



# Complaints, Compliments and Suggestions Policy

## October 2024 - 2027

Prepared By

Document Owner(s)	
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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
5.0 August 2022	Updated following new guidance from the Housing Ombudsman Service Complaints Handling Code
6.0 March 2024	Updated following new guidance from the Housing Ombudsman Service Complaints Handling Code
7.0 May 2025	Minor updates following HQN training
8.0 September 2025	Updated to reflect implementation of the Data Use and Access Act 2025 (DUAA)

## **1.0 Aim/Purpose of the Policy**

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

1.2 At PFH we are committed to excellence in customer service in achieving the highest quality standards of service for residents. As part of our commitment we welcome all 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 Transparency, Influence and Accountability Standard published by the Regulator of Social Housing requires that PFH has an approach to complaints that is “simple, accessible and publicised”. Furthermore, that we provide accessible information to tenants about:

- How tenants can make a complaint about their registered provider
- The registered provider’s complaints policy and complaints handling process
- What tenants can do if they are dissatisfied with the outcome of a complaint or how a complaint was handled, and
- The type of complaints received and how they have learnt from complaints to continuously improve services.

There is also now new requirements from June 2025 within the Data Use and Access Act to acknowledge and respond to any complaints from data subjects around an infringement of data protection law.

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. Feedback provides us with insight into where things are going right or wrong and how we can improve our services.

## **2.0 Principles**

2.1 We will adhere to the Housing Ombudsman Service Complaints Handling Code 2024.

2.2 Complaint handlers investigating complaints will;

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

2.3 Communication with residents will be polite and courteous and take into account the residents communication preferences.

2.4 We will maintain good communication with residents regarding timescales and expectations.

2.5 We will regularly review complaints, complaint resolution and the suggestions we receive and endeavour to learn and improve services as a result

2.6 We will performance manage our complaints service

2.7 The Customer Experience Manager will undertake the role of 'Complaints Officer', and is responsible for overall complaint handling and reporting, including liaison with the Housing Ombudsman Service.

2.8 A Board Member will undertake the role of 'Member Responsible for Complaints'

### **3.0 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*".

3.3 Complaints can include but are not limited to;

- The level of service a resident 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
- Any complaint where more than 12 months have elapsed between the cause of the complaint and it being brought to the attention of PFH. PFH will consider

whether to apply discretion to accept complaints made outside this time limit where there are good reasons to do so.

- Matters that have previously been considered under the complaints policy.
- Formal complaints by staff will be dealt with via PFH's internal staff policies and procedures.

3.6 If we decide not to accept a complaint, an explanation must be provided to the resident setting out the reasons why the matter is not suitable for the complaints process and the right to take that decision to the Ombudsman. Evidence should also be provided to demonstrate the reasoning behind not accepting the complaint.

### *3.7 Other feedback and issues*

3.8 We deal 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.
- Where legal proceedings have started. This is defined by as details of the claim, such as the Claim Form and Particulars of Claim having been filed at court.
- Allegations of malpractice -these will be dealt with via PFH's Public Interest Disclosure policy and procedures
- Disagreement with an approved policy, such feedback will be used for Policy Reviews (unless the claim is of discrimination)

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

3.10 Complaints made by or on behalf of current residents will follow the formal process as set out in this policy which allows access to the Housing Ombudsman Service and adheres to the Complaints Handling Code and complaints definition. Complaints made by former residents can be investigated by the Housing Ombudsman if they are about the licence or the ending of the licence, e.g. recharges for disrepair, or disposal of personal property left behind. Complaints made by applicants and anyone else affected by the operations of PFH will still be investigated as per the policy, however would not escalate to the Housing Ombudsman Service. For the purpose of this policy, from here on in, complainants will be referred to as residents. Councillors and MPs often raise issues on behalf of their constituents and these queries should be logged on the Official Enquiries Log, it should then be determined if this is a complaint or not. 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 resident unless they give permission for responses to be sent elsewhere.

3.11 If a number of people, make the same complaint (such as a deputation or petition) we will deal with this as one complaint. Depending on the nature of the complaint, the response may just be sent to the person submitting the complaint, those listed in the deputation/petition, or to all residents effected by the complaint.

