

Sanctuary Group

Complaints - Housing and All Supported Living Policy

Sanctuary Group

Title: Complaints - Housing and All Supported Living Policy 2024

Business Function:

- Sanctuary Housing
- Sanctuary Property Services
- Sanctuary Supported Living

Owner: Head of Complaints

Authorised by: Executive Committee

Sanctuary Group:

Sanctuary Group is a trading name of Sanctuary Housing Association, an exempt charity, and all of its subsidiaries.

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Complaints - Housing and All Supported Living Policy

1. Policy statement

1.1 Purpose

- 1.1.1 Sanctuary Housing and Sanctuary Supported Living (Sanctuary) aims to provide good quality homes and deliver high quality services to customers and stakeholders. However, it is recognised that there may be times when something goes wrong, or customers are not happy with the services provided. When this occurs, Sanctuary actively encourages customers to contact staff so that action can be taken.
- 1.1.2 This policy sets out Sanctuary's commitment to valuing complaints, and aims to:
- ensure complaints are effectively identified and recorded.
 - act responsibly and fairly when things go wrong.
 - put things right quickly for customers; and
 - learn from complaints to improve services.

1.2 What is a complaint?

- 1.2.1 Sanctuary's definition of a complaint is in line with the Housing Ombudsman's Complaint Handling Code (April 2024).
- 1.2.2 Sanctuary's definition of a complaint is:

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.

Sanctuary will recognise a complaint regardless of whether the word 'complaint' is explicitly used and will distinguish between service requests and complaints. A service request will become a complaint when a resident expresses dissatisfaction with a response received. Sanctuary will also investigate complaints relating to Building Safety in line with The Building Safety Policy should these be raised.

- 1.2.3 Sanctuary will accept and recognise complaints unless there is a valid reason not to do so, as outlined in the Housing Ombudsman's Complaint Handling Code 2024. Sanctuary considers complaints on their merits and any exclusions must be fair and reasonable.
- 1.2.4 There are some circumstances when it is not appropriate to record a complaint because there is another process which is better suited to resolving the problem. Therefore, Sanctuary will not consider the following under this complaints policy:
- Issues that occurred more than 12 months ago, unless there is evidence that this has been raised to staff and no action has been taken
 - An initial request for service when a customer informs us of a problem for the first time. For example, if the word complaint is used during an initial report of a repair that has not yet been notified to Sanctuary
 - Initial contact from a customer to chase up a service request, for example a missed appointment that can be resolved there and then with an apology and the provision of a new appointment. However, if a satisfactory resolution cannot be offered to the customer at the time of the contact or if the customer asks, a complaint must be logged
 - Matters that have already been dealt with by the Housing Ombudsman Service or have already exhausted Sanctuary's Complaints Process
 - Where legal proceedings have started for example, a matter being reviewed by the Small Claims Court, or First Tier Tribunal
 - Reports about the behaviour of tenants or their households; these are handled in line with the Antisocial Behaviour - Housing and Support Policy and Housing Procedure
 - Dissatisfaction with a Sanctuary policy or procedure where there has not been a service failure; these are recorded as policy feedback and passed to the policy owner to be considered in the next review

- Disagreement with a decision where there is another procedure to appeal the outcome, such as a dispute about service charges, succession, or home improvements
- Personal injury claims or claims for damaged items valued at over £5,000; these will be assessed and usually passed to Sanctuary's insurers
- Enquires or expressions of dissatisfaction from members of the public will be sent directly to the Head of Service in line with the Customer Contact - Housing Procedure

1.3 Who can make a complaint?

- 1.3.1 Sanctuary will accept and investigate complaints in line with this policy from:
- any of our customers who fall in scope of this policy including tenants, shared owners, or leaseholders for whom we provide a service
 - former customers
 - a registered applicant for a Sanctuary property; and
 - anyone acting as a representative of a customer where permission has been given by the customer (including family members, Members of Parliament, Councillors, or third-party organisations)
- 1.3.2 Correspondence sent to Sanctuary Executives will be directed to the most appropriate team to respond to. Where the contact relates to dissatisfaction, the issue will be investigated as a new complaint in line with this policy or will be included as further information in a complaint that is already being investigated
- 1.3.3 Sanctuary's Complaints Policy will be made available in a clear and accessible format; including on Sanctuary's website, and will outline the process for raising complaints and accessing support services

