



## Complaints, Compliments and Suggestions Policy

Prepared By

| Document Owner(s)   | Project/Organisation Role  |
|---------------------|--|
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| Version             |  |
| 1.0 – June 2015     | New Complaints, Compliments and Suggestion Policy                                      |
| 2.0 – June 2016     | Annual Update  |
| 2.1 – December 2016 | Amendments to text following Board of Trustee recommendations                          |
| 3.0 – January 2020  | Updated following RLSP review and Internal audit recommendations.                      |
| 4.0 - October 2020  | Updated following new guidance from the Housing Ombudsman and changes to the procedure |

## **1. Aim/Purpose of the Policy**

1.1 This policy covers complaints, compliments and suggestions received by Pickering and Ferens Homes (PFH).

1.2 PFH is committed to excellence in customer service in achieving the highest quality standards of service for customers. As part of our commitment we welcome all customer feedback of complaints, compliments and suggestions. We recognise how important they are in identifying areas of performance which can be improved, and where policies and procedures have weaknesses that need to be strengthened.

1.3 The Tenant Involvement and Empowerment Standard published by the Regulator of Social Housing requires that Pickering and Ferens Homes has an approach to complaints that is “clear, simple and accessible that ensures that complaints are resolved promptly, politely and fairly”. Furthermore, we are required to offer a range of ways for residents to express a complaint, and to set out clear service standards for responding, as well as what to do if a resident is unhappy with the outcome of the complaints process.

1.4 This policy is designed to give us the opportunity to put things right effectively and efficiently and to ensure we are learning from the feedback. Customer feedback provides us with insight on where things are going right or wrong and how we can improve our services.

## **2. 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 will keep good communication with residents regarding timescales and expectations
- 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. Scope of the Policy**

3.1 *What is a complaint?*

3.2 We define complaints using the Housing Ombudsman definition as “an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the organisation, its own staff, or those acting on its behalf, affecting an individual resident or group of residents”. A complaint would arise when PFH have had the opportunity to deal with a service request or have been asked to put things right and this has not been done.

3.3 Complaints can include but are not limited to;

- The level of service a customer received was not acceptable.
- PFH did not act within its own policies and procedures or timescales

- Staff were not courteous or were unhelpful or gave the wrong advice or made errors
- The conduct of staff, Board members, agents or contractors towards customers was not acceptable
- A customer considers that the association has unfairly discriminated against them

#### 3.4 *What isn't a complaint?*

#### 3.5 Issues reported to us that we do not define as complaints include;

- 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 six months have elapsed between the cause of the complaint and it being brought to the attention of PFH. In such cases PFH can at the Directors discretion consider whether we accept the complaint.
- Formal complaints by staff will be dealt with via PFH's internal staff policies and procedures.

#### 3.6 *Other feedback and issues*

#### 3.7 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

#### 3.7 *Who can make a complaint?*

3.8 Complaints can be made by current and former residents, applicants and anyone else affected by the operations of PFH. Councillors and MPs often raise issues on behalf of their constituents and these enquiries will follow the associations Protocol for Working with Elected Members. A complaint could also be made on behalf of someone else by an advocate. This could include, a relative, carer, a member of the CAB, a solicitor or any 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.

3.9 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.

3.10 We will provide assistance to any customer who needs help to make their complaint.

*3.11 How can complaints be made?*

|                 |  |
|-----------------|--|
| In person       | Through any member of staff who works for PFH, by calling into Silvester House or via Scheme Managers at any of our five sheltered housing schemes, Any member of staff will be happy to register your complaint   |
| By telephone    | By calling 01482 223783. Again, any member of staff will be happy to register your complaint   |
| By letter       | By letter, addressed to, Pickering and Ferens Homes, Silvester House, The Maltings, Silvester Street, Hull, HU1 3HA  |
| By e-mail       | By e-mail <a href="mailto:info@pfh.org.uk">info@pfh.org.uk</a>   |
| By going online | By completing the template on the Complaints and Compliments section of the Contact Us page of the website which can be found at <a href="http://www.pfh.org.uk/contact-us/">http://www.pfh.org.uk/contact-us/</a> |

*3.12 Unreasonable complaints*

3.13 There are occasions when complainants can act in a way that staff might consider unacceptable. Whilst it is understood that complainants can sometimes become frustrated, we will not tolerate behaviour, which is deemed unacceptable, threatening, abusive or unreasonably persistent.

3.14 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

3.15 A complainant, or anyone acting on their behalf, could be deemed to be unreasonable if one or more of the following behaviours apply to them, including but not limited to:

- Refusing to co-operate within the investigation
- Insisting on the complaint being dealt with in a way which is contrary to this Policy
- Persistently making malicious or unfounded allegations against other residents or staff.
- Making unnecessary or excessive demands on time and resources of colleagues
- Continually raising secondary, previously resolved issues relating to the complaint whilst the complaint is still being investigated.

- 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.
- Deliberately breaching GDPR legislation.

