



Complaints Policy



1. Purpose

1.1 The purpose of the Complaints Policy is to ensure that Imani Housing Cooperative can resolve customer dissatisfaction as close as possible to the point of service delivery but, if this is not possible, to ensure that staff and customers are clear on the standard of service that should be provided, including timescales for resolution.

1.2 This Policy is in line with the Localism Act 2011, Housing Act 1996 (schedule 2), Data Protection Act 2018, Equality Act 2010, Housing Ombudsman Service (HOS) Complaint Handling Code 2020, the Charter for Social Housing Residents and the Tenant Involvement and Empowerment Standard (part of the Regulator of Social Housing's Regulatory Standards).

2. Scope

2.1 This policy is owned by the Chief Executive Officer and Imani Board of Directors. It is subject to approval via the Imani Housing and Rent Sub Committee.

2.2 The Complaints Policy can be used by all customers of Imani Housing Cooperative when they wish to express dissatisfaction.

2.3 Matters concerning customer dissatisfaction received via Members of Parliament, councillors or directly from customers through the Chief Executive's office will also be treated as complaints under this Policy.

3. Exclusions

In the following circumstances, we will not consider a reported issue under our Complaints Policy and the associated Procedure:

3.1 Complaints should generally be received within six months of the event concerned to ensure that we are able to conduct a thorough investigation. We will always accept complaints beyond this where there is a good reason to do so, for example, if the complaint was not recorded when it should have been or because it relates to ongoing issues. We will also seek to resolve issues for customers in other situations when a complaint is made beyond six months of the event occurring but, as a result of the passage of time, a detailed investigation may not be possible. Where the problem is a recurring issue, we will however consider older reports as background to the complaint if this will help to resolve the issue for the customer.

3.2 Anonymous reports will be considered by Imani Housing Cooperative as useful customer feedback information but, as our aim is resolution which cannot always be achieved without dialogue with the complainant, we will not be able to address anonymous complaints under this Policy and the associated Procedure.



3.3 Any serious allegations of inappropriate conduct, including discriminatory behaviour in relation to a protected characteristic, by a member of staff will be investigated under Imani Housing Cooperative's Disciplinary Policy. Due to the nature of this type of investigation, it is unlikely that the Complaints Policy timescales can always be adhered to, and we would need to carry out this investigation outside of this Policy. On completion of the investigation, we would be in a position to provide a suitable resolution for the customer but would not be able to provide information regarding any disciplinary action. If the complaint does relate to protected characteristics, an Investigating Manager who has the same or similar protected characteristics to the customer raising the complaint will be appointed to carry out the investigation wherever possible.

3.4 The Complaints procedure will be available to customers in order to resolve disputes, as an alternative to or in addition to legal proceedings; however, where legal papers have been served in the Court, Imani Housing Cooperative may suspend the complaint if it is satisfied that the legal claim covers all aspects of it. If elements of the complaint still exist outside of the legal claim, then this will still be investigated.

3.5 Where a customer's complaint relates to an active insurance claim, this may also need to be addressed outside of our Complaints Handling Procedure, as in that instance the issue may be managed by our insurers.

3.6 Any matters that have already been dealt with in line with our Complaints Policy and an outcome has been provided.

3.7 We understand that the circumstances leading to a complaint can sometimes be stressful and upsetting. However, where there are examples of unacceptable behaviour towards staff, our Unreasonable Behaviour procedure will be used in conjunction with this Complaints Policy to support customers and complaint handlers.

3.8 Our aim is to resolve any issues quickly, but these efforts should not obstruct access to our internal complaints procedure or result in any unreasonable delay. Examples include resolving missed appointments or delays in providing a response. These types of service requests called repair failures will be resolved with the customer with a 'there and then approach' in line with the Housing Ombudsman guidance and customers can request that the issue is investigated as a Stage 1 complaint at any time. All these instances will be recorded and monitored, and insight will be captured and used for improvements to service delivery.

3.9 In all cases where an Investigating Officer decides not to accept a complaint, a detailed explanation will be provided to the customer setting out the reasons why the matter is not suitable for the complaints process and advising the customer that they have the right to challenge this decision to the Housing Ombudsman Service (HOS). The HOS will then, if appropriate, instruct a landlord to take on the complaint.

3.10 Whilst a customer does not have to explicitly use the word 'complaint' in order for it to be treated as such, occasionally a customer may be unhappy with actions or services provided but may not wish for a formal investigation or to log a complaint. Where this is the case, the details will still be recorded as part of our Customer Care Policy and a resolution



offered to the customer, which will enable us to quickly respond and to learn from this. We would refer to this type of customer feedback as a 'comment', and it would be allocated to an Investigating Officer in the same way as a complaint as set out in Section 5 below. If the customer later wishes to log a complaint, then they will be able to do this.

