



Policy Name	Complaints Policy <i>Complaints, Compliments & Managing Unreasonable Behaviour</i>
Effective Date(s)	1 April 2024
Approved By	Manchester City Council GVL Board
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Relevant Regulation or Legislation	<ul style="list-style-type: none"> • Localism Act 2011 (legislation.gov.uk) • Housing Act 1996 (legislation.gov.uk) • Tenant Involvement and Empowerment Standard.pdf (publishing.service.gov.uk) • Data Protection Act 2018 (legislation.gov.uk) • Equality Act 2010 (legislation.gov.uk) • The Housing ombudsman's Complaint Handling Code (housing-ombudsman.org.uk)
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1. INTRODUCTION

Grove Village Limited is committed to consistently provide an excellent service, treating residents fairly and recognising that sometimes things go wrong. We value all resident feedback regarding our services, whether a complaint, compliment, comment, or suggestion and respond positively and swiftly to all. We aim to put things right first time and take the opportunity to rebuild trust between Grove Village Limited and our residents, learning from outcomes and are committed to improving our services. High volumes of complaints will not be seen as a negative, they can be indicative of a well publicised and accessible complaints process and allows us to learn from the outcomes.

This policy is in line with the Housing Ombudsman Complaint Handling Code 2024 which aims to enable landlords and their managing agents to resolve complaints raised by their residents quickly and to identify and implement learning from complaints to drive service improvements.

2. PURPOSE

The purpose of this policy is to set out the Grove Village approach to dealing with customer feedback whether complaints, compliments or comments that are reported.

3. LEGISLATIVE & REGULATORY REQUIREMENTS

The Tenant Involvement & Empowerment Standard, set by the Regulator of Social Housing, specifies that registered providers shall:

Provide tenants with accessible, relevant and timely information about:

- how tenants can access services
- the standards of housing services their tenants can expect
- how they are performing against those standards
- the service choices available to tenants, including any additional costs that are relevant to specific choices
- progress of any repairs work
- how tenants can communicate with them and provide feedback
- the responsibilities of the tenant and provider
- arrangements for tenant involvement and scrutiny.

The Housing Ombudsman Service (HOS) have outlined 3 guiding principles when dealing with complaints:

1. **Be Fair**
2. **Put things right**
3. **Learn from outcomes**

The Housing Act 1996 stipulates all social landlords have a duty to be a member of the Housing Ombudsman Scheme, which allows for the provision of an independent who can investigate complaints made to them when unhappy with the service they have received from their Landlord Grove Village Limited provide housing management and maintenance services on behalf of Manchester City Council as the Landlord to Grove Village properties.

4. AIMS OF THE POLICY

- Record and address customer complaints and compliments, offering several different ways for customers to contact us.
- To ensure all complaints are treated fairly, efficiently, and as confidentially as possible, only disclosing information if necessary to properly investigate.
- Ensure customers are aware of how to raise a complaint with Grove Village and to ensure that customers are regularly kept updated of the progress of their investigation or outstanding actions in plain language.
- Record all feedback, communications, and investigations to allow for analysis and recommended service improvement.
- Identify learning from complaints.

5. WHOM THIS POLICY COVERS

The policy covers any customers and will include tenants, leaseholders and freeholders or an advocate authorised to act on their behalf, who has experienced a service delivered by Grove Village, or one of its approved partners. Non-customers may also use the policy should they have been impacted by any decisions or actions taken by Grove Village and its contractors, when acting on their behalf.

6. DEFINITIONS

6.1. Compliments, Comments & Suggestions:

A *compliment* is a polite expression of praise, admiration or gratitude about a service, contractor or member of staff. It's great when customers let us know what we are doing well, as we can learn and share best practice across Grove Village.

A *comment* or *suggestion* is a remark expressing an opinion, reaction or an idea for consideration, or negative feedback following an interaction. We value customer views and understand; our customers are at the heart of everything we do.

6.2. Complaints

The Housing Ombudsman defines a complaint as

- An expression of dissatisfaction, however made, about the standard of service, actions or lack of action by us, our staff, or those acting on our behalf, affecting an individual resident or group of residents.

The Complaint Handling Code also provide clarification on what must not be considered a complaint as:

- Service request is a request from a resident to the landlord requiring action to be taken to put something right. Service requests are not complaints, but must be recorded, monitored and reviewed regularly.
- An expression of dissatisfaction with services made through a survey is not defined as a complaint, though wherever possible, the person completing the survey should be made aware of how they can pursue a complaint if they wish to. Where landlords ask for wider feedback about their services, they also must provide details of how residents can complain.

