

Complaints Handling Procedures

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Scottish Social Housing Charter Relevant Standards and Outcomes

STANDARD	OUTCOME
<p>Section: The customer/landlord relationship</p> <p>1. Equalities</p> <p>Social landlords perform all aspects of their housing services so that:</p> <ul style="list-style-type: none"> <i>every tenant and other customer has their individual needs recognised, is treated fairly and with respect, and receives fair access to housing and housing services</i> <p>2. Communication</p> <p>Social landlords manage their businesses so that:</p> <ul style="list-style-type: none"> <i>tenants and other customers find it easy to communicate with their landlord and get the information they need about their landlord, how and why it makes decisions and the services it provides.</i> 	<p>This outcome describes what social landlords, by complying with equalities legislation, should achieve for all tenants and other customers regardless of age, disability, gender reassignment, marriage and civil partnership, race, religion or belief, sex, or sexual orientation. It includes landlords' responsibility for finding ways of understanding the rights and needs of different customers and delivering services that recognise and meet these.</p> <p>This outcome covers all aspects of landlords' communication with tenants and other customers. This could include making use of new technologies such as web-based tenancy management systems and smart-phone applications. It is not just about how clearly and effectively a landlord gives information to those who want it. It also covers making it easy for tenants and other customers to make complaints and provide feedback on services, using that information to improve services and performance, and letting people know what they have done in response to complaints and feedback. It does not require landlords to provide legally protected, personal or commercial information.</p>

SHR: Standards of Governance and Financial Management

STANDARD	GUIDANCE
<p>2 The RSL is open about and accountable for what it does. It understands and takes account of the needs and priorities of its tenants, service users and stakeholders. And its primary focus is the sustainable achievement of these priorities.</p>	<p>2.1 The RSL gives tenants, service users and other stakeholders information that meets their needs about the RSL, its services, its performance and its future plans.</p> <p>2.2 The governing body recognises it is accountable to its tenants, and has a wider public accountability to the taxpayer as a recipient of public funds, and actively manages its accountabilities.</p> <p>2.3 The governing body is open and transparent about what it does, publishes information about its activities and, wherever possible, agrees to requests for information about the work of the governing body and the RSL.</p> <p>2.4 The RSL seeks out the needs, priorities, views and aspirations of tenants, service users and stakeholders. The governing body takes account of this information in its strategies, plans and decisions.</p> <p>2.5 The RSL is open, co-operative, and engages effectively with all its regulators and funders, notifying them of anything that may affect its ability to fulfil its obligations. It informs the Scottish Housing Regulator about any significant events such as a major issue, event or change as set out and required in our notifiable events guidance.</p>

Foreword

Our Complaints Handling Procedure reflects Lochalsh and Skye Housing Association's commitment to valuing complaints. It seeks to resolve customer dissatisfaction as close as possible to the point of service delivery and to conduct thorough, impartial and fair investigations of customer complaints so that, where appropriate, we can make evidence-based decisions on the facts of the case. This procedure aims to help us 'get it right first time'. We want quicker, simpler and more streamlined complaints handling with local, early resolution by capable, well-trained staff.

Complaints give us valuable information we can use to improve customer satisfaction. Our complaints handling procedure will enable us to address a customer's dissatisfaction and may also prevent the same problems that led to the complaint from happening again. For our staff, complaints provide a first-hand account of the service user's views and experience, and can highlight problems we may otherwise miss. Handled well, complaints can give our customers a form of redress when things go wrong, and can also help us continuously improve our services.

Resolving complaints early saves money and creates better customer relations. Sorting them out as close to the point of service delivery as possible means we can deal with them locally and quickly, so they are less likely to escalate to the next stage of the procedure.

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What is a complaint?

The Association's definition of a complaint is:

'An expression of dissatisfaction by one or more members of the public about the Association's action or lack of action, or about the standard of service provided by or on behalf of the Association.'

A complaint may relate to:

- failure to provide a service
- inadequate standard of service
- dissatisfaction with Association's policy
- disagreement with a decision where the customer cannot use another procedure (for example an appeal) to resolve the matter
- treatment by or attitude of a member of staff
- the Association's failure to follow the appropriate administrative process
- delays in responding to enquiries and requests.

This list does not cover everything. For example, complaints may also be about:

- unfairness, bias or prejudice in service delivery
- failure to follow procedures
- lack of provision, or the provision of misleading, unsuitable or incorrect advice or information
- a repair that has not been carried out properly
- unacceptable behaviour by a member of staff, a committee member or a contractor.

[Appendix 1](#) provides a range of examples of complaints we may receive, and how these may be handled.

A complaint is **not**:

- a routine first-time request for a service
- a request for compensation only
- issues that are in court or have already been heard by a court or a tribunal
- an appeal against a decision where there is an established appeal route; these should be heard through the appropriate appeal process
- an attempt to reopen a previously concluded complaint or to have a complaint reconsidered where we have already given our **final** decision.

You should not treat these issues as complaints, and should instead direct customers to use the appropriate procedures.

[Appendix 2](#) gives more examples of 'what is not a complaint' and how to direct customers appropriately. This includes an example of when an anti social behaviour complaint may and may not be considered a complaint.

Handling anonymous complaints

We value all complaints. This means we treat all complaints including anonymous complaints seriously and will take action to consider them further, wherever this is appropriate. Generally, we will consider anonymous complaints if there is enough information in the complaint to enable us to make further enquiries. If, however, an anonymous complaint does not provide enough information to enable us to take further action, we may decide not to pursue it. Any decision not to pursue an anonymous complaint must be authorised by the Chief Executive (CE).

If an anonymous complaint makes serious allegations, we will also refer it to CE immediately. If we pursue an anonymous complaint further, we will record the issues as an anonymous complaint on the complaints system. This will help to ensure the completeness of the complaints data we record and allow us to take corrective action where appropriate.

What if the customer doesn't want to complain?

If a customer has expressed dissatisfaction in line with our definition of a complaint but does not want to complain, tell them that we do consider all expressions of dissatisfaction, and that customer complaints offer us the opportunity to improve services where things have gone wrong. **Encourage the customer to make their complaint** and allow us to deal with it through the CHP. This will ensure that the customer is updated on the action taken and gets a response to their complaint.

If, however, the customer insists they do not wish to complain, record the issue as an anonymous complaint. This will ensure that the customer's details are not recorded on the complaints database, and that they receive no further contact about the matter. It will also help to ensure the completeness of the complaints data recorded and will still allow us to fully consider the matter and take corrective action where appropriate. Please refer to the example in **Appendix 1** for further guidance.

Who can make a complaint?

Anyone who receives, requests or is affected by our services can make a complaint. This obviously includes our tenants. It also includes a member of the public who could have access to or be affected by our services, including our anti social behaviour services. **All these people are the Association's customers.**

Sometimes a customer may be unable or reluctant to make a complaint on their own. We will accept complaints brought by third parties as long as the customer has given their personal consent using the Association's mandate form. These complaints are treated in the same way as any other, regardless of who has brought the complaint.

Complaints involving more than one service or organisation

If a complaint relates to the actions of two or more of our services, you must tell the customer who will take the lead in dealing with the complaint, and explain that they will get only one response covering all issues raised.

If a customer complains to us about the service of another agency or public service provider, but we have no involvement in the issue, you should advise the customer to contact that organisation directly.

If the complaint relates to one of our services and includes one or more of our contractors, we would normally deal with the complaint, however, depending on circumstances we may agree with the contractor who will take the lead. Where this happens we will work together to investigate all the matters simultaneously, in line with this CHP. You must also tell the customer who will take the lead in dealing with the complaint, and explain that they will receive only one response covering all issues raised.

However, if a complaint relates to our service **and** the service of another agency or public service provider (for example a local authority or a government department), and we have a direct interest in the issue, you must handle the complaint about our service through the CHP. If you need to make enquiries to an outside agency in relation to the complaint always take account of data protection legislation and our guidance on handling our customers' personal information. The Association has detailed guidance on data sharing and has issued a data sharing code of practice.

Such complaints may include:

- a complaint to us about rent arrears that are partly caused by problems with a claim for welfare benefits or Universal Credit
- a complaint to us about anti social behaviour that relates to our service and a local authority service.

