



This policy sets out how Longhurst Group deals with customer complaints. The policy is compliant with the Housing Ombudsman complaint handling code, and outlines our approach to ensuring an accessible, and high-quality complaints handling service is delivered to our customers.

# Complaints Policy

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Part 1

## About this policy

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### Document management

Directorate	Housing, Care and Support
Policy sponsor	Deputy Chief Executive and Chief Financial Officer
Policy owner	Director of Housing and Customer Services
Policy author	Head of Customer Voice
Summary	This policy sets out how Longhurst Group deals with customer complaints. The policy is compliant with the Housing Ombudsman complaint handling code, and outlines our approach to ensuring an accessible, and high-quality complaints handling service is delivered to our customers.
Target audience	All colleagues, customers and contractors

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### Review process

Approval route	Directors Team – Executive Leadership Team – Group Board
Approved by	Group Board
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## Part 2

# Overview

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### Intent

Longhurst Group is committed to providing excellent customer service, addressing complaints effectively and efficiently, and using the learning and insight to drive service improvement.

This policy ensures we provide a high-quality complaint handling service that meets the Housing Ombudsman's complaint handling code requirements, as well as promoting a positive complaint handling culture across the Group.

### Policy statement

This policy supports the Group's values and is a commitment to improving lives and supporting colleagues by providing an effective complaints service that meets both the requirements of the regulatory Tenant Involvement and Empowerment consumer standard and Housing Ombudsman's complaints handling code.

We aim to provide a complaints service that:

- enables customers to be heard and understood
- ensures customers are aware of how to make a complaint and their right to access the Housing Ombudsman service;
- is fair, impartial and easily accessible to all our customers;
- is customer focused and takes account of individual circumstances;
- puts things right (where appropriate) in a timely and effective manner; and
- uses learning and insight to improve and transform services.

### Scope

The terms 'Longhurst Group' and 'the Group' incorporate all member companies and subsidiaries.

This policy applies to all complaints made by any customer, or their representative, and anyone affected by a service we provide, including services provided on our behalf by a contractor.

The policy does not form part of any colleague's contract of employment and the policy may be amended at any time.

## Part 3

# Policy details

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## Definition of a Complaint

A complaint is an expression of dissatisfaction, however made, about the standard of service, actions, or lack of action by the Group, its colleagues or those acting on its behalf, affecting an individual customer or a group of customers (Housing Ombudsman Code 1.2).

A customer does not need to use the word complaint for it to be treated as such. Whenever a customer expresses dissatisfaction, the Group will give them the choice to make a complaint.

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## Exclusions

We will accept a complaint unless there is a valid reason not to do so.

There are circumstances in which a matter will not be considered to be a complaint. For example:

- The issue giving rise to the complaint occurred over twelve months ago. However, we recognise it may not be appropriate to exclude any complaints that concern safeguarding or health and safety concerns.
- Concerns where legal proceedings have commenced. This is defined as details of the claim, such as the Claim Form and Particulars of Claim, having been filed at court.
- Matters that have previously been considered under the complaints policy; however, where the problem is a reoccurring issue, we will consider older reports as part of the background to the complaint.
- A new 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 the Group.
- Dissatisfaction with a Group policy or procedure where there has not been a service failure; these are recorded as a comment concerning 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.
- Enquiries or expressions of dissatisfaction from members of the public who we do not have a relationship with or provide a service.
- Where a complaint relates to statutory or other external obligations and are obliged by law, we cannot change the decision or course of action. Where this is evident, we will outline these details and explain our legal obligation to the customer.

If we do not accept a complaint, a detailed explanation will be provided setting out the reason why the matter is not suitable for the complaints process and the right to take that decision to the Housing Ombudsman

## Accessing the Complaints Service

Complaints may be made:

- by phone;
- online form using our website or social media;
- in person; or
- by letter/completing a complaints form.

Any issues or enquiries received via a MP or local councillor that meet the complaint definition will be resolved using our complaints process.

