

Grosvenor Hart Homes: Complaints Policy



GROSVENOR

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Complaints Policy

Introduction

Grosvenor Hart Homes Limited (GHH) aims to offer the highest possible service standards to its customers but we recognise we are not perfect and on occasion we will get things wrong. When this happens, we want to deal with complaints swiftly and bring them to a satisfactory resolution.

When we receive a complaint:

- We will investigate complaints in a confidential and respectful manner, agreeing with the customer how they will be kept informed throughout the process.
- We will always offer the customer a choice of an informal resolution (service request) to put things right quickly, or a formal complaint investigation through our internal process.
- Where the customer chooses to log a service request we will seek to resolve any issues to achieve a swift and satisfactory outcome for the customer.
- We take learning from complaints seriously and will ensure that lessons learnt from complaint investigations are used to inform service improvements.
- We will ensure that our complaints policy and approach comply with the requirements of the Housing Ombudsman and the Regulator of Social Housing (RSH).

GHH aims to deliver best in sector services, and we recognise that this will only be achieved by working closely with tenants and other customers, ensuring their feedback shapes all aspects of what we do. Within twelve months of our becoming registered with the RSH, we will formally consult our tenants on this policy and will revise our approach as required.

We always welcome feedback on any of our policies, procedures or services at any time. If you have any comments, compliments or complaints about this policy or any of our services, please let us know.

Feedback may be provided, and complaints can be made in one of the following ways:

- by telephone on **01244 563777** (core office hours: Monday-Friday, 9am-5pm)
- in person at any of our offices
- via our [online complaints form](#) on our website
- in writing to any of our offices
- by email to tenant.support@grosvenorhart.com

The Housing Ombudsman Service

GHH is a registered member of the Housing Ombudsman Scheme. As GHH is a provider of both housing and support services, all complaints- housing or non-housing related- will follow the complaints process outlined in this policy, but only complaints from tenants are able to be referred to the Housing Ombudsman.

A condition of membership is that all members agree to be bound by the decisions and adjudications of the Housing Ombudsman's Service, regardless of whether the member agrees with the outcome or not. The

Ombudsman may report a member's complaint handling failure to any appropriate regulatory agency and/or the board, committee, panel or senior officer of the member along with any related details as the Ombudsman sees fit. The Ombudsman may publish the fact and circumstances of a member's complaint-handling determinations, naming the member in the Ombudsman's annual report or elsewhere. We will respond positively to all Ombudsman enquiries, investigations and recommendations and undertake to comply promptly with any determinations. We will also publish on our website details about the Ombudsman and how customers can contact them, as well as our self-assessment indicating our compliance with the Ombudsman Complaint Handling Code 2024.

Aims & key objectives

We will adopt the [Housing Ombudsman's Complaint Handling Code 2024](#) and its dispute resolution principles namely to be fair, to put things right and to learn from outcomes. We will do this by:

- Resolving matters locally and as quickly as possible by being open, accountable and outcome focused
- Resolving complaints at the first point of contact wherever possible
- Treating all customers fairly
- Welcoming all customer feedback on service standards and we will make it easy for customers to provide feedback including making a complaint
- Ensuring all complaints are addressed and dealt with within published timescales wherever possible
- Recording, monitoring, and analysing feedback in order to examine service performance to improve service delivery
- Acknowledging that sometimes things go wrong, that complaints are viewed positively and that they provide us with an opportunity to put things right
- Learning from customer feedback and promote how feedback is used to improve services
- Having a range of options available to us to put things right when service failure occurs including compensation

What is a complaint?

We regard a complaint 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 tenant, group of tenants, prospective tenants, other customers, contractors or members of the public.

We acknowledge that a customer may not explicitly use the word 'complaint' when expressing dissatisfaction but it will be made clear to the customer that they have the choice to register their dissatisfaction as a formal complaint.