3.11 Petitions will be recorded and acknowledged but will not be dealt with under our Complaints Policy. Details of petitions will be shared with the Chief Executive Officer and Imani Board of Directors.

4. Principles

We have adopted the Housing Ombudsman Service (HOS) Complaint Handling Code 2020 and we aim to do this by: -

- Adopting the HOS definition of a complaint, which is *“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”*,
- Treating customers with respect and empathy, taking ownership of resolving issues and apologising when we have got things wrong or service standards have not been met,
- Promoting the HOS to customers to ensure that they are aware of the support that is available to them,
- Resolving matters as quickly as possible by being open, accountable and focussed on outcomes,
- Resolving complaints at the first point of contact where possible,
- Ensuring all complaints are addressed and dealt with in accordance with published timescales wherever possible,
- Recording, monitoring and evaluating feedback to improve service delivery, with themes or trends assessed by senior management to identify any systemic issues, serious risks or areas for improvement for appropriate action,
- Seeking to put things right when there has been a service failure,
- Respecting confidentiality of information given where appropriate and act at all times in accordance with our Privacy notice,
- Allowing complaints to be made via an advocate/representative where appropriate,
- Learning from complaints by ensuring that we record any lessons learned after each complaint and then evaluating this feedback on a quarterly basis in order to improve how we deliver our services, and
- Operating a two stage complaints process, as explained further below.



5. How we will receive and respond to complaints

5.1 We operate a service-led approach to complaint handling because our frontline colleagues have the specialist knowledge needed to resolve complaints quickly and effectively. A response may therefore be provided directly to a customer by any staff member of Imani Housing Cooperative, which does include our maintenance and repairs teams.

Stage One

5.2. A complaint may be made verbally to a member of staff (in person or over the telephone), submitted via the website or one of our verified social media accounts, or in writing (letter, email or using our [printable feedback](#) form).

5.3 The officer who will deal with the complaint (the Investigating Officer) will aim to contact the complainant by telephone by 5pm on the next working day, two days after receipt of the complaint. We also aim to acknowledge the complaint in writing (either by letter or sending this letter via email) within 3 working days. In this letter, we will confirm the details of the Investigating Officer and our timescales for resolving the complaint.

5.4 We will aim to respond and put complaints right within 7 working days. If this is not possible, we will provide an explanation and a date by which this stage one response should be received. This should not exceed 14 days without good reason.

5.5 We will provide a written response to all complaints, addressing all points raised and providing clear reasons for any decisions, referencing relevant policies, law or good practice where appropriate.

Stage Two

5.6 If a customer remains dissatisfied with the outcome of the complaint at Stage One, then the customer will have the option to ask for it to be escalated to Stage Two either immediately, when they have been advised of the outcome, or at any point in 30 days of closure of the stage one complaint.

5.7 If we decline to escalate a complaint, we will provide the customer with clear reasons for this refusal and will provide details of the Housing Ombudsman Service and advise of the customers right to approach the Ombudsman about its decision. Reasons for declining a complaint will be in line with our exclusions set out in Section 3 of this Policy

5.8 We aim to acknowledge the complaint escalation in writing (either by letter or sending the acknowledgement letter via email) within 2 working days of the request to escalate the complaint being received. This letter will also advise which senior manager will review the complaint at Stage Two and our timescales for reviewing the complaint. The review will be conducted by a senior manager who was not involved with the Stage One response.

5.9 We aim to provide a written response at Stage Two within a maximum of 10 working days from receipt of the request to escalate. In exceptional circumstances only where this is not possible then the senior manager conducting the review will contact the customer in order to agree an extension.

Referral to a designated person or the Housing Ombudsman Service



5.10 If a customer has completed both stages of our internal Complaints Procedure and they remain unhappy with the outcome then they have the option to contact a 'designated person', who could be an MP, a local councillor, or make representation to the Imani Housing and Rent sub-committee. Imani Housing and Rent sub-committee is formed of tenants who are members of Imani Board of management.

5.11 Customers can also decide to contact the Housing Ombudsman Service (HOS) without first referring their complaint to a 'designated person'. Customers can contact the HOS by calling them on 0300 111 3000, via email to info@housing-ombudsman.org.uk, using their online form on the website www.housing-ombudsman.org.uk or by writing to them at PO Box 152, Liverpool L33 7WQ.