**Correspondence sent to the Group's 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.**

The customer does not have to use the word complaint in order for it to be treated as such. Although, we will always ensure the customer is happy for us to record it as a complaint.

Complaints that are not made directly to an office location (such as those made to an officer on their patch, or to a colleague at a care home or sheltered housing scheme) will be passed on to the relevant team within the Customer Services department. Any complaints made via social media will remain confidential.

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## Fairness in Complaint Handling

A complaint investigation will be conducted in an impartial manner. To ensure fairness we will:

- deal with complaints on their merits;
- act independently and have an open mind;
- take measures to address any actual or perceived conflict of interest;
- consider all information and evidence carefully; and
- keep the complaint confidential as much as possible, with information only disclosed, if necessary, to investigate the matter.

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## Reasonable Adjustments

We recognise that some customers may experience difficulties in accessing the complaints process due to their personal circumstances, in these instances we will make reasonable adjustments. We will agree jointly with the customer the reasonable adjustments and will consider their personal circumstances ensuring we meet their needs.

Complaints may be made with the assistance of a representative acting on the customer's behalf (such as a family member, friend, support worker, MP, or local councillor). The customer must provide us with consent to deal with the representative.

We will give customers the opportunity to have a representative deal with their complaint on their behalf, and to be represented and/or accompanied at any meeting with Longhurst Group upon request, and where this is reasonable.

## Types of Complaints

### Definition of a Service Request

A service request is a request from a resident to the Group requiring action to be taken to put something right (Housing Ombudsman Complaint Handling Code 1.4)

Where possible we will encourage an early and local resolution of concerns and recognise that there will be times where it may be possible to agree and secure resolutions with customers immediately. In these circumstances, in agreement with the customer, we will not log a formal complaint and will deal with this as a service request.

All service requests will be recorded on our contact management system including a full record of actions, these will be monitored and reviewed regularly.

Where the customer expresses dissatisfaction with the response to their service request, the issue will be logged as a formal complaint and progress to Stage 1.

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## Formal Complaints

We have a 2 stage formal complaints process:

### Stage 1

When a customer makes a formal complaint, including complaints about staff conduct, attitudes and approach, a complaint resolution officer will contact them within **5 working days** to acknowledge the complaint and:

- discuss the details of the complaint so there is a clear understanding.
- identify what outcomes they are seeking.
- advise them of the timescale for resolving the complaint.
- agree the preferred method and frequency of communication; and
- agree when any further feedback will be provided to the customer.

Any action agreed, and the timescale for this, will be confirmed to the customer in a way that suits them.

A dedicated complaint resolution officer will be the single point of contact for the customer and will work closely with the relevant operational manager throughout the complaint case. Our complaint resolution officer will act independently and fulfil an advocacy role for the customer, with the aim of investigating their complaint promptly and to a satisfactory conclusion, where possible.

We will manage customers' expectations from the outset, being clear where a desired outcome is unreasonable or unrealistic.

Any remedy offered will reflect the extent of any service failures and the level of detriment caused to the customer as a result. We will carefully manage the expectations of customers and not promise anything that cannot be delivered or would cause unfairness to other customers.

Within **10 working days** we will aim to notify the customer of our decision, the remedy offer setting out what will happen and by when in agreement with the customer. Where appropriate, this resolution will include an agreed appointment for repair works to be completed by our contractors (within a reasonable timescale as agreed by Longhurst



Group). The complaint resolution officer will monitor the complaint case and commitments made until full resolution; with on-going communication to the customer.

In exceptional circumstances, where this timescale is not possible, we will provide a valid reason to the customer. We will also regularly communicate with the customer until the complaint is fully resolved. This should not exceed a further 10 working days.

If an extension beyond 20 working days is required to enable Longhurst to respond to the complaint fully, this should be agreed by both parties. We will also provide the customer with the contact details of the Ombudsman.

All final responses will be sent to the customer in writing. Within the resolution letter we will always make the customer aware of their right to escalate their complaint if they are unhappy with the outcome and how to do this.

