



## Gravesend Churches Housing Association

# Comments, Compliments and Complaints Policy

<b>Status:</b>	Pending approval (July 2024)
<b>Version Number:</b>	1
<b>Last approved date:</b>	8 June 2023
<b>Revision date:</b>	27 June 2024
<b>Responsible Officer:</b>	Director of Operations

## 1. Introduction

Gravesend Churches Housing Association (GCHA) is committed to 'Putting residents First' by improving the quality of services and the resident's experience of GCHA services. As an organisation we promote 'Empowerment;' Underpinned by a clear set of values that embraces a culture of:

- Adaptability
- Responsiveness
- Inclusivity
- Trustworthiness
- Accountability

We welcome feedback from all our residents as it provides us with an insight into where we are doing well and where we may need to focus improvements.

We respond to all resident feedback in a consistent and professional manner and where we have failed to deliver 'resident excellence,' or meet our 'residents' expectations,' we will hold our hands up, apologise, and work with our residents to rebuild their trust, respect and aim to 'put things right.'

## 2. Scope

### 2.1 Definition

At GCHA, we believe that effective complaint handling should be resident friendly; enabling our residents to be heard and understood.

The starting point is where all parties have a mutual understanding of what constitutes a 'complaint.' GCHA follows the Housing Ombudsman (HO) definition of a complaint, (revised as part of the HO complaint handling code April 2024) which is: -

*"An expression of dissatisfaction, however made, about the standard of services, actions or lack of action by GCHA, their staff, or those acting on GCHA behalf, affecting a resident or group of residents."*

Our residents do not need to use the word 'complaint' for us to treat it as such. Our first approach will always be to try and resolve any complaint at the first point of contact.

Where this is not possible, we will give the resident the option to make a formal complaint or to manage the complaint informally. All complaints (formal) will be logged and recorded on GCHA's Housing Management system.

A complaint submitted via a third party, or representative, will be responded to in line with GCHA's complaint response times. This excludes 'MP Enquiries' as 'MP Enquiries' are not treated as formal complaints. Please refer to (S18) of this policy which sets out how GCHA responds to 'MP Enquires.'

All complaints will be considered fairly; in line with our Equalities and Diversity policy and considered on its individual merit. Please refer to (S27) of this policy with reference to our Equalities statement.

Where we are not able to accept a complaint, we will explain to the resident or third-party representative the reasons why. In line with the code, where we do not accept a complaint, we will ensure this is recorded with the reason.

### **3. Definition of Other Feedback Types**

This policy covers all resident feedback types and the section below details what GCHA considers the definitions of each feedback type.

### **4. Compliments**

A compliment is defined as a resident statement of positive recognition or praise for a service or member of staff. This can be received via any form of communication such as in person, by phone, email, social media, and any other way the resident can contact us.

We welcome and encourage compliments as they help let us know when things are going well and what our residents think about our services. They provide positive feedback to employees and boost morale and motivation. Compliments will be recorded centrally, acknowledged, and referred to the manager of the individual or service concerned.

Compliments will be published anonymously using our website, newsletters and social media and may be used in publicity materials.

### **5. Comments**

A comment can be described as a resident remark or personal opinion about a service that does not require any action or formal response. This could be an observation, reference, or statement about something delivered by GCHA.

Comments and suggestions for improvement will be used to help inform the delivery of our services. Unless specifically requested, there is not an automatic assumption a comment will be replied to. Should the resident indicate they expect a reply, this should be dealt with immediately or no longer than 5 working days.

### **6. Service Request**

A service request is a request from a person requiring action to be taken, to put something right or a request for services for the first time. A service request is not a complaint.

However, a service request could lead to a complaint, where GCHA staff have not carried out the service request leading to an 'Expression of Dissatisfaction' from the resident.

Where we have failed to address or resolve a service request, and the resident continues to remain dissatisfied with the progress or outcome, then we will close the service request with the residents permission and log a formal complaint.

### **7. Resident Survey feedback**

An expression of dissatisfaction with services made through a survey is not defined as a complaint. At GCHA, we encourage resident feedback through all avenues including resident surveys. We have included in our survey questionnaire a section where residents, as part of their feedback on GCHA services, are given the opportunity to raise a complaint.