Significant performance failures

The Scottish Housing Regulator (SHR) has a duty to consider issues raised with them about 'significant performance failures'. A significant performance failure is defined by the SHR as something that a landlord does or fails to do that puts the interests of its tenants at risk, and which the landlord has not resolved. This is something that is a systemic problem that does, or could, affect all of a landlord's tenants. A significant performance failure happens when:

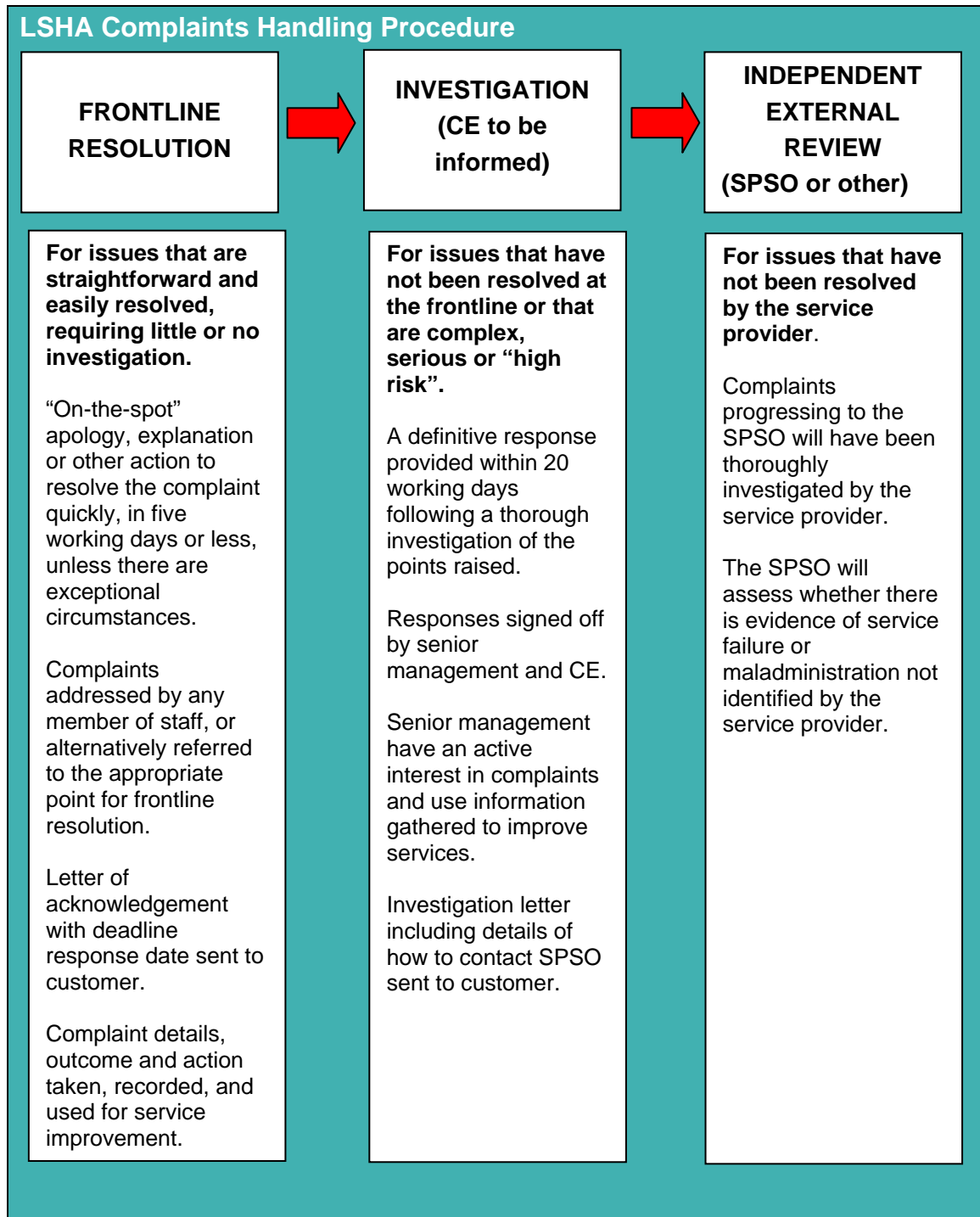
- a landlord is not delivering the outcomes and standards in the Scottish Social Housing Charter over a period of time; or
- a landlord is not achieving the regulatory standards on governance or financial management.

The Complaints Handling Process

Our CHP aims to provide a quick, simple and streamlined process for resolving complaints early and locally by capable, well-trained staff.

Our complaints process provides two opportunities to resolve complaints internally:

1. **Frontline Resolution**, and
2. **Investigation**.



For clarity, the term 'frontline resolution' refers to the first stage of the complaints process. It does not reflect any job description within the Association but means seeking to resolve complaints at the initial point of contact where possible.

Stage one: Frontline Resolution

Frontline resolution aims to quickly resolve straightforward customer complaints that require little or no investigation. Any member of staff may deal with complaints at this stage, but the recording of the complaint must be passed to the complaints handler, who will notify the service manager.

The main principle is to seek early resolution, resolving complaints at the earliest opportunity and as close to the point of service delivery as possible. This may mean a face-to-face discussion with the customer, or asking an appropriate member of staff to deal directly with the complaint.

[Appendix 1](#) gives examples of the types of complaint we may consider at this stage, with suggestions on how to resolve them. In practice, frontline resolution means resolving the complaint at the first point of contact with the customer, either by the member of staff receiving the complaint or other identified staff.

In either case, you may settle the complaint by providing an on-the-spot apology where appropriate, or explaining why the issue occurred and, where possible, what will be done to stop this happening again. You may also explain that, as an organisation that values complaints, we may use the information given when we review service standards in the future.

A customer can make a complaint in writing, in person, by telephone, by email or online, or by having someone complain on their behalf. You should always consider frontline resolution, regardless of how you have received the customer's complaint.

The Association will acknowledge all complaints. The acknowledgement will be sent by the complaints handler and a copy will be distributed to all members of the service team. A copy of the acknowledgement is shown in [Appendix 5](#). A list detailing staff members in each service team is shown in [Appendix 6](#).

What to do when you receive a complaint

- 1 On receiving a complaint, you must first decide whether the issue can indeed be defined as a complaint. The customer may express dissatisfaction about more than one issue. This may mean you should treat one element as a complaint, while directing the customer to pursue another element through an alternative route (see [Appendix 2](#)).
- 2 If you have received and identified a complaint, the details should be recorded on the Complaints Database by our complaints handler.
- 3 Next, decide whether or not the complaint is suitable for frontline resolution. Some complaints will need to be fully investigated before you can give the customer a suitable response. You must escalate these complaints immediately to the investigation stage.
- 4 Where you think frontline resolution is appropriate, you must consider four key questions:
 - What exactly is the customer's complaint (or complaints)?
 - What does the customer want to achieve by complaining?
 - Can I achieve this, or explain why not?
 - If I can't resolve this, who can help with frontline resolution?

What exactly is the customer's complaint (or complaints)?

It is important to be clear about exactly what the customer is complaining of. You may need to ask the customer for more information and probe further to get a full picture.

What does the customer want to achieve by complaining?

At the outset, clarify the outcome the customer wants. Of course, the customer may not be clear about this, and you may need to probe further to find out what they expect, and whether they can be satisfied.

Can I achieve this, or explain why not?

If you can achieve the expected outcome by providing an on-the-spot apology, or explain why you can't achieve what the customer wants, you should do so. If you consider an apology is appropriate, you will follow the SPSO's guidance on the subject: The SPSO Guidance on Apology is in **G: drive, Key Documents, SPSO, Guidance**.

The customer may expect more than we can provide. If so, you must tell them as soon as possible. An example would be where the customer is so dissatisfied with a kitchen refurbishment that they demand a new kitchen, but we are only willing to repair any broken units.

You will normally convey the decision face to face or on the telephone. We will also write to the customer as well. It is important, however, to keep a full and accurate record of the decision reached and passed to the customer. The Association will achieve this by completing the Internal Complaints Handling form and passing the form to the complaints handler to input the data to the Complaints database.

If I can't resolve this, who can help with frontline resolution?

If you cannot deal with the complaint because, for example, you are unfamiliar with the issues or area of service involved, you should be able to pass details of the complaint immediately to someone who can attempt to resolve it.

Timelines

Frontline resolution should be completed within **five working days**, although in practice we would often expect to resolve the complaint immediately.

Clarification from SPSO regarding resolution within 5 days – “In relation to closing frontline complaints, if the Association has made a decision about what needs to be done and communicated this to the tenant/ customer, the complaint can then be closed, with the implementation of any actions to follow. It is important to ensure that these actions are completed, and to note when they have been, but the complaint can be closed before then.”

You may need to get more information from other services to resolve the complaint at this stage. However, it is important to respond to the customer within five working days, either resolving the matter or explaining that their complaint is to be investigated.

Extension to the timeline

In exceptional circumstances, where there are clear and justifiable reasons for doing so, you may agree an extension of no more than five working days with the customer. This must only happen when an extension will make it more likely that the complaint will be resolved at the frontline resolution stage.

When you ask for an extension, you must get authorisation from the appropriate senior manager, who will decide whether you need an extension to effectively resolve the complaint. Examples of when this may be appropriate include staff or contractors being temporarily unavailable. If, however, the issues are so complex that they cannot be resolved in five days, it may be more appropriate to escalate the complaint straight to the investigation stage. You must tell the customer about the reasons for the delay, and when they can expect your response.

