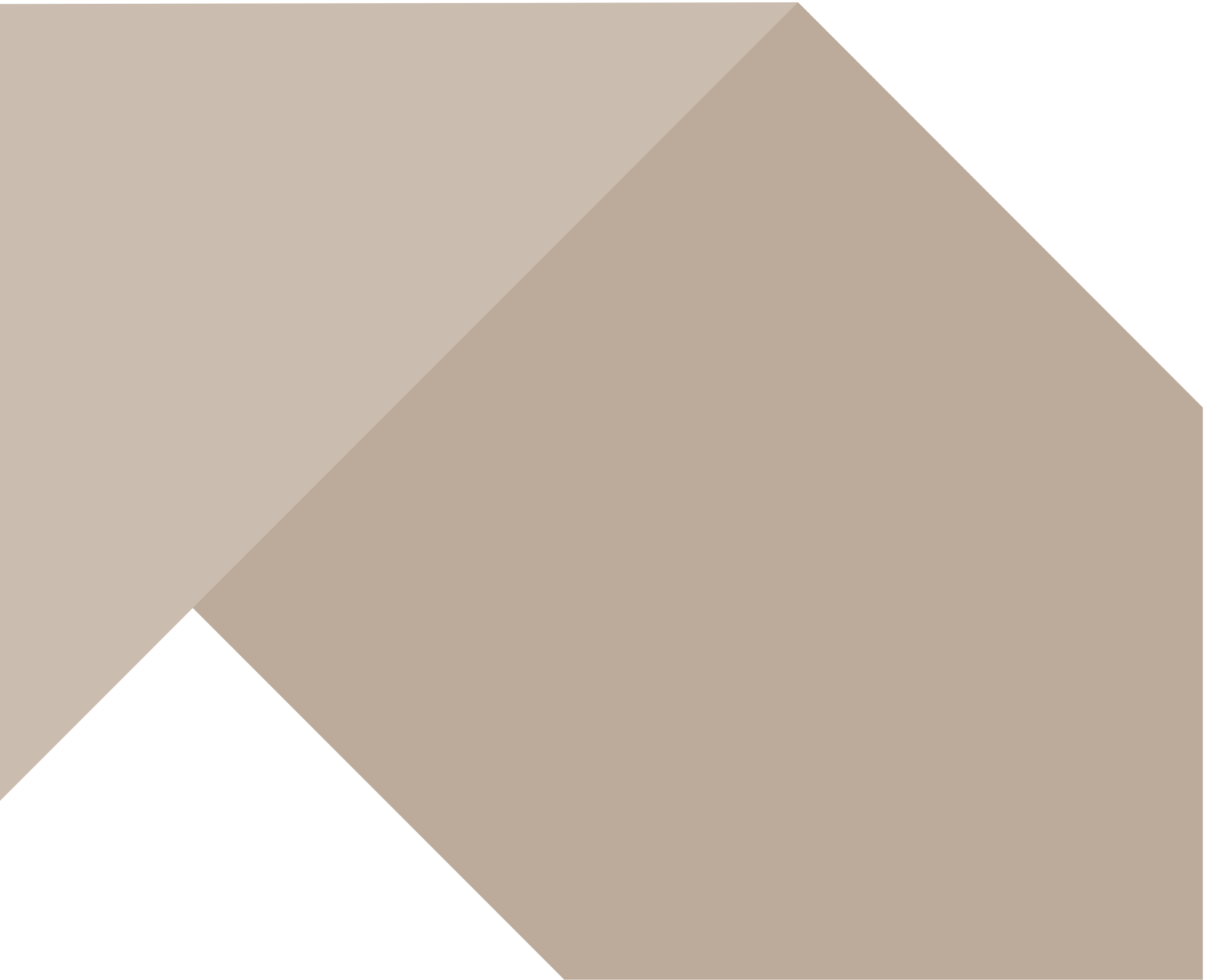


# Wheatley Group Complaints Policy



We can produce information on request in large print, Braille, tape and on disk. It is also available in other languages. If you need information in any of these formats please contact us on Freephone 0800 479 7979.

如果你向我們提出要求，我們可以為你提供本資訊的其他語言的版本，或者是盲文或磁帶。如果你需要本資訊的任何一種這些版式的版本，請聯繫我們，電話號碼是 0800 479 7979.

