

Complaints Policy

Policy reference	CC1-POL-FH
Version number	5.1
Date applies from	01.04.2024
Policy owner	Head of Customer Experience (Complaints)
Next review Date	01.04.2025

Annual Checks

Policy owners should ensure that an annual check of hyperlinks, roles, and names is undertaken. These checks are in addition to formal review process. Please see Policy and Procedure framework guidance for further details.

UNCONTROLLED IF PRINTED

Aim of the Policy

This policy outlines how we seek to resolve complaints as quickly as possible by being fair, putting things right and learning from complaint outcomes.

We welcome complaints and actively encourage customers to express their dissatisfaction to us. All expressions of dissatisfaction are a positive opportunity to gather insight that will help us improve our services.

Our approach aligns to The Housing Ombudsman's Complaint Handling Code, April 2024, which sets out the requirements on how to respond to complaints effectively and fairly.

Definition of a complaint

A complaint is defined as “an expression of dissatisfaction, however made, about the standard of services, actions or lack of action by ForHousing (FH), its own staff, of those acting on its behalf, affecting a customer or group of customers”.

The customer does not have to use the word ‘complaint’ for it to be treated as such. We accept complaints within twelve months of the event but will use discretion to consider cases outside this timescale (see exclusions).

A complaint that is submitted via a third party or an advocate will be handled in line with this policy.

When we receive an expression of dissatisfaction, we will seek to distinguish whether it is a complaint or a service request.

What is a Service Request?

ForHousing will not treat service requests as complaints. A service request is a request from a customer requiring action to be taken to put something right, for example a request for a repair, reporting a neighbourhood issue or anti-social behaviour. We record service requests separately to complaints, and we monitor and review them regularly. If a service request is not dealt with appropriately, the customer can raise this as a formal complaint under this policy.

Who can make a complaint?

Any person using FH services can make a complaint. This includes customers of FH owned properties, leaseholders, and shared owners.

You can also authorise a representative to make a complaint on your behalf. This could be a friend, partner, relative or someone from an external organisation. If you would like someone to act on your behalf, let us know. We need your consent to share details with your representative.

Where a complaint is made by a group of residents or any other group of people, in order to handle the complaint efficiently, we will ask for a single point of contact to be nominated.

Exclusions

We will consider each complaint on its own merits and consider the individual circumstances. There will be exceptional situations when a matter will not be considered as a complaint or escalated, which could include:

- An initial request for a service, e.g. first reporting of a repair, which will be dealt with as a service request.
- Reports of anti-social behaviour or breaches of tenancy.
- The issue giving rise to the complaint occurring over twelve months ago, however, we will apply discretion to this where there are good reasons to do so.
- Closed complaints which have previously been raised and have already been considered under FHs Complaints Policy.
- Where the HOS has already determined the outcome of an investigation.
- Legal proceedings have started. This is defined as details of the claim, such as the Claim Form and Particulars of Claim, having been filed at court.
- Insurance matters where an insurance claim has been made e.g. damages or personal injury.
- Complaints about services, persons, or bodies which FH has no control.

Anonymous complaints and those from non-FH customers will be recorded, depending on the issue we may still investigate outside of this policy.

If FH decides not to accept a complaint, an explanation will be provided to the customer setting out the reasons why the matter is not suitable for the complaints process and the right to take that decision to the Ombudsman. If the Ombudsman does not agree that the exclusion has been fairly applied, the Ombudsman may advise FH to investigate the complaint.

Accessibility and awareness.

We want FH's complaints process to be easily accessible and simple to follow. Customers and their representatives can report a complaint in several ways.

- Via our website – www.forhousing.co.uk and then navigate to the complaints and feedback page ([Complaints - ForHousing](#))
- If you have downloaded the My account + app, you can report a complaint and will be redirected to our website to log the details of your complaint.
- By emailing hello@forhousing.co.uk
- By writing to 52 Regent Street, Eccles, M30 0BP
- Over the phone by calling 0300 123 5522
- In person by calling into our Regent Street office in Eccles, M30 0BP, Monday – Friday 10am – 4pm or our Stockbridge Village office, L28 1NR, open Monday and Wednesday 11am – 2pm.
- You can raise a complaint with any member of FH staff or appointed contractors. All staff will be aware of the complaints process and be able to pass your complaint to the Complaints Team.

We encourage you to contact the Complaints Team at complaintsco@forhousing.co.uk if you believe that we can make reasonable adjustments to enable you to fully access our complaints service. We will agree with you about what may be reasonable based on your individual needs. We value diversity and work to create an inclusive environment for our customers and colleagues, where everyone has access to the same opportunities.