### **8. Legal and Regulatory Compliance**

We operate this policy with due regard to all relevant legislation, regulation, and good practice. We will comply with all regulatory requirements:

- The Charter for Social Housing Residents (Social Housing White Paper)
- The HO Complaint Handling Code (Revised 1 April 2024)
- Social Housing Consumer standards (April 2024) - Tenant and Empowerment Standard
- Equality Act 2010

## **9. A Positive Complaints Culture**

We want to hear from our residents where they have received poor services or remain dissatisfied with GCHA as a Landlord because of poor services. We welcome the opportunity to speak to our residents and put things right where we have failed to deliver 'resident excellence' or meet 'resident expectations.' Every resident will receive the same standard of service regardless of their background, appearance, age, beliefs, or lifestyle. We will focus on the individual by considering the person and their circumstances.

We will train our staff on 'early resolutions' and delivering 'resident excellence' ensuring they have the skills and ability to support and deliver positive resolutions and outcomes.

## **10. Key Principles**

At the point that a Resident expresses any areas of dissatisfaction, we empower our staff to resolve their concerns at the first point of contact. We will seek resident feedback at the end of your enquiry to check your resident satisfaction levels. Where a resident remains unhappy with our approach, we will escalate their concerns through our internal formal complaint's procedure.

## **11. Ways To Provide Feedback.**

We encourage our residents to contact us directly to discuss how we can put things right at the first point of contact. The easiest way to do this is by contacting one of our housing officers who will aim to make it right. We understand residents may wish to contact us by other methods, so they are able to use any of the following ways to do so:

- Email: [general@gcha.org.uk](mailto:general@gcha.org.uk) (available for use 24/7)
- Telephone by calling 01474 369 830
- Website: Complete the complaints form online: <https://www.gcha.org.uk>
- In person: 14 London Road, Northfleet, Gravesend, DA11 9JQ  
(Available weekdays 9am – 5pm)
- In writing: 14 London Road, Northfleet, Gravesend, DA11 9JQ
- Via social media platforms: Twitter, Facebook, and LinkedIn
- Directly to any of our colleagues when you see them out on site
- Via our Out of Hours service delivered outside of office hours and weekends
- Via a representative or advocate (We must have written permission from yourself the resident to speak to a third party acting on your behalf)

A representative can accompany the resident at any meeting with GCHA. However, this should not include a solicitor unless there is a legal case in place. Any legal case will be dealt with and responded to independent of the complaints process.

Where we receive feedback via social media, we will contact the individual directly; not via (social media) to discuss the situation with them. We will adapt our complaints policy, procedures, or processes to accommodate an individual's needs as much as possible, making any reasonable adjustments where necessary.

## **12. Our Approach**

### **12.1 Stage One – Investigation and Resolution**

We will aim to resolve the complaint as early as possible. If we cannot resolve the residents' concerns at the first point of contact, their complaint will be referred to the Operational Lead for (Housing/Repairs) to review and respond to the complaint.

In line with the HO guidance, GCHA will acknowledge your complaint within five working days of receipt. The Operational Lead will explain what steps will be taken to investigate the complaint, which may include visiting them in person if they felt it would help them understand

the context of the complaint and contribute towards the overall solution or outcome.

The target time for responding to complaints at stage 1 is 10 working days from the receipt date.

Although subject to the type of complaint and complexities to resolve, it may not always be possible to complete all agreed actions within this period.

If that is the case, the Operational Lead will contact the resident, agree a new response date, and explain the reasons for this. The Operational Lead will stay connected with the resident by telephone or email to keep them informed of the progress of their complaint.

Where we have had to extend the complaint response times, we will explain the reasons why and give the resident the opportunity to escalate their complaint directly to the HO. We will provide the resident with the HO contact details.

However, our first approach will always be to seek to negotiate with the resident with the aim to resolve the complaint at the respective levels of the complaint stage process. Where possible we will provide a full response as soon as one is available, and not necessarily wait for the 10 working day response time.

Once we have agreed a resolution and confirmed our decision in writing, we will either close the complaint at stage 1 or inform the resident we will need to monitor the progress of any outstanding actions until these are complete, before making the decision to close.

Together, we (GCHA/Resident) will agree what is an appropriate timeline to provide regular updates until the complaint is resolved.