Occasionally a customer may be unhappy with the actions or services provided by GHH but have no interest in engaging in a formal complaint investigation or may not require us to respond to their concerns in writing. On these occasions we will treat the report as a service request and work with the customer at the point of contact to put things right and achieve a solution that is acceptable to all parties. We will usually take this approach when dealing with straightforward problems and only where we have the express consent of the customer(s). The outcome will be fed back to the customer in person or over the phone. Our systems enable us to record and track these 'service requests' allowing us to establish an audit trail and learn from customer feedback, but we will not routinely report upon them and to all intent and purpose they will fall outside of the scope and remit of this policy. If a customer is not satisfied with the response that they receive to their 'service requests' they will be provided with information on how to register a formal complaint, even if the handling of the service request is ongoing. When a service request becomes a complaint, we will continue our efforts to address the service request.

Exclusion grounds

We will consider all complaints on an individual, case-by-case basis and accept all complaints referred to us within 12 months of the issue having occurred or the resident becoming aware of the issue unless there is a valid reason not to do so. In some cases, we may apply discretion to accept complaints issued beyond this time limit where there are good reasons to do so.

We may not consider an expression of dissatisfaction under this policy if the issue:

- occurred more than 12 months ago
- has already been considered under this policy
- is a complaint about another tenant
- circumstances out of our control
- is subject to legal action
- relates to an insurance claim.

If we do not accept a complaint, we will explain the reason for our decision (and how we propose to address the customer's concerns) and where the customer is a GHH tenant, inform the customer that they have the right to take that decision to the Housing Ombudsman. We will comply with any subsequent Ombudsman decision which directs us to accept a complaint where the Ombudsman does not feel the exclusion has been fairly applied.

Who can make a complaint

We accept complaints from:

- Tenants
- Anyone who is in receipt of a service or is affected by a service that we provide
- Anyone who may potentially receive a service from us
- Members of the public
- Contractors
- Stakeholders

Complainants may make a complaint via an advocate. An advocate could be a friend, relative, or an advocacy service such as the Citizens Advice Bureau. Where a complaint is made via an advocate, we will obtain the customer's written consent. Where correspondence is received on behalf of a customer from a Councillor, MP, or Advocacy Service, consent will be assumed. An advocate can accompany or represent the customer throughout the complaints process including at meetings with GHH.

Any complaints that are submitted via a third party or representative will be handled in line with our standard GHH policy and procedures.

How complaints can be made

We welcome complaints and seek to make our complaints process accessible to customers. We therefore provide a range of options for customers to submit a complaint, including in person, in writing, by e mail, 'on line', or by phone. Customers can relay or hand in their complaint in person at any GHH office or to any customer facing staff. Customers who make a complaint on social media (e.g., Facebook or Twitter) will be directed to our on-line complaints form. We will identify service failures and do not expect customers to specifically say "I wish to complain." Survey feedback may not necessarily need to be treated as a complaint, though, where possible, the person completing the survey should be made aware of how they can pursue

their dissatisfaction as a complaint if they wish to. Whenever we request feedback from our customers, we will provide information on how customers can make a complaint if they wish to.

In our endeavour to ensure our complaints process is accessible to our customers, we may reflect on a low volume of complaints as a sign that our customers are unable to complain and look at how we can address this. Conversely, we do not necessarily see a high complaints volume as negative, but rather as a sign that customers are aware of our procedures and that our complaints process is accessible.

MP referrals

GHH also has robust measures in place to deal with MP enquiries. Although strictly outside the remit of this policy, reference is made here for completeness. Where an MP makes a complaint on behalf of a constituent this will be dealt with as a complaint, not an enquiry.

Complaint investigation principles

A complaint investigation will be conducted in an impartial manner, seeking sufficient reliable information from both parties so that fair and appropriate findings and recommendations can be made. To ensure that a complaint investigation is fair, at each stage of the complaints process we will:

- Deal with each case on its merits
- Act independently and have an open mind
- Give the customer a fair chance to set out their position
- Take measures to address any actual or perceived conflict of interest
- Consider all relevant information and evidence carefully
- Keep the complaint confidential as far as possible. We will only disclose details of the complaint more widely where this proves necessary in order to allow us to conduct a thorough investigation. Where a key issue of a complaint relates to the parties' legal obligations, we will clearly set out our understanding of the obligations of both parties and seek clarification before doing so where this is not initially clear.

