



COMPLAINTS, COMPLIMENTS AND SUGGESTIONS POLICY

Prepared By

Document Owner(s)	Project/Organization Role
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Version	
1.0 – June 2015	New Complaints, Compliments and Suggestion Policy
2.0 – June 2016	Annual Update
2.1 – 12 December 2016	Amendments to text following Board of Trustee recommendations

1.0 Policy Statement

- 1.1 This policy covers complaints, compliments and suggestions received by Pickering and Ferens Homes (PFH).
- 1.2 We wish to deliver first class homes and services to all our customers.
- 1.3 However, we recognise that sometimes things do go wrong.
- 1.4 Or that the services we offer may not always meet customer expectations or the expectations of those affected by the services we offer. Customers are often in the best position to make suggestions to improve on the services they receive.
- 1.5 Also, when things go right PFH need to know this too.
- 1.6 This policy is designed to give us the opportunity to put things right quickly, effectively and efficiently and to learn from complaints, through compliments understand where things are going right and through suggestions where we can improve our services.

2.0 Principles

- Complaints will be investigated seriously, objectively, wholly and promptly in a professional and confidential manner
- Communication with complainants will be polite and courteous
- We aim to resolve complaints without the need to escalate them
- We aim to resolve complaints ourselves without the need for external intervention
- We will explain to complainants how we will deal with complaints and how they can be progressed to the next stage if the complainant remains dissatisfied
- We will regularly review complaints, complaint resolution and the suggestions we receive and endeavour to learn and improve services as a result
- We will performance manage our complaints service

3.0 Scope of the Policy

3.1 *What is a complaint?*

- 3.1.1 We define complaints as “an expression of dissatisfaction about the standard and/or quality of a service, action or the lack of action provided to customers by the association, its staff and/or its contractors”

Complaints can include but are not limited to;

- The level of service a customer received was not acceptable or delayed unreasonably
- PFH did not act within its own policies and procedures or timescales
- Staff were not courteous or where unhelpful or gave the wrong advice or made errors
- The conduct of staff, Board members, our agents or contractors towards customers was not acceptable
- A customer considers that the association has unfairly discriminated against them

3.2 *What isn't a complaint?*

- 3.2.1 Issues reported to us that we do not define as complaints in the first instance are:
- A request for service
 - A request for information
 - An enquiry
 - An explanation of policies and procedures
 - External issues that the association cannot control
 - Repairs that are still outstanding but within our published timescales

- Any complaint where more than three months have elapsed between the cause of the complaint and it being brought to the attention of PFH. In such cases PFH can apply discretion on if we accept the complaint.
- Formal complaints by staff will be dealt with via PFH's internal staff policies and procedures.

3.3 *Who can make a complaint?*

- 3.3.1 Complaints can be made by current residents, former residents or applicants for housing and anyone else affected by the operations of PFH.
- 3.3.2 Councillor and MP's often raise issues on behalf of their constituents these enquiries will follow the associations Protocol for Working with Elected Members.
- 3.3.3 Should complaints be made on behalf of a complainant by an advocate, this could include, a relative, carer, a member of the CAB, a solicitor or any other individual with power of attorney. In such cases, responses will in the first instance be addressed back to the complainant unless they give written permission for responses to be sent elsewhere.
- 3.3.4 If a number of people make the same complaint (such as a deputation or petition) we will deal with this as one complaint. Any response will in the first instance be sent to the person submitting the complaint on behalf of the group unless we are otherwise advised.
- 3.3.5 We will provide assistance to any customer who needs help to make their complaint.

3.4 *How can complaints be made?*

In person	Through any member of staff who works for PFH, by calling into Silvester House or via Housing Plus Co-ordinators at any of our five sheltered housing schemes at Ada Holmes Circle, Broadway Manor, Christopher Pickering Lodge, Humberview or Malin Lodge any member of staff will be happy to take and register your complaint
By telephone	By calling 01482 223783, any member of staff will be happy to take and register your complaint
By letter	By letter to, Pickering and Ferens Homes, Silvester House, The Maltings, Silvester Street, Hull, HU1 3HA
By fax	By fax to 01482 223805
By e-mail	By e-mail info@pfh.org.uk
By going on line	By completing the template on the Contact Us page of the website which can be found at http://www.pfh.org.uk/contact-us/

3.5 *Compliments*

- 3.5.1 Compliments can be made the same way as complaints; can be about individual staff members, teams or generally about the services it provided. They let us know that we are providing a good service and will acknowledge all compliments and pass them on to the person who the compliment is about and their manager.

3.6 *Suggestions*

- 3.6.1 We welcome suggestions from customers that will help us enhance the customer experience. As the recipients of services, customers are often best placed to advise us how to improve on what we do. Suggestions can be made the same way as complaints. Suggestions are periodically reviewed by the Management Team.