Where residents raise additional complaints during the investigation, these will be incorporated at stage one if they are relevant, and the stage one response has not been issued. If the stage one response has been issued, or it would unreasonably delay the response, the complaint should be logged as a new complaint. Where the complaint issues are vastly different to the initial complaint at stage one, we will log as a separate complaint.

To ensure that our written response is clear and appropriate, we have adopted the HO guidance as follows, we will:

- set out the complaint stage in all responses
- set out the complaint definition, and ensure clarity on the complaint reason
- be clear on any decision made on the complaint, referencing any relevant policy, law, and good practice where appropriate.
- give clear reasons for any decision made
- set out any remedy offered to put things right
- make clear what part of the complaint is closed/resolved, reasons why
- details of any outstanding actions
- Details on how to escalate complaint to Stage 2 if resident remains unhappy

## **12.2 Complaint Escalation**

If the resident is dissatisfied with the resolution or outcome, and requests to escalate their complaint to stage two, then we will communicate with the resident to try and understand the residents reasons for their continued dissatisfaction and what will help resolve the complaint.

If there is a way, we can resolve the complaint at stage 1, we will.

We will seek further clarification from the resident and If after a discussion with them, they remain unhappy with the stage 1 response, and wish to escalate to stage 2 of the complaints process, we will escalate their complaint.

The HO code does not recommend a time limit on when the resident can seek to escalate their complaint, after the stage 1 complaint has been responded to, we believe if the resident is dissatisfied with their stage 1 response, they would want their complaint to be escalated in a timely manner. For that reason, should a resident wish to seek an escalation of their stage 1 complaint to stage 2 because they remain dissatisfied, they should do so within 10 working days from the stage 1 response date.

### **12.3 Stage 2 – Review and Decision**

The Chief Executive or where the Chief Executive is not available, another member of the Executive Management Team, will carry out a review of the complaint. This may include a Board Member. The identified lead will define, log, and acknowledge the complaint at stage 2 within 5 working days.

The lead person will contact the resident, listen to what they have to say, ask the resident what a successful outcome would look like, investigate the complaint further and write back to the resident within a further 20 working days with a full response or as soon as a outcome, response to the complaint is received.

If the Lead person is not able to resolve the complaint within this time limit, a reasonable time limit will be agreed with the resident. Where the resident remains unhappy about the time extension, they will be given the opportunity to raise their complaint with the HO at which point we will provide the resident with the HO contact details.

Stage two of the complaint process will be the final review process. If a resident remains dissatisfied with how their individual situation has been handled and / or with the outcome, they may refer their complaint to the HO.

As part of our final Stage 2 response, we will ensure the response is clear, in plain English and covers the following: -

- 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 action
- Details of how to escalate the complaint to the HO if the resident remains dissatisfied

### **12.4 The Housing Ombudsman**

At this stage of the complaints process, GCHA will await to hear from the HO. On contact, GCHA will cooperate with the HO requests for evidence and provide this within 15 working days.

If a response cannot be provided within this time limit, we will provide an explanation for the delay. If accepted as reasonable, the HO will agree a revised date with us.

## **13. The Housing Ombudsman Service**

GCHA aims to resolve complaints before they get to Stage 1 or Stage 2. However, should the resident remain dissatisfied at Stage 2 of our complaints process, they can ask for a review of the case by the HO Service. The resident must be a GCHA resident to raise a complaint with the HO.

### 13.1 The Housing Ombudsman Service contact details are:

**Website:** [Make a complaint - HO \(housing-ombudsman.org.uk\)](https://housing-ombudsman.org.uk)

**Email:** [info@housing-ombudsman.org.uk](mailto:info@housing-ombudsman.org.uk)

**Phone:** **0300 111 3000** Phonelines are open Monday to Friday 9am to 5pm.  
Lines will be closed for staff training every Thursday from 3.30pm to 5pm.  
Calls are recorded for training and monitoring purposes.

**Write to:** The Housing Ombudsman Service, PO Box 1484, Unit D, Preston, PR2 OET

### 13.2 GCHA Complaints Process



### 14. Publishing Complaints Policy

We will ensure the complaints policy is published on GCHA's website and information on how residents can report complaints or provide feedback is included in resident newsletters. We will also publish our complaints policy on key social media platforms, where GCHA is signed up to.

