

## 1. STATEMENT OF INTENT

- 1.1 The Saffron Group (Saffron) aims to provide excellent services to all its tenants. In doing so, we encourage staff to view complaints and compliments as valuable sources of feedback on its services, and a learning opportunity to continuously improve.
- 1.2 When we fail to meet these standards and commitments, we will: -
- apologise
  - take action to put this right as quickly as possible.
  - use feedback to change and improve the way we deliver our services.
  - Where something has gone wrong Saffron will acknowledge this and set out the actions it has already taken, or intends to take, to put things right.
  - These can include apologising; acknowledging where things have gone wrong; providing an explanation, assistance or reasons; taking action if there has been delay; reconsidering or changing a decision; amending a record or adding a correction or addendum; providing a financial remedy; changing policies, procedures or practices.
- 1.3 This policy ensures that there is a consistent and fair approach to responding to complaints, which aims to resolve the issue at the earliest opportunity. This policy has been developed in accordance with the Housing Ombudsman's Statutory Complaint Handling Code, our statutory and legal duties and our Tenant Scrutiny Group/Tenant Communication and Audit Group
- 1.4 Any reference to 'we', 'our', 'us' or 'the Group' refers to Saffron Housing Group. When we use 'you' and 'your' we mean any tenant or customer set out above. Customer refers to any individual affected by Saffron's actions or services.

## 2. Purpose

- 2.1 This policy sets out how we respond to feedback, both complaints, and compliments. Complaints will be accepted in any format. Complaints and compliments can be made by e-mail, by letter, in person, via the website, our customer contact centre, tenant portal or any other means.
- 2.2 Saffron will make it easy for residents to complain by providing different channels through which they can make a complaint. Saffron will consider its duties under the Equality Act 2010 and anticipate the needs and reasonable adjustments of residents who may need to access the complaints process.

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## 3. Definition

- 3.1 We have adopted the Housing Ombudsman's definition of a complaint as "an expression of dissatisfaction, however made, about the standard of service, actions, or lack of action by Saffron, our own staff, or those acting on our behalf and which can be affecting an individual or a group of individuals."
- 3.2 guided by the Housing Ombudsman, Saffron recognises the difference between a "service request" and a "complaint". A service request is a request from a resident requiring action to put something right. A complaint will be raised if a resident raises dissatisfaction with the response to their service request even if the handling of the service request remains ongoing. Saffron will not stop their efforts to address the service request if the resident complains.
- 3.3 Any expression of dissatisfaction can be logged as a formal complaint.

## 4. Formal complaint exclusions – circumstances where we will not log a formal complaint.

- 4.1 There are some issues which we will not deal with as a complaint because there may be an alternative process, these include: Saffron will accept a complaint unless there is a valid reason not to do so.
- A request for a service, such as the first report of a repair. A service request is a request from a resident to Saffron requiring action to put something right. A complaint will be raised if the resident expresses dissatisfaction with the response to their service request, even if the handling of the service request remains ongoing.
  - Behaviour of our tenants. We have a separate policy for how we manage complaints of Anti-Social Behaviour. The complaint procedure can be accessed to review our performance managing ASB but will not be utilised to investigate initial reports of ASB/tenant behaviour.
  - Legal and/or insurance proceedings – where a complainant has started court action or an insurance claim against us in respect of the specific issue(s) covered by their complaint, the complaint will be removed/excluded from our complaints process. • 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.
  - Personal injury or third-party liability claims. These claims will be dealt with by our insurers.
  - If the complainant is subject to specific contact restrictions, including restricted access to its Complaints Policy, which have been introduced in line with our Unacceptable Behaviour Policy, or if the complaint is being pursued in an unreasonable manner including frivolous and vexatious complaints.
  - Matters that have already been considered under the complaints policy, and a response provided.
  - We will not normally accept a complaint about a matter which occurred over 12 unless the complaint concerns a safeguarding or health and safety issue.
  - Saffron will consider whether to apply discretion to accept complaints made outside this time limit where there are good reasons to do so.
  - Saffron will not take a blanket approach to excluding complaints; Saffron will consider the individual circumstances of each complaint.

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4.2 If we do not accept a complaint, a detailed written explanation will be provided setting out the reason why the matter is not suitable for the complaints process. If you are unhappy with this decision, you will have the right to take your complaint to the Housing Ombudsman. If we refuse a complaint, we will log this to reflect the reasons for our decision as a Service Feedback Case.

