

## **1. STATEMENT OF INTENT**

- 1.1 The Saffron Group (Saffron) aims to provide excellent customer service to all its tenants and customers. 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
- 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.
- 1.4 This policy has been developed in accordance with the Housing Ombudsman's Complaint Handling Code, our statutory and legal duties and our Tenant Scrutiny Group/Tenant Communication and Audit Group
- 1.5 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.

## **2. Purpose**

- 2.1 This policy sets out how we respond to tenant and customer feedback on 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 If you raise your complaint via social media, we will reply and ask you to message us directly with further details. We will not comment beyond this to ensure that confidentiality and privacy is maintained. Upon receipt of the details, we will register your complaint in the way agreed with you.
- 2.3 Where complaints are raised through social media, to maintain confidentiality and privacy we will request contact details for the complainant via private message, and then any complaint details not fit for the public domain will be removed from the social media platform. This may include names of staff, names of customers, or customer address details.

## **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 customer/tenant or a group of customers/tenants."

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3.2 As guided by the Housing Ombudsman, Saffron recognise the difference between a “service request” and a “complaint”. A service request is a request from a resident requiring action to be taken to put something right. A complaint will be raised if a resident raises dissatisfaction with the response to their service request

3.3 Any expression of dissatisfaction can be logged as a formal complaint.

3.4 If you do not want to access the formal complaints procedure, Saffron will log your concerns as a Service Feedback Case and seek a rapid resolution to put your problem right efficiently, without the need to register your concerns as a formal complaint. Service Feedback cases will be logged onto our case management system and captured to drive continual service improvement.

3.5 **Formal complaint exclusions** – circumstances where we will not log a formal complaint.

There are some issues which we will not deal with as a complaint because there may be an alternative process, these include:

- A request for a service, such as the first report of a repair.
- Behaviour of our tenants. We have a separate policy for how we manage complaints of Anti-Social 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.
- 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 6 months ago unless the complaint concerns a safeguarding or health and safety issue.
- Where the expression of dissatisfaction concerns the content of one of Saffron’s policies or is about a Board approved decision. The complaint procedure concerns adherence to relevant policies, not their content. We will accept feedback about the content of our policies, and, accordingly, ensure our services are appropriate and in line with tenant and customer feedback/need.

This list is not exhaustive.

3.6 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.

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## 4. Complaints Procedure

- 4.1 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.
- 4.2 A person complaining does not have to use the word 'complaint' for it to be treated as such. On receipt of an expression of dissatisfaction about a service, Saffron will clearly outline how to access the complaints procedure and all its steps.
- 4.3 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. As a Landlord, we 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.
- 4.9 Stage 1 complaints can be logged even if they are resolved on the same day. However, we recognise that some customers will prefer not to access the formal complaints procedure, but these will still be logged on our CRM 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.

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- 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.

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

- 5.1 Saffron acknowledges that in some cases our tenants or customers 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 tenant/customer's 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.
- 5.2 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.
- 5.3 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. Our Complaints Team also support achieving rapid resolutions. On receipt, we will ask you to explain why you are unhappy, the outcome you are seeking and how best to contact you. We will confirm with you what actions we will be taking and when you can expect to hear from us again.
- 5.4 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 focussed approach. Examples of Service Feedback Cases that could be considered for rapid resolution also include, a missed appointment, a delay in providing a response or not carrying out a scheduled task, such as an estate inspection
- 5.5 Customers and tenants can choose to have their concerns investigated at stage 1 immediately if they wish.
- 5.6 If you are not happy with the rapid resolution of your Service Feedback Case you have the right to escalate the matter to stage 1 of the formal complaints procedure. A stage 1 complaint can be logged at any time, regardless of whether a service feedback case is live and ongoing.

## 6. Formal complaint – Stage 1

- 6.1 The Complaints Team will contact you, by phone where possible, within 3 working days of receipt of the complaint. The Complaints Team will acknowledge receipt of your complaint, confirm our understanding of your complaint and find out what resolution you are seeking. 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.

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- 6.2 We will discuss with you and adhere to any reasonable arrangements agreed with customer/tenant in terms of frequency and method of communication about the complaint. See Reasonable Adjustments Policy.
- 6.3 A stage 1 complaint can be logged even if the matter is resolved on the same day.
- 6.4 Our aim is to provide you with a response within 10 working days. If this is not possible, we will contact you and let you know why we are not able to do this and let you know when you should expect to receive the response. Exceptionally, Saffron may provide an explanation to the tenant/customer containing a clear timeframe for when the response will be received
- 6.5 If an extension beyond 20 working days is required to enable the Saffron to respond to the complaint fully, this should be agreed by both parties.
- 6.6 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.
- 6.7 Where a tenant/customer raise additional issue/s during the investigation, these will be incorporated into the stage one response if they are relevant and the stage one response has **not** been issued. Where the stage one response has been issued, or it would unreasonably delay the response, the complaint should be logged as a new complaint.
- 6.8 Where there has been a recurring issue, Saffron can consider any previous history of similar issues as part of the background to the complaint if this will help to resolve the complaint.
- 6.9 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.
- 6.10 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 with regular updates provided to the customer/tenant.
- 6.11 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 should be explained and a new date for an answer confirmed.
- 6.12 The remedy offer will clearly set out what will happen and by when, in agreement with the customer/tenant where appropriate. Any remedy proposed must be followed through to completion.