If the customer does not agree to an extension but it is unavoidable and reasonable, a senior manager should decide on the extension. You must then tell the customer about the delay and explain the reason for the decision to grant the extension.

It is important that such extensions do not become the norm. Rather, the timeline at the frontline resolution stage should be extended only rarely. All attempts to resolve the complaint at this stage must take no longer than **ten working days** from the date you receive the complaint.

The proportion of complaints that exceed the five-day limit will be evident from reported statistics. These statistics go to our Management Committee on a quarterly basis.

[Appendix 3](#) provides further information on timelines.

Closing the complaint at frontline resolution stage

When we have informed the customer of the outcome, we will write to the customer to say that we consider the complaint to be closed. Our response to the complaint must address all areas that we are responsible for and explain the reasons for our decision. We will keep a full and accurate record of the decision reached and given to the customer. The complaint should then be closed and the complaints system updated accordingly.

When to escalate to the investigation stage

A complaint should be escalated to the investigation stage when:

- frontline resolution was tried but the customer remains dissatisfied and requests an investigation into the complaint. This may be immediately on communicating the decision at the frontline stage or could be some time later (in which case the complaint will need to be re-opened on receipt of the request for investigation)
- the customer refuses to take part in the frontline resolution process
- the issues raised are complex and will require detailed investigation
- the complaint relates to serious, high risk or high profile issues.

When a previously closed complaint is escalated from the frontline resolution stage, the complaint should be re-opened on the complaints system.

Take particular care to identify complaints that might be considered serious, high risk or high profile, as these may require particular action or raise critical issues that need senior management's direct input. Potential high risk or high profile complaints are those that may:

- involve a death or terminal illness
- involve serious service failure, for example major delays in providing, or repeated failures to provide, a service
- generate significant and ongoing press interest
- pose a serious risk to our operations
- present issues of a highly sensitive nature, for example concerning:
 - immediate homelessness
 - a particularly vulnerable person
 - child protection.

Stage two: Investigation

Not all complaints are suitable for frontline resolution and not all complaints will be satisfactorily resolved at that stage. Complaints handled at the investigation stage of the CHP are typically complex or require a detailed examination before we can state our position. These complaints may already have been considered at frontline resolution stage, or they may have been identified from the start as needing immediate investigation.

An investigation aims to establish all the facts relevant to the points made in the complaint and to give the customer a full, objective and proportionate response that represents our final position.

What to do when you receive a complaint for investigation

It is important to be clear from the start of the investigation stage exactly what you are investigating, and to ensure that both the customer and service understand the investigation's scope.

It may be helpful to discuss and confirm these points with the customer at the outset, to establish why they are dissatisfied and whether the outcome they are looking for sounds realistic. In discussing the complaint with the customer, you should consider three key questions:

1. What specifically is the customer's complaint or complaints?
2. What does the customer want to achieve by complaining?
3. Are the customer's expectations realistic and achievable?

It may be that the customer expects more than we can provide. If so, you must make this clear to the customer as soon as possible.

Where possible you should also clarify what additional information you will need to investigate the complaint. The customer may need to provide more evidence to help us reach a decision.

Details of the complaint must be recorded on the system for recording complaints. Where appropriate, this will be done as a continuation of the frontline resolution action. The details must be updated when the investigation ends.

If the investigation stage follows attempted frontline resolution, we will use case notes and associated information provided at the frontline stage to the officer responsible for the investigation, and record that this has been done.

Timelines

The following deadlines apply to cases at the investigation stage:

- complaints must be acknowledged within **three working days**
- you should provide a full response to the complaint as soon as possible but not later than **20 working days** from the time you received the complaint for investigation.

Extension to the timeline

Not all investigations will be able to meet this deadline. For example, some complaints are so complex that they require careful consideration and detailed investigation beyond the 20-day limit. However, these would be the exception and you must always try to deliver a final response to a complaint within 20 working days.

If there are clear and justifiable reasons for extending the timescale, senior management will set time limits on any extended investigation, as long as the customer agrees. You must keep the customer updated on the reason for the delay and give them a revised timescale for completion. If the customer does not agree to an extension but it is unavoidable and reasonable, then senior management should consider and confirm the extension. The reasons for an extension might include the following:

- essential accounts or statements, crucial to establishing the circumstances of the case, are needed from staff, customers or others but they cannot help because of long-term sickness or leave
- you cannot obtain further essential information within normal timescales
- operations are disrupted by unforeseen or unavoidable operational circumstances, for example industrial action or severe weather
- the customer has agreed to mediation as a potential route for resolution.

These are only a few examples, and you must judge the matter in relation to each complaint. However, an extension would be the exception and you must always try to deliver a final response to the complaint within 20 working days.

As with complaints considered at the frontline stage, the proportion of complaints that exceed the 20-day limit will be evident from reported statistics. These statistics will go to our Management Committee on a quarterly basis.

[Appendix 3](#) provides further information on timelines.

Mediation

Some complex complaints, or complaints where customers and other interested parties have become entrenched in their position, may require a different approach. Where appropriate, you may consider using services such as mediation or conciliation using suitably trained and qualified mentors to try to resolve the matter, and to reduce the risk of the complaint escalating further.

Mediation may help both parties to understand what has caused the complaint, and so is more likely to result in mutually satisfactory solutions.

If you and the customer agree to mediation, revised timescales will need to be agreed.

Closing the complaint at the investigation stage

You must let the customer know the outcome of the investigation, in writing or by their preferred method of contact. Our response to the complaint must address all areas that we are responsible for and explain the reasons for our decision. You must record the decision, and details of how it was communicated to the customer, on the system for recording complaints. You must also make clear to the customer:

- their right to ask the SPSO to consider the complaint
- the time limit for doing so, and
- how to contact the SPSO.

Independent external review

Once the investigation stage has been completed, the customer has the right to approach the SPSO if they remain dissatisfied.

The SPSO considers complaints from people who remain dissatisfied at the conclusion of our complaints procedure. The SPSO looks at issues such as service failure and maladministration (administrative fault), as well as the way we have handled the complaint.

We will use the following wording in informing customers of their right to ask SPSO to consider the complaint. The SPSO also provides a leaflet [The Ombudsman and your organisation](#) which we will provide to customers on request.

Information about the SPSO

The Scottish Public Services Ombudsman (SPSO) is the final stage for complaints about public services in Scotland. This includes complaints about Scottish housing associations or co-operatives. If you remain dissatisfied with a housing association or co-operative after its complaints process, you can ask the SPSO to look at your complaint. The SPSO cannot normally look at complaints:

- where you have not gone all the way through the housing association's or co-operative's complaints handling procedure
- more than 12 months after you became aware of the matter you want to complain about, or
- that have been or are being considered in court.

The SPSO's contact details are:

Scottish Public Services Ombudsman
Bridgeside House
99 McDonald Road
Edinburgh
EH7 4NS

If you would like to visit SPSO in person, please call 0800 377 7330 to arrange an appointment. SPSO are open Monday, Wednesday, Thursday and Friday from 9am until 5pm; Tuesday 10am until 5 pm.

By post –
Freepost SPSO (no stamp required)

Freephone: 0800 377 7330 or call 0131 225 5300

Website: www.spsso.org.uk

Mobile site: <http://m.spsso.org.uk>

Factoring complaints

The SPSO does not normally look at complaints about our factoring service. From October 2012, there will be a new route for these complaints: the Homeowners Housing Panel. This will work to resolve complaints and disputes between home owners and property factors. So if a factoring customer is still dissatisfied after our investigation stage, they can go to the Homeowners Housing Panel. More information will be available once the Panel is fully established.

Roles and responsibilities

Overall responsibility and accountability for the management of complaints lies with the CE and senior management.

Our final position on the complaint is signed off by an appropriate senior manager in consultation with CE and we will confirm that this is our final response. This ensures that our senior management own and are accountable for the decision. It also reassures the customer that their concerns have been taken seriously.

Management committee: As the governing body with responsibility for overseeing our work, our management committee must provide leadership and strategic guidance. It will also have overall control of our affairs and ensure compliance with our policies and procedures.

In relation to complaints, its role is threefold:

- to approve the adoption of the CHP
- to ensure that staff keep to this CHP and associated internal processes (through involvement with senior management)
- to ensure that information and learning from complaints are used to improve our understanding of, and to steer, our policies and practices.

Particularly important is the management committee's role in developing and fostering a culture that values complaints. The management committee must ensure that recording and reporting of complaints is thorough and effective, so that reports to committee reflect a true picture of all complaints.

A management committee that values complaints will:

- support all staff in resolving complaints locally, quickly and effectively, to reduce the potential for a complaint to escalate
- encourage frontline staff to be 'active listeners' and to understand and act on the information they receive
- set out how complaints data will be reported and used to promote continual improvement
- ensure that tenants and other customers are kept informed about how we have used feedback to improve services.