## 5. Accessing the Complaint Procedure

- 5.1 Complaints will be accepted in any format. Saffron will accept contact verbally, written, by telephone, email, online or via social media. All complaints will follow the same process. All complaints will be entered onto our case management system by the member of staff receiving the complaint on the date the complaint is received.
- 5.2 On receipt of an expression of dissatisfaction about a service, Saffron will clearly outline how to access the complaints procedure and all its steps. A resident does not have to use the word 'complaint' for it to be treated as such. Whenever a resident expresses dissatisfaction Saffron will give them the choice to make complaint. A complaint that is submitted via a third party or representative will be handled in line with Saffron's complaints policy.
- 5.3 The Complaints Team will acknowledge your complaint. A member of the Complaints Team will be allocated to investigate your concerns in the way agreed with you, either as a Service Feedback Case or as a Stage 1 complaint.
- 4.3 Complaints may be received anonymously. As far as possible such complaints will be logged and addressed in a similar manner to other complaints received. However, due to their nature any investigation may be compromised because of insufficient verifiable information and therefore subsequent action may be limited.
- 4.4 Complainants are entitled to utilise the help of representative at any stage of the complaint's procedure. A representative may be a family member, friend, or support agency, such as the Citizens Advice Bureau, or a support worker. In these cases, we will require formal authorisation in writing before we discuss details of any complaint with a third party.
- 4.5 A complaint representative cannot include a person that you have appointed in a legal capacity unless they have been appointed due to your incapacity or disability (for example, they have a Power of Attorney or have been appointed by an authority such as the Court of Protection to act on your behalf).
- 4.6 If you need any support or assistance in making a complaint, please let us know so that we can support you, or if you prefer, provide you with details of other organisations that can help. Saffron may be able to make adjustments to your individual needs. Please see our Reasonable Adjustments Policy on our website for more information.
- 4.7 If at any point of the complaint procedure you are unhappy with how we are dealing with your complaint, then please let the Complaints Team know.
- 4.8 You are also able to contact the Housing Ombudsman Service at any point throughout your complaint for advice. Their details can be found on our website and at the end of this document.

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- 4.9 Stage 1 complaints can be logged even if they are resolved on the same day. However, we recognise that some individuals complaining will prefer not to access the formal complaints procedure, but these will still be logged on our Customer Relationship Management system as a Service Feedback Case to enable effective learning and business improvement.
- 4.10 There will be cases where the issues cannot be resolved without reference to the formal complaints procedure and if an investigation requires extensive enquiries and actions to resolve your concerns the formal procedure is most appropriate.
- 4.11 If a complaint is received directly by a member of the Executive Team, at this stage they will record the details and pass the complaint on to the Complaints Team to contact the complainant and acknowledge at stage 1 of the formal procedure.

## **6. Service Feedback Case – Rapid Resolutions and Capturing Drivers of Dissatisfaction**

- 6.1 Saffron acknowledges that in some cases individuals may prefer to resolve any issues they have without the need to enter a formal complaints process. A complaint will only be logged with agreement that it is the individuals preferred way of dealing with their issue/s. If a tenant does not wish to enter the formal complaints procedure, then their issue will still be logged as a Service Feedback Case.
- 6.2 Where actions are required to resolve your Service Feedback Case, we will seek a rapid resolution of the matter. This will include a prompt answer to your concerns within 5 working days. Saffron will include provision of a clear timeline for any resolution be completed and when further updates will be provided.
- 6.3 Rapid resolution of your Service Feedback Case can be dealt with by the person who receives the feedback unless it falls well outside of their remit.
- 6.4 Where a complaint can be answered with only a few simple actions, such as a quick call to a contractor followed by call back within a prompt, reasonable timeframe, we can, with your agreement, log your concerns as a Service Feedback Case to enable an efficient resolution focused approach.
- 6.5 Any individual expressing dissatisfaction can choose to have their concerns investigated at stage 1 immediately if they wish.
- 6.6 If you are not happy with the rapid resolution of your Service Feedback Case, you have the right to request an investigation at stage 1 of the formal complaint procedure. A stage 1 complaint can be logged at any time, regardless of whether a service feedback case is live and ongoing.

## **7. Formal Complaints – Multistage Procedure – Stage 1**

- 7.1 In line with the Housing Ombudsman Service's statutory Complaint Handling Code, Saffron operates a 2-stage formal complaint procedure.
- 7.2 Complaint will always be first logged at stage 1 of the procedure.