3.15 We will always take great care and make sure that there is clear evidence before recommending any action to be taken regarding unreasonable complainants

3.17 Examples of actions that may be taken include:

- Limiting the complainant to contact with one named staff member
- Time limits on the number and duration of contacts with staff per week or month
- Refusing to register further complaints about the same or resolved matters
- Applying a formal warning to the complainant

3.18 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 complaints, they will subsequently write to the complainant to inform them that:

- A decision has been made
- Why it has been taken
- How the complainant should engage with PFH in the future.
- How long the action(s) will last
- What the complainant can do to have the decision reviewed

3.19 *Anonymous Complaints*

3.20 Anonymous complaints cannot go through our Complaints, Compliments and Suggestion Policy but we will still investigate the complaint as far as is possible/practical.

3.21 *Legal Action*

3.22 Where a complaint is also accompanied by legal action, the organisation will consider whether to suspended the complaint whilst legal action takes place.

## **4. Dealing with Complaints**

4.1 All complaints will be dealt with in a timely manner as set out in the timeframes below through a two stage process. If at the end of 1 stage, the complainant is not satisfied with the outcome, they will be able to escalate the complaint and this process will be clearly set out in any correspondence. At the end of Stage 2 which is the final stage of the process, if the resident remains unsatisfied, the resident is then able to take this further with the Housing Ombudsman. Letters should receive sign-off from the Manager or Director investigating the complaint to ensure that there is a clear message and the letter resolves all points being dealt with.

- 4.2 Initial complaint – Every effort should be made by the person receiving the initial complaint to try to resolve the issue there and then where possible , if this is unable to be resolved it will be passed through to the relevant manager. The manager will send a written acknowledgement to the complainant within 5 working days of receiving the complaint. Included in this letter it will set out the details of the complaint and if received verbally, the outcome the resident is looking for and who the complaint is being handled by if delegated to another member of staff.
- 4.3 Stage 1 - to be completed within 10 working days of receiving the complaint – An investigation should be undertaken into the complaint taking the necessary steps. It is good practice to ensure a conversation has taken place with the complainant and to avoid the complainant just receiving a letter with a response. Once this has been undertaken a letter confirming the outcome should be sent, this should detail any learning and positive action PFH has taken from the complaint. If a complainant remains dissatisfied following attempts to resolve, the resident can escalate this to the second stage.
- 4.4 Stage 2 – to be completed within 20 working days of receipt of the dissatisfaction. If a complainant is not satisfied with the outcome of Stage 1, it becomes the responsibility of the relevant Director to manage a Stage 2 investigation. The Director will contact the complainant to understand first-hand the nature of the complaint and will contact the complainant again once their investigations have been completed. This will be the final step of the process, which will be highlighted in the letter along with any further actions, or confirming that PFH feels they have done everything that can to resolve the matter. The resident can then take this further with the Housing Ombudsman which they can do via a designated person within 8 weeks, or directly by the resident after 8 weeks.
- 4.5 The organisation will use Castleton Housing for handling complaints. All complaints letters will be generated through and stored on the Castleton Housing platform. All letters will be written in plain English, and where possible, the organisation will use templates so that there is a consistent message being sent out. The templates will be reviewed on a regular basis to ensure that they remain fit for purpose and that they comply with the current regulatory requirements.
- 4.6 PFH takes its commitment to complaint resolution very seriously, and welcomes complaints as an opportunity to make improvements to its operations. As part of this commitment, it will focus on the complaints process and on reporting complaints performance figures once a year in the resident newsletter, as well as highlighting this performance in the Annual Report.
- 4.7 As part of the performance management of complaints, the Resident Experience Manager will write to the resident a month after the complaint was closed to obtain feedback on how they felt the complaint was handled and if they were satisfied with the outcome.

## **5. Discretionary Payments**

- 5.1 In some circumstance PFH may make use of discretionary payments to

complainants as part of the response. Payments should be proportionate and recognise an actual quantifiable loss or a proven inconvenience. Before a payment is made or felt appropriate, this issue should be discussed with the relevant Director.

## **6. Compliments**

- 6.1 Compliments can be made the same way as complaints; they can be about individual staff members, teams or generally about the services the organisation provides. They let us know that we are providing a good service; we will acknowledge all compliments by passing them on to the person who the compliment is about including their line manager.

## **7. Suggestions**

- 7.1 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.

## **8. Our Commitment to Equalities**

- 8.1 PFH seeks to ensure that their actions do not lead to unlawful discrimination. 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.
- 8.2 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, Retirement Living 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.
- 8.3 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.
- 8.4 We will take into account the individual needs of complainants who may require additional support.

## **9. Using and Reporting Feedback**

- 9.1 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 recording this using the Continuous Learning Log.
- 9.2 Action against the timescales detailed in our Complaints, Compliments and Suggestion procedures will be monitored by the Resident Experience Manager.
- 9.3 We are accountable to our residents and the Board of Trustees. Complaints handling performance information and lessons learned will be submitted to the Resident Committee for each meeting (4 times per year) and to the Board of Trustees on an annual basis. Where there is an exceptional case or a case that has escalated to the Housing Ombudsman Service the board will be made aware and updates will be provided.
- 9.4 We will use the Housing Ombudsman Service Complaint Handling Self Assessment tool to periodically review our performance against the Complaint Handling Code and publish this.

## **10. Publicity**

- 10.1 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 Retirement Living Plus Schemes
  - Via articles in People First
  - Via PFH's Facebook page and Twitter feed
  - On PFH's website

## **11. Update**

This policy will be reviewed October 2022