Si vous nous le demandez, nous pouvons vous remettre ces informations en d'autres langues, en braille ou sur cassette. Si vous souhaitez que ces informations vous soient fournies sous l'un de ces formats, contactez-nous en composant le 0800 479 7979.

چنانچه مایل باشید می‌توانید این مطالب را به فارسی یا زبان‌های دیگر و همچنین بریل و یا بر روی نوار کاست دریافت دارید. در صورت نیاز خواهشمندیم با شماره تلفن 0800 479 7979 با ما تماس بگیرید.

ਜੇ ਤੁਸੀਂ ਸਾਨੂੰ ਬੇਨਤੀ ਕਰੋ ਤਾਂ ਅਸੀਂ ਤੁਹਾਨੂੰ ਇਹ ਜਾਣਕਾਰੀ ਹੋਰ ਭਾਸ਼ਾਵਾਂ, ਬ੍ਰੇਲ (ਨੋਤ੍ਹੀਣਾਂ ਲਈ ਭਾਸ਼ਾ) ਵਿੱਚ, ਜਾਂ ਟੇਪ ਉੱਪਰ ਦੇ ਸਕਦੇ ਹਾਂ। ਜੇ ਤੁਹਾਨੂੰ ਇਨ੍ਹਾਂ ਵਿੱਚੋਂ ਕਿਸੇ ਰੂਪ ਵਿੱਚ ਚਾਹੀਦੀ ਹੋਵੇ, ਤਾਂ ਕਿਰਪਾ ਕਰਕੇ ਸਾਡੇ ਨਾਲ 0800 479 7979 ਨੰਬਰ ਤੇ ਸੰਪਰਕ ਕਰੋ।

Na Pana/Pani życzenie możemy zapewnić te informacje w innych językach, alfabetem Braille'a lub na kasecie. Jeśli chciał(a)by Pan(i) uzyskać te informacje w którejś z tych form, prosimy skontaktować się z nami pod numerem telefonu 0800 479 7979.

Haddii aad na weydiisato waxaanu warbixintan kugu siin karaa iyadoo ku qoran luuqad kale, farta ay dadka indhaha la' akhriyaan ama cajalad ku duuban. Haddii aad jeclaan lahayd in warbixintan lagugu siiyo mid ka mid ah qaababkaas, fadlan nagala soo xidhiidh telefoonka 0800 479 7979.

По вашей просьбе данная информация может быть предоставлена на других языках, шрифтом Брайля или в аудиозаписи. Если вам требуется информация в одном из этих форматов, позвоните нам по номеру 0800 479 7979.

Approval body	<i>Group Board</i>
Date of approval	<i>25 August 2022 (interim review and update Jun 24, section 10.7)</i>
Review Year	<i>2025</i>
Customer engagement required	<i>No</i>
Trade union engagement required	<i>Yes – for info</i>
Equality Impact Assessment	<i>No</i>

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## 1. Introduction

1.1 Our 2021-26 Strategy, '*Your Home, Your Community, Your Future*' clearly demonstrates our commitment to delivering exceptional customer experience and our ambition to progress from excellent to outstanding service. However, it is recognised that there may be times when customers are not happy with the services provided. When this occurs, Wheatley actively encourages customers to contact staff so that action can be taken.

1.2 In line with the Scottish Public Service Ombudsman's (SPSO) Complaint Handling Code (2020), Wheatley defines a complaint 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.*

1.3 When handling complaints, Wheatley commits to putting customers at the heart of the process by:

- Accepting complaints in any format, including verbal, written and online';
- Making reasonable adjustments so customers can access the process;
- Giving customers opportunities to share evidence and suggest solutions;
- Using records and evidence to inform decisions rather than speculation; and
- Signposting customers to other organisations for support where needed.

1.4 Wheatley uses all customer feedback, including complaints to inform service delivery and has put the following processes in place to ensure that lessons are learned from customers' experiences:

- Regular engagement with customers undertaken to seek their feedback on improvements they want to see in our complaint handling process;
- Records of any service failures and the actions taken in response;
- Feedback opportunities given to complainants to assess the process;
- Regular reports detailing performance to relevant management teams;
- Annual performance update and lessons learned shared with customers.

1.5 More broadly, Wheatley looks for opportunities to work with the wider sector to identify, share and embed best practice through:

- Actively engaging with the SPSO and using their regular insight reports to review and improve services as required;
- Taking part in recognised training and development activities where appropriate;
- Participating in sector-wide reviews, assessments and feedback activities wherever the opportunity arises.