Chief Executive: The Chief Executive provides leadership and direction in ways that guide and enable us to perform effectively across all services. This includes ensuring that there is an effective CHP, with a robust investigation process that demonstrates how we learn from the complaints we receive. The Chief Executive may take a direct role in all or some complaints, or may delegate responsibility for the CHP to senior staff. Regular management reports will assure the Chief Executive of the quality of complaints performance.

Senior managers and the complaints handler: On the Chief Executive's behalf, senior managers will be responsible for:

- managing complaints and the way we learn from them
- ensuring that recording and reporting on complaints is thorough and effective
- overseeing the implementation of actions required as a result of a complaint
- investigating complaints
- deputising for the Chief Executive on occasion.

All our staff: A complaint may be made to any member of our staff. So all staff must be aware of the CHP and how to handle and record complaints at the frontline stage. They should also be aware of who to refer a complaint to, in case they are unable to personally handle the matter. We encourage all staff to try to resolve complaints early, as close to the point of service delivery as possible, and quickly to prevent escalation.]

Complaints about senior staff or committee members

Complaints about senior staff or committee members can be difficult to handle, as there may be a conflict of interest for the staff investigating the complaint.

When serious complaints are raised against CE or committee members, it is particularly important that the investigation is conducted by an individual who is independent of the situation. The SHR specifies that a serious complaint against senior staff or the governing body of an RSL is a 'notifiable event', and as such the regulator must be informed immediately. It has also drawn up 'regulatory expectations' for the handling of serious complaints against the Chief Executive. This specifies that we must seek independent, professional advice to support us in handling, and in some cases investigating, the complaint.

The SHR's expectations also specify that strong governance arrangements must be in place that set out clear procedures for handling such complaints, including the governing body's role in such cases. Our processes specify the measures in place to ensure this is achieved, and the types of complaints we consider 'serious'.

We also have arrangements for handling minor complaints against the Chief Executive and for complaints against other senior staff and the governing body. These arrangements take account of the need to ensure that the final decision is fair, objective and impartial.

The SHR's Regulatory Expectations on serious complaints against a Chief Executive are attached as [Appendix 8](#).

Recording, reporting, learning and publicising

Complaints provide valuable customer feedback. One of the aims of the CHP is to identify opportunities to improve services across our business. We must record all complaints in a systematic way so that we can use the complaints data for analysis and management reporting.

By recording and using complaints information in this way, we can identify and address the causes of complaints and, where appropriate, identify training opportunities and introduce service improvements.

Recording complaints

To collect suitable data it is essential to record all complaints, as follows:

- the customer's name and address
- the date the complaint was received
- the nature of the complaint
- how the complaint was received (for example by email, post etc)
- the service the complaint refers to
- the date the complaint was closed at the frontline resolution stage (where appropriate)
- the date the complaint was escalated to the investigation stage (where appropriate)
- action taken at the investigation stage (where appropriate)
- the outcome of the complaint at each stage
- the date the complaint was closed at the investigation stage (where appropriate)
- the underlying cause of the complaint and any remedial action taken.

We have structured systems for recording complaints, their outcomes and any resulting action. These provide a detailed record of services that have failed to satisfy customers.

Reporting of complaints

Complaints details are analysed for trend information to ensure we identify service failures and take appropriate action. Regularly reporting the analysis of complaints information helps to inform management of where services need to improve. It will also help us report efficiently on the Annual Return on the Charter (the ARC).

We publish on a quarterly basis on our website and in our office the outcome of complaints and the actions we have taken in response. This demonstrates the improvements resulting from complaints and shows that complaints can influence our services. It also helps ensure transparency in our complaints handling service and will demonstrate to our customers that we value complaints.

We will:

- publicise on a quarterly basis complaints outcomes, trends and actions taken
- use case studies and examples to demonstrate how complaints have helped improve services.

This information will be reported quarterly to our Audit, Finance and Performance (AFP) Sub-Committee and discussed at the Management Team meetings following the Management Committee meetings.

Learning from complaints

At the earliest opportunity after the closure of the complaint, the Association will ensure that staff understand the lessons learned from the complaint and will implement any recommendations made.

CE and senior management will regularly review the information gathered from complaints and consider whether our services could be improved or internal policies and procedures updated.

As a minimum, we must:

- use complaints data to identify the root cause of complaints
- take action to reduce the risk of recurrence
- record the details of corrective action in the complaints file
- systematically review complaints performance reports to improve service delivery.

Where we have identified the need for service improvement:

- the action needed to improve services should be authorised
- a staff member (or team) must be designated as the 'owner' of the issue, with responsibility for ensuring the action is taken
- a target date must be set for the action
- the designated individual must follow up to ensure that the action happens within the agreed timescale
- where appropriate, performance in the service area must be monitored to ensure that the issue has been resolved
- we must ensure that staff and management committee members all learn from complaints.

Publicising complaints performance information

We also report our performance in handling complaints to the SHR, through the ARC. This includes performance statistics showing the volumes and types of complaints and key performance details, for example on the time taken and the stage at which complaints were resolved.

Maintaining confidentiality

Confidentiality is important in complaints handling. This includes maintaining the customer's confidentiality and explaining to them the importance of confidentiality generally. We must always bear in mind legal requirements, for example, data protection legislation, as well as internal policies on confidentiality and the use of customers' information.

Managing unacceptable behaviour

People may act out of character in times of trouble or distress. The circumstances leading to a complaint may result in the customer acting in an unacceptable way. Customers who have a history of challenging or inappropriate behaviour, or have difficulty expressing themselves, may still have a legitimate grievance.

A customer's reasons for complaining may contribute to the way in which they present their complaint. Regardless of this, we must treat all complaints seriously and properly assess them. However, we also recognise that the action of customers who are angry, demanding or persistent may result in unreasonable demands on time and resources or unacceptable behaviour towards our staff. We will, therefore, apply our policies and procedures to protect staff from unacceptable behaviour such as unreasonable persistence, threats or offensive behaviour from customers.

Where we decide to restrict access to a customer under the terms of an unacceptable actions policy, we have a procedure in place to communicate that decision, notify the customer of a right of appeal, and review any decision to restrict contact with us. We must also make clear to the customer that they can still request other services such as repairs while their access is restricted.

Supporting the customer

All members of the community have the right to equal access to our CHP. Customers who do not have English as a first language may need help with interpretation and translation services, and other customers may have specific needs that we will seek to address to ensure easy access to the CHP.

We must always take into account our commitment and responsibilities to equality. This includes making reasonable adjustments to our service to help the customer where appropriate.

Several support and advocacy groups are available to support customers in pursuing a complaint and customers should be signposted to these as appropriate.

Time limit for making complaints

This model CHP sets a time limit of six months from when the customer first knew of the problem, within which time they may ask us to consider the complaint, unless there are special circumstances for considering complaints beyond this time.

We will apply this time limit with discretion. In decision making we will take account of the Scottish Public Services Ombudsman Act 2002 (Section 10(1)), which sets out the time limit within which a member of the public can normally ask the SPSO to consider complaints. The limit is one year from when the person first knew of the problem they are complaining about, unless there are special circumstances for considering complaints beyond this time.

If it is clear that a decision not to investigate a customer's complaint will lead to a request for external review of the matter, we may decide that this satisfies the special circumstances criteria. This will enable us to consider the complaint and try to resolve it.

REVIEW

This document will be reviewed by the Management Committee or Sub-Committee set up for that purpose in accordance with the requirements of the Association's Register of Policies and Procedures.

Appendix 1 – Complaints at frontline resolution

The following tables give examples of complaints that may be considered at the frontline stage, and suggests possible actions to achieve resolution.

Complaint	Possible actions to achieve resolution
<p>The customer complains that her rent payment standing order has been set up wrongly.</p>	<ul style="list-style-type: none"> • Apologise to the customer and resolve the issue by properly updating the standing order details. • Record the complaint on the complaints database. • Send Frontline acknowledgement and include a deadline resolution date
<p>The customer complains that a member of staff or a contractor did not attend to carry out a housing repair as we had agreed.</p>	<ul style="list-style-type: none"> • Speak to the member of staff or a contractor to explain the customer's complaint and to agree how to resolve the issue, for example by arranging a new time and date to do the repair. • Explain the reasons for the failed appointment and apologise to the customer. • Record the complaint on the complaints database. • Send Frontline acknowledgement and include a deadline resolution date
<p>The customer complains that the quality of a repair carried out by us or our contractor is not satisfactory.</p>	<ul style="list-style-type: none"> • Ask the service department to examine the repair to assess whether or not it is acceptable. • If it is not acceptable, agree that the service department should do more work to resolve the matter. • Explain and apologise to the customer. • Record the complaint on the complaints database. • Obtain a report from the service or contractor to confirm that the repair is now complete. • Send Frontline acknowledgement and include a deadline resolution date • Feed back the lessons learned from the complaint into a report to be discussed at the service progress meeting plan.

