



Complaints Policy

Approved by SMT	27 th March 2024
Approved by Committee/Board	Customer Experience Committee
Effective date	1 st April 2024
Review date	31 st March 2027
Policy developed by	Head of Communities
Consultations	Customers, Colleagues and Internal Audit
Associated procedure	Complaints Procedure, Compensation Procedure

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Introduction

1. Purpose

- 1.1 No matter how good we make our service, there will be times when we fall short of our customers' expectations or the level of service to which we aspire. This policy outlines our approach to resolving such situations. This policy can be made available in alternative formats/languages upon request.
- 1.2 We encourage all feedback from customers and this Complaints Policy sets out how we will deal with complaints fairly and effectively. The policy also ensures Connexus meets its obligations with the Housing Ombudsman's Complaint Handling Code and associated regulatory standards.
- 1.3 We will ensure that Connexus views complaints as an opportunity to improve. We will highlight poor practice and put it right; taking each complaint as an opportunity to learn from our mistakes.
- 1.4 The policy applies to the whole of the Group. This means Connexus Homes Limited, (ultimate parent) and all of its subsidiaries.

2. Problem to Solve

2.1 **Providing an accessible complaints process:**

We will provide customers with easy access to the complaints process giving them a choice in how they can make a complaint without delay. Customers can complain in person or in writing as set out in the procedure.

2.2 **Providing clarity on what is a service request and what is a complaint:**

Service request:

'A request from a resident to Connexus to take action to put something right.'

Complaint:

'An expression of dissatisfaction, however made, about the standard of service, actions, or lack of action by Connexus, its own staff, or those acting on its behalf, affecting a resident or group of residents.'

2.3 **Defining who can make a complaint:**

Any individual who requests or receives a service from Connexus, or any of its subsidiaries; this includes a specific named individual who can act as an advocate. This person must have permission to raise a complaint on behalf of a service user and Connexus will require explicit consent from the complainant to use the nominated individual.

Should an advocate be party to any contact restriction imposed upon them via the Connexus Unacceptable User Actions and Behaviour Policy, then these restrictions would still apply and all contact would be required in line with their individual arrangement.

2.4 **Clarifying when we will not accept a complaint:**

We will consider the individual circumstances for each complaint. However, the below provides clarity on when we are unlikely to accept a complaint into the complaint process.

- If the matter occurred more than 12 months ago
- When the matter is best dealt with under a different policy e.g. a complaint about a neighbour (Anti-Social Behaviour policy)
- Where there is an allegation of illegal or criminal wrongdoing which should be dealt with through police/courts or other appropriate organisations in conjunction with our HR team. This includes allegations of violence/intimidation/harassment or theft.
- Where Connexus has already provided a complaint response to the issue and what is being reported is the same, or a very similar issue, to which the response would be the same.
- Where 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.

If Connexus will not accept a complaint, it will provide an explanation in writing and advise the individual of their right to take their complaint further with the Housing Ombudsman or other appropriate organisation.

2.5 **Providing a clear complaint process:**

Connexus has a two-stage complaint process with specified timescales in which to respond:

- Stage 1 – Complaint – 10 working days from the acknowledgment date
- Stage 2 – Review – 20 working days from the acknowledgment date

Extensions to these timescales may be required, if so, we will clearly state our reasons why and update the customer beforehand.

Record keeping during all stages of a complaint is crucial, as such Connexus will keep comprehensive records of what we do to try and resolve an individual's concerns, including recording them on our central complaint system.

2.6 **Ensuring complaint responses are not biased and that colleagues have the relevant authority:**

Stage 1 - Complaint

A Manager from the service area about which there is a complaint, will investigate and respond. They will not have had any involvement in the issue prior to receiving the complaint.

Stage 2 - Review

A Connexus Complaints Manager will investigate, review and respond, or a colleague at a suitably senior level. Again, they will not have been involved prior to the stage 2 review. They will be authorised to provide a final response on behalf of Connexus.

