



## The Glendale Gateway Trust Complaints Policy

<u>Title:</u>	Complaints Policy
<u>Person responsible:</u>	CEO
<u>Customer consultation arrangement:</u>	Experience Involved Customers
<u>EIA required:</u>	Yes
<u>EIA completed (date):</u>	March 2024
<u>Approved by:</u>	Trustees
<u>Business Strategy Objective</u>	All themes
<u>Approval date:</u>	March 24
<u>Links to other key policies:</u>	Asset Management Strategy Repairs Policy Damp and Mould Policy Disrepair Policy Good Neighbourhood Management Policy Anti-Social Behaviour Policy Unacceptable Behaviour Policy Safeguarding Children and Adults at Risk Policy Data Protection and Data Privacy Policy
<u>Review date:</u>	March 2027

## **1. Purpose and Scope**

- 1.1 The Glendale Gateway Trust (GGT) is a registered housing provider. We own and manage 20 homes in Wooler, North Northumberland. GGT is committed to providing excellent services, creating safe and sustainable communities and promoting pride in its neighbourhood.
- 1.2 GGT believe that our customers of have a right to be heard, listened to, understood and treated with respect. We work hard to be open and accessible to everyone.
- 1.3 We welcome feedback from our customers, including complaints and compliments and carry out regular transactional and perception customer satisfaction surveys. We also provide wider opportunities for our customers to provide feedback, shape and influence service provision, be involved in decision making and hold us to account.
- 1.4 This policy provides a framework to promote a positive culture and support strong resident-landlord relationships. It means things can be put right for customers when they have gone wrong. It will help GGT to develop and improve services. It follows established dispute resolution principles: to be fair, put things right, and learn from outcomes.

## **2.0 Regulatory and Legislative Requirements**

- 2.1 This policy complies with the Regulator of Social Housing's Standards, particularly the Tenant Involvement and Empowerment Standard and the Housing Ombudsman Service (HOS) Complaint Handling Code (CHC). GGT Board will formally adopt the HOS CHC and we will annually self-assess against the Code, publishing the assessment.
- 2.2 Other relevant legislation and reference points include, but are not limited to:
  - ☐ Housing Acts 1985 and 1996
  - ☐ Landlord and Tenant Act 1985
  - ☐ RSH Consumer Standards
  - ☐ Housing Ombudsman Service – Complaint Handling Code, Determinations, Spotlight Reports and Guidance, Compensation Policy – Guidance for Landlords, Guidance on Pre-Action Protocol for Housing Conditions Claims and service complaints
  - ☐ Homes (Fit for Human Habitation) Act 2018
  - ☐ Defective Premises Act 1972
  - ☐ Housing Health and Safety Rating System (HHSRS) 2006
  - ☐ Pre-Action Protocol for Housing Disrepair Cases (England)
  - ☐ Equality Act 2010
  - ☐ Data Protection Act 2018

### 3.0 Definitions

- Customers includes tenants, leaseholders, shared owners and wider residents and where applicable their representatives or advocates.
- Service Request - a service request is a request from a resident to the landlord requiring action to be taken to put something right.
- Complaint - 'an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the landlord, its own staff, or those acting on its behalf, affecting a resident or group of residents.'
- Unacceptable behaviour – aggressive and abusive behaviour, harassment or actions that result in unacceptable or excessive demands on our service or refusal to co-operate with reasonable requests in that it prevents colleagues from carrying out their duties effectively.
- Compensation - providing redress to restore a person to the position they would have been in had the service failure not occurred.

### 4.0 Our Approach

- 4.1 Effective complaint handling enables customers to be heard and understood and for GGT to put right for customers when they have gone wrong and help GGT to develop and improve services.
- 4.2 A service request is a request from a resident to GGT requiring action to be taken to put something right. Service requests are not complaints, but must be recorded, monitored and reviewed regularly.
- 4.3 A complaint is defined as 'an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the landlord, its own staff, or those acting on its behalf, affecting a resident or group of residents.' A customer does not have to use the word 'complaint' for it to be treated as a complaint. A complaint that is submitted via a third party or representative will be handled in line with this policy. Customers will be given the choice if they wish to make a complaint, if they are unhappy about our services.
- 4.4 A complaint will be raised when the resident expresses dissatisfaction with the response to their service request, even if the handling of the service request remains ongoing. GGT will not stop our efforts to address the service request if the resident complains.
- 4.5 An expression of dissatisfaction with services made through a survey is not defined as a complaint, though wherever possible, the person completing the survey will be made aware of how they can pursue a complaint if they wish to.

Where GGT ask for wider feedback about our services, we will also provide details of how residents can complain.