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- 7.3 Stage 1 complaints will be acknowledged in writing in no more than 5 working days from the receipt date of the complaint.
- 7.4 The Complaints Team will advise you who will be the designated investigating officer and provide you with a case reference number. You will be sent a formal acknowledgement by your preferred method of communication.
- 7.5 We will discuss with you and adhere to any reasonable arrangements agreed with complainant in terms of frequency and method of communication about the complaint. See Reasonable Adjustments Policy.
- 7.6 A stage 1 complaint can be logged even if the matter is resolved on the same day.
- 7.7 Stage 1 complaints will be responded to in writing in no more than 10 working days from the date of the acknowledgement of your complaint.
- 7.8 Where this is not possible, Saffron will contact you and let you know why we are not able to do this and let you know when you can expect to receive the response.
- 7.9 If an extension beyond 20 working days is required to enable the Saffron to respond to the complaint fully, this will be agreed by Saffron with the complainant. The new agreed deadline will be confirmed in a holding response to the complainant.
- 7.10 Where agreement over an extension period cannot be reached, Saffron will provide you with the Housing Ombudsman's contact details so you can challenge Saffron's plan for responding and/or the proposed timeliness of our response.
- 7.11 The stage 1 investigation will be carried out by the Complaints Team and will include the production of written notes to capture information of any communication/actions that have taken place between the complainant and Saffron regarding the issue.
- 7.12 The complaint response will be sent to the complainant when the answer to the complaint is known, not when the outstanding actions required to address the issue are completed. Outstanding actions will be tracked, actioned expeditiously and appropriate updates provided to the resident.
- 7.13 Saffron will address all points raised in the complaint and provide clear reasons for any decisions, referencing the relevant policy, law and good practice where appropriate. We will provide you with comprehensive responses that each cover all points raised in the complaint. Where an answer to a point of complaint cannot be answered in a response, the reasons for any delay to an answer will be explained and a new date for an answer confirmed.
- 7.14 The remedy offer will clearly set out what will happen and by when, in agreement with the complainant where appropriate. Any remedy proposed will be followed through to completion.

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- 7.15 We recognise that complaints can be resolved in different ways and as part of our response to your complaint we will offer a resolution that reflects the extent of any service failure(s) and the level of detriment this may have caused, taking into account all of the circumstances. This may include acknowledging where things have gone wrong, providing an explanation, apologising, taking action to correct the issue and use the feedback to inform improvements or changes to our services.
- 7.16 Any remedy we offer will reflect the extent of any service failures and the level of detriment caused to the individual as a result. Saffron will carefully manage the expectations of those complaining and not promise anything that cannot be delivered or would cause unfairness to others.
- 7.17 Saffron will manage expectations from the outset, being clear where a desired outcome is unreasonable or unrealistic and/or beyond our power and authority to achieve. We cannot be held accountable for the action of third parties who have no relationship with Saffron Housing Trust, and where there are no management obligations on Saffron's part.
- 7.18 Resolution may involve consideration of a goodwill payment or compensation (see relevant policies). This will be proportionate to the level of service failure. When awarding compensation Saffron will consider if any statutory payments are due. As a result of a complaint investigation, a complainant may have a legal entitlement to redress. On occasion we may need to seek some legal advice to determine the correct redress. Where a key issue of a complaint relates to the parties' legal obligations Saffron will clearly set out their understanding of the obligations of both parties.
- 7.19 The resident, and if applicable any staff member who is the subject of the complaint, will also be given a fair chance to:
- set out their position.
  - comment on any adverse findings before a final decision is made.
- 7.20 In Summary Saffron will confirm the following in writing to the complainant at the completion of stage one in clear, plain language.
- the complaint stage.
  - the decision on the complaint
  - the complaint definition.
  - the reasons for any decisions made.
  - the details of any remedy offered to put things right.
  - details of any outstanding actions
  - details of how to escalate the matter to stage two if the complainant is not satisfied with the answer.
- 7.21 The response will include how to escalate to the next stage of the complaints process if you remain dissatisfied. If no further contact is received from you within 21 days of the date of the response letter, the complaint will be closed. This will be outlined in the response letter.