Complaints will not be considered for:

- A request for service, or query to Grove Village, unless the customer expresses dissatisfaction with the response to their service request, even if the handling of the service request remains ongoing
- Issues raised more than twelve months after the relevant events or twelve month after the individual becomes aware of the issue (unless it is an on-going issue Grove Village is aware of).
- Matters that have previously been considered under this policy and as such exhausted the Grove Village complaints procedure.

- Cases where legal proceedings have started, or a final legal decision has been made.
- Housing Benefit (unless the issue is a Grove Village error). Where the issue is an error by Manchester City Council, this will be passed to the relevant team to investigate and respond direct.
- Reports of Anti-Social Behaviour (unless regarding an alleged breach of ASB policy or process)
- Complaints regarding serious allegations against staff which would be more appropriate to be investigated through relevant disciplinary procedure. Such outcomes would not be shared with the complainant under GDPR.
- Allegations of Data Breaches or issues relating to Subject Access Requests are managed through GDPR and investigated by Grove Village's Housing Management Contractor Your Housing Group's Data Protection Lead and reported where necessary to the ICO.

This list is not exhaustive.

We will not take a blanket approach to excluding complaints, each complaint will be considered individually. Should Grove Village decide not to accept a complaint, a detailed explanation will be provided setting out the reasons why the matter is not suitable for the complaints process and the right to take that decision to the Housing Ombudsman Service.

7. HOW TO CONTACT US

We have a variety of ways to enable customers to provide us with their views or feedback.

- **Online** – through our website [Grove Village customers \(yourhousinggroup.co.uk\)](https://yourhousinggroup.co.uk) or via the Your Home HUB customer portal and completing the online form.
- **Mail** – by writing to us at Grove Village Neighbourhood Office, 19 Guide Post Road, Ardwick, M13 9UP.
- **Telephone** - By calling 0161 274 1180.
- **Face to face** – e.g., in person, to a member of staff or at of our offices if you need assistance in raising your complaints.
- **Email** – GroveVillage@yourhousinggroup.co.uk
- **Social Media**- These will be directed through to the Complaints Department to be recorded and actioned accordingly.

We will make our customers aware of our Complaints Policy by publicising in our newsletters and other campaigns, to ensure that customers know how to make a complaint, compliment or raise a query with us.

8. OUR COMPLAINT STAGES

8.1. Stage 1 Complaints

A complaint recorded at Stage 1 will be subject to a full investigation, and we will aim to provide a written response within 10 working days of the complaint being recorded. On occasion, it may not be possible to provide our response within this time and as such,

we will write to the customer to advise of the delay and include contact details of the Housing Ombudsman. We will ensure our response is no later than an additional 10 working days.

Upon receipt of a Stage 1 complaint, we will:

- Acknowledge receipt within 5 working days, providing a unique reference number and date for when a response will be received by.
- Where further detail is required in relation to the complaint case, we will make contact with the customer via the phone, or their chosen method of communication, to discuss the complaint and desired outcome.
- We will advise which aspects of the complaint we are responsible for and which we aren't and clarify any areas where this is not clear.
- Customers will be treated fairly, empathetically and by the relevant staff member that has authority and autonomy to resolve the dispute quickly.
- Investigate in an impartial manner, seeking sufficient, reliable information from all parties, making appropriate recommendations to resolve the complaint, providing realistic timescales and to manage customers' expectations.
- Any additional complaints raised during the stage 1 investigation will be incorporated if related. **Where the stage 1 response has been issued, the new issues are unrelated to the issues already being investigated or it would unreasonably delay the response, the new issues will be logged as a new complaint.**
- Contact you to discuss the outcome of our investigation.
- Confirm in writing the outcome of your complaint within 10 working days or earlier for less complex complaints, along with any proposed actions, any offers of remedy to put things right and details of how to escalate the matter to the next stage, should you not be happy with the outcome.

Should any actions remain outstanding after the complaint is closed, regular contact will be maintained to ensure these are completed in the timescales we have set.

Once a complaint has been closed at Stage 1, the customer has a maximum of 8 weeks to escalate their complaint to the next stage of the complaints process. If we refuse to escalate a complaint, we will set out our reasons in line with the Complaint Handling Code.