6. Further Information & Support

Customer Care Policy

Disciplinary Policy

Equality, Diversity & Inclusion Policy

People Policy

Complaints Procedure

Financial Redress and Compensation Procedure

Unacceptable Behaviour Procedure

Warning Marker Procedure

['Making a comment, compliment or complaint'](#) customer leaflet

Online ['Make a complaint'](#) form

[Privacy notice](#)

7. Roles and Responsibilities

Customer Service Advisers and Front-line colleagues

- Receiving an initial report of dissatisfaction from a customer across any channel and seeking to achieve a resolution for the customer wherever possible during this first contact
- Where this is not possible, recording the details of the issue as a complaint and allocating it to the relevant business area to investigate and resolve as a complaint

Complaint Handlers (Investigating Officers at Stage One and Senior Managers at Stage Two)

- Contacting the customer as soon as possible but within the maximum timescales set out to acknowledge receipt of the complaint and obtain further details where necessary to enable a thorough investigation to be completed
- Dealing with complaints on their merits, acting independently and having an open mind
- Taking measures to address any actual or perceived conflict of interest, and keep the complaint confidential as far as possible, only disclosing information only disclosed if necessary to properly investigate the matter.

Complaint Compliance Team

- Providing analysis of complaint trends, themes and lessons learned for business leads to inform service development and improvements
- Checking process and procedure compliance on a monthly basis, and providing guidance to colleagues and managers where needed
- Provision of an annual report to Imani Housing Cooperative Management Committee at the end of each financial year, including all Housing Ombudsman Service determinations and it's Landlord Performance report, as well as actions taken to improve performance and service delivery
- Provision of complaints information for inclusion in Imani Housing Cooperative Annual Report to Customers.

8. Risk Thresholds



Housing Ombudsman Service Complaint Handling Code and Investigations

8.1 The Housing Ombudsman Service (HOS) looks at complaints about registered providers of social housing, including housing associations, who are required by law to be members of this scheme. Imani Housing Cooperative is a member of the scheme and this Policy and the associated procedure comply with the HOS Complaint Handling Code. A condition of membership is that all members agree to be bound by the decisions and adjudications of the Housing Ombudsman's Service, regardless of whether the member agrees with the outcome or not. The Ombudsman may report a member's complaint handling failure to any appropriate regulatory agency and/or the board, committee, panel or senior officer of the member along with any related details as the HOS sees fit. The HOS now publishes all decisions on cases investigated and provides annual landlord performance reports. We will respond positively to all Ombudsman enquiries, investigations and recommendations and undertake to comply promptly with any determinations.

Customer experience

8.2 We acknowledge that there are some gaps in our delivery of consistent high-quality service that customers trust. However, our risk appetite for adverse customer experience is reducing and therefore our focus on closing those gaps is increasing. We will be less tolerant of service failure and/or any actions that negatively impact customer satisfaction and trust. We will only accept changes that have a temporary adverse service impact where there is a clear articulation of the potential impact and an agreed action plan to return to acceptable levels.

8.3 We are aware of increasing customer expectations regarding service levels, which are further encouraged and strengthened by the Social Housing Charter, and we want to respond positively to those higher expectations. Where the issues raised require a full investigation, this will either be entered into the formal complaint process or be included as further information on a complaint already being investigated. In order to maintain privacy and confidentiality, complaints received via social media will be invited to provide a limited amount of personal information or further details via a direct message or be advised of alternative contact methods where personal information can be provided privately.

8.4 We acknowledge that we don't always get things right first time for customers; whilst doing so will always remain our aim, we will also seek to put things right at the earliest opportunity through our complaints handling process and have a zero tolerance of adverse finding by the Housing Ombudsman Service.

9. Equality, Diversity and Inclusion

Imani Housing Cooperative is committed to Equality, Diversity & Inclusion. We strive to be fair in our dealings with all people, communities, and organisations, taking into account the diverse nature of their culture and background and actively promoting inclusion. This policy aligns with Imani Housing Cooperative's [Equality, Diversity and Inclusion Policy](#).

When dealing with a complaint, we will:



- Keep the complainant informed about the complaint at all stages using their preferred method of communication, which includes using an interim address for survivors of domestic abuse or victims of hate crime or harassment.
- Allow complaints to be made via an advocate/representative where appropriate and support customers to access Language Line or our online services, through which customers can use online tools such as Browse Aloud which can make websites more accessible. Our customers can also use Relay UK when they call our Customer Service Centre.