- 1.6 The establishment of a Group Complaints Policy and Complaint Handling Procedure outlines our two-stage complaints process which is compliant with the requirements of the SPSO model Complaint Handling Procedure (CHP) and the requirements of the Scottish Housing Regulator (SHR).
- 1.7 Effective complaint management is critical to the successful delivery of our 2021-26 Strategy. It is vital that we ensure consistent and robust arrangements are established for handling and investigating complaints, identifying issues, establishing clear strategies for seeking an appropriate resolution and where possible mitigating risk for the Group. The analysis of qualitative and quantitative information from complaints received across the Group is vital to support service delivery and drive continuous improvement. This customer insight will enable the Group to better understand all sections of its customer base and set the benchmark in Scotland, and beyond, for outstanding customer satisfaction in housing, care and property management.
- 1.8 Building and maintaining our customers' trust is at the heart of our approach and we'll make sure customers feel we're taking their issues seriously. This policy explains how we'll make it easy for customers to tell us when things have gone wrong and how we'll resolve them and use the lessons learned and customer feedback to drive continuous improvement in our service delivery.

## **2. Background**

- 2.1 Our Complaints Policy and operational Complaint Handling Procedure support our aims to help us 'get it right first time'. We want quicker, simpler and more streamlined complaints handling with local, early resolution by capable, well-trained staff.
- 2.2 The Group Complaints Policy and our operational complaint handling procedure reflect the commitment to valuing complaints and support the aim to resolve customer dissatisfaction at the earliest opportunity by conducting thorough, impartial and fair investigations of customer complaints so that, where appropriate, we can make evidence-based decisions on the facts of the case.
- 2.3 Complaints give us valuable information we can use to improve customer satisfaction and drive continuous business improvement. Our complaints handling procedure enables us to address a customer's dissatisfaction and will help to prevent the same problems that led to the complaint from happening again. For our staff, complaints provide a first-hand account of the customer's views and experience and can highlight problems we may otherwise miss. Handled well, complaints can give our customers a form of redress when things go wrong, and can also help us continuously improve our services.
- 2.4 Resolving complaints at the earliest opportunity drives customer satisfaction with our services. Finding appropriate solutions to complaints as soon as possible means we can deal with them locally and quickly, so they are less likely to escalate to the next stage of the procedure. The Complaints Policy and operational Complaint Handling Procedure will help us do our job better, improve relationships with our customers

and enhance public perception of the Wheatley Group. It will help us keep the customer at the heart of the process, while enabling us to better understand how to improve our services by learning from complaints.

### **3. Objectives of the policy**

- 3.1 Our aim is to develop an approach to complaints management which embeds a consistent methodology across the Group.
- 3.2 We aim to ensure that the procedure designed to manage complaints is intrinsically built into everyday business practices. This is described in more detail in our Complaint Handling Procedures and guidance notes.
- 3.3 Identifying issues, establishing clear strategies for seeking an appropriate resolution and where possible mitigating risk for the Group should be an integral part of the culture and way we operate our day-to-day business. Where possible, the handling and learning from complaints should be embedded in our operational practices. In this way, seeking early resolution to issues and managing complaints effectively is not the responsibility of senior management alone, but more appropriately the responsibility of all colleagues and stakeholders.
- 3.4 In order to achieve group awareness and to help manage the delivery of our business objectives in an effective manner, we aim to:
  - promote a Group wide customer-centric culture focussed on ‘Thinking Yes Together’;
  - view complaints as an opportunity to resolve dissatisfaction at the earliest opportunity where possible;
  - adopt a uniform approach to the management of complaints which is captured through the performance management system;
  - ensure that management decisions taken are informed by the complaints we receive and learning from complaints is communicated effectively across the Group;
  - encourage all staff to consider how their work practices can contribute towards a favourable approach to the effective management of complaints; and
  - focus on the opportunities that the effective management of complaints can provide.

### **4. Roles and Responsibilities**

- 4.1 The Group Director of Communities is responsible for ensuring adoption of, and adherence to, this policy across the Group.