Complaint	Possible actions to achieve resolution
<p>The customer complains that a member of staff turned up late for a meeting and was smoking.</p>	<ul style="list-style-type: none"> • Discuss the matter with the member of staff. • Check the timetable for visits and discuss with staff the complaint about smoking. • You in turn contact the customer to explain the policy, confirm the timing of visits (for example. between 8am and 12 noon) and where appropriate apologise for the inconvenience. • Record the complaint on the complaints database. • Send Frontline acknowledgement and include a deadline resolution date
<p>The customer expresses dissatisfaction in line with the definition of a complaint, but says she doesn't want to complain – just wants to tell us about the matter.</p>	<ul style="list-style-type: none"> • Tell the customer that we value complaints because they help to improve services. Encourage her to submit the complaint. • To improve our service and learn from mistakes, we need to record, evaluate and act upon customer feedback like this. Therefore, if the customer still insists she does not want to complain, record the matter as an anonymous complaint. This will avoid breaching the complaints handling procedure. Reassure the customer that she will not be contacted again about the matter. • No letter to be sent.
<p>Dissatisfaction with a planned maintenance programme</p>	<ul style="list-style-type: none"> • Take details of the complaint and pass them to the team involved in planned maintenance. Tell the customer about the timescales for planning such work, and that we will take their views into account for future work. • Record the complaint on the complaints database. • Send Frontline acknowledgement and include a deadline resolution date

Appendix 2 - What is not a complaint

A concern may not necessarily be a complaint. For example, a customer might make a routine first-time request for a service. This is not a complaint, but the issue may escalate into a complaint if it is not handled effectively and the customer has to keep asking for service.

A customer may also be concerned about the various decisions we make. These decisions may have their own specific review or appeal procedures, and, where appropriate, we should direct customers to the relevant procedure. However, if a customer expresses dissatisfaction with the administrative process we have followed to arrive at a decision, we should treat this as a complaint. This distinction is shown in the example below about how an allocations policy applies.

The following paragraphs provide examples of the types of issues or concerns that should not be handled through the complaints handling procedure. This is not a full list, and you should decide the best route for resolution based on the individual case.

Example 1: Housing allocation decisions

Decisions about the allocation of homes follow a specific internal policy, in line with legal requirements. You should steer customers who are dissatisfied with an allocation decision towards the associated appeals process.

Customer A complains that they were not given enough priority for housing, given their current housing circumstances and health needs.

Steer the customer towards the appeals process for allocation decisions.

However, if the customer is dissatisfied about how we applied the policy or administered the process, the complaint can go through this CHP.

Customer B complains that a home was allocated to someone else, who they knew were in less need than them, and had not been on the housing list as long.

Record the customer's complaint. Explain that personal details are not disclosed, so we cannot discuss the other applicant's details. The customer will also need to be clear that we will review the basis for the decision to see if we are at fault.

If we find that the decision was based on sound evidence of need, inform the customer of the outcome. But if there is evidence that there was maladministration (fault) in the process followed to reach our decision, we must take suitable action and inform Customer B.

Update the complaint as appropriate and report the case to senior management.

Customer B can also request a review of their circumstances or may appeal their points through the appeals process.

Example 2: Claims for compensation

A customer may seek compensation from us if they consider us liable. This includes issues such as personal injury or loss of or damage to property. Claims for compensation only are not complaints, so you should not handle them through the complaints handling procedure. However, where a customer wants to complain about the matter leading to their request for compensation, for example workmen damaging their home, you may consider that matter as a complaint, but deal with the request for compensation separately. You may decide to suspend complaint action pending the outcome of the claim for compensation. If you do this, you should notify the customer and explain that the complaint will be fully considered when the compensation claim has been resolved.

If you receive a compensation claim, you should explain to the customer the process for seeking resolution in line with our policy on these claims. [Click here](#) to view our Redress Policy and Procedures.

Example 3: Anti social behaviour complaints

We must respond well to concerns or dissatisfaction about our tenants' behaviour from a neighbour or a member of the public (for example, a home owner living near by). We initially handle such concerns through our anti social behaviour policy. However, someone may complain about the way we have handled an anti social behaviour complaint. See SPSO Guidance and LSHA Anti Social Behaviour Policy.

Mr A complains that his neighbour has been playing music late at night for the last three nights. This is the first time he has phoned to complain.

We should handle this through our anti social behaviour policy. We should fully explain our process to Mr A, and say what he should do if the situation continues.

Ms B complains she has reported her neighbour's barking dog several times over the last year, and nothing has been done about it.

We should handle this as a complaint and pass it to the right team to establish what has happened so far and update Ms B. We should consider whether we applied our policy properly, and whether we could do anything else to resolve the situation. We should record the complaint on the complaints system and send the Frontline letter.

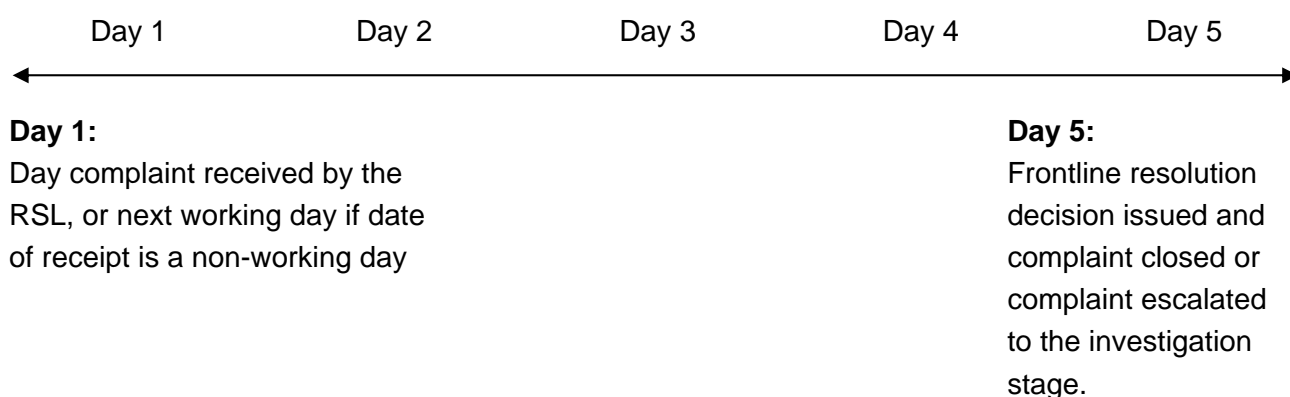
Appendix 3 - Timelines

General

Reference to timelines throughout the CHP relate to working days. When measuring performance against the required timelines, we do not count non-working days, for example weekends and public holidays.

Timelines at frontline resolution

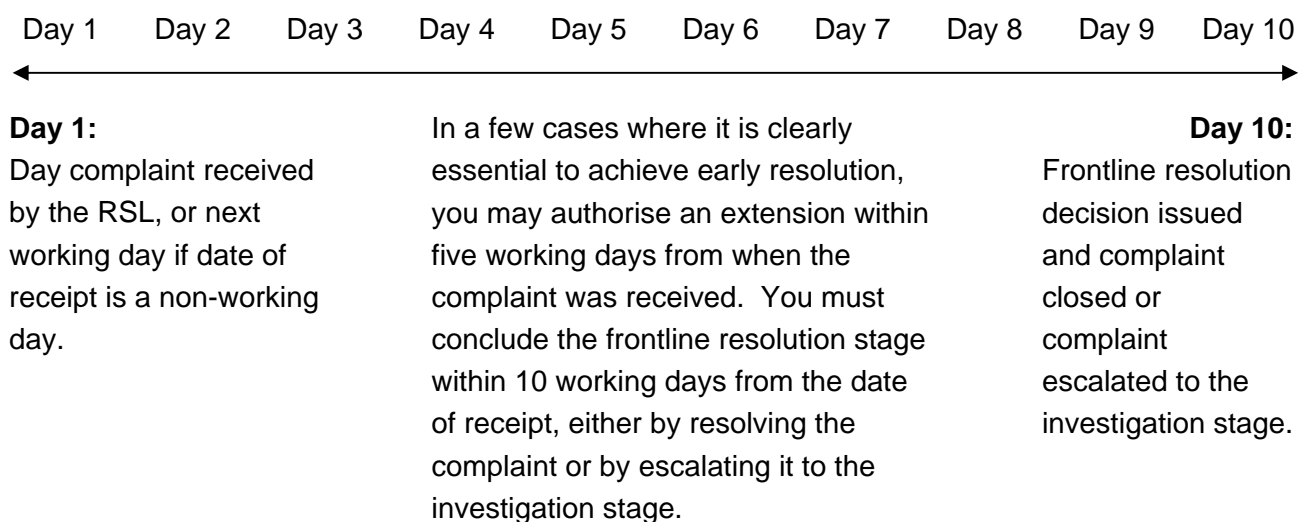
You should aim to achieve frontline resolution within five working days. The day you receive the complaint is day 1. Where you receive it on a non-working day, for example at the weekend or on a public holiday, day 1 will be the next working day.