In our handling of complaints, our approach for all employees and any third parties we work with will seek to:

- Take a collaborative and co-operative approach towards resolving complaints, working with colleagues across organisations and departments as appropriate.
- Take collective responsibility for any shortfalls identified, rather than blaming others
- Act within the professional standards for engaging with complaints as set by relevant professional bodies.

How complaints will be handled

Customers can raise a complaint with any member of GHH staff. Staff will be trained in handling and responding to complaints appropriately and will be empowered to deal with complaints as and when they arise including escalating the complaint to the appropriate person within the organisation. We will endeavour to act early and swiftly to resolve issues as they arise. Where GHH has got things wrong, staff will apologise and explain what went wrong and what action will be taken to put things right. When responding in writing we will make it clear what stage in the process the response relates to and give clear guidance on how to escalate a complaint if the customer does not feel their complaint has been resolved. We will at all stages provide residents with contact information for the Housing Ombudsman making it clear that there is a continual right of access to their service, not just at the point at which our internal complaint processes are exhausted.

We have a two-stage complaints process.

Stage 1

When a complaint is made, it will be acknowledged, defined and logged at Stage 1 within five working days of receipt. When we acknowledge a complaint at Stage 1 we will set out our understanding of the complaint and the outcomes the customer is seeking i.e. the 'complaint definition'. We will seek clarification of the customer's views where this is necessary and if any part of the complaint is unclear. We will also make clear which aspects of the complaint we are and are not responsible for and clarify any areas where this is not clear.

In the interest of seeking quick and early resolutions to complaints where possible, our initial triage process will consider the complexity of each complaint and whether the tenant is vulnerable or at risk and determine an appropriate course of action to resolve the case promptly at stage 1, providing an explanation, apology or other resolution without delay where possible.

We will provide a full response to the complaint within 10 working days of the complaint being acknowledged. We will respond when the answer to the complaint is known, not when any outstanding actions required to address the issue have been completed. Our response will address all the points raised in the complaint definition and refer to the relevant policy, law and good practice, where appropriate, to explain the reasons for any decisions.

Our response will be in writing in clear, plain language and include:

- the complaint stage
- the complaint definition
- our decision on the complaint
- the reasons for any decisions made
- the details of any remedy offered to put things right
- details of any outstanding actions
- details of how to escalate the matter to Stage 2 if the customer is not satisfied with the answer.

Thereafter, we will continue to progress and complete any outstanding actions as promptly as possible and issue regular updates to the customer.

There will be times when we are unable to provide a comprehensive response in the timeframes set out. On these occasions, we may extend a response deadline by up to a maximum of 10 working days but only with the prior agreement of the complainant. On these occasions, complainants will be kept up to date and will receive an explanation for any delays. We will provide customers with contact information for the person handling the complaint and also the contact details of the Housing Ombudsman in case the customer is a tenant who is not happy with our proposed response timescale.

If an extension of more than 10 working days is required to enable us to respond to the complaint fully, we will agree this with the customer and agree suitable intervals with the customer for keeping them informed about their complaint. Where agreement over an extension period cannot be reached, we will provide the Housing Ombudsman's contact details so the customer can challenge our plan for responding and/or the proposed timeliness of our response.

If, during the course of the Stage 1 investigation, further complaints are made by the customer, we will incorporate these into our response if the issues are related and we have not yet issued the Stage 1 response. In cases where we have already issued the Stage 1 response, where the new issues are deemed unrelated to

the original issue under investigation or where incorporating the new issue would unreasonably delay the response, the new issue would be required to be logged as a new complaint.