- 4.2 This is supported by the Customer Insight and Complaints Manager, who provides guidance and support to staff and maintains independent oversight of all complaints handled through this policy. Additionally, the Customer Insight and Complaints Manager is responsible for ensuring that complaints are used to inform service delivery and that action is taken in response to lessons learned.
- 4.3 Managers and Leaders have day-to-day responsibility for implementation of the Policy and associated procedure in practice. They are responsible for ensuring:
- Communication to all staff;
  - Suitable and sufficient training and direction is provided;
  - Adherence to the policy by all staff; and
  - The provision of the necessary equipment, resources, and the monitoring of record management to make sure that compliance is achieved; and
  - The monitoring of effective management of lessons learned and the associated improvements required.
- 4.4 Communication with customers is centred around the concept that all enquiries are resolved at the first point of contact wherever possible. This is particularly pertinent with the introduction of our new Customer First Centre model which is built on this premise. All staff, particularly those who may interact with customers and receive complaints must:
- Be aware of, understand and implement this policy and associated procedure;
  - Support resolution of complaints and concerns at the first point of contact;
  - Provide assistance to colleagues handling complaints where requested;
  - Participate in training that the Group makes available to support effective complaint handling and management; and
  - Communicate any issues with implementing this policy to their line manager and identify any areas for continuous improvement promptly.

## **5. Group benefits**

- 5.1 There are many benefits to be gained by embedding effective complaint management into our culture and across the Group. These include:
- greater focus by the Group Board(s) on the key business issues;
  - increased likelihood of business success;
  - reduction in surprise events;
  - more internal focus on doing things in the right way to get it right first time;
  - greater likelihood of achieving business objectives;
  - more informed decision making.

## **6. Regulatory requirements**

- 6.1 We adopt and regularly review best practice in the effective management of complaints. We recognise the SPSO specific guidance on complaint handling and the Scottish Housing Regulator's Framework that sets out their approach to gathering information about complaints.

## **7. Related policies**

- 7.1 This policy is supported by the operational Complaint Handling Procedure, the Social Media Policy and the Unacceptable Actions Policy.
- 7.2 Reference may also be made to the Terms of Reference for the Group Board within our Standing Orders, which refer to the Group Board's responsibility for approving the Group Policy Framework and Group Policies.

## **8. Policy Review and Compliance**

- 8.1 This policy may only be changed or varied with the specific authority of the Group Board.
- 8.2 We will review this policy every three years. More regular reviews will be considered where, for example, there is a need to respond to new legislation/policy guidance. Reviews will consider legislative, performance standard and good practice changes.
- 8.3 If there are significant changes to legislation or regulation or there are found to be deficiencies or failures in this policy, as a result of complaints or findings from any independent organisations, the Group Director of Communities will initiate an immediate review.
- 8.4 We will publish this policy on our website. A hard copy is available on request. Customers can also get a copy of the policy on tape, in Braille, in large print or in translation on request.
- 8.5 Where appropriate, key stakeholders, residents and interested parties will be consulted as part of any review of this policy.

## **9. Equal Opportunities and Impact on Diversity**

- 9.1 This policy complies fully with our Equal Opportunities Policy. We recognise our proactive role in valuing and promoting diversity, fairness, social justice and equality of opportunity by adapting and promoting fair policies and procedures.
- 9.2 We are committed to providing fair and equal treatment for all our stakeholders and demonstrate our commitment to diversity and promotion of equality by ensuring that this policy is applied in a manner that is fair to all sections of the community, with due regard to the protected characteristics identified under the Equalities Act 2010.



- 9.3 Wheatley recognises that some customers have disabilities or communication needs, which may make it difficult for them to express themselves or communicate clearly; especially when they are anxious or upset.
- 9.4 Where Wheatley is made aware that a customer has particular needs, staff will make reasonable adjustments to meet their needs. Examples of adjustments that may be made include (but are not limited to):
- Using different ways to communicate to customers;
  - Arranging for translation services, large print or braille where required;
  - Signposting customers to advocacy or support services if appropriate.

9.3 We carry out Equality Impact Assessments when we review our policies. We check policies and associated procedures regularly for their equal opportunity and diversity implications. We take appropriate action to address inequalities likely to result or resulting from the implementation of the policy and procedures.

## **10. Operational Arrangements**

10.1 This policy must be read in conjunction with our Complaints Handling Procedure and associated guidance documents.

### **Raising Complaints**

10.2 Wheatley operates a two-stage complaints procedure in which the first stage, Front Line Resolution (FLR) focusses on front line staff taking swift action to resolve and rectify customers' concerns effectively and timeously. The second stage, Investigation, focusses on providing an independent investigation into customer concerns and providing a full written report of their findings.