The date of receipt will be determined by the RSL's usual arrangements for receiving and dating of mail and other correspondence.

Extension to the five-day timeline

If you have extended the timeline at the frontline resolution stage in line with the procedure, the revised timetable for the response must take no longer than 10 working days from the date of receiving the complaint.



Transferring cases from frontline resolution to investigation

If frontline resolution was tried but the customer remains dissatisfied, they can ask for their complaint to be investigated. This may be immediately on communicating the decision at the frontline stage or could be some time later, in which case the complaint will need to be re-opened on receiving the request for investigation. As soon as this request is received, the complaint should be passed for investigation.

Timelines at investigation

You may consider a complaint at the investigation stage either:

- after attempted frontline resolution, or
- immediately on receipt if you believe the matter to be sufficiently complex, serious or appropriate to merit a full investigation from the outset.

Acknowledgement

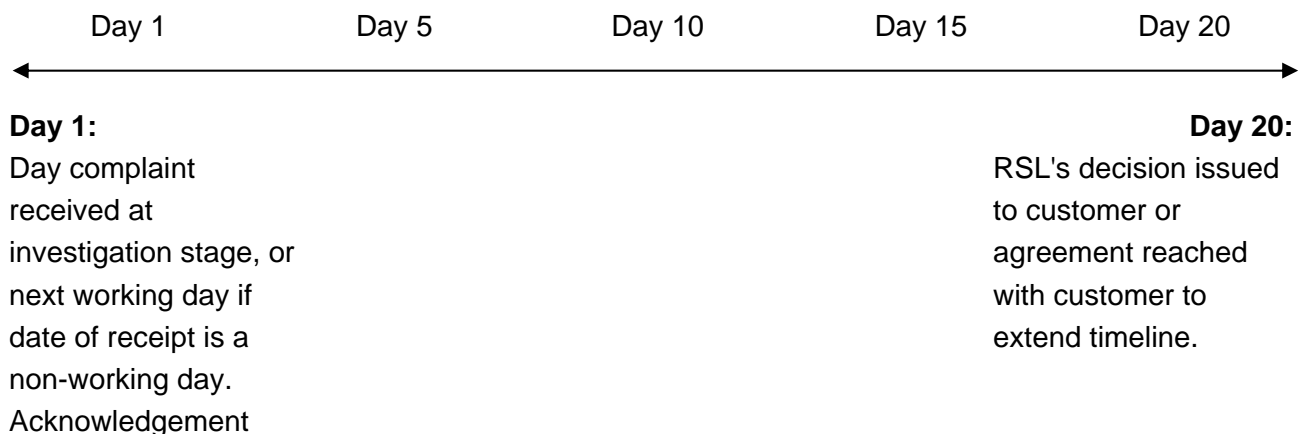
All complaints considered at the investigation stage must be acknowledged within **three working days** of receipt. The date of receipt is:

- the day the case is transferred from the frontline stage to the investigation stage, where it is clear that the case requires investigation, or
- the day the customer asks for an investigation after a decision at the frontline resolution stage. You should note that a customer may not always ask for an investigation immediately after attempts at frontline resolution, or
- the date you receive the complaint, if you think it sufficiently complex, serious or appropriate to merit a full investigation from the outset.

Investigation

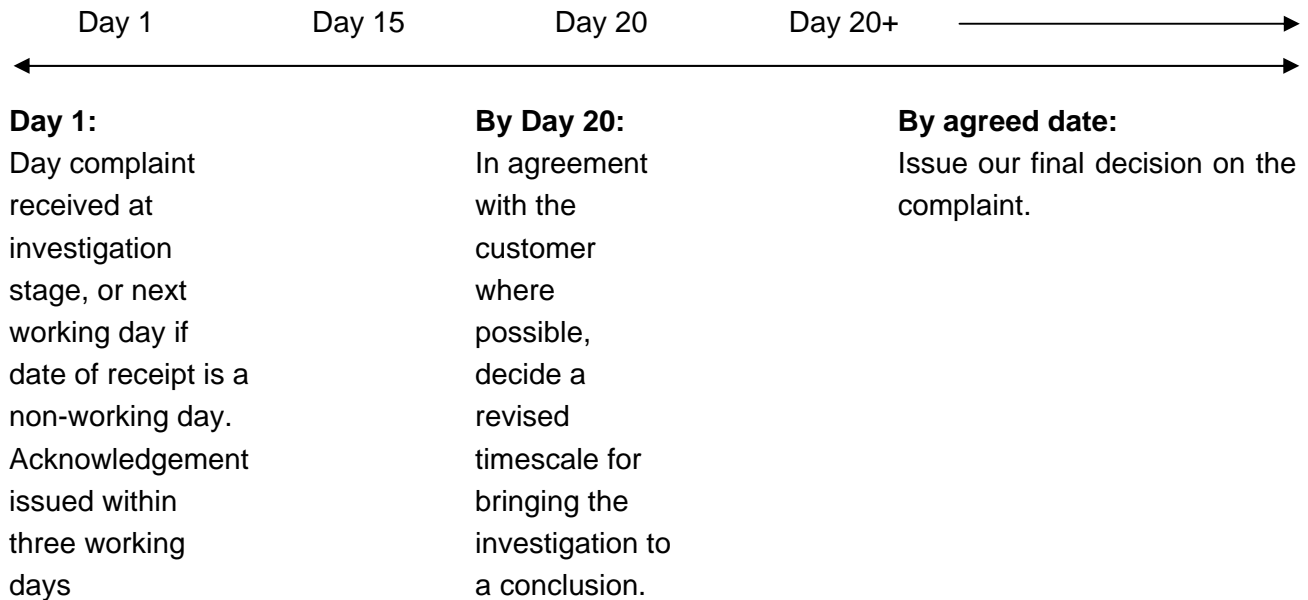
You should respond in full to the complaint within **20 working days** of receiving it at the investigation stage.

The 20-working day limit allows time for a thorough, proportionate and consistent investigation to arrive at a decision that is objective, evidence-based and fair. This means you have 20 working days to investigate the complaint, regardless of any time taken to consider it at the frontline resolution stage.



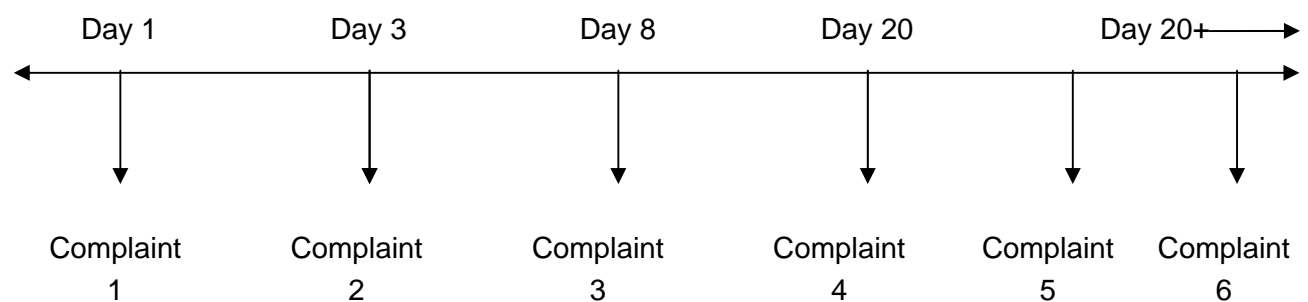
issued within three working days

Exceptionally you may need longer than the 20-day limit for a full response. If so, you should explain the reasons to the customer, and agree with them a revised timescale.



Timeline examples

The following illustration provides examples of the point at which we conclude our consideration of a complaint. It is intended to show the different stages and times at which a complaint may be resolved.



The circumstances of each complaint are explained below:

Complaint 1 – is straightforward and we can resolve it by an on-the-spot explanation and, if appropriate, an apology. Such a complaint can be resolved on day 1.

Complaint 2 – is also straightforward and needs little or no investigation. Resolution is reached at day three of the frontline resolution stage.