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## 8. Formal Complaints – Multistage Procedure – Stage 2

- 8.1 If you are unhappy with the response provided, you can either speak to us, to discuss your concerns so that we can explore if there is anything further that can be done, or you can request for your complaint to be escalated to Stage 2. If all or part of your complaint is not resolved to your satisfaction at stage one, we will progress the complaint to stage two of the procedure. Stage 2 is Saffron's final response.
- 8.2 When requesting for your complaint to be escalated we will work with tenants to understand why you are unhappy with our response and the outstanding outcome that you are seeking. Complaints can be escalated by any means of contact, over the telephone or in writing. A key element of stage 2 will involve understanding why a tenant remains dissatisfied.
- 8.3 A complainant must request escalation within 28 days of the date of the last response letter at stage 1 and/or the date of the last action proposed to resolve the complaint at stage 1.
- 7.4 Saffron will only escalate a complaint to Stage 2 once stage 1 of the process has been exhausted and only with agreement from the complainant.
- 8.4 Upon receipt of the Stage 2 complaint, the Complaints Team will log and acknowledge receipt of it within 5 working days. The Complaints Team will provide you with the names of the two managers that will undertake the review, who have not been previously involved with the complaint. One manager will lead the investigation and one will act as an independent reviewer.
- 8.5 The Complaints Team will ask you if you would like to speak to the lead reviewing Manager, and if so, arrangements will be made to accommodate this, including accommodating any reasonable adjustments.
- 8.6 The Managers will consider all actions and correspondence relating to the complaint and will aim to make a full written response. within 20 working days of the complaint being acknowledged. Where this is not possible the complainant will be kept informed.
- 8.7 Exceptionally, Saffron may provide an explanation containing a clear timeframe for when the response will be received. If an extension of more than an additional 10 working days is required to enable Saffron to respond to the complaint fully, this will be agreed by both parties.
- 8.8 Where agreement over an extension period cannot be reached, Saffron will provide the Housing Ombudsman's contact details so the complainant can challenge Saffron's plan for responding and/or the proposed timeliness of our response.
- 8.9 Saffron will confirm the following in writing to the resident at the completion of stage 2 in clear, plain language: a) the complaint stage; b) the complaint definition; c) the decision on the complaint; d) the reasons for any decisions made; e) the details of any remedy offered to put things right; f) details of any outstanding actions; and g) details of how to escalate the matter to the Ombudsman Service if the individual remains dissatisfied.

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8.10 The outcome letter that is sent to you following the conclusion of Stage 2 will be Saffron's final response to your complaint.

## 9. What happens if you are remain dissatisfied?

9.1 If you remain dissatisfied, you can contact the Housing Ombudsman Service directly. Their contact details are:

Housing Ombudsman Service

PO Box 152

Liverpool L33 7WQ

Phone: 0300 111 3000

Email: [info@housingombudsman.org.uk](mailto:info@housingombudsman.org.uk)

10.3 Where Saffron is notified that a complaint has been referred to the Housing Ombudsman Service, the case management and engagement will be assigned to The Complaints Team who will lead on liaison and communication with the Housing Ombudsman Service.

10.4 Where Saffron receives requests for information from the Housing Ombudsman Service in relation to a complaint, we will ensure these responses are provided within 10 working days and/or meet the timescale as requested by the Housing Ombudsman Service, whichever is the earlier.

## 10. Complaints made against Board Members

10.1 A complaint made against board member will be investigated and a written stage 1 response will be provided within 10 working days of the acknowledgement of the complaint by the Company Secretary.

10.2 If you are unhappy with the response provided, you can either speak to us to discuss your concerns so that we can explore if there is anything further that can be done, or you can request for your complaint to be escalated to Stage 2.

10.3 Upon receipt of the Stage 2 escalation request, the Complaints Team will acknowledge within 3 working days. The Complaints Team will also provide you with the names of the two Managers not previously involved in the complaint who will investigate your concerns at stage 2. This could include a member of the executive team.

## 11. What happens if you are remain dissatisfied?



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- 11.1 If you remain dissatisfied, you can contact the Housing Ombudsman Service directly.  
Their contact details are:

Housing Ombudsman Service  
PO Box 152  
Liverpool  
L33 7WQ  
Phone: 0300 111 3000  
Email: [info@housingombudsman.org.uk](mailto:info@housingombudsman.org.uk)

- 10.5 Where Saffron is notified that a complaint has been referred to the Housing Ombudsman Service, the case management and engagement will be assigned to The Complaints Team who will lead on liaison and communication with the Housing Ombudsman Service.
- 10.6 Where Saffron receives requests for information from the Housing Ombudsman Service in relation to a complaint, we will ensure these responses are provided within 10 working days and/or meet the timescale as requested by the Housing Ombudsman Service, whichever is the earlier.

## 12. Unacceptable or Unreasonable Behaviour

- 12.1 Complainants who are unreasonably persistent or abusive can place excessive demands or behave in a way which we deem to be unacceptable towards staff. In such cases, we may channel the contact we have with these complainants through agreed and appropriate routes to ensure that the cases are handled effectively. This is outlined in the Unacceptable/Unreasonable Behaviour Complaints Policy.