1.4 Sanctuary's Two Stage complaints process

- 1.4.1 When handling complaints, Sanctuary commits to putting customers at the heart of the process by:
- accepting complaints in any format, including verbally, written and online
 - making reasonable adjustments so all customers can access the process
 - giving customers opportunities to share evidence and suggest solutions
 - using records and evidence to inform decisions rather than speculation
 - ensuring the process remains focussed on identifying a resolution to the issues raised where this is possible; and
 - signposting customers to other organisations for support where needed
- 1.4.2 Complaints will be acknowledged, defined, and logged promptly, with responses provided within 5 working days
- 1.4.3 At each stage Sanctuary will address all points raised, provide clear reasons for decisions, and provide suitable remedies where necessary
- 1.4.4 Sanctuary will follow a two stage complaints procedure **only**. Early resolution is encouraged at Stage 1 via an initial response, which we aim to issue within 10 working days
- 1.4.5 Stage 2 focuses on investigation into customer concerns, providing a Final Response of Sanctuary's findings
- 1.4.6 Sanctuary will attempt to contact customers to discuss the outcome at both stages of the complaint investigations and to explain our decision before we confirm in writing
- 1.4.7 Sanctuary will confirm in writing the outcome of all stages of the complaint including any findings, proposed actions to put things right, and will provide customers with information about what options they have if they remain unhappy, including contact details for the Housing Ombudsman
- 1.4.8 Where Sanctuary decides not to accept a complaint, this will be explained to the customer, setting out the reasons why the matter is not suitable for the complaints process. They will be advised of their right to contact the Housing Ombudsman Service to challenge this decision
- 1.4.9 Customers have the right to request that their complaint is escalated to Stage 2 if they remain unhappy with the response at Stage 1. The Stage 2 investigation will be separate of the Stage 1 investigation and a different complaint manager will take ownership

- 1.4.10 Sanctuary aims to respond to Stage 2 complaints within 20 working days of the complaint being escalated
- 1.4.11 There are times when complaint investigations are more complex. If this is the case, Sanctuary may extend the timeframe to respond to a complaint at Stage 1 or Stage 2 by 20 working days. Sanctuary will contact the customer to discuss this and explain the reasons for the extension and confirm any extension to the above timescales in writing
- 1.4.12 If a customer remains unhappy following Sanctuary's Stage 2 response, they are made aware, again of their right to contact the Housing Ombudsman Service. Sanctuary do not operate a third stage in their complaints process. Referral to the Housing Ombudsman Service is included at both Stage 1 and Stage 2 of Sanctuary's complaint process

1.5 Managing challenging or unacceptable behaviours

- 1.5.1 Whilst staff do understand that there are times that customers may become upset, frustrated, or anxious and will endeavour to respond positively and sensitively, there are occasions that customers behave in ways that are challenging or unacceptable
- 1.5.2 Where customers behaviour prevents staff from carrying out their duties effectively or is rude, abusive, or threatening, Sanctuary will act in line with the Managing Challenging and Unacceptable Behaviour - Housing Policy and Procedure

1.6 External review

- 1.6.1 Whilst Sanctuary always aims to resolve concerns through the internal complaints process, customers do have the right to refer their complaint to the Housing Ombudsman Service should they remain unhappy with the final response
- 1.6.2 The complainant may approach the Housing Ombudsman Service or Local Government and Social Care Ombudsman directly once their complaint has exhausted Sanctuary's complaint process

1.7 Putting things right - compensation/redress

- 1.7.1 Sanctuary will acknowledge and rectify any mistakes promptly, offering apologies, explanations, and appropriate compensation/redress
- 1.7.2 Compensation/Redress offered will consider the impact on the resident and their individual circumstances and will be agreed upon where appropriate