8.2. Stage 2 Complaints

If a customer is not happy with the outcome of their complaint, they can ask for it to be reviewed at Stage 2 within 8 weeks of the Stage 1 complaint response and do not need to explain why they wish to escalate to stage 2. We aim to resolve Stage 2 complaints within 20 working days. On occasion, it may not be possible to provide our response within this time and as such, we will write to the customer to advise of the delay and include contact details of the Housing Ombudsman. We will ensure our response is no later than an additional 20 working days.

Upon receipt of your complaint Stage 2 complaint, we will:

- Assign your complaint to an appropriate senior member of staff who was not involved in the original complaint. All Stage 2 Complaints will be reviewed by a Grove Village Manager prior to issue. This can be a senior manager of Grove Village Limited, Your Housing Group or Morgan Sindall Property Management Services as appropriate.
- Complete a full investigation to the initial complaint and how the Stage 1 was addressed.
- We will advise which aspects of the complaint we are responsible for and which we aren't and clarify any areas where this is not clear.
- Customers will be treated fairly, empathetically and by the relevant staff member that has authority and autonomy to resolve the dispute quickly.
- Investigate in an impartial manner, seeking sufficient, reliable information from all parties, making appropriate recommendations to resolve the complaint, providing realistic timescales and manage customers' expectations.
- Provide a formal response within 20 working days, which could be a letter or email, which will detail an outline of the complaint, the outcome which may include outstanding actions, any offers of remedy to put things right and details of how to escalate the complaint to the Housing Ombudsman.

9. HOW WE DEAL WITH OTHER COMPLAINTS

9.1. Petitions/Group complaints

Complaints raised by a group of people where there is no nominated lead representative will be recorded and responded to within 10 working days and all signatories where a name and address is provided will receive acknowledgment and response. We will review on a case by case basis whether the issue is to be logged as a complaint or a petition.

Where a complaint is raised by group of people with a nominated lead, a Stage 1 complaint will be recorded and will follow the formal complaints process. This is line with the Housing Ombudsman's Guidance on Group Complaints in accordance with paragraph 19 which states there is no provision to consider complaints from groups of residents however a complaint will be accepted should a group complaint have a lead complainant and clearly representing named individuals.

9.2. Anonymous complaints

Anonymous complaints will always be considered where the complainant provides sufficient information to identify the issue of concern. All anonymous complaints by nature precludes any response to the complainant. Anonymous complaints about our service should be sent to the Grove Village team who will record these and liaise with the relevant Service Manager to determine the most appropriate way to consider the point(s) of complaint.

10. TIME LIMIT FOR MAKING COMPLAINTS

A complaint will only be considered if it is made within 12 months of the initial incident taking place or twelve month after the individual becomes aware of the issue (unless it is an on-going issue Grove Village is aware of). This is to ensure a thorough investigation can be completed with all relevant notes and documentation.

This decision is made on a case-by-case basis, taking into account individual circumstances and if it is still possible to be able to provide a full investigation.

11. OMBUDSMAN COMPLAINT

Customers can contact the Housing Ombudsman at any stage of their complaint to receive impartial advice.

Should a customer remain dissatisfied with the outcome of their stage 2 complaint, they can escalate the matter to the Housing Ombudsman.

The Housing Ombudsman can be contacted via

- o their website, <https://www.housing-ombudsman.org.uk/contact-us/>
- o by email info@housing-ombudsman.org.uk
- o writing to: Housing Ombudsman Service, PO Box 1484, Unit D, Preston, PR2 0ET
- o or contact them on telephone number 0300 111 3000.

12. UNREASONABLE BEHAVIOUR OR DEMANDS

Our aim is to deal with comments, suggestions, complaints or general contacts in an open, fair and impartial way. Staff will respond professionally and sympathetically to all customers and work positively with them to resolve issues and explain the reason for their outcome. There are occasions when there is nothing further that can reasonably be done to rectify a perceived problem, or further assist, and recognise that this or other distressing circumstances can cause a customer to act out of character. However, if a customer because of their actions and behaviour, or nature and frequency of their contacts with us, hinders theirs, or other people's interactions with us, or delays our ability to investigate the complaint, we will consider such behaviour to be unreasonable.

12.1. Examples of unreasonable behaviour or demands may include;

This list is not exhaustive.

- Raising the same issue, complaint or similar complaint many times when this is already being managed through YHG Complaints or other procedure which has already concluded.