10.3 Complaints will be accepted from residents and applicants with who the Group has a formal contract.

10.4 There are circumstances in which it is not appropriate for a complaint to be raised because there is another process which is better suited to resolving the problem. These are:

- Issues that occurred more than six months previously unless there is evidence that this has been raised to staff and no action has been taken.
- Concerns that have already been investigated through the Group's Complaints Policy and a final response has been given.
- Matters are being considered through the relevant legal process such as a Small Claims Court or First Tier Tribunal.
- Complaints about the behaviour of tenants and their households – these are handled in line with the Group's Anti-Social Behaviour Policy and Procedure.

- Dissatisfaction with the Group's policy or procedure – these are recorded as policy feedback and passed to the policy owner to be considered in the next review.
- Personal injury claims or claims for damaged items – these will be assessed and usually passed to the Group's insurers.

10.5 Where the Group decides not to raise a complaint, this will be explained to the customer and they will be advised of their right to contact the SPSO or Third Tier Tribunal to challenge this decision.

#### Front-Line Resolution (FLR) – the first stage

10.6 In most cases, FLR complaints are undertaken by the member of staff who receives the complaint. Staff are empowered to undertake the activity they feel is appropriate to achieve resolution, in consultation and agreement with the customer. This is a critical part of our 'Think Yes Together' culture.

10.7 Staff aim to acknowledge FLR complaints within 48 hours, although we will always attempt to do this sooner, particularly where customer raise a complaint through our Customer First Centre or on one of our digital channels. Appendix 1 outlines in more detail the response time that can be expected based on the communication channel in which a complaint is submitted through. The response will explain whether the complaint is upheld and what action will be taken to resolve the situation moving forward.

10.8 Where customers are unhappy with the proposed action, they have the right to escalate their complaint to the second stage and in order to do so, they should explain to the person handling the complaint why they remain unhappy and what recourse they are looking for in order to resolve the complaint.

#### Investigation – the second and final stage

10.9 The aim of the second stage of the process is to resolve the complaint through robust investigation of the issues by an independent and objective team or suitably senior manager.

10.10 The Group aims to respond to all Stage 2 complaints within 20 working days and will ensure that customers are informed whether their complaint has been upheld and what action will be taken to resolve the situation.

10.11 If a customer remains unhappy with the outcome of the investigation of the complaint, they are encouraged to make contact with the complaints handler and to share why they remain unhappy, provide any additional evidence which may have not been considered and to explain what they are looking for to resolve the complaint.

10.12 Once this has been provided, staff will provide a final response to the customer and this will explain fully the Group's position and the customer's rights should they wish to pursue their complaint further. In all instances, this will involve a referral to the SPSO, Homeowners Housing Panel, Care Inspectorate and any other agencies should this be appropriate.

#### Managing Challenging or Unacceptable Behaviours

10.13 Whilst staff to understand that there are times that customers may become upset, frustrated or anxious and will endeavour to respond positively, timeously and sensitively, there are occasions that customers behave in ways that are challenging or unacceptable.

10.14 Where customers behaviour prevents staff from carrying out their duties effectively or is rude, abusive or threatening, the Group will take action in line with our Unacceptable Actions Policy.

## Summary Complaints Process

### COMPLAINTS PROCEDURE

You can make your complaint in person, by phone, by e-mail, online or in writing.

We have a **two-stage complaints procedure**. We will always try to deal with your complaint quickly. But if it is clear that the matter will need a detailed investigation, we will tell you and keep you updated on our progress.

### STAGE 1: FRONTLINE RESOLUTION

We will always try to resolve your complaint quickly, within **five working days** if we can.

If you are dissatisfied with our response, you can ask us to consider your complaint at stage 2.

### STAGE 2: INVESTIGATION

We will look at your complaint at this stage if you are dissatisfied with our response at stage 1. We also look at some complaints immediately at this stage, if it is clear that they are complex or need detailed investigation.

We will acknowledge your complaint within **two working days**. We will give you our decision as soon as possible. This will be after no more than **20 working days** *unless* there is clearly a good reason for needing more time.

### INDEPENDENT EXTERNAL REVIEW

If, after receiving our final decision on your complaint, you remain dissatisfied with our decision or the way we have handled your complaint, you can ask the SPSO, Homeowners Housing Panel or Care Inspectorate (where appropriate) to review your complaint.

We will tell you how to do this when we send you our final decision.