1.8 Learning from complaints/Self-Assessment & Reporting

- 1.8.1 Sanctuary will produce an annual complaints performance and service improvement report, including self-assessment against the 2024 Complaint Handling Code and any findings of non-compliance by the Ombudsman
- 1.8.2 Sanctuary uses all customer feedback, including complaints to inform service delivery and has the following measures in place to ensure that lessons are learned from customers' experiences:
- National Resident Scrutiny Panel review and scrutinise activities
 - records of any service failures and the actions taken in response
 - feedback opportunities given to complainants to assess the process
 - regular reports detailing performance to relevant management teams; and
 - annual performance update and lessons learned shared with customers
- 1.8.3 More broadly, Sanctuary looks for opportunities to work with the wider sector to identify, share and embed best practice through:
- actively engaging with the Housing Ombudsman Service and using its regular insight reports to review and improve services as required
 - taking part in recognised training and development activities, where appropriate; and
 - participating in sector-wide reviews, assessments, and feedback activities, wherever the opportunity arises

2. Roles and responsibilities

- 2.1 The Director - Customer Experience and Engagement is responsible for ensuring adoption of, and adherence to, this policy across Sanctuary
- 2.2 The Head of Complaints will provide guidance and support to staff and maintains independent oversight. Additionally, the Head of Complaints is responsible for ensuring that complaints are used to inform service delivery and lessons learnt are acted upon
- 2.3 The Head of Complaints and Customer Relations Managers have day-to-day responsibility for policy implementation, adherence, communication, training, and resource provision
- 2.4 Communication with customers is centred around the concept that all enquiries are resolved at the first point of contact wherever possible. Therefore, all staff, particularly those who may interact with customers and receive complaints must:
 - be aware of, understand and implement this policy and associated procedure
 - support resolution of complaints and concerns at the first point of contact
 - help colleagues handling complaints where requested
 - participate in any training that Sanctuary Group makes available; and
 - communicate any issues with implementing this policy to their line manager and identify any areas for continuous improvement promptly

3. References and sources

- 3.1 References include the Housing Ombudsman Service Complaints Handling Code 2024 and relevant legislation such as the Equality Act 2010, additionally:
 - Housing Ombudsman Service
 - The Regulator of Social Housing
 - Disability Discrimination Act 1995
 - Data Protection Act 2019
 - Human Rights Act 1998
 - Equality Act 2010

4. Impact on diversity

- 4.1 Sanctuary will ensure that this policy is applied fairly to all residents, with reasonable adjustments made to meet the needs of individuals with disabilities or communication needs
- 4.2 Sanctuary Group demonstrates its commitment to diversity and promoting equality by ensuring that this policy is applied in a manner that is fair to all sections of the community, with due regard to the protected characteristics identified under the Equality Act 2010 and in accordance with its Inclusion for all Equality, Diversity, and Inclusion Strategy 2021 - 2024
- 4.3 Where Sanctuary is made aware that a customer is disabled or has particular needs, staff will make reasonable adjustments to meet their needs. Examples of adjustments that may be made include (but are not limited to):
 - using different ways to communicate with a customer
 - arranging for translation services, large print or braille where required; and
 - signposting customers to advocacy or mediation services if appropriate

5. Resident consultation

- 5.1 The policy has been created and supported by the Complaints Community of Interest and using resident feedback and input and reflects the expectations that customers have shared with staff through various channels, including the Residents Panel and:
 - Complaints Improvement survey
 - Complaints Improvement webinars and focus groups
 - STAR (Survey of Tenants and Residents) results
 - complaints received about housing and maintenance services

6. Monitoring and compliance

- 6.1 This policy, and associated procedures, will be monitored through regular review by the Head of Complaints, who will ensure compliance with the policy across operations by maintaining independent oversight of action taken under this policy
- 6.2 The Housing Ombudsman Service ensure compliance with the policy where individual complaints are referred to it for consideration
- 6.3 Complaint performance information and compliance with the Housing Ombudsman Complaint Handling Code will be reported regularly to management teams, Executive Committee, Group Housing Board and Group Board
- 6.4 Until a new policy is formally adopted this document will remain in force and operational
- 6.5 If there are significant changes to legislation or regulation or there are found to be deficiencies or failures in this policy, as a result of complaints or findings from any independent organisations, the Director - Customer Experience and Engagement will initiate a review
- 6.6 Where appropriate, key stakeholders, residents and interested parties will be consulted as part of any review of this policy

7. Approval

- 7.1 This policy is approved by Sanctuary Group's Executive Committee

8. Operational arrangements

- 8.1 This policy must be used in conjunction with the Complaints - Housing and All Supported Living Procedure and associated guidance documents
- 8.2 Guidance and information are available to internal teams through Solis and Knowledge Point

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