- 4.6 GGT will accept complaints made in person, via email, telephone, letter or through any other communication channels such as GGT website or social media. Any complainants via social media will be taken offline, and the customer will be encouraged to continue their complaint either by email, telephone or letter.
- 4.7 GGT will accept complaints referred to us within 12 months of the issue occurring or the customer becoming aware of the issue, unless they are excluded on other grounds. We will consider whether to apply discretion to accept complaints made outside this time limit where there are good reasons to do so.
- 4.8 GGT will consider the [HOS Guidance on the Pre-Action Protocol for Housing Conditions Claims and service complaints](#) when handling disrepair cases and considering compensation.

## 5.0 Exclusions

- 5.1 We will consider each complaint on its own merits and consider the individual circumstances. There will be exceptional situations when a matter will not be considered as a complaint or escalated, which could include:
- ☐ An initial request for a service e.g. first reporting a repair,
  - ☐ The issue giving rise to the complaint occurred over twelve months ago,
  - ☐ Legal proceedings have started. This is defined as details of the claim,
    - such as the Claim Form and Particulars of Claim, having been filed at court,
    - Insurance matters where an insurance claim has been made and this is being dealt with by GGT insurers. Note that complaints about delays accessing the complaints procedure or other complaints not part of the insurance claim will be investigated, but not insurance claims until those steps have been exhausted. Complaints will be dealt with by following the Housing Ombudsman's [Guidance on complaints involving insurance issues \(housing-ombudsman.org.uk\)](#) including clarity on what can be considered through the complaints procedure.
  - ☐ Matters that have previously been considered under the complaints policy,
  - ☐ On the basis that it has been pursued in a way that is unacceptable and has been dealt with under our Unacceptable Behaviour Policy,
  - ☐ Persons or bodies over which GGT has no control.
- 5.2 If GGT decides not to accept a complaint, an explanation will be provided to the customer setting out the reasons why the matter is not suitable for the complaints process and the right to take that decision to the Ombudsman. If the Ombudsman does not agree that the exclusion has been fairly applied, the Ombudsman may tell GGT to take on the complaint.

## **6.0 Access and Awareness**

- 6.1 GGT will make it easy for our customers to complain by providing different channels through which customers can make a complaint. We will consider our duties under the Equality Act 2010 and endeavour to anticipate the needs and reasonable adjustments of residents who may need to access the complaints process.
- 6.2 Customers can raise their complaints in any way and with any colleague. All colleagues will be made aware of the complaints process and be able to pass details of the complaint to the Complaints Officer – the Customer Insight Partner.
- 6.3 GGT recognise the value of complaints and high volumes of complaints are not to be GGT's seen as a negative, as they can be indicative of a well-publicised and accessible complaints process. Low complaint volumes are potentially a sign that customers are unable to complain.
- 6.4 GGT will make this Complaints Policy available in a clear and accessible format for all customers on our website, in publications and communal noticeboards, where available. A copy can be provided upon request. This will detail the two-stage process, what will happen at each stage, and the timeframes for responding. The policy including information about the Housing Ombudsman Service and the HOS Complaint Handling Code will be published on our website.
- 6.5 GGT will give customers the opportunity to have a representative deal with their complaint on their behalf, and to be represented or accompanied at any meeting with GGT.
- 6.6 GGT will provide customers with information on their right to access the Housing Ombudsman Service and how the individual can engage with the HOS about their complaint. This will include in this policy, on our website and in complaint acknowledgement and outcome letters.

## **7.0 Complaint Handling Colleagues**

- 7.1 GGT's Property Officer will take responsibility for complaint handling, including liaison with the HOS and ensuring complaints are reported to the governing body (or equivalent). We refer to that person or team as the 'Complaints Officer'. The Complaints Officer has access to colleagues at all levels to facilitate the prompt resolution of complaints. They have the authority and autonomy to act to resolve disputes promptly and fairly and to escalate any issues or complaints to the CEO or Chair of the Trustees if required.
- 7.2 GGT will promote a positive complaint handling culture and the value of learning of complaints. All relevant colleagues will be suitably trained in the importance of complaint handling.