2.7 Resolving issues promptly and fairly:

The early and local resolution of issues between Connexus and our customers is key to effective complaint handling. We will therefore discuss an individual's concerns and how best to resolve them when an individual first tells us of their dissatisfaction. These efforts will not obstruct access to the formal complaints procedure or result in any unreasonable delay.

When a complaint is raised, we will endeavour to resolve it as soon as possible and within the timescales set out for that stage.

Following the completion of our investigation, we will send a final response. This will outline whether we have been able to resolve the matter or whether there are actions to be completed in order to do so. If there are actions, we will provide clarity on what to expect next and by who.

2.8 Defining the timescale in which a complaint can be escalated:

We will accept a request to escalate a complaint from the time we provide our complaint response, up to a calendar month after any resultant actions have been completed.

2.9 Providing opportunities for customers to appeal decisions:

A customer may object to a decision that has been based on policy if they feel that the policy has been unfairly applied, or they feel the policy is not correct. The Complaints Policy allows the customer to appeal that decision.

2.10 Ensuring Policies are accessible and when to apply reasonable adjustments:

Connexus complies with the Equality Act 2010 and has an Equality and Diversity Policy that covers all aspect of equalities. All policies are subject to an Equalities Impact Assessment to ensure that any adaptations to the normal policy or procedure may be applied to accommodate an individual's needs.

The Formal Complaints process has been designed to be accessible to all, but we will proactively ask customers if they need any support or reasonable adjustments when accessing/using our services. We will do this in the following ways:

- By including a paragraph in written communications (e.g. acknowledgement letters) that proactively asks if adjustments or support are needed.
- By asking whether a reasonable adjustment might be required over the telephone.
- By including a note on our published documents indicating that we can provide the document in an alternative format on request.

We will record any reasonable adjustments requested when dealing with the complaint. This will be in accordance with the Reasonable Adjustments Policy and procedure.

2.11 Meeting regulatory requirements:

The Housing Ombudsman Complaint Handling Code is statutory from 1st April 2024. Through our membership of the Housing Ombudsman, we are required to abide by their Complaint Handling Code. Non-compliance could result in a non-compliance order.

We are also required under the Tenant Involvement and Empowerment Standard to have a clear, simple and accessible complaints process and ensure that complaints are resolved promptly, politely and fairly.

This Policy and the accompanying procedure have been revised to ensure Connexus adheres to the regulatory and statutory requirements.

All colleagues are required to follow the complaints policy and procedure, which will ensure Connexus complies with the code. Disciplinary action may be taken if a colleague regularly fails to follow the policy and/or procedure.

Connexus will comply with the reporting requirements of the Housing Ombudsman and submit the required evidence by 30th June each year.

2.12 Improving our Services through complaints:

We will accurately record customers' complaint and what we do to resolve them so that we can identify what needs to be 'put right' in terms of behaviour, process, or systems.

The data we gather will be reviewed each quarter to ensure we are making best use of the intelligence we are gathering and to spot emerging trends.

This will benefit all customers and colleagues; and in turn, stop us from repeating the same mistakes.

3. Method/s

3.1 Connexus will advise all customers annually about the complaints process and their right to access the Housing Ombudsman service, not just when they have been through Connexus' formal complaints process.

3.2 Connexus aims to record and resolve complaints quickly, fairly and effectively. We will: -

- Allow complaints in any format through which it communicates with customers about issues that have occurred within the last 12 months.
- Handle complaints submitted via a non-legal third party or representative in the same way as one received directly from the customer, once we have confirmation they are acting on the customers behalf.

