

FEEDBACK POLICY: COMPLAINTS, COMPLIMENTS & COMMENTS

DOCUMENT CONTROL	
(Policy) author:	Emma Bailey, Housing Services Lead
(Policy) owner:	Dan Baker, Director of Operations
Effective date from:	15.05.2025
Approved by:	ELT and Customer Experience Committee
Date approved:	14.05.2025
Review cycle:	3 years but reviewed annually
Next review start date:	May 2028
This policy applies to:	Everyone who uses our services or those supporting them, including staff.
Method of delivery:	Email SharePoint Teams & Operational Managers Meetings Website

Version Control

Date	Author	Version	Reason for Change
14.5..25	Emma Bailey	1	Renewed Policy to Customer Experience Group for agreement

Summary of Changes

Section	Change
All	Original Policy re-written all sections affected

Consultations

Consulted with	Version	Date
Customer and tenant engagement panels	No customer facing changes	n/a
Staff speak out		
Volunteers	n/a	n/a

1.0. Purpose

1.1 The purpose of this policy is to set out how we will respond to feedback that includes complaints and compliments.

2.0. Objective

2.1 We want our customers to be heard and understood so feedback is important to us, including complaints and compliments. It gives us an opportunity to review the way we work, identify changes and continually learn so we improve the services we deliver.

2.2 Our response to feedback is driven by our corporate values and by our compliance with the Regulator of Social Housing's Regulatory Standards and the Housing Ombudsman's Complaint Handling Code published in February 2024.

2.3 Our Commitments: Complaints

We will;

- Make reasonable adjustments where possible to ensure everybody has equal access to the complaints process.
- Listen to your feedback
- Ensure our handling of complaints is fair and reasonable, complies with equality legislation and published timescales
- Ensure we understand your complaint
- Be open and honest about the process
- Investigate your complaint thoroughly
- Keep you up to date with progress
- Provide clear reasons for any decisions, referencing the relevant policy, law and good practice where appropriate
- Address all points raised in your complaint, identify any failings and apologise for this, seek an agreeable resolution that is appropriate and proportionate to the situation
- Investigate in an independent and fair manner using the evidence available, making appropriate recommendations to resolve the complaint, providing realistic timescales and manage expectations
- Keep the investigation confidential as far as possible and manage potential conflicts of interest
- Provide transparent information about our complaints service, trends and data on the types and volumes received and how we are using this information to improve our service

2.4 Our Commitments: Service Request

- We will use comments to improve service and put things right. These are not complaints but may be if action is not taken.

2.5 Our Commitments: Compliments

- We will use compliments to make sure we are recognising and celebrating the behaviours and actions of staff and volunteers that customers appreciate so they can be replicated and expanded on across the organisation.

3.0. Scope

3.1 This policy covers:

- Expressions of dissatisfaction (complaints and service recovery)
- Compliments

3.2 Who can Complain:

- Anyone who receives or requests a service from Brighter Futures Housing Association
- People seeking to use our services – ‘applicants’.
- Others could be affected by the actions of Brighter Futures Housing Association.
- Customers may have an advocate or representative complain on their behalf.

3.3 Our Staff:

- All staff are encouraged to take a collaborative and cooperative approach towards resolving complaints.
- Differing service areas should not be seen as a barrier to a single point of response (complaints will not be separated into multiple response letters unless a specific element requires an extension)
- Complaints Investigators are encouraged to accept responsibility and avoid blaming others
- All staff are requested to operate within our Staff Code of Conduct

4.0. Policy Owner

4.1 The responsibility of the policy falls under the Director of Corporate Services.

5.0. Definitions

‘Complaint’ is defined as “an expression of dissatisfaction, however made, about the standard of service, actions, or lack of action by the organisation, its own staff or those acting on its behalf, affecting an individual resident or group of residents”.

A customer does not have to use the word “complaint” for us to treat their concerns as a complaint under this policy. We will identify where a customer / tenant has expressed dissatisfaction and will respond to their complaint within the timeframes stated in this policy.

‘Customer’ can be a tenant or any person receiving or requesting a service from Brighter Futures.

