaint relates to regulated care services or a more senior director, not to investigate the complaint. The complainant will be told about the relevant Ombudsman service and given their information.

### Historic complaints

We would generally expect a complaint to be made no later than 12 months after the event occurred or 12 months after the event came to the complainant's attention.

The time limit will not apply if:

- ♦ The complainant can give a good reason for not making the complaint within the 12-month time limit and despite the delay, it is still possible to investigate the complaint effectively and fairly.
- ♦ The nature of the complaint is so severe that we should investigate it even at a late stage.

### Legal proceedings

The problems identified in the complaint may already be subject to legal proceedings. Legal proceedings are defined as details of the claim, such as the Claim Form and Particulars of Claim, having been filed at court.

## Other means of appeal

If there is another means of appeal, it may be more suitable to direct the complainant towards that appeal process.

## Requests for service

This could include requests for support with Anti-Social Behaviour (ASB).

In any circumstances where a complaint is not accepted, the complainant will be told of the decision and the reason – or reasons – why will be explained. The complainant will be told how they can continue with their complaint, if they wish to do so, and we will share information about the relevant Ombudsman service. This will happen within 5 working days of the organisation receiving the complaint.

## 9. Complaints process – stage 1

*(Please see Appendix A for County Town Homes complaints process)*

All accepted complaints will be logged, and we will write to you to let you know that we've received your feedback, within 5 working days. Our response will confirm the detail of the complaint. Complaints will be logged as soon as possible after receipt and will not be unreasonably delayed.

We will keep a log which contains all relevant details of the complaint and the result the complainant would like. 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 and a customer advocacy officer, who will approve all responses and be responsible for making sure that complaints are responded to in a timely way. We aim to respond within 10 working days of letting you know we received your complaint.

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.

## Extensions

Complaints will usually 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 told of the delay and the reason for it.

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

- ◆ Key employees are absent, who are needed to complete the investigation.
- ◆ The complainant is unavailable for a home visit.
- ◆ We need more information from the person making the complaint.
- ◆ The case is complex and needs involvement from multiple services.
- ◆ Severe situations outside of our control prevent a home visit taking place. This could be extreme weather or flooding.
- ◆ A system or IT failure prevents a response being sent.
- ◆ A system or IT failure prevents us getting access to information that we need to complete the investigation.
- ◆ There is a delay in us receiving relevant information from a third-party. This will be someone outside our 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 need to contact the complainant to explain the reason for the delay and agree the timescale for a final response.

In all cases where there is an extension, we will share details of the relevant Ombudsman service with the complainant.

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

## Responses

Responses to complaints will be shared in a way that has been agreed with the complainant. If the person making the complaint is unable to read English well enough to understand a written response, we will offer other options. This includes audio communications or face-to-face meetings.

### 10. Review – Stage 2

If the complainant is dissatisfied with the outcome of the investigation at stage 1, they may ask that the complaint and response are reviewed. 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 begins stage 2 of the complaints handling procedure. A complaint which is escalated to stage 2 will usually be accepted unless any of the grounds for exclusion at stage 1 have come into effect.

If a complaint is declined at stage 2, the director of housing or a more senior manager will explain to the complainant why the escalation has not been accepted. This will usually be done in writing but we can provide other formats, if necessary. The complainant will be given information about the relevant Ombudsman service.

A stage 2 complaint will be reviewed by the senior advocacy officer. You should receive a response to an escalated complaint within 20 working days of us sending you an acknowledgement, unless there are exceptional reasons to justify an extension as shown above. Any extension will not be more than 20 working days. If such an extension is considered necessary, we will discuss this with the complainant and explain 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. They will make sure they are satisfied with the adequacy of the investigation, the reasonableness of the conclusions reached and the solution that is proposed.

At the end of stage 2 of the complaints handling procedure, the complainant will be told of the process for escalating the matter to the relevant Ombudsman service if they feel the complaint has not been resolved to their satisfaction.

### 11. Ombudsman services

If you are still unhappy after your complaint has been reviewed at stage 2, you can contact the relevant Ombudsman service. Please note that a separate process applies for customers of County Town Homes, which can be found in Appendix A.

## Housing Ombudsman

If you are a Homes Plus customer and your complaint falls within the remit of the Housing Ombudsman service, you can contact them at any time during the complaints process.

**Write to:** Housing Ombudsman Service, PO Box 152, Liverpool, L33 7WQ

**Call:** 0300 111 3000

**Email:** [info@housing-ombudsman.org.uk](mailto:info@housing-ombudsman.org.uk)

**Complete an online form:** [www.housingombudsman.org.uk/contact-us](http://www.housingombudsman.org.uk/contact-us)

## Local Government and Social Care Ombudsman

If you are a Care Plus customer and you are making a complaint about the care you receive, you can contact the Local Government and Social Care Ombudsman.

**Write to:** Local Government and Social Care Ombudsman, PO Box 4771, Coventry, CV4 0EH

**Call:** 0300 061 0614

**Complete an online form:** <https://www.lgo.org.uk/how-to-complain>

## 12. Lessons learned

At the end of the complaint's 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) needed for remediation, the target date for remedial action to be taken and the date that it was finished. This information will be reported to the Customer Partnership Panel and the Homes Board.

The Homes Board will also check performance against the Housing Ombudsman's Complaints Handling Code and will receive an annual self-assessment from the executive director responsible for housing. The results of the self-assessment will be published on the Homes Plus website.

## 13. Publication

The complaints policy and details of Ombudsman services will be published on the Housing Plus Group website and websites for the organisations that make up our Group.

We will publish regular reminders about how to make a complaint, where to find the complaints policy and relevant Ombudsman scheme information in our newsletters for customers and monthly e-bulletin emails.

Information about the complaints policy can also be found in the pack provided to new tenants when they sign a tenancy agreement and in our retirement living schemes.

## 14. Reasonable adjustments

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

Our Equity, Diversity and Inclusion (EDI) commitment is to make sure that everyone has an equal opportunity to get the best outcomes from our services and that people are not disadvantaged for any reason. If you need any additional support, our customer advocacy officer will help you through the complaints process, to make sure you get the best possible outcome.

We will always make reasonable changes and follow the Equality Act 2010, helping complainants to tell us their concerns and engage in the process. Please refer to the reasonable adjustments policy for more information.

## Other documents

This policy should be read and used along with:

- ◆ Care Plus duty of candour policy
- ◆ Compensation policy
- ◆ Reasonable adjustments policy
- ◆ Safeguarding policy
- ◆ Social media policy

Appendix A - County Town Homes complaints procedure.



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