- Be positive about complaints.
- Give the resident a fair chance to set out their position.
- Be clear what is, or is not, within our responsibility and manage expectations of a possible outcome.
- Have a team to manage the complaints process and monitor compliance with the Housing Ombudsman Complaint Handling Code.
- Have appropriate managers who will respond to complaints. They will:
 - a) have a collaborative and co-operative 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
 - c) act within the professional standards for engaging with complaints as set by any relevant professional body
 - d) have the appropriate authority to offer suitable remedies to resolve a complaint
- Recognise and acknowledge when we have got things wrong and put things right quickly.
- Clearly explain the reasons for our decisions.
- Seek to learn from complaints to improve future performance.
- Recognise that putting things right is every colleague's responsibility.
- Direct the complaint to the appropriate organisation if the complaint relates to matters not within the responsibility of Connexus.
- Have a team dedicated to liaising with the Housing Ombudsman.

3.3 Connexus' Director of Customer Experience assumes lead responsibility for its complaint handling.

4. Measurement

- 4.1 We will monitor the complaints we respond to and whether the responses are in accordance with this policy and the Housing Ombudsman Complaint handling code.
- 4.2 We will monitor the root cause of complaints and the outcomes and use this feedback to improve our services and reduce the number of complaints about the same issues.
- 4.3 We will demonstrate to customers what we are learning from complaints and what we have changed, at least annually, through our newsletter which is sent to every customer.
- 4.4 The Customer Experience team will produce an annual report for the Customer Experience Committee. This report will include:
 - a) the annual self-assessment against the Code to ensure Connexus' complaint handling policy remains in line with its requirements.
 - b) a qualitative and quantitative analysis of Connexus complaint handling performance. This will also include a summary of the types of complaints Connexus has refused to accept.

- c) any findings of non-compliance with the Code by the Ombudsman.
- d) the service improvements made as a result of the learning from complaints.
- e) any annual report about Connexus' performance from the Ombudsman.
- f) any other relevant reports or publications produced by the Ombudsman in relation to the work of Connexus.

- 4.5 Once the report has been reviewed by the Committee, we will make it available to all customers, along with the Committee's response, for scrutiny and challenge.
- 4.6 We will provide the Self-Assessment and Annual Complaints Performance and Service Improvement Report to the Housing Ombudsman by 30th June each year.
- 4.7 In addition to the report at 4.4, the Customer Experience Team will provide a half yearly update to the Customer Experience Committee to include:
- i. regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance.
 - ii. regular reviews of issues and trends arising from complaint handling.
 - iii. examples of changes made as a result of feedback through complaints.
 - iv. regular updates on the outcomes of the Ombudsman's investigations and progress made in complying with orders related to severe maladministration findings.
- 4.8 The Head of Communities will update the lead Board member of any determinations that result in service failure or maladministration and invite them to take part in any review of a complaint that resulted in a determination of severe maladministration.
- 4.9 The Head of Communities will meet at least twice-yearly with the nominated lead Board member for complaints.
- 4.10 Colleagues who as part of their role either respond to, or receive complaints, will receive ongoing training to ensure their skills and knowledge are maintained.



Equality Impact Assessment Form

Strategy / policy / procedure / service / function / project being assessed	Complaints Policy
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Stage 1 Lead officer	Jacqui Gears	
Date of assessment	21 st March 2024	
Date for next review	Upon policy review	
Reason for assessment	Policy amendments following introduction of updated Housing Ombudsman Code.	
Agreed and signed off by lead officer's line manager	Manager's signature <i>G Darlington</i>	Date 22/03/2024

Stage 2 Aims of the service / function / policy/project under assessment	We encourage all feedback from customers and this Complaints Policy sets out how we will ensure that we deal with complaints fairly, effectively and comply with the approach as set out by the Housing Ombudsman's Complaint Handling Code and associated regulatory standards.
Main stakeholders / beneficiaries	Any person who requests or receives a service from Connexus or any of its subsidiaries; this includes an authorised advocate to raise a complaint on behalf of a service user.
Who is likely to be affected by the service/ function/ policy/project?	As noted above in main stakeholders.
What are the arrangements for monitoring and reviewing the actual impact of the service/function/policy/project?	The policy is reviewed every 3 years and key measurements are outlined in the policy under 'measurement'.