### 15. Compensation for service failure

GCHAs is committed to providing an efficient and responsive service. Where we have failed, we will offer an explanation and an honest apology. In some cases, however a gesture of goodwill may be appropriate. These can occur when:

- Specific evidenced financial losses have been incurred.
- The resident has spent an undue amount of time pursuing their concerns.
- Where exceptional hardship and inconvenience has been caused by events surrounding the complaint

There is a separate GCHA Compensation Policy staff can refer to which is saved on GCHA's share point.

### 16. Continuous learning

We see complaints as an opportunity to gain experience from our mistakes and improve our services. Complaint numbers, outcomes and satisfaction levels help to inform policy reviews and reshape our services in the future.

We will act on recommendations and feedback from others involved in the complaint's resolution process i.e., Staff, Resident and their advocates, or the HO.

The Executive Management Team (EMT) will discuss and review complaints at the monthly staff and EMT meetings. This will enable trends, root causes and lessons learnt to be identified so we do not repeat our mistakes.

We will also look at good practice with other Housing Associations including G320, which is a Housing Association forum for Housing Associations under 1000 properties.

### **17. Petitions**

A complaint made in the form of a petition on behalf of multiple residents will be treated as one complaint, with contact via the nominated signatory.

### **18. MP Enquiries**

An MP enquiry is not considered under the formal complaints policy. All MP enquires will be logged separately and responded to on the same day or within 5 working days. Should this not be possible, we will contact the MP office and explain the reasons why. Anonymous complaints from the MP may not be acted upon; they will, however, be brought to the appropriate manager's attention and investigated if necessary. The MP will update the resident directly as will GCHA staff.

### **19. The Complaints Policy does not apply where: -**

- There is already a live complaint, or the matter has already been considered under the complaints policy.
- Complaints of anti-social behaviour, as these are covered by GCHA anti-social behaviour policy. However, a complaint will be accepted if the resident is dissatisfied with how their anti-social behaviour complaint was handled.
- Cases where a legal claim is made against GCHA, including disrepair cases and insurance claims. (If the claim occurs after the complaint has been raised, we will close the complaint)
- Cases where a resident is taking a matter to court, or the matter is being dealt with by another statutory agency, which has the power to resolve the complaint. (If the claim occurs after the complaint has been raised, we will then close the complaint).
- Complaints made by GCHA staff – these are dealt with under the grievance procedure through HR. However, the policy will apply if the member of staff is a GCHA resident making a complaint about GCHA service and not a colleague.
- Complaints relating to staff conduct will be fully investigated in line with our HR policies. We will not be able to divulge the outcome of these investigations for reasons of confidentiality. We will, however, explain what our investigation involved.
- Complaints are past the twelve-month period, which reduces the opportunity for GCHA to undergo an effective or productive investigation.

Residents are encouraged to raise their concerns at the time of an issue arising so GCHA staff can respond more effectively. We will where possible seek to investigate complaints within a 12-month period of the resident first becoming aware of the issue, unless they are excluded on other grounds set out in this policy. Each complaint will be considered on its individual merit and managed in line with our Equalities and Diversity policy.

If the resident seeks to raise their concerns after twelve months or longer after an issue occurs, it may reduce any opportunity for a successful outcome, staff moving on or information in general. We will not consider investigating complaints after 12 months for reasons already included within this policy.



## **20. Vexatious Complaints**

We define a vexatious complainant as someone who, because of the nature, or frequency of their contact with GCHA, hinders our ability to deal effectively with their or other residents' complaints.

This applies to a small minority of residents who make unreasonable demands on GCHA staff time and behave in a manner that is aggressive, intimidating, or refuses to accept GCHA response.

Some examples of these type of behaviours include:

- Refusing to specify the grounds of a complaint, despite offers of help
- Not co-operating with the complaints investigation process
- Changing the basis of the complaint as the investigation proceeds
- Pursuing parallel complaints on the same issue with various organisations
- Making excessive and unnecessary demands on the time and resources of staff with lengthy phone calls, emails to numerous staff, Board members, external parties, including letters, emails, every few days expecting immediate responses
- Submitting repeat complaints with minor additions, variations and insisting they are 'new' complaints.
- Refusing to accept a decision or repeatedly argue points with no new evidence.
- Making a complaint has no serious purpose or value. It may have little merit and investigating would be out of proportion to the seriousness of the issues complained about.
- Unreasonable levels of behaviours towards GCHA and GCHA contractors.