## 4.0 Accessibility and Awareness

4.1 *To make is easy to raise a complaint, complaints will be accepted by all communication channels below.*

4.2 *Please communicate with us prior to lodging a complaint with the ICO in relation to the Data Use and Access Act 2025.*

In person	Through any member of staff who works for PFH, by calling into our Head Office or via Scheme Managers at any of our five sheltered housing schemes
Telephone	By calling 01482 223783.
Letter	By letter, addressed to our Head Office
E-mail	By e-mail <a href="mailto:info@pfh.org.uk">info@pfh.org.uk</a> or PFH Connect
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>
Social Media	Twitter - @PFH_Hull @ Facebook - @Pickering.Ferens (Where complaints are received via Social Media, PFH should not disclose any information relating to that complaint in the public forum, for further information see the Social Media Policy)

4.3 Posters informing residents on how to complain and on the Housing Ombudsman Service are on notice boards in communal areas. Regular articles on the complaints process are shared in People First which are sent to all our residents in their preferred communication method and language ensuring access for all.

4.4 We will provide assistance and make reasonable adjustments via our Reasonable Adjustment Policy to any resident who needs help to make their complaint.

## 5.0 Unreasonable complaints

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

5.2 An unreasonable resident complaint 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

5.3 A resident, 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 conversation without the prior knowledge and consent of the other person(s) involved.
- Deliberately breaching GDPR legislation.

5.4 Any restrictions placed on a resident's contact due to unacceptable behaviour should be appropriate to their needs and should demonstrate regard for the provisions of the Equality Act 2010.

5.5 We will always take great care and make sure that there is clear evidence before recommending any action to be taken regarding unreasonable resident complaints.

5.6 Examples of actions that may be taken include:

- Limiting the resident 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 resident

5.7 The above actions will be considered by the Senior Leadership 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 resident to inform them that:

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

## **6.0 Anonymous Complaints**

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

## **7.0 Complaint Stages**

7.1 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 Stage 1, the resident is not satisfied with the outcome, they will be able to escalate the complaint and this process will be clearly set out in all correspondence. At the end of Stage 2 which is the final stage of the process, if the resident remains dissatisfied, the resident is then able to take this further with the Housing Ombudsman Service. Letters should receive sign-off from the Manager or Director investigating the complaint to ensure that the response is clear and the letter resolves all points raised by the resident.

7.2 Where possible every effort should be made by the person receiving the initial complaint to try to resolve the issue to the residents satisfaction, however whenever a resident is expressing dissatisfaction, PFH must give the resident the option of raising a formal complaint.

7.3 Stage 1 Acknowledgement – The complaint will be assigned a “Complaint Handler” which is usually the relevant service area manager. If the complaint is regarding the service manager, or a decision made by them, this should be passed to a different manager to investigate, the Complaints Officer will oversee this. The Complaint Handler is responsible for sending a written acknowledgement within 5 working days of receiving the complaint using the standard templates. Please note that in line with the DUAA organisations have 30 days to acknowledge a data protection complaint. This letter should set out the Complaint Handlers understanding of the complaint known as the ‘complaint definition’ and the outcomes the resident is seeking. If any aspect of the complaint is unclear, the resident must be asked for clarification. If any aspect of the complaint is not the responsibility of PFH, the acknowledgement must clarify this.

7.4 Stage 1 Investigation – An investigation should be undertaken into the complaint taking the necessary steps as set out in the complaints training materials and adhering the principles of this policy, including good record keeping and good communication with the resident throughout the process. The Complaint Handler has 10 working days from the date the acknowledgement letter has been sent to issue a response and closure letter using the standard templates. Stage 1 should be completed and resolved at the earliest opportunity, ensuring that appropriate remedies can be provided without the need for escalation.

7.5 Extension – Should the Complaint Handler require longer than the 10 working days to respond at Stage 1, this can be extended by an additional 10 working days,

however a written explanation to the resident must be sent using the standard templates informing them of the extension, and agree suitable intervals for keeping the resident informed on their complaint. Extensions must be no more than 10 working days without good reason, and the reason(s) must be clearly explained to the resident, the template letters must always state the Housing Ombudsman contact details on them.

**7.6 Stage 1 Response** – Once the investigation has been completed by the Complaint Handler, it is expected that the investigation findings and outcome are to be discussed with the resident before issuing the formal response to check they are satisfied with this. A complaint response must be sent to the resident when the answer to the complaint is known, not when the outstanding actions required to address the issue, are completed. Stage 1 responses should address all points raised in the complaint definition, and provide clear reasons for any decisions, referencing relevant policy, law and good practice where appropriate. If additional complaints have been raised during the investigation, these must be incorporated into the stage 1 response if they are related, and the response hasn't been issued yet. Where the stage 1 response has been sent, any new issues that are unrelated to the original complaint already being investigated or it would unreasonably delay the response should be logged as a new complaint. The Stage 1 response must adhere to PFH Communication guide. Outstanding actions must still be tracked and actioned using the Complaints Action and Learning Log with regular updates provided to the resident.