We welcome our responsibility to comply with equalities legislation and regulatory requirements that relate to equity, diversity and inclusion and aim to do more. Through our activities we aim to remove systemic barriers to equal opportunities and eliminate all forms of discrimination, harassment, and victimisation within our organisation.

We are committed to providing excellent customer services, which are fair, equitable and inclusive. As such, we will endeavour to understand and make any reasonable adjustments required for customers in line with ForHousing's Reasonable Adjustment Statement and the Equality Act 2010. Any reasonable adjustment provided will be recorded and kept under active review.

Examples of reasonable adjustments we might make include providing a translator or information in a different format.

This Complaints Policy is published on our website and available in other accessible formats on request.

The Housing Ombudsman Service can also provide advice and support in relation to complaints. The details of how to access their services are provided on our website, in complaint outcome letters, the link to their website is included here : www.housing-ombudsman.org.uk

The Housing Ombudsman Service contact details:

Housing Ombudsman Service PO Box 1484 Unit D Preston PR2 0ET

Telephone: 0300 111 3000

Email: info@housing-ombudsman.org.uk

Website: www.housing-ombudsman.org.uk

Related Legislation and Regulation

- Housing Ombudsman Complaint Handling Code 2024
- The Social Housing (Regulation) Act 2023
- The Building Safety Act 2022
- Data Protection Act 2018
- The Equality Act 2010
- Localism Act 2011
- Housing Act 1985 and 1996
- Landlord and Tenant Act 1985
- Regulator for Social Housing Consumer Standards

Policy

This policy provides the framework for handling complaints. We will not treat customers differently if they complain. The early and local resolution of issues between FH and our customers is key to effective complaint handling.

Complaint handling staff

FH have a designated team, of complaint handlers, assigned to take responsibility for complaint handling, including liaison with the Ombudsman and ensuring complaints are

reported to the governing body (or equivalent). The complaint handlers have access to staff at all levels to facilitate the prompt resolution of complaints. In addition, they have authority and autonomy to act to resolve disputes promptly and fairly.

We prioritise complaint handling and a culture of learning from complaints. All staff are suitably trained in the importance of complaint handling.

The Complaint Handling Process

FH has a two stage complaints process.

When a complaint is logged at Stage 1 or escalated to Stage 2, FH will set out our understanding of the complaint and the outcomes the customer is seeking. This is referred to as “the complaint definition”. If any aspect of the complaint is unclear, we will ask the customer for clarification. We will be clear about which aspects of the complaint we are, and are not, responsible for investigating and clarify any areas where this is not clear.

At each stage of the complaints process, the complaint handlers will:

- deal with complaints on their merits, act independently, and have an open mind.
- give the resident a fair chance to set out their position.
- take measures to address any actual or perceived conflict of interest.
- and consider all relevant information and evidence carefully.

Where a response to a complaint will fall outside the timescales set out in this policy, FH will agree with the customer suitable intervals for keeping them informed about their complaint.

A full record will be kept of the complaint, and the outcomes at each stage. This will include the original complaint and the date received, all correspondence with the customer, correspondence with other parties, and any relevant supporting documentation such as reports or surveys.

FH will ensure appropriate remedies can be provided at any stage of the complaints process without the need for escalation.

FH has a policy and procedure in place for managing unacceptable behaviour from customers and/or their representatives. Please see Unacceptable Behaviour Policy.

FH have a two stage complaints process. We will consider which complaints can be responded to as early as possible, and which require further investigation. We will consider factors such as the complexity of the complaint and whether the customer is vulnerable or at risk. Most Stage 1 complaints can be resolved promptly with an explanation, apology or resolution provided to the customer.

Stage 1

Will be acknowledged, defined, and logged within **5 working days the complaint being received**.

FH will issue a full response to Stage 1 complaints within **10 working days of the complaint being acknowledged**. If an extension to this timescale is needed when considering the complexity of the complaint, we will inform the customer of the expected timescale for response. Any extension will be no more than 10 working days without good reason, and the

reason(s) will be clearly explained to the customer, and they will be provided with the contact details of the Housing Ombudsman Service.

A complaint response will be provided to the customer when the answer to the complaint is known, not when the outstanding actions required to address the issue are completed.

Outstanding actions will be tracked and actioned promptly with appropriate updates provided to the resident. The response will address all points raised in the complaint definition and provide clear reasons for any decisions, referencing the relevant policy, law, and good practice where appropriate.

Where customers raise additional complaints during the investigation, these will be incorporated into the Stage 1 response if they are related, and the Stage 1 response has not been issued. Where the Stage 1 response has been issued, the new issues are unrelated to the issues already being investigated or it would unreasonably delay the response, the new issues will be logged as a new complaint.