Stage 2

Once Stage 1 has been completed, if all or part of the complaint is not resolved to the customer's satisfaction it will be progressed to Stage 2, unless an exclusion ground applies. In cases where we cannot accept a complaint because exclusion grounds apply, we will explain the reason for this to the customer.

Stage 2 is the final stage in our complaints process and signals our final response to the issue as the landlord. It will involve suitable staff members needed to issue such a response. As such, a Stage 2 complaint will be considered by a member of our Executive Leadership Team as long as they have not considered the complaint at Stage 1.

A request to escalate a complaint to Stage 2 will be acknowledged, defined and logged within five working days of the escalation request being received. Customers do not have to explain their reasons for escalation to Stage 2 and we will seek to understand why the customer remains unhappy. When we acknowledge a complaint at Stage 2 we will set out our understanding of the complaint and the outcomes the customer is seeking i.e. the 'complaint definition'. We will seek clarification of the customer's views where this is necessary or if any part of the complaint is unclear. We will also make clear which aspects of the complaint we are and are not responsible for and clarify any areas where this is not clear.

We will provide a final response to the complaint within 20 working days of the complaint being acknowledged. We will respond when the answer to the complaint is known, not when any outstanding actions required to address the issue have been completed. Our response will address all the points raised in the complaint definition and refer to the relevant policy, law and good practice, where appropriate, to explain the reasons for any decisions.

Our response will be in writing in clear, plain language and include:

- the complaint stage
- the complaint definition
- our decision on the complaint
- the reasons for any decisions made
- the details of any remedy offered to put things right
- details of any outstanding actions
- details of how to escalate the matter to the Housing Ombudsman service if the customer is a GHH tenant and remains dissatisfied.

Thereafter, we will continue to progress and complete any outstanding actions as promptly as possible and issue regular updates to the customer.

In exceptional circumstances where we are unable to respond within this timeframe, due to the complexity of the complaint, the timeframe may be extended. We will provide an explanation to the customer and confirm a clear timeframe for when the response will be received. This extension should not exceed 20 working days without good reason. We will continue to keep the customer up to date with the progress of their complaint and provide them with the details of the Housing Ombudsman if they are not satisfied with the timeliness of our response.

If an extension beyond 20 working days is required to enable us to respond to the complaint fully, we will agree this with the customer and agree suitable intervals with the customer for keeping them informed about

their complaint. Where agreement over an extension period cannot be reached, we will provide the Housing Ombudsman's contact details so the customer can challenge our plan for responding and/or the proposed timeliness of our response.

We will clearly communicate in writing any decision we make to decline to escalate a complaint to Stage 2. In doing so, we will explain our reasons for not escalating as well as confirm the customer's right to approach the Ombudsman about our decision if the customer is a GHH tenant.

In all cases, we will keep a full record of each complaint and the outcomes at each stage.

Grosvenor Hart Homes are committed to ensuring the security and protection of the personal information that we process and to provide a compliant and consistent approach to data protection.

Immediate safety

We will from time to time receive complaints containing information that suggests an individual may be in imminent risk of harm either as a result of health and safety or safeguarding concerns. Our immediate concern should be for the wellbeing of that individual and the officer who first receives the complaint must make referral on Health and Safety or Safeguarding grounds, following the procedures laid down by the Company. Only then should a complaint be logged.

Our 3 key overarching principles in complaint resolution

- **Be fair** – seeking fair outcomes. We will treat each case individually and ensure the remedy is fair when considering the specific circumstances of the case by providing a remedy which is appropriate
- **Put things right.** A remedy must set out the measure(s) that will correct the perceived failures
- **Learn from outcomes.** Where possible we add value by looking beyond the circumstances of the individual complaint and considering whether anything can be improved in terms of process and systems.

Customer communication

We will maintain regular contact with a customer throughout the complaints process, including where there is no new information.

Putting things right

Where something has gone wrong, we will acknowledge this and take actions to put things right.

This may 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 financial remedy

- Changing policies, procedures or practices.

Any remedy offered will consider and reflect the impact on the customer of any fault identified. We will also consult Ombudsman guidance when determining appropriate remedies.