‘Service request’ is when a customer contacts us to ask us to do something / provide a service, for example, a repair. If the request has not been made before then this is not a complaint but if we fail to carry out the repairs this may become a complaint.

‘Compliment’ is an unsolicited expression of gratitude or praise for a member of staff or service area. It’s feedback that lets us know if we did something well.

‘Appeal’ will be defined as a “disagreement with the decision we have made in line with our published policies and procedures”.

Complainant is anyone making a complaint, including customers, service users – or their representative – and other people who may be affected by our delivery of service.

‘Advocate’ is someone who gives a voice to someone else by supporting them and helping them express their views.

‘Anonymous complaints’ If a complaint is made anonymously, we will still investigate it if we have

enough information. We would prefer that customers leave their name and contact details so that we can let the customer know the outcome of their complaint and track their satisfaction with the resolution

6.0. The Complaints Process

- 6.1 Brighter Futures operates a 2-stage complaints process. The process focuses on resolving issues at the earliest opportunity.
- 6.2 We will adhere to the Housing Ombudsman Complaints Code timescales.
- 6.3 We recognise that it is sometimes more difficult to get to a resolution where everyone is satisfied, so our second stage enables the findings of the first stage to be reviewed. Our complaints process also signposts complainants to organisations and individuals that can help people make complaints and deal with appeals.
- 6.4 Staff and tenants who have had complaints made against them will be given the opportunity to give their version of events to the investigation's findings.
- 6.5 Investigations will consider previous complaints and reports made if the complaint relates to an unresolved issue.
- 6.6 Each complaint will be assigned to an investigating officer who will speak or meet with the complainant prior to issuing their response to ensure that they have fully investigated the complaint to resolve the complaint.
- 6.7 In each stage of our complaints process, we will inform complainants that they can contact the Housing Ombudsman service although they will not be able to investigate a complaint whilst it is going through our internal complaints process.
- 6.8 However, they will be able to provide advice on the way that a complaint is managed. In our stage 1 response we will provide the complainant with details of how they can contact the Housing Ombudsman service for advice and guidance.
- 6.9 If the complainant is still dissatisfied with the outcome at the end of our two stage complaints process, our stage 2 response provides contact details for the Housing Ombudsman service contact so they can further escalate their complaint externally. This is an independent, impartial and free service. The Ombudsman will decide if the complaint is appropriate for them to consider.
- 6.10 Housing Ombudsman contact details are:
- Website – <https://www.housing-ombudsman.org.uk/contact-us/>
 - Email – info@housing-ombudsman.org.uk
 - Write to – Housing Ombudsman Service, PO Box 1484, Unit D, Preston, PR2 0ET
 - Telephone – 0300 111 3000
- 6.11 Local complaints about support services can be taken to the Local Government and Social Care Ombudsman. Any customer receiving care services may choose to access their local council's complaints process instead of Brighter Futures' complaints process before approaching the Ombudsman. The Local Government and Social Care Ombudsman can be contacted at:
- Website – www.lgo.org.uk

- Write to – LGO, PO Box 47771, Coventry, CV4 0EH
- Telephone – 0300 061 0614

6.12 Complaints regarding third parties acting on behalf of Brighter Futures will be handled in line with the code.

7.0. How long is available to make a complaint?

7.1 A complaint will only be considered if it is made within 12 months of the initial incident taking place. This is to ensure a thorough investigation can be completed with all relevant notes and documentation.

8.0. How to submit complaints/ comments and feedback?

8.1

- Complaints can be sent by email to: complaints@brighter-futures.org.uk
- By telephone calling (01782) 406000
- Through our website at www.brighter-futures.org.uk/contact-us/complaints-and-compliments/
- To any member of staff
- By writing to:

Brighter Futures Housing Association
Three Counties House
Festival Way, Festival Park
Hanley, Stoke-on-Trent
ST1 5PX

8.2 We will review comments and other forms of feedback and identify those which constitute a complaint and treat those as complaints to be managed through the complaints process.

8.3 Customers are not encouraged to make complaints by social media but to make complaints through the channels specified in this policy. This enables compliance with data protection rules and maintains privacy.

8.4 If complaints are posted through social media channels, these are directed by the Marketing and Communications Officer to the Customer Services Team, to be recorded and actioned accordingly within the timeframes stated in this policy.