We reserve the right to refuse to deal with vexatious complaints or deal with them differently. For example, we may advise them to approach the HO Service without a review (if the request is an impossible one). The CEO must agree to this decision.

## **21. Unacceptable Behaviour**

GCHA staff will always be professional, friendly and treat our residents with respect and fairness. We ask that our residents do the same when communicating with GCHA staff.

Where this is not the case, and the residents behaviours or demands become unreasonable, then the Operational Lead will contact the resident directly and provide options on how to progress their concerns.

Where a resident's behaviour is unreasonable or excessive. GCHA reserves the right, at any stage of the complaints procedure, to review a complaint and put specific action in place which could include:

- The Operational Lead speaking to the resident directly with the intent to set out expectations and agree how the complaint will be managed
- Put in place a designated single named point of contact
- Limit number of emails and telephone contacts
- Seek guidance from the HO on whether there is any other course of action GCHA could take in these situations.

There is a separate 'Unacceptable Behaviour' policy in place. This is saved on GCHA's shared drive under Policies and Procedures.

## **22. Anonymous complaints**

Anonymous complaints may not be acted upon; they will, however, be brought to the appropriate manager's attention and investigated if necessary.

### **23. Monitoring complaints**

All formal complaints will be recorded by GCHA and will remain open until all agreed actions have been resolved. The Housing Operations team will review the complaints weekly and monthly via EMT meetings with quarterly updates to GCHA Board.

As part of our monitoring complaints process, we will also provide an annual complaints performance and service improvement plan report for scrutiny and challenge on our website and to the HO. This will include: -

- The annual self-assessment against the Code
- A qualitative and quantitative analysis of GCHA complaint handling performance which will also include a summary of the type of complaints we refused to accept.
- Any findings of non-compliance with the code by the HO
- The service improvements made because of the learning from complaints
- Any annual report about the landlords performance from the HO
- Any other relevant reports or publications produced by the HO in relation to the work of GCHA.
- The annual complaints performance and service improvement report must be presented to GCHA governing body and published on GCHA website relating to complaints.
- The governing body response to the report must be included in the report.

### **24. Complaints made directly to GCHA board**

There will be times where our residents feel they cannot trust GCHA staff to respond to their complaints and will seek to by-pass the formal complaints policy and procedure. In these situations, the board members are advised to redirect the complaint back to GCHA via the CEO and their Operations Team to respond.

### **25. Mediation**

In circumstances where the relationship between the resident and GCHA staff has deteriorated, GCHA may seek the support of an independent mediator (TPAS) to work with both parties to resolve the complaint and to rebuild relationships.

Once the complaint has been formally responded to and resolved, the CEO and/or Director of Operations will update the board members.

### **26. Confidentiality**


All complaints are treated with confidentiality and in line with the Data Protection Act 2018.

### **27. Equalities statement**

GCHA will treat all residents with fairness, dignity, and respect. We value diversity and work to promote equality and tackle unlawful discrimination. Our Equalities, Diversity and Inclusion policy sets out our commitment to equality, diversity, and inclusion and how we apply this commitment into practice.

Our approach to complaints promotes empathy, openness between residents and GCHA staff to understand the complaint and resolve the complaint in a positive manner. We will take fully into account an individual's needs, including any vulnerabilities and where necessary make any reasonable adjustments by offering support or tailor our approach as appropriate.

## Appendix A - Policy controls & approval table

Approval Table	Details of Approval
Approved (on behalf of the Board Review Group) by:	Brian Horton
Signature:	
Date:	8 June 2023

Date of Last Review	Main changes and why (i.e., change in legislation, internal processes, next review date)
January 2021	Policy was due for a full review
June 2023	Policy reviewed in line with the HO Complaint Code to consider a 2 stage complaints process and also expand on vexatious and unreasonable behaviours and removed the 'designated person' in line with the HO Complaint Code which took effect on 1 <sup>st</sup> October 2022).
May 2024	For information only: HO contact details amended within the policy following a change of address.
June 2023	Chair of the Policy Review meeting approved variations to the contract in line with revised HO complaint Handling Code. 8 June 2023.
June 2024	Updated policy to reflect revised HO complaint handling code following a full self assessment of the code. (27/06/2024). To be presented to the next P&R meeting in July 2024 for approval.