Remedies can be put in place at any stage of the complaints process as appropriate and in agreement with the Complaints Officer.

When a remedy is offered, we will clearly set out what will happen and by when, in agreement with the customer, where appropriate. We will follow through all remedies to completion.

Compensation

In some circumstances, it will be appropriate to offer compensation as part of a complaint response. Compensation offers will be considered on a case-by-case basis and will take account of the following:

- the length of time that a situation has been ongoing
- the frequency with which something has occurred
- the severity of any service failure or omission
- the number of different failures
- the cumulative impact on the customer
- the customer's particular circumstances or vulnerabilities.

Restrictions

We may place restrictions on a customer's contact with us where their behaviour becomes unacceptable, impacts upon our ability to consider their complaint or to serve other customers or they engage in abusive or threatening behaviour.

In these instances, we will explain the reason for our decision and how we propose to engage with the customer to address their concerns. We will keep any restrictions we place under regular review. We will ensure our decision is proportionate and takes account of the customer's needs and demonstrates regard for the provisions of the Equality Act 2010.

Promoting awareness of our approach to complaints

We will ensure that our complaints policy and process, the Housing Ombudsman's Complaint Handling Code and the Housing Ombudsman scheme (including contact information) is promoted in leaflets, posters, newsletters, online and as part of our regular correspondence with customers.

Equality, diversity and inclusion

We will ensure that our complaints policy and process is accessible to all customers. This means we will:

- Fulfil our legal duties under the Equality Act 2010 to advance equality of opportunity and prevent discrimination
- Adapt our approach considering the needs of our customers and make reasonable adjustments to ensure a tenant can raise and address their complaint with us.
- Keep a record of any reasonable adjustments agreed with customers as well as recording any disabilities residents have disclosed and keep the reasonable adjustments under active review

- Ensure that all staff who handle complaints receive equality, diversity and inclusion training.

Learning from complaints

Effective complaint handling is a key priority for us and we are committed to learning from complaints and to establishing a positive complaint handling culture so we can effectively resolve disputes. Our Housing Director (DCEO) is our appointed complaints officer, who is responsible for complaints handling and will take the lead on assessing themes and trends, risks and where policies and procedures need to be revised. We will ensure that all employees understand our expectations and senior leadership considers insights from individual complaints, and broader themes and trends to ensure learning from complaints is translated into service improvements and positive changes to service delivery.

We have an appointed Lead Member Responsible for Complaints (MRC) on our Board. We will ensure that the MRC and the rest of the Board receive regular updates on complaints including on volume, categories and outcomes, complaint handling performance, reviews of issues and trends and updates on the outcomes of any Ombudsman investigations and progress in addressing any findings, as well as the annual complaints performance and service improvement report. The MRC is responsible for ensuring that the Board receives regular information on complaints to enable it to understand our complaints handling performance.

We will publish on our website an annual complaints performance and service improvement report, which will include our annual self-assessment against the Housing Ombudsman Code, summary details of complaints and an analysis of our complaint handling performance and learning and improvements arising from complaints. This will be accompanied by a response to the report from our Board.

In line with our commitment to accountability and transparency, we will also report on our performance and learning and service improvements which have resulted from complaints to key stakeholders, including to our customer voice groups and committees.

Performance measures

As a minimum, we will collect and report the following measures. These are all Tenant Satisfaction Measures (TSMs) which the Regulator of Social Housing requires us to collect:

- Complaints relative to the size of the landlord (CH01)
- Complaints responded to within Complaint Handling Code timescales (CH02)
- Satisfaction with the landlord’s approach to handling complaints (TP09)

Review schedule

This policy will be reviewed every three years or more frequently as a result of feedback obtained, internal/external audits and change in legislation or regulatory requirements. This process ensures the policy’s continuing suitability, adequacy, and effectiveness.

The Housing Director has responsibility for this policy, and ultimate responsibility for performance and compliance sits with the board.

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