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| Policy Title: | Complaints Policy |
| Owner: | Business Improvement Manager |
| Date Approved: | 25 th November 2021 |
| Approved By: | Board |
| Next Review Date: | November 2024 |
| Regulatory Standards: | <ul style="list-style-type: none">▪ Regulatory Requirement TS2: Provide tenants and other service users with the information they need to exercise their right to complain and seek redress, and respond to tenants within the timescales outlined in its service standards, in accordance with guidance from the Scottish Public Services Ombudsman (SPSO).▪ Regulatory Requirement TS3: Ensure there are effective arrangements to learn from complaints and from other tenant and service user feedback, in accordance with SPSO guidance. |

1. Introduction

- 1.1. Cadder Housing Association aims to provide a first-class service to all of its customers. This policy details how complaints should be handled if a customer is unhappy with the standard or quality of our service.
- 1.2. This policy is applicable to all Cadder Housing Association staff in dealing with any complaints against staff or our organisation. This policy does not cover complaints made by customers against other customers – these are dealt with under the Anti-Social Behaviour Policy.
- 1.3. In implementing this policy and the supporting procedures we are adopting and complying with the Scottish Public Services Ombudsman's Model Complaints Handling Procedure. Full details of how complaints will be handled, along with accompanying guidance for staff, are found in the Complaints Handling Procedure.

2. Definitions

Complaint

- 2.1. An expression of dissatisfaction about our action or lack of action, or about the standard of service provided by or on behalf of us.

Complaints Stages

- 2.2. There are two stages for handling complaints:
- Stage 1 – Frontline
Straight forward and easily resolved, requiring little or no investigation.
Responded to within 5 working days.
 - Stage 2 – Investigation
Requiring more investigation, complex or high risk. Escalated Frontline complaints where the customer is not satisfied with our response at Stage 1. Acknowledged within 3 working days. Responded to within 20 working days.

Scottish Public Services Ombudsman (SPSO)

- 2.3. The final stage for complaints about public services: <https://www.spsso.org.uk>

First-tier Tribunal for Scotland (Housing & Property Chamber)

- 2.4. The final stage of complaints for factored owners.

3. Roles and responsibilities

- 3.1. All staff will be aware of:
- the Complaints Handling Procedure (CHP).
 - how to handle and record complaints at the frontline response stage.
 - the need to try and resolve complaints early and as close to the point of service delivery as possible.
 - their clear authority to attempt to resolve any complaints they may be called upon to deal with.
- 3.2. Training on this procedure will be part of the induction process for all new staff. Refresher training will be provided for current staff on a regular basis.
- 3.3. Senior management will ensure that:
- The Association's final position on a complaint investigation is signed off by an appropriate manager in order to provide assurance that this is the definitive response of Cadder Housing Association and that the complainant's concerns have been taken seriously.
 - it maintains overall responsibility and accountability for the management and governance of complaints handling.
 - it has an active role in, and understanding of, the CHP.
 - mechanisms are in place to ensure a consistent approach to the way complaints handling information is managed, monitored, reviewed and reported at all levels of the Association.

- complaints information is used to improve services, and this is evident from regular publications.

3.4. The role of the Board is:

- to approve the adoption of the CHP.
- to ensure that staff keep to this CHP and associated internal processes.
- to ensure that information and learning from complaints are used to improve our understanding of, and to steer, our policies and practices.

3.5. Particularly important is the Board's role in developing and fostering a culture that values complaints. The Board must ensure that recording and reporting of complaints is thorough and effective, so that reports to committee reflect a true picture of all complaints.

3.6. The Chief Executive is responsible for ensuring that there is an effective CHP, with a robust investigation process that demonstrates how we learn from the complaints we receive.

3.7. The Chief Executive is also responsible for ensuring that there are governance and accountability arrangements in place in relation to complaints about contractors. This includes:

- ensuring performance monitoring for complaints is a feature of the service/management agreements between the Association and its contractors.
- setting clear objectives in relation to this complaints procedure and putting appropriate monitoring systems in place to provide the Association with an overview of how the contractor is meeting its objectives.

3.8. The Chief Executive may delegate these responsibilities to appropriate senior staff. Regular management reports will be used to assure the Chief Executive of the quality of complaints performance.

3.9. On the Chief Executive's behalf, senior managers may be responsible for:

- managing complaints and the way we learn from them.
- overseeing the implementation of actions required as a result of a complaint.
- investigating complaints.
- deputising for the Chief Executive on occasion.

3.10. The Business Improvement Manager is responsible for ensuring all new staff receive training on the CHP as part of the induction process, and that refresher training is provided for current staff on a regular basis.

4. Recording complaints

4.1. Complaints provide valuable customer feedback. One of the aims of the CHP is to identify opportunities to improve services across the Association. By recording and analysing complaints data, we can identify and address the causes of complaints and, where appropriate, identify training opportunities and introduce service improvements.

- 4.2. It is important to record suitable data to enable us to fully investigate and respond to the complaint, as well as using our complaint information to track themes and trends. As a minimum, we should record:
- the customer's name and contact details.
 - the date the complaint was received.
 - the nature of the complaint.
 - the service the complaint refers to.
 - staff member responsible for handling the complaint.
 - date the complaint was closed.
 - the underlying cause of the complaint and any remedial action taken.
 - outcome/decision (i.e. resolved, upheld or not upheld).
 - any learning that will help prevent similar complaints in future.
- 4.3. If the customer does not want to provide any of this information, we will reassure them that it will be managed appropriately, and record what we can.
- 4.4. We will also have arrangements in place to ensure complaints about contractors are recorded, reported on and published in line with the CHP.
- 4.5. Individual complaint files will be stored in line with our document retention policy.

5. Learning from complaints

- 5.1. We must have clear systems in place to act on issues identified in complaints. As a minimum, we will:
- seek to identify the root cause of complaints.
 - take action to reduce the risk of recurrence.
 - systematically review complaints performance reports to improve service delivery.
- 5.2. Learning may be identified from individual complaints (regardless of whether the complaint is upheld or not) and from analysis of themes evident in complaints data.
- 5.3. Learning will be recorded on the complaints module of our housing management system and reported on quarterly.

6. Reporting on complaints

- 6.1. We will report quarterly to Board on:
- performance statistics, in line with the complaints performance indicators published by the SPSO and from the Annual Return on the Charter.
 - analysis of the trends and outcomes of complaints.

7. Publicising complaints information

- 7.1. We will publish information on complaints including 'you said, we did' information around complaints outcomes and actions taken to improve services. This will be published on our website and in our customer newsletter.

- 7.2. We will publish an annual complaints performance report on our website in line with SPSO requirements, and provide this to the SPSO on request. This will include:
- performance statistics, in line with the complaints performance indicators published by the SPSO.
 - complaint trends and the actions that have been or will be taken to improve services as a result.

8. Complaints redress

- 8.1. Redress is setting right what went wrong for an individual or group of individuals. This means that, wherever possible and practicable, a customer negatively affected as a consequence of when something has gone wrong should be returned to the position they would have been in if the failure had not occurred.
- 8.2. Redress may include some or all of the following:
- An apology.
 - An explanation.
 - Practical action to mitigate any detriment.
 - Where possible, reimbursement of demonstrable loss and/or costs incurred.
 - Other appropriate action suggested by the complainant or the organisation.
- 8.3. Redress may be limited by:
- The time elapsed since the problem occurred.
 - The degree to which the complainant had a contributory responsibility for the failure and the detriment suffered.
 - The capability of the organisation to comply.