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PENTLAND HOUSING GROUP

COMPLAINTS POLICY

1. Introduction

- 1.1 This policy relates to the Pentland Housing Group (PH Group). The Group comprises of Pentland Housing Association (PHA) as the Group parent organisation; and its subsidiary Pentland Community Enterprises (PCE). The policy and associated procedure also apply to services managed by the PH Group for Care and Repair and Handyperson Services in Caithness.

2. Complaint Definition

- 2.1 We accept the definition of a complaint provided in the CHP:

“An expression of dissatisfaction by one or more members of the public about Pentland Housing Group's action or lack of action, or about the standard of service provided by or on behalf of Pentland Housing Group including by any of our contractors.”

3. Our approach:

- 3.1 The PH Group welcome and value complaints as a way to continuously improve our services.

- 3.2 We aim to provide a high-quality service in response to the needs of our customers and to get things right first time, every time. However, we accept that sometimes things do go wrong. If a customer is dissatisfied with our service, we want to know about it so we can try to resolve the matter and learn how we can improve our service in the future. Our complaints system is designed to:

- provide customers with a fair, consistent, impartial and confidential process through which they can express dissatisfaction about an element of our service;
- give us an opportunity to apologise and put right what has gone wrong; and
- be an integral part of our service provision whereby we actively encourage staff to record service failures so that we can learn from our mistakes and continue to improve.

- 3.2 We fully adopt the model Complaints Handling Procedures (Model CHP) produced by the Scottish Public Sector Ombudsman (SPSO) for the

Registered Social Landlord (RSL) sector. We will work to embed an organisational culture that values and learns from complaints and uses them in a positive way to identify and implement service improvements.

- 3.3 We will promote and publicise the CHP so that all customers are aware of their right to complain and information about making a complaint is visible, transparent and easy to understand.
- 3.4 We will ensure that all staff are fully aware of the CHP, are empowered to use it and receive appropriate training to understand the complaints procedure and their role in it.
- 3.5 Legal requirements and group policies relating to GDPR and confidentiality will apply to all complaints recording and investigations.

4. Redress and Appeal

- 4.1 We acknowledge the role of complaints in providing customers with a form of redress where we have failed to meet reasonable expectations or service standards. We accept the SPSO guidance on redress, which is where possible to re-instate an individual to the position they were in prior to the subject of the complaint. This may include compensation for financial loss or hardship resulting from the complaint. Substantiating evidence may be requested if required.
- 4.2 Redress can also involve providing an explanation and apology through personal contact. In such cases we will aim to find the most appropriate way of providing this, taking into account any particular communications needs and preferences of the complainant.
- 4.3 The SPSO model CHP for RSLs will be our main framework for complaints management across the group. However, there are circumstances where customers may pursue complaints with external regulatory agencies where we have not been able to resolve a complaint within these procedures. They are:
 - **The Scottish Housing Regulator** (SHR) will consider issues and complaints that relate to significant performance failure of an RSL
 - **Office of the Scottish Charity Regulator** (OSCR) will respond to concerns about how a charity is being run through their Inquiry Process.
 - **Housing and Property Chamber** (HPC) that sits within the First Tier Tribunal for Scotland, may consider complaints between home owners and property factors.
- 4.4 If we are unable to resolve the complaint the complainant can request an external review of the case as follows:

- If the complaint is from a tenant, an applicant or from a home owner in connection with a service charge for the management of the complainant's home, the complainant can approach the Scottish Public Services Ombudsman (SPSO)
 - If the complaint relates to factoring services these complaints should be directed to the Homeowners Housing Panel (HOHP). This panel deals with all complaints under the **Property Factors (Scotland) Act 2011**
- 4.5 We will communicate and co-operate with all external agencies where they have received a complaint and intend to carry out an investigation, and co-operate fully with any decisions they make.

5. Recording, Reporting and Learning from Complaints:

- 5.1 We will develop and maintain appropriate business support systems to enable us to record, manage and respond to complaints, and monitor our complaints handling performance
- 5.2 We will review trends to identify service failures and ensure appropriate action is taken.
- 5.3 We will record and monitor all dissatisfaction with our service delivery by recording all complaints, even when the matter is immediately resolved. We will also record as 'feedback' other comments and suggestions received.
- 5.4 Regular reports will be considered by the Management Team identifying:
- The number and type of complaints
 - The action taken
 - Whether the complaint was upheld
 - Whether it was responded to within timescale
 - Service improvements being implemented
 - Results of satisfaction surveys.
- 5.5 The Board of Management will review performance information on complaints handling at least quarterly and will also receive an annual report. The annual report will provide a summary of complaints received and actions taken to improve services as a consequence. Board reports will include updates on the number of SPSO investigations and any recommendation made. They will also highlight any complainant characteristics that will help us identify and remove barriers that make it difficult to complain.
- 5.6 We will publish good quality and up to date information for tenants and other service users about our complaints handling performance, and how complaints have been used to improve services.

- 5.7 We will present information to our customers to encourage complaints to be reported and demonstrate that we value them. Taking appropriate steps to maintain confidentiality, we will publish information about complaints on our website, in our tenants' newsletter, and in our Annual Performance Review. This will include information about our performance, the number and type of complaints and examples of resulting changes to policy or practices.
- 5.8 Once a complaint has been resolved we will survey a sample of complainants to establish if they were happy with how the complaint was handled and to use feedback to improve our processes where required.

6. Consultation and review:

- 6.1 The SPSO aim to review the model CHP on a three-year cycle. This policy and our complaints procedures will accordingly be reviewed in conjunction with any changes that result from an SPSO review of the model CHP, or as otherwise required to comply with regulatory or business needs.
- 6.2 Where flexibility in the model permits, our customers and staff will be consulted to help us review our procedures and how we respond to complaints.

Version 1	April 2010
Version 2	August 2012
Version 3	August 2015
Version 4	February 2017
Version 5	May 2019