The written complaint response to the customer at the completion of Stage 1 will be in clear, plain language and include:

- the complaint stage.
- the complaint definition.
- the decision on the complaint.
- the reasons for any decisions made.
- the details of any remedy offered to put things right.
- details of any outstanding actions; and
- details of how to escalate the matter to Stage 2 if the individual is not satisfied with the response.

Stage 2

If all or part of the complaint is not resolved to the satisfaction of the customer at stage 1, it will be escalated to Stage 2. The Stage 2 investigation is not conducted by the same person that considered the complaint at stage 1.

Requests for Stage 2 must be acknowledged, defined, and logged at Stage 2 of the complaint's procedure within **5 working days of the escalation request being received**.

Customers are not required to explain their reasons for requesting Stage 2. FH will make reasonable efforts to understand why a customer remains unhappy as part of its Stage 2 response.

We will issue a final response to Stage 2 within **20 working days of the complaint being acknowledged**. If an extension to this timescale is needed when considering the complexity of the complaint, we will inform the customer of the expected timescale for response. Any extension must be no more than 20 working days without good reason, and the reason(s) will be clearly explained to the customer, and they will be provided with the contact details of the Housing Ombudsman Service.

A complaint response will be provided to the customer when the answer to the complaint is known, not when the outstanding actions required to address the issue are completed.

Outstanding actions will be tracked and actioned promptly with appropriate updates provided to

the resident. The response will address all points raised in the complaint definition and provide clear reasons for any decisions, referencing the relevant policy, law and good practice where appropriate.

The written complaint response to the customer at the completion of Stage 2 will be in clear, plain language and include:

- the complaint stage.
- the complaint definition.
- the decision on the complaint.
- the reasons for any decisions made.
- the details of any remedy offered to put things right.
- details of any outstanding actions; and
- details of how to escalate the matter to the Ombudsman Service if the individual remains dissatisfied.

Stage 2 is FHs final response and will involve all suitable members needed to issue such a response.

Putting things right

Where something has gone wrong FH will acknowledge this and set out the actions it has already taken, or intends to take, to put things right. This can happen at any stage of the process, without the need for escalation. These can include:

- Apologising.
- Acknowledging where things have gone wrong.
- Providing an explanation, assistance, or reasons.
- Taking action if there has been delay.
- Reconsidering or changing a decision.
- Amending a record or adding a correction or addendum.
- Providing a financial remedy.
- Changing policies, procedures, or practices.

Any remedy will reflect the impact on the customer because of any fault identified and take account of the guidance issued by the HOS. The remedy offer will clearly set out what will happen and by when, in agreement with the customer where appropriate. Any remedy proposed will be followed through to completion.

Any financial remedy will be offered in conjunction with the FH Compensation Policy.

How the policy will be delivered

Scrutiny and Oversight

We recognise the importance of learning from complaints and value the opportunities they give us to make improvements. We will share what we've learned and the service improvements we implement with customers, colleagues, and relevant committees.

The following people have lead responsibilities for complaints in our organisation: The Member Responsible for Complaints (the MRC) is a member of our governing body (the FH Board) who is appointed to have lead responsibility for complaints to support a positive complaint handling

culture. Currently, this is a Board member and Customer Committee Chair.

The senior lead person is a senior manager who is accountable for complaint handling. This person must assess any themes or trends to identify potential systemic issues, serious risks, or policies and procedures that require revision. Currently, this is the Executive Director of Customer.

The Complaints and Feedback Panel regularly reviews complaints learnings and trends and to ensure compliance with this policy and to make recommendations for future handling and management of complaints.

Equity and reasonable adjustment statement

We value diversity and work to create an inclusive environment for our customers and colleagues, where everyone has access to the same opportunities. We welcome our responsibility to comply with equalities legislation and regulatory requirements that relate to equity, diversity and inclusion and aim to do more. Through our activities we aim to remove systemic barriers to equal opportunities and eliminate all forms of discrimination, harassment, and victimisation within our organisation.

We are committed to providing excellent customer services, which are fair, equitable and inclusive. As such, we will endeavour to understand and make any reasonable adjustments required for customers in line with ForHousing's Reasonable Adjustment Statement and the Equality Act 2010. Any reasonable adjustment provided will be recorded and kept under active review.