8.5 In the absence of the Customer Services Team the Customer Experience Team Leader, Housing Manager and Housing Services Lead have been trained to process complaints through the various channels to ensure that these are handled within the timescales set in the Housing Ombudsman Complaints Code.

8.6 Confidentiality and data protection apply to the complaints process; We will not share personal, or property information gathered as part of the complaint investigation with any third party who is not entitled to receive it, in line with data protection legislation.

8.7 A complaint submitted via a third party or representative will still be handled in line with our complaints policy.

8.8 We will accept a complaint unless there is a valid reason not to do so. We will always provide a detailed explanation setting out the reasons why the matter is not suitable for our complaints process and your right to escalate to the Housing Ombudsman.

8.9 We will always manage your expectations from the outset, being clear where your desired outcome is unreasonable or unrealistic.

9.0. Exemptions

9.1 Request for service

- The issues being raised are better dealt with using another Brighter Futures policy or process, antisocial behaviour or repairs, for example.
- A first request for a service, such as the first report of a repair.
- Reports of anti-social behaviour or nuisance (not the handling of an existing ASB case).

9.2 Complaints already been investigated

- The complainant has made repeated complaints about the same or related matters that have been already addressed.

9.3 Legal proceedings

- The complainant is taking legal action related to their complaint.
- The complainant has or is also making a significant insurance claim (unless they want to complain about the way we handled this).

9.4 Frivolous or unreasonably persistent complaints

- The complainant has made repeated or clearly unfounded complaints.
- The complainant has made an unreasonable number of complaints over a short period of time about matters that are minor.
- The volume of contact from a resident or customer is unreasonable (in which case response times in our service standards may not apply).
- The content or tone of the contact causes a disproportionate or unjustified level of disruption.

9.5 Historic complaints

- We generally expect a complaint to be made no later than 12 months after the event occurred or 12 months after the event came to the complainant's attention and will use our discretion to accept complaints outside this time limit.

9.6 Other

- The complaint is not about Brighter Futures but about another organisation or person.
- We will use our discretion and consider the individual circumstances of each complaint before deciding if not to accept it. Where we decide not to accept a complaint, the complainant will be provided with a detailed explanation for the reasons why and will be provided with information on how the complaint can be escalated to outside organisations including the Housing Ombudsman.

10.0. Unacceptable behaviour policy

10.1 Where Brighter Futures believes complaints are being made in an unacceptable way, including persistent, vexatious, or malicious, they may be dealt with under its Unacceptable Behaviour Policy.

10.2 This may involve Brighter Futures liaising with external bodies such as the Housing Ombudsman to resolve a complaint. Brighter Futures will consider the implications of the Equality Act when managing complaints through its Unacceptable Behaviour Policy.

11.0. Statutory appeals

- 11.1 In addition to “general appeals” there are a few areas of service delivery where Brighter Futures’ customers have a legal right to an internal appeal, known as “statutory appeals” (as below).
- 11.2 All statutory appeals are on a 1 stage process and will be heard via an appeal meeting, at which the customer may choose to make personal representation, submit evidence, and be accompanied by a person of their choice, giving Brighter Futures 48 hours’ notice in advance of the meeting. All statutory appeals will be heard by a more senior officer than sanctioned the original decision.
- 11.3 Any subsequent changes to this evidence or change of the person accompanying may result in the review being postponed, the evidence not being considered or a refusal to hear the customer(s) representative.
- 11.4 If having requested an internal appeal hearing the customer(s) fail to attend or inform Brighter Futures of the reasons why they cannot attend, the reviewing officer may proceed with the hearing in their absence.
- 11.5 On a discretionary basis, Brighter Futures may choose to postpone a hearing if requested by the customer(s) and there is a justifiable reason for doing so or if the person due to hear the appeal is unavailable for any reason.
- 11.6 This may, however, not always be possible if the delay would prevent Brighter Futures from taking expedient legal action to remedy a tenancy breach or it would result in hearings being outside the permitted legal framework.
- 11.7 If during a hearing an adjournment is requested by either Brighter Futures, the customer or their representatives (with customers consent) and a further meeting is necessary, Brighter Futures will give reasonable notice of the date, time, and venue of the adjourned hearing.
- 11.8 When hearing internal statutory appeals, the reviewing officer will assess the following:
- If the legal procedures and notice periods have been adhered to in serving notices or letters sent to customer(s) advising of actions to be taken.
 - It was appropriate in terms of the evidence provided.
 - The decision will stand up to scrutiny.