3.7 *Unreasonable or vexatious complaints*

- 3.7.1 There are occasions when complainants can act in a way that staff might consider unacceptable. And whilst it is understood that complainants can sometimes become frustrated, we will not tolerate behaviour which is deemed unacceptable, threatening, abusive or unreasonably persistent.
- 3.7.2 An unreasonable complainant can be characterised by any of the following:

- Actions which are harassing, prolific, repetitive or obsessive
 - An insistence on pursuing unsubstantiated complaints
 - An insistence on pursuing a complaint in an unreasonable manner
- 3.7.3 A complainant, or anyone acting on their behalf, could be deemed to be unreasonable or vexatious if one or more of the following behaviours apply to them, including but not limited to:
- Refusing to co-operate within the complaints investigation
 - Insisting on the complaint being dealt with in ways which are not within this Policy
 - Persistently making malicious unfounded allegations against other residents or staff.
 - Making unnecessary excessive demands on time and resources of colleagues
 - Continually raising subsidiary, trivia, previously resolved issues or newly stated issues relating to the complaint whilst the complaint is being addressed
 - Persistently approaching PFH through different routes about the same issue
 - Electronically recording meetings and conversations without the prior knowledge and consent of the other person(s) involved
- 3.7.4 We will always take great care and make sure that we have clear evidence before recommending any action to be taken with regard to unreasonable and vexatious complainants
- 3.7.5 Examples of actions that will be taken include:
- Limiting the complainant to one medium of contact or with one named staff member
 - Time limits on the number and duration of contacts with staff per week or month
 - Refusing to register and process further complaints about the same or resolved matters
 - Apply a formal warning to the complainant which may involve other policies such as the Anti-Social Behaviour policy
- 3.7.6 The above actions will be considered by the Senior Management Team who will receive a written report on the case. If it is agreed that the matter falls into the category of *unreasonable or vexatious*, complaints will subsequently write to the complainant to inform them that:
- A decision has been made
 - Why it has been taken
 - What it means for the complainant to future contact with Pickering and Ferens Homes
 - How long the action(s) will last
 - What the complainant can do to have the decision reviewed
- 3.8 *Anonymous Complaints*
- 3.8.1 Anonymous complaints cannot go through our Complaints, Compliments and Suggestion Policy but we will still (as far as is possible/ practical) investigate the complaint as we would any other Stage 1 Informal Resolution complaint (see below).
- 3.9 Legal Action
- 3.9.1 Where a complaint is also accompanied by legal action, the complaint will be suspended whilst legal action is taking place if the matter that is the subject of legal action has also been raised as a complaint.
- 3.10 *Other feedback and issues*
- 3.10.1 PFH deals with a number of other issues that constitute feedback from residents that are not covered by this policy document, these include;
- Insurance claims -these will be dealt with via PFH's Insurance Policy and Procedures, any complaint that is also being dealt with as an insurance claim will be suspended whilst the insurance claim is dealt with
 - Allegations of malpractice -these will be dealt with via PFH's Public Interest Disclosure policy and procedures
 - Anti-social Behaviour, will be dealt with via our Anti-Social Behaviour Policy and Procedures, see the definition of anti-social behaviour below
 - Domestic Abuse _ will be dealt with via our Domestic Abuse Policy and Procedures, see the definition of domestic abuse below

- Harassment - will be dealt with via our Harassment Policy and Procedures, see the definition of harassment below

3.10.2 Anti-Social Behaviour

Part 1 of the Anti-Social Behaviour, Crime and Policing Act 2014, defines ASB in the following way:

- a) conduct that caused, or is likely to cause, harassment, alarm or distress to any person,
- b) conduct capable of causing nuisance or annoyance to a person in relation to that person's occupation of residential premises, or
- c) conduct capable of causing housing-related nuisance or annoyance to any person.

ASB therefore includes a wide range of unacceptable activity that can negatively impact the lives of many people, often on a daily basis. It can leave those affected feeling helpless, desperate and with a seriously reduced quality of life, examples of ASB are as follows:

- Harassment on the grounds of age, gender, gender reassignment, religion or belief, race, colour, size, appearance, disability, sexual orientation, ability, cultural background, domestic circumstances, illness or lifestyle
- Violence or threats of violence to any person (including domestic violence or abuse)
- Abuse or insulting words or behaviour (to staff, contractors, residents or any other member of the community)
- Offensive drunkenness or drug use
- Damage or threat of damage to property belonging to another person including damage to any part of a person's home
- Writing graffiti and in particular graffiti which is abusive, threatening or insulting
- Making unnecessary or excessive noise
- Using or allowing the premises to be used for illegal or immoral activity, such as prostitution, handling drugs and handling or storing stolen goods
- Any nuisance or annoyance caused by pets or other animals including barking (dogs) and fouling.
- Fly tipping
- Inconsiderate parking that may cause an obstruction.
- Breach of Local Authority Byelaws such as dog fouling
- Facebook/social media or text abuse

4.0 Dealing with Complaints

4.1 We have a three stage process for dealing with complaints and we aim to resolve all complaints at the earliest stage possible. All complainants will receive a written acknowledgement letter within three working days of the complaint being received stating where possible the reasons for the complaint and seeking to ascertain the outcomes the complainant expects as a result of their complaint.