Where appropriate, for complex complaints that need a more detailed investigation we may consult with the relevant Director. If during the investigation of a complaint, a serious incident or issue was raised by a customer, we would escalate this through the complaint process to either the Executive Leadership Team or Directors Group (depending upon the nature of the complaint) as a matter of urgency.

The customer, and if applicable any employee who is the subject of the complaint, will be given a fair chance to: set out their position and comment on any adverse findings before a final decision is made.

## **Stage 2**

Customers who remain unhappy following the outcome of the formal complaint process at stage 1 can request a review of their complaint (known as stage 2). Any request to escalate to Stage 2 of the formal complaint process must be done within 20 working days of the Stage 1 response being issued.

The Complaints Team will contact the customer within 5 working days from the date the escalation request is received to acknowledge the complaint at Stage 2.

Any new complaints or issues not raised during the initial complaint would be dealt with separately and are not grounds for a review.

A stage 2 review will be completed within **20 working days**. The person considering the complaint at stage 2 will not be the same person that considered the complaint at stage 1.

If this timescale is not possible due to exceptional circumstances, an explanation, and a date of when our stage 2 response will be sent to the customer will be provided. This should not exceed a further 20 working days.

If an extension beyond 20 working days is required to enable the landlord to respond to the complaint fully, this should be agreed by both parties. We will also provide the customer with the contact details of the Ombudsman. All final responses will be sent to the customer in writing.

Within the resolution letter we will always make the customer aware of their right to escalate their complaint if they are still unhappy with the decision and how to do this.

All complaints will be recorded on our contact management system and a full record will be kept of the complaint; including the original complaint details, date received, all correspondence, reports, and communication (including third parties), any review and the outcomes at each stage.

At each stage of the formal complaints process (Stage 1 and Stage 2) we will inform the customer of the following:

- the complaint stage;
- the complaint definition
- the outcome of the complaint;
- the reason for any decisions made;
- the details of any remedy offered to put things right;
- details of any outstanding actions;
- details of changes made, or actions taken to prevent a reoccurrence; and
- details of how to escalate the matter if dissatisfied.

We will address all points raised in the complaint and provide clear reasons for any decisions, referencing the relevant policy, law, and good practice where appropriate.

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### Putting things right

Where it is clear that something has gone wrong, we will acknowledge this and advise on the actions we intend to take to put things right, both for the individual customer, but also wider service improvements to prevent a similar matter arising again. The Group will take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.

### Compensation

We have a separate compensation procedure for complaint handling. In awarding compensation, we will consider whether any statutory payments are due, if any quantifiable losses have been incurred, the time and trouble a customer has been put to as well as any distress and inconvenience caused.

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### Dissatisfaction with our Decision-Making

There will be occasions where customers have exhausted our complaints process and remain dissatisfied with the outcome. In these circumstances there are a range of options available for further escalation.

- Any customers, leaseholders and housing applicants who are unhappy with the outcome of their review (stage 2), can escalate the matter directly with the Housing Ombudsman
- For complaints relating to our care and support services, customers can refer their complaint to the Care Quality Commission.

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### Managing Unacceptable Actions and Behaviours

Sometimes customers using our complaints service use behaviour, actions or general conduct that makes it very difficult for us to deal with their complaint effectively. In these instances, colleagues should refer to the Managing Unacceptable Behaviour procedure.

In such circumstances we reserve the right to use different communication methods for individual customers, refuse to consider the complaint or to terminate the investigation.

We will confirm this to the person making the complaint in writing, with the reasons for our decision including a review date.

Any restrictions placed on a customer's contact due to unacceptable behaviour will demonstrate regards for the provisions of the Equality Act 2010.

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### **Learning from Complaints**

We will use complaints to drive continuous learning and improvement.

Complaints will be reviewed to identify any common themes and areas for learning. Although, we will actively highlight any major service failures as a matter of urgency and without delay. Any issues identified will be raised with the relevant service area and/or contractor to aid service improvement.