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- 6.13 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.
- 6.14 Any remedy we offer will reflect the extent of any service failures and the level of detriment caused to the customer/tenant as a result. Saffron will carefully manage the expectations of customer/tenants and not promise anything that cannot be delivered or would cause unfairness to other customers/tenants.
- 6.15 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.
- 6.16 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 customer/tenant 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.
- 6.17 The resident, and if applicable any staff member who is the subject of the complaint, must also be given a fair chance to:
- set out their position
  - comment on any adverse findings before a final decision is made.
- 6.18 In Summary Saffron will confirm the following in writing to the customer/tenant at the completion of stage one in clear, plain language
- the complaint stage
  - the decision on the complaint
  - 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 customer/tenant is not satisfied with the answer
- 6.19 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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## **7. Escalating your complaint.**

- 7.1 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, unless an exclusion ground now applies.
- 7.2 In instances where we decline to escalate a complaint, we will clearly communicate in writing our, reasons for not escalating as well as the customer/tenants right to approach the Ombudsman about its decision.
- 7.3 When requesting for your complaint to be escalated we will require you to set out in writing the reasons why you are unhappy with our response and the outstanding outcome that you are seeking. We can provide help with this requirement if it is required or signpost to relevant, third-party support agencies if that is preferred by the complainant.
- 7.4 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.
- 7.5 Circumstances in which we could decline to escalate a complaint include:
- Where stage 1 of the procedure has not been exhausted. This means that all parties should provide a reasonable timeframe for resolution at stage 1. Resolutions should reference relevant policies to inform reasonableness of timeframes. Complainants can seek advice about the reasonableness of responses/timeframes for actions from the Housing Ombudsman Service at any stage of the procedure.
  - Where the resolution sought by the complainant is not within our power to grant, and/or is not our liability and/or if the complaint is the result of unrelated third-party action.
  - Where a complainant has refused to engage with Saffron during stage 1 of the investigation. This could include failing to provide crucial information or evidence necessary to allow an effective stage 1 investigation.

## **8. Formal Complaint – Stage 2**

- 8.1 Upon receipt of the Stage 2 complaint, the Complaints Team will acknowledge receipt of it within 3 working days. The Complaints Team will also provide you with the names of the two Senior Managers that will undertake the review; who have not been previously involved with the complaint. One senior manager will lead the investigation and one will act as an independent reviewer.

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- 8.2 The Complaints Team will ask you if you would like to speak to the lead reviewing Senior Manager, and if so, arrangements will be made to accommodate this, including accommodating any reasonable adjustments.
- 8.3 The Senior Managers will consider all actions and correspondence relating to the complaint and will aim to make a full written response within 10 working days. Where this is not possible the complainant will be kept informed.
- 8.4 Exceptionally, Saffron may provide an explanation containing a clear timeframe for when the response will be received. If an extension beyond 20 working days is required to enable Saffron to respond to the complaint fully, this should be agreed by both parties.
- 8.5 Where agreement over an extension period cannot be reached, Saffron will provide the Housing Ombudsman's contact details so the tenant/customer can challenge Saffron's plan for responding and/or the proposed timeliness of our response.
- 8.6 The outcome letter that is sent to you following the conclusion of Stage 2 will be Saffron's final response to your complaint.

## 9. Complaints made against Board Members

- 9.1 A complaint made against board member will be investigated and a written stage 1 response will be provided within 10 working days by the Company Secretary.
- 9.2 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.
- 9.3 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 most Senior Managers not previously involved in the complaint who will investigate your concerns at stage 2. This could include a member of the executive team.

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

- 10.1 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)



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10.3 Where Saffron are 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.

### **11. Unacceptable or Unreasonable Behaviour**

11.1 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.

### **12. Continuous learning and improvement**

12.1 We speak to customers 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.

12.2 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 customer prefers to deal with their issues without recourse to the formal complaint procedure. See section 5. (Service Feedback Case).

12.3 Organisational learning and changes to policy and services resulting from complaints will be captured and shared with our Board, Committees, Staff and Tenants.

12.4 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 customers and this can be viewed in our Annual Report to Tenants or on our website.

12.5 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.

12.6 Saffron will report back on wider learning and improvements from complaints in their annual report and more frequently to their tenants/customers, staff and scrutiny panels.

12.7 We will undertake satisfaction surveys for all closed complaints to understand if there is anything we can improve in the way they are handled.

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## **13. Annual Self-Assessment**

- 13.1 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.
- 13.2 Saffron will additionally carry out a self-assessment following a significant restructure and/or change in procedures.

## **14. Equality and diversity and Inclusion**

- 14.1 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 a customer'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.

## **15. Confidentiality**

- 15.1 All complaints will be considered confidential between the customer, Saffron Staff and partner organisations.
- 15.2 Saffron will respect customer confidentiality wherever possible and will advise customers in cases where this would not be possible.

## **16. Compliments**

- 16.1 When a compliment is received this will be recorded on the register by the individual manager/team leader. If the compliment relates to a member of staff, the feedback will be shared with them and their manager.

## **17. Statutory and Regulatory Requirements**

- 17.1 The Housing Ombudsman expects Saffron to act within the Housing Ombudsman Complaint Handling Code and to carry out regular self-assessment against this Code.
- 17.2 In line with the Housing Ombudsman Code, Saffron will publish a self-assessment on our website and will review the assessment as appropriate.
- 17.3 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/customers. Saffron will actively promote access to the complaints procedure.

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## 18. Data Protection

18.1 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).

## 19. 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>	Board
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