4.1.1 *Stage 1 - Informal Resolution (five working days from the date of acknowledgement)* —Our staff will aim to resolve all complaints at this stage. If a complainant remains dissatisfied following attempts to informally resolve, their complaint will be moved to the second stage of our process.

4.1.2 *Stage 2 Formal Resolutions (ten working days from the receipt of the complainant's dissatisfaction)* - It is the responsibility of our Directors to manage Stage 2 complaints via our Complaints, Compliments and Suggestion Procedures

4.1.3 *Stage 3 Complaints Panel* – (twenty working days from the customer indicating their dissatisfaction with the response to the complaint). It is the responsibility of the Performance Improvement Manager to oversee complaints that cannot be resolved at Stage 1 and Stage 2 and that go to the Complaints Panel.

4.1.4 Our Complaints Panel will consist of two Board Trustees, one of which will preferably be a Resident Trustee, and either the Chief Executive or a Director who has not been involved in the complaint previously.

5.0 Discretionary Payments

- 5.1 In some circumstance PFH may make use of discretionary payments to complainants as part of the response they give to complaints.
- 5.2 Payments should be proportionate and recognise an actual quantifiable loss or a proven inconvenience.
- 5.3 Before a payment is made or felt appropriate, this issue should be discussed with the Actioning Officer's line manager or the Performance Improvement Manager.

6.0 The Designated Person and Independent Housing Ombudsman Service

- 6.1 If after exhausting all three stages of PFH's complaints process, the complainant remains dissatisfied, complainants have the right of appeal to a *Designated Person* to assist them in facilitating a local resolution of their complaint instead of directly referring it to the Independent Housing Ombudsman Service.
- 6.2 A Designated Person will usually be a Councillor or M.P. who will work with the complainant and the association to resolve the complaint. If this is not possible the Designated Person can refer a complaint to the Independent Housing Ombudsman Service at the customer's request at any time, following the exhaustion of our complaints process, should they feel that it is appropriate to do so.
- 6.3 If a complaint remains unresolved the complainant can take their complaint to the Independent Housing Ombudsman Service. There is a requirement to wait eight weeks once PFH's Complaints process has been exhausted.

7.0 Our Commitment to Equalities

- 7.1 PFH seeks to ensure that their actions do not lead to unlawful discrimination.
- 7.2 Deliberate acts of discrimination, including victimisation, harassment, instruction or pressure to discriminate, will result in disciplinary actions and/or termination of contracts with external agents.
- 7.3 We can provide access to interpreters for minority languages including sign language, and we can arrange written material in large print and Braille where necessary. Our Offices, Service Plus Schemes and Pop In Centre's are wheelchair accessible. An induction loop has been provided in the main reception area and board room at our main office.
- 7.4 PFH will aim to ensure that no individual or group is treated less favourably on the grounds of age, disability, gender, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion and belief, sex and sexual orientation. We aim to recognise the needs of individuals and treat each person through the complaints process with dignity and respect.
- 7.5 We will take account the individual needs of complainants who may require additional support so as to provide an individual complaints where necessary.

8.0 Using and Reporting Feedback

- 8.1 All information that is recorded via our Complaints, Compliments and Suggestion procedures is an opportunity for us to learn about what or how we change to improve our services. We will record and monitor Complaints, Compliments and Suggestions to learn from feedback.
- 8.2 Action against the timescales detailed in our Complaints, Compliments and Suggestion procedures will be monitored by the Performance Improvement Manager as will the quality, completeness and satisfaction with responses.
- 8.3 We are accountable to our Residents and Board of Trustees, regularly reporting our complaints handling performance and lessons learned to the Residents Committee, other fora as well as on our web site.

9.0 Publicity

9.1 PFH Complaints, Compliments and Suggestions Policy and Guide for Residents will be publicised in the following ways:

- In the Residents Handbook given out at sign up
- In the reception area of Silvester House
- On the noticeboards at Pop In Centres
- On the noticeboards of Service Plus Schemes
- Via articles in People First
- Via PFH's Facebook page and Twitter feed
- On PFH's website

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