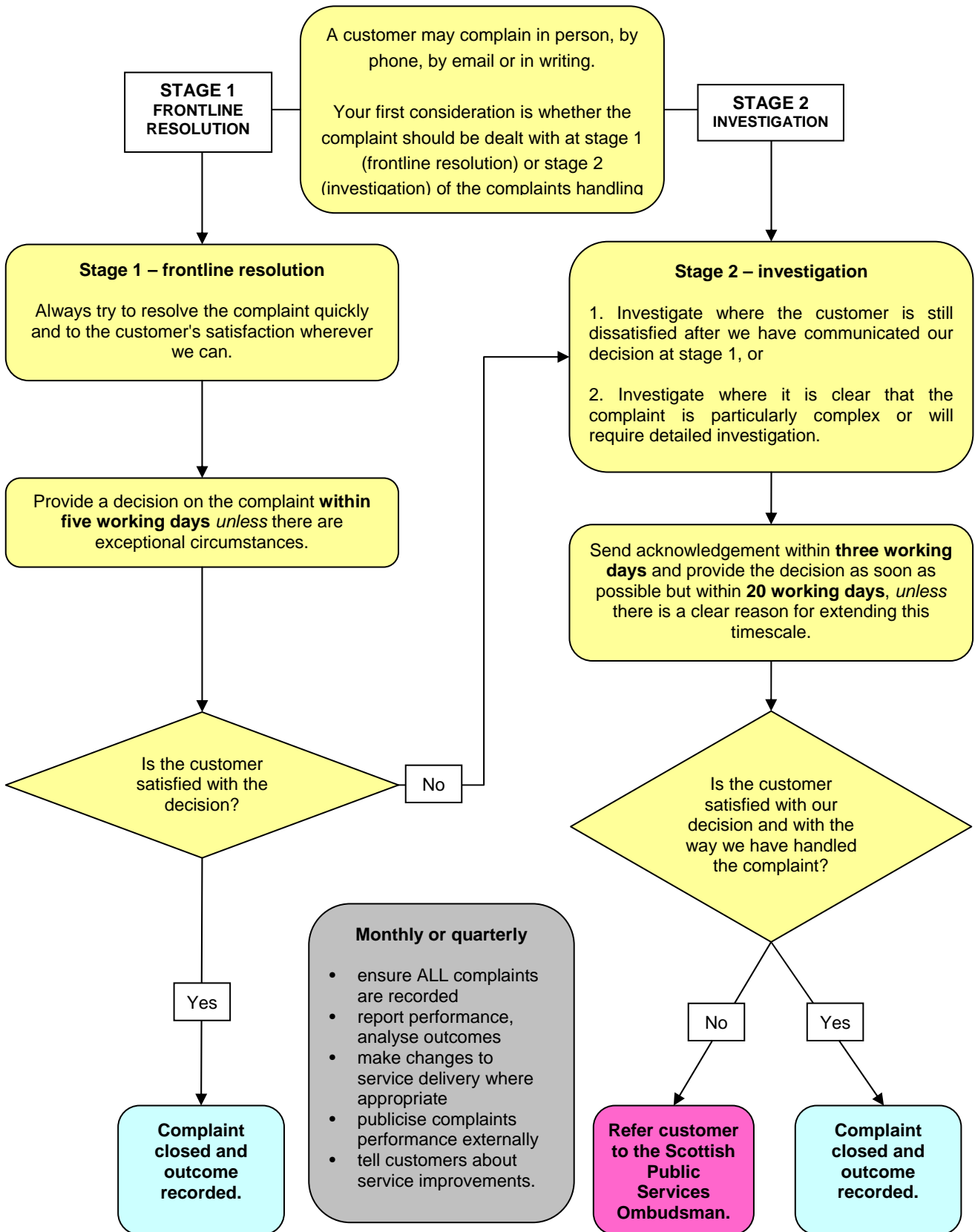
Complaint 3 – refers to a complaint that we considered appropriate for frontline resolution. We did not resolve it in the required time of five working days. However, we authorised an extension because there was a clear and demonstrable expectation that the complaint would be satisfactorily resolved within a further five days. We resolved the complaint at the frontline resolution stage in a total of eight days.

Complaint 4 – was suitably complex or serious enough to pass to the investigation stage from the outset. We did not try frontline resolution; rather we investigated the case immediately. We issued a final decision to the customer within the 20-day limit.

Complaint 5 – we considered complaint 5 at the frontline resolution stage but a 5-day extension was authorised. At the end of the frontline stage the customer was still dissatisfied. At their request, we conducted an investigation and issued our final response within 20 working days. Although the end-to-end timeline was 30 working days we still met the combined time targets for frontline resolution and investigation.

Complaint 6 – we considered complaint 6 at both the frontline resolution stage and the investigation stage. We did not complete the investigation within the 20-day limit, so we agreed a revised timescale with the customer for concluding the investigation beyond the 20-day limit.

Appendix 4 - The Complaints Handling Procedure flow chart



Appendix 5 – Frontline Acknowledgement letter/email

«Title» «FirstName» «Surname»

Our Ref: G156 CP«complaintref»

«Address1»

«Address2»

«Address3»

«Postcode»

Today's Date

«GreetingLine»

COMPLAINT REFERENCE CP«complaintref»

Thank you for your letter/email which we received on «**datemade**».

Your comments/message will be passed on to the relevant members of staff, who will contact you in the near future.

Yours sincerely

Marion Douglas
CORPORATE SERVICES MANAGER

Paragraph to be used in final letter/email:-

We hope that you consider the complaint to be resolved to your satisfaction. If we do not hear from you by <<resolution date>>, we will assume that this matter is closed.

Appendix 6 – Details of Staff Members in Service Teams

SENIOR MANAGERS	
Service Manager	Lachie MacDonald, Chief Executive Iain McIvor, Director of Investment
Members of Service Team:	Angus MacLennan, Technical Manager Maureen Taylor, Housing Services Manager Lesley MacIntosh, Finance Services Manager Donnie Mackay, Energy Advice Manager Marion Douglas, Corporate Services Manager Janet Masson, Rent Administration Manager Ruaridh MacKinnon, Handyman Services Manager Lesley Kirkwood, Legal Services Manager
CORPORATE	
Service Manager	Lachie MacDonald, Chief Executive
Members of Service Team:	Marion Douglas, Corporate Services Manager Aggie MacSween, Personal Assistant Alison Jagger, Corporate Services Assistant Jennifer MacInnes, Corporate Services Clerical Assistant
DEVELOPMENT	
Service Manager	Iain McIvor, Director of Investment
Members of Service Team:	John Lamont, Development Officer Anne Scholes, Property Services Assistant
Service Manager	Iain McIvor, Director of Investment
Members of Service Team:	Donnie Martin, Care & Repair Officer Anne Scholes, Property Services Assistant
PROPERTY AND TECHNICAL SERVICES	
Service Manager	Angus MacLennan, Technical Manager
Members of Service Team:	Wilfar Matheson, Property Services Officer Gavin Convery, Property Services Officer Morag Palmer, Property Services Assistant Anne Scholes, Property Services Assistant Robert Bruce, Technical Co-ordinator Angus Campbell, Technical Services Jenna Beaton, Technical Services Murdo Nicolson, Technical Services Iain Matheson, Technical Services Donald Gillies, Technical Services

	Jason Murdoch, Technical Services Angus Neil MacDonald, Technical Services
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FINANCE SERVICES	
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Service Manager	Lesley MacIntosh, Finance Services Manager
Members of Service Team:	Fiona Duguid, Finance Services Assistant

Service Manager	Janet Masson, Rent Administration Manager
Members of Service Team:	Linda Shaw, Rent Administration Assistant Alex Macleod, Tenant Adviser

HOUSING SERVICES	
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Service Manager	Maureen Taylor, Housing Services Manager
Members of Service Team:	Moira Gillies, Housing Services Assistant Hayley-Louise Gater, Housing Services Clerical Assistant

ENERGY ADVICE SERVICES	
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Service Manager	Iain McIvor, Director of Investment
Members of Service Team:	Donnie Mackay, Energy Advice Manager Moira Scobbie, Energy Adviser Laura Campbell, Energy Advice Services Assistant

HANDYPERSON SERVICES	
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Service Manager	Iain McIvor, Director of Investment
Members of Service Team:	Ruairidh MacKinnon, Handyperson Services Manager Donnie Morrison, Handyperson Neil MacLean, Handyperson Michael Taylor, Handyperson Alison Jagger, Corporate Services Assistant

Appendix 7 – Making an Apology

Sample Apology Phrases

We recognise thatwas not carried out correctly and did not meet our standards. We failed to within a reasonable timescale and we also failed We apologise unreservedly for these failures and assure you that we have since examined our procedures thoroughly and adjusted them to ensure that we do not fail any of our other clients in the future.

We apologise profoundly for our actions.

The Association deeply regrets the inaccuracies and false claims in the correspondence between yourself and and the inappropriate and potentially inflammatory nature of some of the statements that were made. We have a robust Complaints Policy and Procedure in place but we failed to meet our timescale targets and we apologise to you for this. Association staff involved in handling complaints will be required to undergo further training and more rigorous checking of correspondence will be implemented. We will closely examine our current procedure and ensure that all staff are completely aware of all of their responsibilities regarding complaints.

The Association will learn a valuable lesson from the correspondence with the Scottish Public Services Ombudsman and we appreciate the opportunity to improve on the service that we provide.