Stage 3 Collect and evaluate the evidence				
Key questions	Positive impact	Negative impact	No specific impact on any one group	Evidence
Does the policy or service have a positive or negative impact on any racial groups? Describe how and which.			X	
Does the policy or service have a positive or negative impact on individuals where English is not their first language Describe how and which.		X		Copies can be translated, and translation services are available to ensure the policy is understood by all when/where required, this is emphasized within the policy with the inclusion of reasonable adjustments, linked to our reasonable adjustment policy.
Does the policy or service have a positive or negative impact on women or men? This includes Transgender people / Trans people. Describe how and which			X	
Does the policy or service have a positive or negative impact on people with disabilities? Describe how and which			X	The policy at 2.9 provides assurance that the process has been designed to be accessible to all, but should a customer advise that they have a disability that requires a reasonable adjustment to the process, we will consider whether we can meet their request.
Does the policy or service have a positive or negative impact on people of a particular age? (e.g. children, young people, older people). Describe how and which			X	A service user or customer will be at least 16 years old, therefore children would not be able to access this policy, however, an advocate could make a complaint on their behalf.

Key questions	Positive impact	Negative impact	No specific impact on any one group	Evidence
Does the policy or service have a positive or negative impact on people with particular sexuality / sexual orientation? Describe how and which			X	
Does the policy or service have a positive or negative impact on people in terms of marriage/civil partnership status? Describe how and which			X	
Does the policy or service have a positive or negative impact on people with a particular religion or belief? Describe how and which			X	
Does the policy or service have a positive or negative impact on people in terms of pregnancy/maternity? Describe how and which			X	
Is it possible that the service/function/policy could discriminate or unfairly disadvantage those that do not have access to digital equipment?		X		A hard copy of the policy can be made available in print for those unable to view the actual policy on the Connexus Website or receive a copy via e-mail. Any action/outcome would consider the preferences of the customer, for example, those who are not able to access digital services would not receive electronic communications or asked to communicate only via e-mail. The complaints process is explained in the customer newsletter at least annually.
Is it possible that the service/function/policy could discriminate or unfairly disadvantage or cause an individual/community financial hardship?			X	

Outsourced services

If delivery of your strategy, policy, project or service is partly or wholly provided by external organisations / agencies, please list any arrangements you plan, to ensure that they promote equality and diversity.	Language Line is in place for translation services as part of the reasonable adjustments we put in place for all Connexus customers.
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Relations between different equality groups

Does your assessment show that a policy, project or service may have a differential impact between any discrete groups? If yes, please explain how this issue is going to be tackled	N/A
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Stage 4 – Summary of replies from individuals and stakeholders consulted, including any previous complaints on equality and diversity issues about the policy or service

This specific update to the policy is derived from the updated Housing Ombudsman Code of Practice which received extensive consultation. In addition, findings from the internal audit (Apr-23), including subsequent recommendations and actions have helped shape the policy. As part of that process numerous discussions were held to review our approach and ensure that the policy is fit for purpose, this process meant that a significant number of complaints were reviewed to determine compliance and where gaps in the policy were identified.

Stage 5 – Options resulting from this equality impact assessment, including measures necessary to minimise or remove any adverse impact and better promotion of equality and diversity. Consider any alternative solutions

None.

Stage 6 – Arrangements for regular monitoring of the impact of the policy, project or service

Section 4 (Measurement) within the policy describes how the policy will be monitored.

The Policy has a set review date, at which point it will be reviewed and a refreshed EIA completed.

If we receive several complaints about the policy or access to the complaints process, we would review our approach early to decide if any amendments were necessary to ensure it is accessible and fair to all.

Stage 7 – Any actions and outcomes, including how these are to be communicated both internally and externally as required

Policy will be uploaded to the website and the intranet upon approval.

Communication through the customer newsletter within the next year.