



*"Offering our community more than a home"*

## **Draft Complaints Handling Procedure for the Association (Internal document)**

### **Part 4 of 5 – Governance**

Management Committee submission:	27 October 2020
Last Review Date:	01 May 2018
Approved:	
Review date:	August 2023

#### **CHA Objectives:**

- To provide quality, affordable housing that meets the changing needs of our customers and to ensure fair access to housing within our area.
- To manage the houses provided, in a professional and cost effective manner, for the benefit of our local community and the environment.
- To provide a first class maintenance service which offers value for money and ensures the comfort and safety of our residents while achieving high levels of satisfaction
- To work in partnership with others, supporting our tenants and other customers, to maximise opportunities for physical and socio-economic regeneration in Clydebank.
- To ensure local decision making and community control, we will encourage our tenants and other customers to influence our policy and participate in decisions, which may affect them.
- To ensure that our resources are adequate to deliver our objectives by investing in our people, demonstrating value for money and through robust procurement practices.
- To promote social inclusion by applying principles of equality and diversity to everything we do.

#### **Regulatory Standards:**

- The governing body leads and directs the RSL to achieve good outcomes for its tenants and other service users.
- 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.
- The governing body bases its decisions on good quality information and advice and identifies and mitigates risks to the organisation's purpose.
- The RSL conducts its affairs with honesty and integrity.

This procedure is based on Version 2 of the Scottish Public Services Ombudsman Model Complaints Handling Procedure, published January 2020.



## **Contents**

<b>Roles and responsibilities .....</b>	<b>3</b>
<b>Recording, reporting, learning from and publicising complaints.....</b>	<b>5</b>
Recording complaints .....	5
Learning from complaints.....	6
Reporting of complaints .....	6
Publicising complaints information .....	7

## Roles and responsibilities

1. All staff will be aware of:
  - the Complaints Handling Procedure (CHP)
  - how to handle and record complaints at the frontline response stage
  - who they can refer a complaint to, in case they are not able to handle the matter
  - the need to try and resolve complaints early and as close to the point of service delivery as possible; and
  - their clear authority to attempt to resolve any complaints they may be called upon to deal with.
2. Training on this procedure will be part of the induction process for all new staff. Refresher training will be provided for current staff on a regular basis.
3. Senior management will ensure that:
  - Clydebank Housing Association's final position on a complaint investigation is signed off by an appropriate manager or officer in order to provide assurance that this is the definitive response of the Association and that the complainant's concerns have been taken seriously
  - it maintains overall responsibility and accountability for the management and governance of complaints handling (including complaints about contracted services)
  - it has an active role in, and understanding of, the CHP (although not necessarily involved in the decision-making process of complaint handling)
  - mechanisms are in place to ensure a consistent approach to the way complaints handling information is managed, monitored, reviewed and reported at all levels in the Association; and
  - complaints information is used to improve services, and this is evident from regular publications.
4. **Management Committee:** As the governing body with responsibility for overseeing our work, our Management Committee provides leadership and strategic guidance. It also ensures 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 or directly)
  - Reviewing complaints received on a quarterly basis to ensure that information and learning from complaints are used to improve our understanding of, and to steer, our Policies and practices.
5. 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.

6. A Management Committee and Senior Staff that values complaints will:
  - support all staff in handling 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.
7. **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 personal interest in all or some complaints, or may delegate responsibility for the CHP to Senior Staff. Regular management reports assure the Chief Executive of the quality of complaints performance. The Chief Executive is responsible for ensuring all new staff receive training on the CHP as part of the induction process, and that refresher training is provided for current staff on a regular basis.
8. The Chief Executive is also responsible for ensuring that there are governance and accountability arrangements in place in relation to complaints about contractors. This includes:
  - ensuring performance monitoring for complaints is a feature of the service/management agreements between Clydebank Housing Association and contractors
  - setting clear objectives in relation to this complaints procedure and putting appropriate monitoring systems in place to provide the Association with an overview of how the contractor is meeting its objectives
9. **Senior Managers:** On the Chief Executive's behalf, Senior Managers will be responsible for:
  - managing complaints and the way we learn from them
  - overseeing the implementation of actions required as a result of a complaint
  - investigating complaints; and
  - deputising for the Chief Executive on occasion.
10. They will also be responsible for preparing and signing off decisions for customers, so they should be satisfied that the investigation is complete and their response addresses all aspects of the complaint.
11. **Complaints investigator:** The complaints investigator is responsible and accountable for the management of the investigation. They will be involved in the investigation and in coordinating all aspects of the response to the customer. This may include

preparing a comprehensive written report, including details of any procedural changes in service delivery and identifying wider opportunities for learning across the organisation.