- Contentiously raising an issue or complaint without having sufficient grounds, refusing to specify the grounds or having no grounds.
- Constantly introducing new information whilst a complaint is being investigated, which is not significant or relevant. If the new issue is deemed to be complaint, then it will be logged as a separate complaint accordingly.
- Refusing to accept the answer that has been provided, continuing to raise the same subject matter without providing any new evidence, continuously adding to or changing the subject matter of the complaint.
- Making persistent and unreasonable demands of staff, or the complaints process, or persistent or unreasonable contact by any means for example out of hours telephone calls, overload of letters, calls, emails or contact via social media.
- Verbal abuse, inappropriate language in any format, inclusive of harassment, aggression, violence, this is not just limited to actual physical or verbal abuse but can include derogatory remarks, rudeness, inflammatory allegations and threats of violence.
- Electronically record meetings without prior consent of the other party.
- Social media 'trolling'. Posting inflammatory, offensive, abusive or confidential comments or information online.

12.2. How we will deal with unreasonable behaviour or demands.

We have to act when unreasonable behaviour impairs the functioning of Grove Village. We aim to do this in a way that allows a customer to progress through our processes. We will try to ensure that any action we take is the minimum required to solve the problem, considering relevant personal circumstances including the seriousness of the issue or complaint and the needs of the individual. The threat or use of physical violence, verbal abuse or harassment towards our staff is likely to result in a termination of all direct contact with the customer. Incidents may be reported to the police. This will always be the case if physical violence is used or threatened.

We will not accept any correspondence that is abusive to staff or contains allegations that lack substantive evidence. We will tell the customer that we consider their language offensive, unnecessary and unhelpful and ask them to stop using such language. We will state that we will not respond to their correspondence if the action or behaviour continues.

12.3. Actions we may take include;

- limit contact via telephone calls at set times on set days.
- Request a suitable advocate to be nominated to act on behalf of the customer.
- Restrict contact to a nominated member of staff who will deal with future calls or correspondence from the customer or their nominated advocate.
- Restrict contact from the customer to writing only.
- Return any documents to the customer or, file them and not respond.
- Take any other action that we consider appropriate.

- Where we consider continued correspondence on a wide range of issues to be excessive, we will tell the customer that only those matters within our remit will be considered.
- We will always formally write to the customer to tell them what actions we are taking and why'.
- When and where applicable, we will ensure that all appropriate referrals have been made and correct support is in place for individuals who we propose action against for unreasonable behaviours.
- **Any restrictions placed on contact due to unacceptable behaviour will be proportionate and demonstrate regard for the provisions of the Equality Act 2010.**

13. RESPONSIBILITIES UNDER THIS POLICY

The Policy Owner is the Grove Village Limited General Manager. All Grove Village staff have personal responsibility for their own behaviour in relation to this policy and are responsible for ensuring that their conduct is in line with the standards set out in this policy.

14. RISK MANAGEMENT

There are reputational risks in relation to managing complaints effectively. Complaints data is reviewed and analysed on a regular basis by the relevant Service Manager and actions are taken to address any issues arising. Grove Village is also committed to learning from our complaints process, and we will ensure that appropriate processes are in place in order to do this.

15. DATA PROTECTION, RECORD STORAGE AND RETENTION

Any complaints reported under this policy will be managed via our housing management systems. These systems are GDPR compliant.

Complaints relating directly to Data Protection or the potential mishandling of customer data are excluded from this policy and are investigated by the Data Protection Lead in line with Your Housing Group (Grove Village's Housing Management Contractor) in line with the requirements of Information Commissioners Office.

16. EQUALITY AND DIVERSITY

We will ensure that no customer, resident or service user is treated less favourably on the grounds of age, ethnicity, religion or belief, disability, gender, gender reassignment, sexual orientation, pregnancy or maternity, marriage or civil partnership status. We will keep a record of any reasonable adjustments agreed and keep them under review. This policy, and all related information, can be made available in different formats and languages on request. This policy complies with the requirements of the Equality Act 2010 and has been Equality Impact Assessed.

17. COMMUNICATION

This policy will be made available in the Grove Village Neighbourhood Office and will be regularly referenced in our quarterly newsletter. It will also be published on our web site - [Grove Village customers \(yourhousinggroup.co.uk\)](http://yourhousinggroup.co.uk). We will undertake an annual review and ensure this is made available to residents.

18. LEARNING AND DEVELOPMENT

This policy will form part of the induction process for any new staff who manage complaints. They are also briefed on any changes made following the annual review.

19. REVIEW OF THIS POLICY

This policy will be reviewed annually by the Grove Village Limited General Manager alongside the relevant Service Managers at Your Housing Group (Housing Management Contractor) and Morgan Sindall Property Services (Facilities Management Contractor).