Any themes or trends will be assessed by senior management to identify systemic issues, serious risks, and policies and procedures that require revision. This will also inform training for both colleagues and contractors.

We will proactively use learning from complaints to revise policies and procedures, to train colleagues and contractors and to improve communication and record-keeping.

We will report back on wider learning and improvements by publishing information to customers, scrutiny groups, colleagues, and stakeholders, as well as providing evidence on our website, annual report, and customer magazine.

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### **Culture and Training**

We encourage a culture that welcomes complaints and the opportunity they give to help improve our services. We fully recognise that a positive complaint handling culture is integral to the effectiveness of our ability to resolve disputes, improve the quality of the service provided and the relationship with our customers.

Training, communication, and awareness will be provided to all relevant colleagues required to implement this policy. This also includes our contractors and involved customers.

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### **Contractors**

All contractors will be expected to provide the relevant information to our complaint resolution officers in a timely manner and to an agreed standard. This includes agreed appointments (kept and made) within the agreed set timescale, from the date of when the complaint was logged by Longhurst Group. |

## Part 4

# Policy implications

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## Roles and responsibilities

**All persons involved with the Group, whether Board Member, or employee have delegated responsibilities. The key roles and responsibilities are listed below.**

### Group Board

The Board is responsible for ensuring that there is an effective policy with controls in place, but delegation is the Management Team of the Group.

### Executive Management Team

The Chief Executive, Executive Directors and Directors collectively are the officers responsible for ensuring the implementation of the Group's objectives in this policy.

### Policy Sponsor - [Deputy Chief Executive and Chief Financial Officer]

This person has strategic responsibility for the policy and how it relates to business plans, key strategies and other elements of the policy framework.

### Policy Owner – Director of [Housing and Customer Services.]

Responsible for the policy's suitability; effective implementation; and commissioning new policy development and periodic policy review.

### Policy Author – [Head of Customer Voice]

Responsible for drafting a new policy and proposing any amendments to an existing policy.

### Data Protection – Data Protection Officer

Responsible for identifying, assessing and mitigating privacy risks with data-processing activities that fall within the policy.

### Customer Engagement Team

Responsible for leading on policy consultation with customers and the Customer Forum.

### Member Responsible for Complaints (MRC)

The Chair of the Repairs, Complaints and Customer Voice Committee has been appointed to have lead responsibility for complaints, this person is referred to as the Member Responsible for Complaints.

### Additional Roles

Responsibility for the complaints service is held jointly by:

- Longhurst Group Chief Executive
- Executive Director of Housing, Care and Support Services

Operational responsibility for the complaints service is held by the Director of Housing and Customer Services and Head of Customer Voice.

Day-to-day responsibility for the complaints service is held by:

- Senior Complaints and Improvement Manager, Regional Complaints Manager, Complaints Team Leader, and Complaint Resolution Officers
- Contact Centre teams

### **Data protection**

On occasions, customer's may provide personal data to support the investigation of their complaint, this is stored in the Group's CRM, Dynamics. The information is held in accordance with the Group's retention period and is managed in line with the Group's Data Protection Policy.

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### **Safeguarding**

There are no safeguarding concerns as a result of this policy.

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### **Equality, diversity and inclusion**

We will demonstrate regards for the provisions of the Equality Act 2010. The Group is committed to ensuring that no person or group of persons will be treated less favourably than another person or group of persons and will carry out our duty with positive regard for the following protected characteristics, age, disability, race, gender reassignment, sex, sex orientation, religion or belief, marriage and civil partnership and pregnancy and maternity.

The Group is committed to equality, diversity, and inclusion and such will make reasonable adjustments to the policy to recognise, accommodate and support customers' individual needs, where needed.

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### **Complaints and feedback**

Any complaint relating to this policy will be handled in line with the organisational Complaints Policy.

Quarterly performance reports are provided to our Group Board, Directors Group, Heads of Service, Operational Managers, Customer Experience Committee, and the Customer Forum.