## **8.0 The Complaint Handling process**

- 8.1 This policy provides the framework for handling complaints. We will not treat customers differently if they complain. The early and local resolution of issues between GGT and our customers is key to effective complaint handling. It may be possible to provide an explanation and resolution to the customer's satisfaction when they first contact us, such as delay in a contractor attending an appointment by ringing the contractor, apologising and informing the customer when the contractor will arrive and if so, we will record details on the system, if not we will log a complaint.
- 8.2 GGT has a 3 stage complaints process, and we will take responsibility for ensuring that any third parties handle complaints in line with this policy.
- 8.3 When a complaint is logged at Stage 1 or escalated to Stage 2, GGT will set out our understanding of the complaint and the outcomes the customer is seeking. This is referred to as "the complaint definition". If any aspect of the complaint is unclear, we will ask the customer for clarification. We will be clear which aspects of the complaint we are, and are not, responsible for and clarify any areas where this is not clear.
- 8.4 At each stage of the complaints process, complaint handlers 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; and consider all relevant information and evidence carefully
- 8.5 Where a response to a complaint will fall outside the timescales set out in this policy, GGT will agree with the customer suitable intervals for keeping them informed about their complaint.
- 8.6 GGT will make reasonable adjustments for customers where appropriate under the Equality Act 2010. GGT will keep a record of any reasonable adjustments agreed, as well as a record of any disabilities a resident has disclosed. Any agreed reasonable adjustments will be kept under active review.
- 8.7 GGT will not refuse to escalate a complaint through all stages of the complaints procedure unless we have valid reasons to do so as outlined in the exclusions in Section 5.
- 8.8 A full record will be kept of the complaint, and the outcomes at each stage. This will include the original complaint and the date received, all correspondence with the customer, correspondence with other parties, and any relevant supporting documentation such as reports or surveys.
- 8.9 GGT will ensure appropriate remedies can be provided at any stage of the complaints process without the need for escalation.
- 8.10 GGT has a policy and procedures in place for managing unacceptable behaviour from residents and/or their representatives.

## **9.0 Complaints Stages**

- 9.1 GGT has a three stage complaints process. We will consider which complaints can be responded to as early as possible, and which require further investigation. We will consider factors such as the complexity of the complaint and whether the customer is vulnerable or at risk. Most Stage 1 complaints can be resolved promptly, and an explanation, apology or resolution provided to the customer.
- 9.2 If you wish to make a complaint regarding your GGT housing application which is managed by GGT, about the handling of an application, poor service, or the way you have been treated by GGT, your complaint will follow this complaints process.

### **Stage 1- Property Officer**

A tenant, member of the public or organisation who feels aggrieved by a decision or action of the Trust or member of staff should, in the first instance, lodge their complaint preferably in writing directly to Miss Cindy Crossman – Property Officer. Telephone Complaints should be followed up in writing within seven days. GGT has a target of 5 working days for acknowledging and responding to complaints received.

Where it is not possible to examine all facts in a particular case fully and reply within five working days the complaint will be advised accordingly, again in writing, and given a date by which a written response should be expected. Complaints about the Trust's service or against members of staff should be addressed to:

Miss Cindy Crossman, Property Officer, Glendale Gateway Trust, The Cheviot Centre, 12 Padgepool Place, Wooler, NE71 6BL.

If the complainant is not satisfied with the response received or if a reply has not been made within the specified time or any later time stipulated the complaint may progress to stage two.

**NOTE: Where a complaint is being made about a direct decision or action of the person detailed above it is not necessary to go through the Stage 1 Procedure, Stage 2 should be initiated in such circumstances.**

**Stage 1 investigations and responses will be overseen by the CEO.**

### **Stage 2 - Chair of the Board of Trustees**

Where a complaint has not received a satisfactory response after going through Stage One (where applicable) and Stage Two he / she should write to the Chair of the Board of Trustees the following address:

Chair, Glendale Gateway Trust, The Cheviot Centre, 12 Padgepool Place, Wooler, NE71 6BL

**Correspondence to the Chairman must be marked Private and Confidential.** The Chair will acknowledge all complaints in writing immediately and advise the complainant of the date on which a substantive written response will be provided.

The Chair will investigate the full facts in relation to the complaint and a written response will normally be provided within ten working days of receipt.

Please use the following contact details if you require assistance with our Complaints Procedure or if you wish to forward a complaint to Glendale Gateway Trust:

Glendale Gateway Trust  
The Cheviot Centre  
12 Padgepool Place  
Wooler, NE71 6BL

The written complaints response to the customer at the completion of Stage 2 will be in clear, plain language and include:

- a. the complaint stage;
- b. the complaint definition;
- c. the decision on the complaint;
- d. the reasons for any decisions made;
- e. the details of any remedy offered to put things right;
- f. details of any outstanding actions; and
- g. details of how to escalate the matter if the individual is not satisfied with the response

Stage 3 is GGT's final response and will involve all suitable colleagues needed to issue such a response and will be overseen by the Chair of the Board of Trustees.

## **10 Putting things right**

10.1 Where something has gone wrong GGT will acknowledge this and set out the actions it has already taken, or intends to take, to put things right. This can happen at any stage of the process, without the need for escalation. These can include:

- ☐ Apologising.
- ☐ Acknowledging where things have gone wrong;
- ☐ Providing an explanation, assistance or reasons;
- ☐ Taking action if there has been delay.
- ☐ Reconsidering or changing a decision.
- ☐ Amending a record or adding a correction or addendum;
- ☐ Providing a financial remedy.
- ☐ Changing policies, procedures or practices
- ☐ Gestures of goodwill (e.g. vouchers, chocolates, flowers).