**7.7 Escalation to Stage 2** – Residents can escalate their complaint to Stage 2 within 12 months of the date they raised the Stage 1 complaint. The complaint will be assigned a “Complaint Handler” which will be the Head of Service, Director or Chief Executive, but must not be the same person that considered the complaint at Stage 1.

**7.8 Stage 2 Acknowledgement** - The Complaint Handler is responsible for sending a written acknowledgement within 5 working days of receiving the request of escalation using the standard templates. This letter should set out the Complaint Handlers understanding of the complaint known as the ‘complaint definition’ and the outcomes the resident is seeking. If any aspect of the complaint is unclear, the resident must be asked for clarification. If any aspect of the complaint is not the responsibility of PFH, the acknowledgement must clarify this.

**7.9 Stage 2 Extension** – Should the Complaint Handler require longer than the 20 working days to respond at Stage 2, this can be extended by an additional 20 working days, however a written explanation to the resident must be sent using the standard templates informing them of the extension, and agree suitable intervals for keeping the resident informed on their complaint. Extensions must be no more than 20 working days without good reason, and the reason(s) must be clearly explained

to the resident, the template letters must always state the Housing Ombudsman contact details on them.

7.10 In instances where PFH declines to escalate a complaint it must clearly communicate in writing its reasons for not escalating as well as the resident's right to approach the Ombudsman about its decision. This must also be agreed by the Senior Leadership Team

7.11 PFH will use their Housing management system for recording the handling complaints. All complaints letters will be stored on the Housing management system platform.. All responses will be written in plain English, and where possible, PFH 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.

7.12 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.

7.13 As part of the performance management of complaints, the Complaints Officer will contact 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, this will also be reported on through the performance management framework.

## **8.0 Complaints, Compensation and Discretionary Payments**

8.1. Refer to the PFH Compensation policy which covers Complaints, Compensation and Discretionary Payments

## **9.0 Compliments**

9.1 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.

## **10.0 Suggestions**

10.1 We welcome suggestions from residents that will help us enhance the experience for our residents. As the recipients of services, residents are often best placed to advise us how to improve on what we do. Suggestions can be made the same way as complaints and are tracked internally.

## **11.0 Our Commitment to Equalities**

11.1 We seek to ensure that our 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.

11.2 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, PFH Plus Schemes and Pop-In Centres are wheelchair accessible.

11.3 We 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.

11.4 We will take into account the individual needs of residents who may require additional support and make reasonable adjustments via our Reasonable Adjustment Policy inline with the Equality Act 2010.

## **12.0 Self-Assessment, Reporting and Compliance**

12.1 A positive complaint handling culture is integral to the effectiveness with which we resolve disputes. We will use complaints as a source of intelligence to identify issues and introduce positive changes in service delivery. Accountability and transparency are also integral to a positive complaint handling culture. We report on performance, wider learning and improvements from complaints to stakeholders in a variety of ways including the resident Learning From Feedback Forum, Resident Committee, Board reports and sharing information to all residents in People First and the Annual Report.

12.2 Action against the timescales detailed in our Complaints, Compliments and Suggestion procedures will be monitored by the Complaints Officer.

12.3 The Board of Directors has a 'Member Responsible for Complaints' (the MRC) whom is responsible for ensuring the governing body receives regular information on complaints that provides insight on the landlord's complaint handling performance.

12.4 We will produce an annual "Complaints Performance and Service Improvement Report" which will be submitted to the Board and published on the website along with the Boards response. This is in addition to regular performance updates on complaints which are presented at each meeting and a 6 month in depth update.

12.5 The 'Learning From Feedback Forum', made up of residents and chaired by the MRC, will convene twice a year to review complaints performance, trends and the quality of responses. Officers will use feedback from this forum to improve complaints management and service delivery.

12.6 We will use the Housing Ombudsman Service Complaint Handling Self Assessment tool to annually review our performance against the Complaint Handling Code and publish this.

## **13.0 Update**

13.1 This policy will be reviewed October 2027