## **Recording, reporting, learning from and publicising complaints**

12. Complaints provide valuable customer feedback. One of the aims of the CHP is to identify opportunities to improve services across Clydebank Housing Association. By recording and analysing complaints data, we can identify and address the causes of complaints and, where appropriate, identify training opportunities and introduce service improvements.
13. We also have arrangements in place to ensure complaints about contractors are recorded, reported on and publicised in line with this CHP.

### **Recording complaints**

14. It is important to record suitable data to enable us to fully investigate and respond to the complaint, as well as using our complaint information to track themes and trends. As a minimum, we should record:
  - the customer's name and contact details
  - the date the complaint was received
  - the nature of the complaint
  - the service the complaint refers to
  - staff member responsible for handling the complaint
  - action taken and outcome at frontline response stage
  - date the complaint was closed at the frontline response stage
  - date the investigation stage was initiated (if applicable)
  - action taken and outcome at investigation stage (if applicable)
  - date the complaint was closed at the investigation stage (if applicable); and
  - the underlying cause of the complaint and any remedial action taken.
  - the outcome of the SPSO's investigation (where applicable). This would be good practice. For example, where there are a high number of complaints 'not upheld' by the Association but then 'upheld' by the SPSO, this could suggest that there are opportunities to improve complaints handling at a local level.
15. If the customer does not want to provide any of this information, we will reassure them that it will be managed appropriately, and record what we can.
16. Individual complaint files will be recorded in our database and information stored in line with our document retention policy.
17. We will provide further guidance or examples in relation to how to record complaints in line with our Homemaster system and this will be included in an annex to this document in January 2021.

## Learning from complaints

18. We must have clear systems in place to act on issues identified in complaints. As a minimum, we must:

- seek to identify the root cause of complaints
- take action to reduce the risk of recurrence; and
- systematically review complaints performance reports to improve service delivery.

19. Learning may be identified from individual complaints (regardless of whether the complaint is upheld or not) and from analysis of complaints data.

20. Where we have identified the need for service improvement in response to an individual complaint, we will take appropriate action.

- the action needed to improve services must be authorised by an appropriate manager
- an officer (or team) should be designated the 'owner' of the issue, with responsibility for ensuring the action is taken
- a target date must be set for the action to be taken
- the designated individual must follow up to ensure that the action is taken within the agreed timescale
- where appropriate, performance in the service area should be monitored to ensure that the issue has been resolved; and
- any learning points should be shared with relevant staff.

21. SPSO has guidance on learning from complaints.

22. Senior Managers will review the information reported on complaints regularly to ensure that any trends or wider issues which may not be obvious from individual complaints are quickly identified and addressed. This will be done in a number of ways. Firstly, the Quarterly Complaints Report which is issued to the Management Committee is issued to all Senior Managers to discuss at their team meetings. Also complaints are discussed at full staff meetings. Where we identify the need for service improvement, we will take appropriate action (as set out above). Where appropriate, performance in the service area should be monitored to ensure that the issue has been resolved.

## Reporting of complaints

23. We have a process for the internal reporting of complaints information, including analysis of complaints trends. Regularly reporting the analysis of complaints information helps to inform management of where services need to improve.

24. We will report at least **quarterly** to senior management on:

- performance statistics, in line with the complaints performance indicators published by SPSO

- analysis of the trends and outcomes of complaints (this should include highlighting where there are areas where few or no complaints are received, which may indicate either good practice or that there are barriers to complaining in that area).

### **Publicising complaints information**

25. We publish on a **quarterly** basis information on complaints outcomes and actions taken to improve services in our ChitChat newsletter. This could include case studies or you said, we did features.
26. This demonstrates the improvements resulting from complaints and shows that complaints can help to improve our services. It also helps ensure transparency in our complaints handling service and will help to show our customers that we value their complaints.
27. We will publish an **annual** complaints performance report on our website in line with SPSO requirements, and provide this to the SPSO on request. This summarises and builds on the quarterly reports we have produced about our services. It includes:
  - performance statistics, in line with the complaints performance indicators published by the SPSO; and
  - complaint trends and the actions that have been or will be taken to improve services as a result.
28. We will also provide information to the Scottish Housing Regulator on our complaints in line with their requirements via our Annual Report on the Charter (ARC) submission each May. This information will also be included in our Annual Report to stakeholders.
29. These reports must be easily accessible to members of the public and available in alternative formats as requested per our Information in Different Formats procedure.