12.0. Putting things right

- 12.1 If our own complaint investigation or reviews by outside agencies including the Housing Ombudsman find that we have failed in our duties to our tenants, customers and other stakeholders we will seek to put things right to the satisfaction of the complainant.
- 12.2 We will make a sincere apology, put things right and offer compensation where appropriate in line with our Compensation policy. We will seek to honour all our legal obligations for redress.
- 12.3 We will act upon and fully implement any recommendations or determinations that are made because of cases that have been reviewed by the independent Housing Ombudsman

13.0. How we manage complaints

- 13.1 With strategic direction from the Board, Executive Leadership Team (ELT) and Senior Leadership Team (SLT), a positive approach is provided for complaints, appeals and all forms of customer feedback, with this information being used to deliver improvements in customer services.
- 13.2 The Member Responsible for Complaints (MRC) will be the lead responsibility for driving the positive complaints handling culture. They will be responsible for ensuring the governing body receives regular information on complaints that provides an insight on the landlord's complaint handling performance.
- 13.3 The MRC and the governing body must receive:
- Regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance;
 - Regular reviews of issues and trends arising from complaint handling;
 - Regular updates on the outcomes of the Ombudsman's investigations and progress made in complying with orders related to severe maladministration findings; and
 - Annual complaints performance and service improvement report
- 13.4 The MRC is accountable for complaint handling, and they are responsible for assessing any themes or trends to identify potential systemic issues, serious risks, or policies and procedures that require revision.
- 13.5 We will ensure that it provides complaints, comments, compliments and feedback opportunities that are easy to understand and easy to access for all customers. This will be done by:
- Involving customers in designing and improving all information on complaints, appeals and feedback to ensure it is jargon free and easy to understand.
 - Making relevant information available in alternative languages and formats such as large print, on request.
 - Ensuring customers receive support from Brighter Futures staff, or via working in partnership with community support agencies and advocacy grounds.
 - Analysing complaints, appeals and feedback information against our known customer profile information and the diversity of the community where Brighter Futures operates.
 - Resolving complaints to customers' satisfaction, efficiently and learning from it to improve customer service.
- 13.6 We will use appropriate resources to gather, analyse and act upon complaints, comments, compliments and feedback. We will do this by:
- Ensuring staff are trained in complaints, appeals and feedback handling including being aware of the relevant policies and procedures and taking ownership of the issues with an aim to resolve at the first point of contact.
 - Ensuring we use complaints, appeals and customer feedback to improve the service delivered to customers.
- 13.7 We will constantly monitor our standards of service and the way we respond to complaints / compliments and feedback. To achieve this, we will:
- Provide information to our managers, customers, and Board to show trends and responses provided and subsequent actions taken to improve the service.
 - Set targets to benchmark performance against our peers.

- Undertake regular reviews of the policy and best practice in dealing with complaints, compliments and feedback to improve the service to customers.
- Publish data including lessons learned so that performance and satisfaction overall is improved.

14.0. Feedback

14.1 We will maximize all types of formal and informal customer feedback to drive service improvement. The learning gained from all forms of feedback including performance and satisfaction information is regularly shared with customers. The information is used to identify improvement opportunities and may trigger a service review and remedial actions when there are any dips in performance.

14.2 We aim to capture informal interactions that tell us about the service, whether positive or negative. We use these comments about the service to identify issues that are common to several customers and feedback on the action taken as a result in customer newsletters and on the website.

14.3 We encourage customers to let us know when we have done something well, in addition to areas it needs to improve in. A register of all compliments received is maintained to improve future service delivery.

14.4 All customers (internal / external) are encouraged to submit suggestions on how it can change and improve the ways in which it works to deliver better services.

14.5 Surveys will be used to gain customer intelligence and assess satisfaction with the ways in which it is delivering services. People participating in surveys will be informed of the Feedback Policy as a mechanism to record their feedback and remedy any potential dissatisfaction with our services.