## 13. Continuous learning and improvement

- 13.1 We speak to complainants to find out how we dealt with their complaint and pass their feedback onto the managers across the business to improve the services we provide.
- 13.2 We record and monitor all complaints that we receive. This information is reviewed by Managers and Staff across the Group and is used to identify areas where we can improve our services. Any expression of dissatisfaction is captured on our database, even if the complainant prefers to deal with their issues without recourse to the formal complaint procedure. See section 5. (Service Feedback Case).
- 13.3 Organisational learning and changes to policy and services resulting from complaints will be captured and shared with our Board, Committees, Staff and Tenants.
- 13.4 Our complaint handling performance is constantly reviewed, and this information is provided to the Senior Leadership Team and our Board. Information concerning our performance is also available to our tenants and this can be viewed in our Annual Report to Tenants or on our website.
- 13.5 If we are not managing our complaints professionally and impropriety is identified/reported, we will refer this to our Governance Director who will refer to our internal auditor to investigate.

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- 13.6 Saffron will report back on wider learning and improvements from complaints in their annual report and more frequently to our tenants, staff and scrutiny panels.
- 13.7 We will undertake satisfaction surveys for all closed complaints to understand if there is anything we can improve in the way they are handled.
- 12.8 An expression of dissatisfaction with services made through a survey is not defined as a complaint, though wherever possible, the person completing the survey will be made aware of how they can pursue a complaint if they wish to. Where Saffron asks for wider feedback about our services, we will also provide details of how residents can complain.
- 12.9 Saffron will carry out an annual self-assessment against the Code to ensure their complaint handling remains in line with its requirements. In line with the Housing Ombudsman Code, Saffron will publish a self-assessment on our website and will review the assessment as appropriate.
- 12.10 Saffron will additionally carry out a self-assessment following a significant restructure and/or change in procedures.

## **13 Equality and diversity and Inclusion**

- 13.1 We will make reasonable adjustments to our complaints process where necessary, ensuring that tenants with a specific need are not at a disadvantage when accessing the service. Examples of the reasonable adjustments we may make include using an individual's communication preference for the duration of the complaint and providing information in alternative formats e.g., Braille or large print. More information is available in our Reasonable Adjustments Policy.

## **14 Confidentiality**

- 14.1 All complaints will be considered confidential between the complainant, Saffron Staff and partner organisations. See section 17 for more information about data protection and this policy.
- 14.2 Saffron will respect confidentiality wherever possible and will advise complainants in cases where this would not be possible.

## **15 Compliments**

- 15.1 When a compliment is received this will be recorded on our database by the individual manager/team leader receiving the feedback. If the compliment relates to a member of staff, the feedback will be shared with them and their manager. All published compliments will be anonymized unless the tenant consents otherwise.

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## 16 Statutory and Regulatory Requirements

- 16.1 The Housing Ombudsman expects Saffron to act within the Housing Ombudsman Complaint Handling Code and to carry out regular self-assessment against this Code.
- 16.2 In line with the Housing Ombudsman Code, Saffron will publish a self-assessment on our website and will review the assessment as appropriate.
- 16.3 We will publish our complaint procedure in accessible format on our website. We will also include information about accessing the complaint procedure in our regular communications with our tenants. Saffron will actively promote access to the complaint procedure and ensure the process is consistently accessible to all.

## 17 Data Protection

- 17.1 Where a complaint involves a third party, for example the conduct of a contractor, it may be necessary for us to disclose some of the details of the complaint for us to investigate this. Where the information is of a sensitive nature, we will discuss this with the complainant before we share any data. Any data shared by Saffron will be done in line with the Data Protection Act 2018 and requirements of GDPR (General Data Protection Regulations).

## 18 Related Policies

- Unacceptable Behaviour Complaints Policy
- Reasonable Adjustment Policy
- Equality, Diversity & Inclusion Policy
- Data Protection Policy
- Repairs and Maintenance Policy
- Compensation policy

## 18. Policy Review

- 18.1 This policy will be reviewed every two years.

<b>Consulted with Tenant Scrutiny Group</b>	September 2022
<b>Executive Review</b>	September 2022
<b>Board/Committee</b>	Service Quality Committee
<b>Date Approved</b>	June 2024
<b>Review Date</b>	January 2025
<b>Officer</b>	Director of Tenant Experience and Insight
<b>Version Number</b>	6.0