10.2 Any remedy will reflect the impact on the customer as a result of any fault identified and take account of the guidance issued by the HOS. The remedy offer will clearly set out what will happen and by when, in agreement with the customer where appropriate. Any remedy proposed will be followed through to completion

### 10.3 Reporting

GGT will produce an annual complaints performance and service improvement report for scrutiny and challenge, which will include:

- a. the annual self-assessment against this HOS Complaint Handling Code to ensure our complaint handling policy remains in line with its requirements.
- b. a qualitative and quantitative analysis of GGT's complaint handling performance. This will include a summary of the types of complaints GGT has refused to accept.
- c. any findings of non-compliance with this HOS Complaint Handling Code by the HOS.
- d. the service improvements made as a result of the learning from complaints;
- e. any annual report about the landlord's performance from the HOS; and
- f. any other relevant reports or publications produced by the HOS in relation to the work of the landlord

The annual complaints performance and service improvement report will be reported to our Board and published on the on the section of the website relating to complaints. The Board's response to the report will be published alongside the report.

If GGT is unable to comply with the HOS CHC due to exceptional circumstances, such as a cyber incident, we must inform the HOS, provide information to customers who may be affected, and publish this on our website, providing a timescale for returning to compliance with the Code.

## 11.0 Scrutiny & oversight: continuous learning and improvement

11.1 GGT welcome and recognises the value of complaints and the importance of accountability and transparency and will look beyond the circumstances of the individual complaint and consider whether service improvements can be made as a result of any learning from the complaint. GGT will also:

- ☐ use complaints as a source of intelligence to identify issues and introduce positive changes in service delivery.
- ☐ report back on wider learning and improvements from complaints to stakeholders, such as customers' panels, colleagues and relevant committees
- ☐ appoint a suitably senior lead person as accountable for their complaint handling on the Board of Trustees, who will assess any themes or trends to identify potential systemic issues, serious risks, or policies and procedures that require revision.

## **11.2 Governance**

11.2.1 GGT will appoint a Board member to have lead responsibility for complaints to support a positive complaint handling culture. This person is referred to as the Member Responsible for Complaints ('the MRC'). The MRC will be responsible for ensuring the Board receives regular information on complaints that provides insight on GGT's complaint handling performance. This person will have access to suitable information and colleagues to perform this role and report on their findings.

11.2.2 The MRC and the Board will receive:

- a. regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance.
- b. regular reviews of issues and trends arising from complaint handling
- c. regular updates on the outcomes of the HOS's investigations and progress made in complying with orders related to severe maladministration findings; and
- d. annual complaints performance and service improvement report.

## **11.3 Colleagues**

11.3.1 GGT will ensure all relevant colleagues receive training on the complaints policy and know how to log, investigate and respond to complaints. GGT will have a standard objective in relation to complaint handling for all relevant colleagues or third parties that reflects the need to:

- a. have a collaborative and cooperative approach towards resolving complaints, working with colleagues across teams and departments;
- b. take collective responsibility for any shortfalls identified through complaints, rather than blaming others; and
- c. act within the professional standards for engaging with complaints as set by any relevant professional body.

## **12.0 Equality, Diversity and Inclusion**

12.1 GGT is aware of our responsibilities under the Equality Act 2010 and is committed to equality, diversity and inclusion. We will endeavour to provide a service that seeks to meet the needs of a particular individual or household and ensure no one is disadvantaged in accessing our services. We recognise that some of our customers may have permanent or transitory vulnerabilities and where customers require additional support, we will endeavour to make reasonable adjustments.

12.2 We will also take account of any known vulnerabilities and identify if any impact is worsened through for example disability, old age or the presence of young children when considering redress and/or compensation payments.

### **13.0 Monitoring & Review**

- 13.1 This policy will be reviewed every three years, or where there have been significant changes to regulation, legislation, operations or best practice to warrant a further policy review.
- 13.2 GGT would also carry out a self-assessment if we were involved in a significant restructure, merger and/or change in procedures or if asked to review and update the self-assessment following a HOS investigation.
- 13.3 If you have any questions about this policy, please contact GGT via email, [Gemma@wooler.org.uk](mailto:Gemma@wooler.org.uk).

At any time in the process a customer can contact the Housing Ombudsman Service for advice. Once GGT Complaint's Policy has been exhausted, customers have the right to refer the complaint to the Housing Ombudsman Service, of which GGT is a member.

Further information is available <https://www.housing-ombudsman.org.uk/residents/make-a-complaint/>, or call on 0300 111 3000 or write to Housing Ombudsman Service, PO Box 152, Liverpool L33 7WQ.