Related documents

- Unacceptable Behaviour Policy
- Unacceptable Behaviour Procedure
- Reasonable Adjustment Statement
- Compensation Policy
- Compensation Procedure
- Complaints Procedure

Inclusive Decision-Making Framework (IDMF) analysis

Date of approved IDMF analysis	This policy complies with The Housing Ombudsman's Complaint Handling Code. The Housing Ombudsman provides information on how the code has ensured complaints handling is accessible on their website. This policy has been reviewed by the Equity, Diversity and Inclusion Service Excellence Group.
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Actions taken forward to mitigate any potential negative impact	The application of the Policy will be monitored to understand the impact on customers ensuring Equity, Diversity, and Inclusion.
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Data Protection Impact Assessment

Data Protection Impact Assessment (DPIA)

Under the UK GDPR and the Data Protection Act 2018, you are required to carry out a DPIA when developing a new Policy or Procedure that will have a widespread or serious impact on data held on individuals. Careful consideration should be given as to whether the policy or process will have an impact on any processing of personal information that is large scale, involves profiling or monitoring, decides on access to services or opportunities, or involves sensitive data or vulnerable individuals. Information and support regarding this can be obtained from the Data Protection Officer (DPO).

Has a DPIA been completed?	31/03/2024
If a DPIA has been completed, was the DPO consulted?	Yes
If a DPIA has been completed, were any risks identified?	No
If risks were identified as part of the DPIA process, have mitigation actions been identified?	No

Consultation

The Policy has been developed with colleagues across several FH service areas. Involved customers will also review the annual self-assessment to provide scrutiny that we are compliant with The Housing Ombudsman's Complaint Handling Code.

Self-assessment, reporting and compliance

We will produce an annual complaints performance and service improvement report. This report, alongside our Customer Committee's response to it, is published in the complaints section of our website.

The Housing Ombudsman requires that we self-assess against its Complaint Handling Code 'the Code' each year. We must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.

If we are unable to comply with the Code due to exceptional circumstances, such as a cyber incident, we will inform the Ombudsman, provide information to residents who may be affected and publish this on our website. We will include a timescale for returning to compliance with the Code.

Monitoring and review of this policy.

Complaints will be recorded through the housing management system (QL) and reported via a Power BI dashboard which is available to teams and managers across ForHousing.

Complaints are contained within the suite of key performance indicators which are routinely reported through the governance arrangement at ForHousing.

Satisfaction with complaints handling is part of the tenant satisfaction measures that are collected and reported in line with the regulatory guidance.

Regular audits will be carried out to ensure compliance with policy and guidance.

We will publish information about the complaints we receive every year on our website in the Annual Report. This will include the number, nature, and outcome of complaints and how we learned from complaints and applied that learning to improve our services.

This policy will be reviewed annually or where there have been significant changes to regulation, legislation, operations or best practice to warrant a further policy review.

Policy summary for the intranet

This policy supports a positive complaint handling culture with an approach which is clear, simple, and accessible to resolve complaints promptly, politely, and fairly. It represents the Housing Ombudsman code for complaints handling and sets out how complaints will be managed and learning from complaints will be used to improve services.

Words linked to this policy for intranet searches

Complaint
Service Request
Ombudsman
Stage 1
Stage 2
Remedy
Compensation
Insight

Where this policy should be accessible

ForHousing owned.
ForLiving

Control data and approval history

Action	Approved by	Date
Approval	Relevant lead or director	26/05/2024
Approval	Executive Management Team representative(s)	26/05/2024
Approval	Relevant board / committee	N/A
Inclusive Decision-Making Framework review and advise	Relevant director	11/04/2024

Health and Safety review and advise	Health and Safety	N/A
Data protection impact assessment	Data Protection Officer	28/03/2024
Legal review and advise		N/A
Human Resources review and advise	Human Resources (Trade Union and staff consulted when required)	N/A

Annual check history

Date annual check completed	Version number	Non substantive changes (Where non-substantive changes have been made the policy/procedure will have a minor version number, for example V1.1)

Document revision history

Date approved	Version number	Version history
15.11.2022	1	Previously ForHousing Redress Policy
Date amended	Version number	Key changes
24.02.23	2	<ul style="list-style-type: none"> Clarification on legal action Removal of service request
10.05.23	3	<ul style="list-style-type: none"> Updated exclusions including legal action position. Removed my account option to make a complaint as replaced by online form. Added targets for Stage 1 acknowledgement from calendar to working days and added acknowledgement for Stage 2 escalation. Added options to confirm if tenant wants to make a complaint when they are dissatisfied. Removed designated person option. Clarified tenant involvement role in complaints. <p>The above has been informed by a meeting with the Housing Ombudsman Service on 4.5.23.</p>
11.5.23	4	Reasonable adjustment examples added.
30.04.2024	5	Revised policy to comply with Housing Ombudsman new Handling Code (April 2024)
29.07.2024	5.1	Inclusion of paragraph related to reasonable adjustment statement of intent.