15.0. Data Protection and confidentiality

15.1 We will treat all complaints we receive as confidential unless we have a legal obligation to disclose information to a third party such as the police.

15.2 We will do our best to investigate anonymous complaints that clearly state their matters of concern. However, our ability to investigate will be greater if we are able to communicate with the person making the complaint to discuss their concerns with them.

15.3 The Data Protection Act sets out how we handle personal data. We are committed to safeguarding the right of our customers to confidentiality and privacy. We are required to maintain a duty of care towards information regarding our customers in line with data protection legislation and our Data Protection Policy. Our Privacy Statement Summary can be found on our website.

16.0. Safeguarding

16.1 If we receive a complaint about safeguarding, we will follow the steps set out in our Safeguarding Policy to address it.

17.0. Reasonable adjustments

17.1 We are committed to providing excellent services to all our customers, enabling fair and equal access to our services. We are committed to making reasonable adjustments to this policy in line with the Equality Act 2010. We encourage customers to contact us if they believe that we can make

reasonable adjustments to enable them to fully access our services, including the complaints process.

17.2. If customers would like to request a reasonable adjustment, then they should notify staff at the earliest opportunity. There is no prescribed list of reasonable adjustments. These could include but are not limited to

- producing this policy and related information in different formats such as large print and alternative languages on request.
- We have already produced an 'easy read' how to complain guide which is available on our website.
- A paper copy of any documents can be provided on request if electronic versions are not suitable.

18.0. Equality, diversity and inclusion

18.1. We have an Equality, Diversity and Inclusion policy, and this applies to all aspects of our services. We will ensure that no customer, tenant or service user is treated less favorably on the grounds of age, ethnicity, religion or belief, disability, gender, gender reassignment, sexual orientation, pregnancy or maternity, marriage or civil partnership status.

18.2. We offer opportunities for complaints to be made in different ways that are accessible to complainants, and we will offer support in accessing this process if it is required. All decisions will be based on evidence and facts so that they are free from bias and impartiality. Our complaint responses will be clearly set out with reasons for decisions made and any further actions to be taken.

19.0. Compensation

19.1 We are committed to delivering quality services that consistently meet or exceed customers' expectations. Our Compensation Policy sets out our approach to compensation where that service falls below these expectations. It details some circumstances when compensation will be considered and what the compensation may be. It should be noted that each case will be considered on its own merit.

20.0. Communications of the policy

20.1. This policy will be made publicly available on our website.

20.2. The policy will be communicated to staff by publishing it on our intranet SharePoint for staff to access and will be discussed in team and operational managers' meetings.

21.0. Whom this policy applies to

21.1 This policy applies to everyone who uses our services and for those supporting them, including staff.

22.0. Legislative and regulatory requirements

- Human Rights Act 1998 (www.legislation.gov.uk)
- Localism Act 2011 (www.legislation.gov.uk)
- Housing Act 1996 (www.legislation.gov.uk)

- Data Protection Act 2018 (www.legislation.gov.uk)
- General Data Protection Regulations (GDPR)
- Equality Act 2010 (www.legislation.gov.uk)
- The Housing Ombudsman’s Complaint Handling Code (www.housing-ombudman.org.uk)
- Guidance on remedies – Housing Ombudsman Service
- Regulatory Standards

23.0. Related policies, procedures and documents

Policies	<ul style="list-style-type: none"> • Compensation Policy • Data Protection Policy • Equality, Diversity and Inclusion Policy • Unacceptable Behaviour Policy
Forms / Guides / Leaflets	<ul style="list-style-type: none"> • Brighter Futures complaint/feedback form How to complain leaflet • How to complain accessible guide
Websites	<ul style="list-style-type: none"> • Brighter Futures – www.brighter-futures.org.uk • Brighter Futures privacy statement - https://www.brighterfutures.org.uk/wp-content/uploads/2023/03/Privacy-StatementSummary-002.pdf

24.0. Monitoring and Review

24.1 This policy will be reviewed annually by the Director of Corporate Services unless significant changes are made to the Complaints Handling Code by the Housing Ombudsman which requires an earlier review.