Performance updates include details of complaint volumes, arising issues and trends from complaints handling, outcomes in terms of learning and future improvement plans; as well as updates on compliance with the Housing Ombudsman's orders.

Quarterly performance updates, including insight and learning will be added to our website for customers to view.

The Group Board will receive individual outcomes from Housing Ombudsman's determinations and will be presented on an annual basis with the outcomes from our self-assessment against the Housing Ombudsman's code.

We will also publish the outcome of our self-assessment on our website.

The Groups annual report will include complaints performance, trends and wider learning and improvements arising from complaints.

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### **Risk analysis**

The Risk Analysis section within the Policy Development Plan (PDP) identified the following risks and mitigating actions:

The following risks have been identified relating to the Complaints Policy and the Group's handling of complaints:

- Failure to comply with the Housing Ombudsman Complaint Handling Code could result in the Ombudsman issuing Complaint Handling Failure orders.
- Impacts on the reputation of the Group, trust of stakeholders and sector wide impact.
- Non-compliance with regulatory and legal requirements and governance best practice.
- Failure to meet the requirements of the Consumer Standards, specifically Transparency, Influence and Accountability Standard.

These risks are being mitigated via our annual review and self-assessment against the Housing Ombudsman's Complaint Handling Code to ensure compliance. Additional compliance checks and internal audits are in place along with regular performance reporting to Group Board, Exec Directors, and key departments across the Group.

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### Evaluation, review and performance reporting

This policy will be reviewed on a Triennial basis to ensure that it remains fit for purpose. A policy review may also be required earlier, in response to internal or external changes for example changes in legislation. Prompt and effective action will be taken where improvements are identified.

We will monitor the following:

- Volume of complaints received (Stage 1 and Stage 2)
- Number and % of Stage 1 complaints escalated to stage 2 (including refusals)
- The type of complaints received (i.e., service areas) and the root cause.
- Performance against our stage 1 response timescale (including any extensions)
- Performance against our stage 2 response timescale (including any extensions)
- Performance against the number of commitments made and completed within the agreed timescales.
- % of complaints upheld at Stage 1 and Stage 2
- Satisfaction levels – complaint handling and outcome
- The outcome of closed complaint cases
- Number of complaints referred to the Housing Ombudsman, % of referrals completed within the agreed timescale and the outcome.
- Goodwill and compensation payments
- Actions taken and changes made resulting in service improvements.

In addition, complaints performance is also reviewed:

- By the Head of Customer Voice and Senior Complaint and Improvement Manager, weekly, monthly, and quarterly
- With our partner contractors every month as part of their contractual requirements

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### Summary of local variations

No variations of this policy are required.

## Part 5

# Compliance

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## Legal and regulatory compliance

This policy fully complies with the Group's legal and regulatory obligations.

- Regulator of Social Housing Consumer Standards- Transparency, Influence and Accountability Standard
- Housing Ombudsman Service Complaint Handling Code (April 2024)

This list is not exhaustive, and policy authors will undertake thorough research and/or seek professional advice to ensure the Group meets its obligations and complies with the current and relevant legislation and regulations.

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## Related policies

All the Group's operational policies and procedures are related to the Complaints Policy and will be utilised where required to investigate complaints effectively.



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Part 6

## Appendices

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### A. Glossary of terms

<b>Term</b>	<b>Definition</b>
<b>Legislation</b>	The legal requirements that must be followed.
<b>Policy</b>	A statement of intent describing our approach towards a particular activity or area – usually comprising a set of rules or standards that must be followed.
<b>Policy Development Plan (PDP)</b>	The document used to support planning policy development and review.
<b>Procedure</b>	An agreed way of doing things that describes how a policy will be implemented. The specific steps and/or actions that must be taken to put policy into practice and ensure a consistent service.
<b>Regulation</b>	The rules or standards set by a governing body such as the Housing Ombudsman, Regulator of Social Housing and Financial Conduct Authority.

## **B. Associated documents**

The following documents are associated with this policy:

- Policy Approval Control
- Policy Development Plan
- Process map(s)

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