Appendix 8 – SHR’s Regulatory Expectations on Serious Complaints against CE

NOTIFIABLE EVENTS – REGULATORY EXPECTATIONS **The Scottish Housing Regulator’s expectations about** **handling a serious complaint against the Director/Chief** **Executive of a registered social landlord**



Purpose

- 1 This supplementary advice sets out what we expect a governing body to do when dealing with a serious complaint or grievance against the Director/Chief Executive of the registered social landlord (RSL).
- 2 Our guidance on notifiable events (SHR25) requires RSLs to tell us when there is a serious complaint, investigation or disciplinary action relating to senior staff. These serious complaints do not arise often but because of their nature and sensitivity they have the potential to seriously damage the organisation. Our experience of these cases has shown us that if the governing body does not have a clear process to deal with such matters then it can get into difficulties and the original issue can be made worse by inappropriate handling of the complaint. So this note sets out our regulatory expectations with the aim of helping RSLs prepare to deal properly with this type of situation.
- 3 We do not become involved in employment matters. Employment issues are for the governing body as employer to resolve with the individual employee. But we do need to be assured that the governing body will handle a serious complaint or grievance about its Director properly and will seek external advice and support to help it manage these situations.

Our expectations

- 4 When dealing with a serious complaint or grievance about a Director, we expect RSLs to:
 - Tell us about it, in accordance with SHR25, our guidance on notifiable events;
 - Take prompt, independent and professional advice as appropriate to the individual complaint or grievance; and
 - Put in place strong governance systems that set out clear procedures for dealing with serious complaints or grievances about the Director and the role of the governing body. And we expect RSLs to be open and transparent about their decision-making processes.

Notify SHR

- 5 RSLs should deal with and resolve minor issues informally, at a local level, and we would not expect to be notified about minor grievances. And even serious complaints can be dealt with informally. But some serious complaints cannot be successfully resolved at the informal stage or are raised formally.
- 6 The Chairperson of the RSL should notify us if there is a formal serious complaint against the Director, for example serious allegations from an individual employee of bullying or harassment by the Director. And tell us how the governing body intends to handle it

-
- 7 We recognise the highly sensitive nature of such serious complaints. If RSLs give us information in confidence we will respect that confidentiality, provided it does not compromise our ability to safeguard the overall interests of the RSL or the sector, or breach our legal obligations.

Take prompt, independent and professional advice

- 8 We need to be assured by the governing body that it is seeking independent professional advice to support it in handling the complaint. In normal circumstances it is the Director who provides advice to the governing body. But clearly where it is the Director who is the subject of the serious complaint or grievance, he/she has a clear conflict of interest and cannot be involved in any way in managing the complaint made against him/her. In such cases the governing body should seek external advice and support to manage the complaint.
- 9 The governing body needs to act quickly when a staff member raises a serious grievance about the Director. For instance, if the grievance is about bullying or aggressive behaviour then the governing body has a responsibility to take immediate action. Given the likely sensitive nature of the grievance it should be handled carefully with independent, expert support and advice. The RSL may need to seek an employment/personnel specialist to assist, or a consultant with expertise in investigating such matters.
- 10 Where a serious complaint has been made against the Director by a governing body member or someone else who is not an employee, then we would also in these circumstances expect the governing body to ensure that it is taking independent advice about how to handle the complaint and that the Director takes no part in any investigation.

Have clear procedures

- 11 RSLs must have clear procedures to set out how they will investigate serious complaints or grievances against the Director. RSLs which are members of EVH can apply the Grievance Procedures included in the Statement of Terms and Conditions of Employment and there is also a Guidance Manual for handling discipline and grievance issues. RSLs which are not EVH members may have other good practice guidelines which they can follow. We expect RSLs to apply the available good practice in dealing with the grievance and to meet our expectations as set out in this note.

The governing body's role

- 12 Most RSLs have a standing sub-committee, such as a staffing sub-committee, with delegated authority to deal with personnel matters or consider serious staff complaints. In the case of a serious complaint against the Director, we would always expect the staffing sub-committee to be informed and involved, rather than the Chairperson dealing with the complaint alone. The staffing sub-committee is likely to be involved in hearing and deciding on the grievance. In some cases, it may be more appropriate to commission an independent party to conduct the investigation and report back to the sub-committee. Where there is an investigation then the sub-committee must oversee the investigation and record all decisions to ensure transparency.
- 13 Where the decision is taken to investigate a serious complaint, then the full governing body should be told but not about any of the detail, which must be kept confidential. This ensures:

-
- The full governing body retains control over the RSL's affairs;
 - The details of the grievance remain confidential (the individuals at the centre of allegations have the right to confidentiality);
 - The full governing body knows the grievance is being dealt with, for example, by the staffing sub-committee;
 - If the RSL needs to bring in outside help, then the full governing body is aware of the situation from the outset and can authorise any associated costs;
 - The governing body can monitor if a pattern of grievances emerges and decide what action to take; and
 - By keeping the substance of the grievance confidential then there is a clean route for any appeal to be heard by other members of the governing body who are untainted by detailed knowledge about the issue.

14 At the end of the process, the full governing body should be told about the outcome of the grievance.

SHR involvement

15 If we have concerns about the action the governing body is proposing to take, or it appears that the Director is involved in advising the governing body or in handling the grievance, then we may need to act to support the governing body to carry out its role effectively and properly.

Conclusion

16 Serious complaints against the senior member of staff will not happen often, if at all, in most RSLs. But when they do occur they need to be handled properly. We expect to be notified if there is a serious grievance or complaint about the Director. We need to be confident that the governing body will discharge its employment responsibilities fully and properly and have access to objective and expert advice about how to handle a serious complaint or grievance against its Director. We expect RSLs to look at our regulatory expectations as we have set out here and ensure these are reflected in the RSL's own governance processes for dealing with such a situation.

SCHEDULE OF REVISIONS		
DATE	REVISION No.	DETAILS
20/02/2017	V2	No revisions required to new Version 2 apart from new members of staff and job titles.
16/08/2019	V2.1	SHR: Standards of Governance and Financial Management – 2.1-2.5 added in
		Pg 9 “Housing Benefit” changed to “Universal Credit”
		<p>Pg 11 – Paragraph amended from</p> <p><i>The Association will write to all customers making a complaint in any event. The letter will be signed by the relevant service manager, and a copy will be distributed to all members of the service team. A copy of the letter is shown in Appendix 5. A list detailing staff members in each service team is shown in Appendix 6.</i></p> <p>To</p> <p>The Association will acknowledge all complaints. The acknowledgement will be sent by the complaints handler and a copy will be distributed to all members of the service team. A copy of the acknowledgement is shown in Appendix 5. A list detailing staff members in each service team is shown in Appendix 6.</p>
		<p>Pg 12 - New Paragraph regarding Stage One: Frontline Resolution (after Timelines) – added in:-</p> <p><u>Clarification from SPSO regarding resolution within 5 days</u> – “In relation to closing frontline complaints, if the Association has made a decision about what needs to be done and communicated this to the tenant/ customer, the complaint can then be closed, with the implementation of any actions to follow. It is important to ensure that these actions are completed, and to note when they have been, but the complaint can be closed before then.”</p>
		<p>Pg 11 – What to do when you receive a complaint – point 2 - amended from</p> <p><i>If you have received and identified a complaint, the details should be recorded on the Internal Complaints Handling form (see Appendix 7) and passed to our complaints handler to record onto our complaints system.</i></p> <p>To</p> <p>If you have received and identified a complaint, the details should be recorded on the Complaints Database by our complaints handler.</p>
		<p>Pg 13 Closing the complaint at frontline resolution stage, changed from</p> <p><i>When you have informed the customer of the outcome, we will write to the customer. You must ensure that our response to the complaint addresses all areas that we are responsible for and explains the reasons for our decision. It is also important to complete the Internal Complaints Handling form, which should be passed to the complaints handler. This will keep a full and accurate record of the decision reached and given to the customer. The complaint should then be closed and the complaints system updated accordingly.</i></p>

		<p>To</p> <p>When we have informed the customer of the outcome, we will write to the customer to say that we consider the complaint to be closed. Our response to the complaint must address all areas that we are responsible for and explain the reasons for our decision. We will keep a full and accurate record of the decision reached and given to the customer. The complaint should then be closed and the complaints system updated accordingly.</p>
		<p>Pg21, Last paragraph changed from <i>This information will be reported quarterly to our Management Committee.</i></p> <p>To</p> <p>This information will be reported quarterly to our Audit, Finance and Performance (AFP) Sub-Committee and discussed at the Management Team meetings following the Management Committee meetings.</p>
		<p>Pg 24 – Appendix 1-Complaints at frontline resolution - “Frontline letter” changed to “Frontline acknowledgement”</p>
		<p>Pg 33 “Frontline Resolution letter” changed to Frontline Acknowledgment letter/e-mail”</p>
		<p>Pg 36 Appendix 7 changed from “Internal Complaints Handling Form” to “Making an Apology”</p>